FINAL PROGRAM
ENVIRONMENTAL
IMPACT REPORT

CITY OF ADELANTO

GENERAL PLAN UPDATE

(SCH 94082081)

FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

CITY OF ADELANTO

GENERAL PLAN UPDATE

(SCH 94082081)

CITY OF ADELANTO
PLANNING DEPARTMENT
11600 AIR BASE ROAD
ADELANTO, CALIFORNIA 92301

PATRICIA A. CHAMBERLAINE
PLANNING DIRECTOR

PREPARED BY:
MICHAEL J. WAGNER & ASSOCIATES, INC.
2111 YUCCA AVENUE
FULLERTON, CALIFORNIA 92635
MAY 1995

FINAL ENVIRONMENTAL IMPACT REPORT

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PART I FINAL PROGRAM EIR

1.0 INTRODUCTION

1.1 Final Program EIR

The City of Adelanto Draft Program Environmental Impact Report (DPEIR) was prepared to evaluate the environmental impacts of the proposed 1994 General Plan Update. The project involves the long term development of the 81,000 acre Planning Area. The DPEIR was circulated for public review and comments from September 6, 1994 to October 21, 1994. The Final PEIR (FPEIR) herein contains the comment letters and responses to comments, as well as revisions to the DPEIR. The FPEIR was circulated to the reviewing public agencies 10 days prior to proposed certification. Together, these documents will be used by the Lead Agency (Adelanto City Council) in consideration of either the proposed 1994 General Plan Update, or projects undertaken in pursuant to the implementation of the 1994 General Plan Update, as may be legal and appropriate.

This FPEIR has been prepared in accordance with the California Environmental Quality Act (CEQA) of 1970, as amended (Public Resources Code, Section 21000 et seq.), and the State Guidelines for the Implementation of the California Environmental Quality Act of 1970, as amended (California Code of Regulatons, Section 15000 et seq.).

1.2 Summary

A Summary of the project's impacts, mitigation measures and significance is included on Pages 8 through 11 of the DPEIR.

2.0 DRAFT PROGRAM EIR

The Draft Program Environmental Impact Report for the City of Adelanto 1994 General Plan Update (August, 1994) is incorporated herein by reference. Revisions to the DPEIR are included in Section 5.2 of this document.

3.0 DISTRIBUTION OF THE DRAFT PROGRAM EIR

The DPEIR was submitted to the agencies and individuals listed in Exhibit 1. They were sent First Class U.S. Mail, Certified, Return Receipt Requested.

3.1 Notice of Availability

The Notice of Availability (Exhibit 2) was distributed to all of the agencies and individuals listed in Exhibit 1 and to all of the persons listed in Exhibit 3. The

EXHIBIT 1

MAILING LIST (MAILED AUGUST 31, 1994)

DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT

NOTICE OF AVAILABILITY FOR PUBLIC REVIEW

REGULAR MAIL

Michael J. Wagner & Associates, Inc.
Michael J. Wagner
2111 Yucca Avenue
Fullerton, CA 92635

PHD Investments
Brian Vieira, Owner
P.O. Box 295
Apple Valley, CA 92307

Realty World - Lucky Properties
Kristina Chou, Realtor
1400 S. Euclid Street
La Habra, CA 90631

Mr. FooKak NG
1609 Manor Gate Road
Hacienda Heights, CA 91745

TMP Investment - Attn Charles Jowell
801 North Park Center Drive Suite 235
Santa Ana, CA 92705

Mike V. Lidikay
P.O. Box 123
Adelanto, CA 92301

Shear Associates
Corporate Pointe
14350 Civic Drive, Suite 140
Victorville, CA 92392

Mr. & Mrs. Charles W. Harris
714 Gay Street
Inglewood, CA 90302

Harold J. Edelman
Certified Public Accountant
1250 East Walnut Street Suite 240
Pasadena, CA 91106

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EXHIBIT 1 (CONT.)

Victor Valley Investment Realty
Dean Kim, Land Specialist Broker
15208 Bear Valley, Suite A-200
Victorville, CA 92392

Ludwig Engineering
Leon V. Keding
109 Third Street
San Bernardino, CA 92410

Starfire
Terry Donoghue
20044 Rancherias Lane
Apple Valley, CA 92307

RDA Engineering Corporation
Glicerio D. Ramirez, President
11798 Bartlett Avenue, P.O. Box 602
Adelanto, CA 92301

Jamal A. Ahmad
Overland Enterprises, Inc.
12225 Benmore Terrace
Los Angeles, CA 90049

Roadrunner Realty
Carol Smillie, GRI-Broker
P.O. Box 86
Phelan, CA 92371

Tuttle Realty
Derry R. Kempf
P.O. Box 35
Phelan, CA 92371

Madole & Associates, Inc.
of The Inland Empire
William "Bill" Humphrey
10601 Church Street Suite 107
Rancho Cucamonga, CA 91730

George Woodworth Realty
Attn Pete
18429 Highway 18 #2
Apple Valley, CA 92307

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Jim Nowain
2939 Tiffany Circle
Bel-Air CA 90077

Natwar Mathur

EXHIBIT 1 (CONT.)

771 South Goldfinch Way
Anaheim, CA 92807

Paul Lee
5135 Muir Drive
Orange, CA 92669

Art Bright
1016 13th Street
Huntington Beach, CA 92648

California Land Development
1135 East Alosta # 204
Glendora, CA 91740

Nathan Russo
5716 Likins Court
Martinez, CA 94553

James Ross
6863 White Avenue
Long Beach, CA 90805

Jim Hoxie
Landsing and Associates
291 South La Cienega Boulevard
Suite 307
Beverly Hills, CA 90211

William A. Pietri
18028 Concord Pl. 1755
Adelanto, CA 92301

Ysidro M. Viena
16675 Sage Street
Hesperia, CA 92345

The Land Baron Realty, Inc.
"Baron" Cliff Miller
P.O. Box 1491
Victorville, CA 92393

GBC Real Estate Company, Inc.
Y.Y. Lin, Executive Vice President/
Chief Operating Officer
1420 East Valley Boulevard Suite A
Alhambra, CA 91801

Adams Advertising, Inc.
Attn Dan Garff
19081 Rocky Road
Santa Ana, CA 92705

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EXHIBIT 1 (CONT.)

Adams Advertising, Inc.
Bob Adams
19081 Rocky Road
Santa Ana, CA 92705

Sally L. Higman
Higman Doehle Incorporated
445 South Figueroa Street, Suite 2600
Los Angeles, CA 90071-1630

Charles Holloway
City of Los Angeles, Department of Water and Power
111 North Hope Street, Room 1121
Los Angeles, CA 90012

Z.A. Shams
P. O. Box 217
South Pasadena, CA 91030

Points West Realty Sales
Gary & Eileen A. Schultz
18882 Sunnyview Circle
Yorba Linda CA 92686

State Farm Insurance
Joseph J. Turkmany
& J.J. Turkmany Jr.
26010 Mureau Rd. Ste 110
Calabasas, CA 91302-3130

Eun Sook Yoon
4101 E. Chapman Ave.
Orange, CA 92669

GBC Real Estate Company, Inc.
Y.Y. Lin
1420 E. Valley Blvd. Ste A
Alhambra, cA 91801

Charles & Mary Terranova
3193 Horizon Pl
West Covina Ca 91791-3486

Randy Christman
P.O. Box 1987
Victorville, CA 92393-1987

Ken W. Hunt
2050 S E Army Post Rd
DSM IA 50320-1820

Mr & Mrs Chs W Harris

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EXHIBIT 1 (CONT.)

714 Gay Street
Inglewood CA 90302

Paul Lee
5135 Muir Dr
Orange CA 92669

James Ross
6863 White Ave
Long Beach CA 90805

City of Adelanto
Planning Department
COUNTER COPY

Patricia A. Chamberlaine
City Manager
OFFICE DELIVERY

Michael Sakamoto
Assistant City Manager
/Finance Director
OFFICE DELIVERY

R. Zaiden Corrado
City Attorney
U S MAIL

Samuel K. Dwyer
Planning Commission Chairman
OFFICE DELIVERY

Lawrence A. Mac Murray, Sr.
Planning Commissioner
OFFICE DELIVERY

Patsy Durocher
Planning Commission Vice Chairman
OFFICE DELIVERY

Warren Smith
Planning Commissioner
OFFICE DELIVERY

County Library
Adelanto Branch
OFFICE DELIVERY

Postmaster
Adelanto Post Office

OFFICE DELIVERY

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EXHIBIT 1 (CONT.)

Adelanto Fire Department
OFFICE DELIVERY

Adelanto Police Department
OFFICE DELIVERY

Building Official
OFFICE DELIVERY

Water Superintendent
OFFICE DELIVERY

City Engineer
OFFICE DELIVERY

Mary L. Scarpa
Mayor Pro-Tem
OFFICE DELIVERY

Ernie Scott
Councilor
OFFICE DELIVERY

Judith A. Crommie
Mayor
OFFICE DELIVERY

Harold Smith
Councilor
OFFICE DELIVERY

Thomas Thornburg
Councilor
OFFICE DELIVERY

City Library
OFFICE DELIVERY

Sharon Gasaway
City Clerk
OFFICE DELIVERY

EXHIBIT 2

NOTICE OF AVAILIABILITY FOR PUBLIC REVIEW

TO: Responsible Agencies
Interested Citizens
and Groups

FROM: City of Adelanto
PO Pox I0
Adelanto. CA 92301

DATE: **August 31, 1994**

DOCUMENT TYPE: **Draft Program Environmental Impact Report**

SUBJECT: **General Plan Update, 1994**

Applicant: **City of Adelanto**
11600 Air Base Road
Adelanto, California 92301

Proposal: The proposed project includes the General Plan Update and all of the General Plan Elements. The proposed project also includes all subsequent projects that conform to the goals, policies and programs of the General Plan Update and the Elements, including, but not limited to, rezonings, use permits, variances, subdivisions, parcel maps, specific plans, redevelopment plans, surface mining and reclamation plans, public works projects, water facilities and acquisition, assessment districts, other financings, annexations, sphere of influence additions, and other similar activities. The General Plan has been prepared in accordance with the requirements established under the Government Code of the State of California as presented in the State of California General Plan Guidelines, as amended by Chapter 1009, Statute of 1984, the Government Code requires that seven mandatory elements be included In a City or County General Plan. These elements are as follows: Land Use, Housing, Circulation, Conservation/ Open Space, Noise and Safety Element. The City has also prepared a Parks and Recreation Element, a Public Facilities Element and a Community Design Element

Number of Acres: 81,000

Current Zoning: Residential, Commercial, Industrial, Open Space, Mobile Home Subdivision and Airport Development Park.

This to advise that City of Adelanto will be the Lead Agency. Lead Agency Contact Person is Patricia A. Chamberlaine, Telephone 619.246.8606. As mandated by State law, the minimum public review period for this document is 45 days (The DPEIR was submitted to the State Clearing House for review). The review period is from September 6, 1994 to 5:00 P.M. October 21, 1994. The document is available for review at Adelanto City Hall, 11600 Air Base Road, Adelanto, California 92301. To date, no Public Hearings have been scheduled. Testimony at future Public Hearings may be limited to those issues raised during the public review period either orally or submitted in writing by 5:00 P.M. the day the comment period closes.

Date: August 31, 1994 Signature: P. Chamberlaine
Title: Director of Planning
Telephone: 619-246-8606

EXHIBIT 3

MAILING LIST (MAILED AUGUST 31, 1994)

1. NOTICE OF AVAILABILITY FOR PUBLIC REVIEW
2. DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT
   CITY OF ADELANTO
   GENERAL PLAN UPDATE

CERTIFIED, RETURN RECEIPT REQUESTED

Board of Supervisors
County of San Bernardino
385 North Arrowhead Avenue
San Bernardino, CA 92415-0110

Clerk of Board of
Supervisors - 2nd Floor
385 North Arrowhead Avenue
San Bernardino, CA 92415-0130

Operations Location Site Manager OL-C
Air Force Base Conversion Agency
Building 321 George Air Force Base, CA 92394

Victor Valley College District
18422 Bear Valley Road
Victorville, CA 92392

Steve Johnson, Chief
Project Management Staff
Bureau of Land Management
6221 Box Springs Boulevard
Riverside, CA 90630

James Roddy
LAFCO
175 West Fifth Street
2nd Floor
San Bernardino, CA 92415-0490

Town of Apple Valley
P.O. Box 429
Apple Valley, CA 92307

City of Hesperia
P.O. Box 2966
Hesperia, CA 92345

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EXHIBIT 3 (CONT.)

City of Victorville
14343 Civic Drive
Victorville CA 92392

Sabo & Greene
Suite 400
6320 Canoga Avenue
Woodland Hills, CA 91367

California Regional Quality Control Board
Suite 100
15428 Civic Drive
Victorville, CA 92392

Victor Valley Union
High School District
16350 Mojave Drive
Victorville, CA 92392

U.S. Fish & Wildlife Services
Suite 100
2140 Eastman Avenue
Ventura CA 93003

Environmental Health Services
15505 Civic Drive
Victorville, CA 92392

Chief, Department of Transportation
District 8 Office
P.O. Box 231
San Bernardino, CA 92402

Southwest Gas Company
13471 Mariposa Road
Victorville, CA 92392

San Bernardino
Associated Government
472 North Arrowhead Avenue
San Bernardino, CA 92401

Southern California Gas Company
ATTN: Michael Hoyt
17071 Gasline Road
Victorville, CA 92392

Adelanto Elementary School District
Administration Office
11824 Air Base Road
Adelanto, CA 92301

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EXHIBIT 3 (CONT.)

Continental Telephone
16461 Mojave Drive
Victorville, CA 92392

Mojave Water Agency
13615-A John Glenn Road
Apple Valley, CA 92307

Desert Land Division
San Bernardino County Planner
15505 Civic Drive
Victorville, CA 92392

Mojave Desert Air Quality Management District
15428 Civic Drive Suite 100
Victorville, CA 92392

Adelanto Chamber of Commerce
c/o Frank Pacheco
P.O. Box 700
Adelanto, CA 92301

Southern California Edison
RM 515 Land Rights Section
P.O. Box 410
100 North Long Beach Boulevard
Long Beach, CA 90801

Planning/Recycling Division
Solid Waste Management Department
2nd Floor
222 West Hospitality Lane
San Bernardino, CA 92415-0017

State Department of Fish & Game Region 5
Wildlife Protection Suite 50
330 Golden Shore
Long Beach, CA 90802

Chuck Wigley, General Manager
Victor Valley Wastewater Reclamation Authority
P.O. Box 1481
Victorville, CA 92393

State of California
Office of Planning & Research
1400 10th Street
Sacramento, CA 95814

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EXHIBIT 3 (CONT.)

State of California
Department of Conservation
Division of Mines & Geology Headquarters
801 K Street Mail Station 12-30
Sacramento, CA 95814-3531

OFFICE DELIVERY

City of Adelanto
Planning Department
COUNTER COPY

Patricia A. Chamberlaine
City Manager

Michael Sakamoto
Assistant City Manager
/Finance Director

R. Zaiden Corrado
City Attorney
U.S. Mail

Mary L. Scarpa
Mayor Pro-Tem

Ernie Scott
Councilor

Judith A. Crommie
Mayor

Harold Smith
Councilor

Thomas Thornburg
Councilor

Samuel K. Dwyer
Planning Commission Chairman

Lawrence A. Mac Murray, Sr.
Planning Commissioner

Patsy Durocher
Planning Commission Vice Chairman

Warren Smith
Planning Commissioner

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EXHIBIT 3 (CONT.)

Adelanto Police Department

Building Official

Water Superintendent

City Engineer

City Library

County Library
Adelanto Branch

Sharon Gasaway
City Clerk

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Notice of Availability was also posted in three public places pursuant to the requirements of CEQA.

3.2 Notice of Completion

The Notice of Completion (Exhibit 4) was distributed to the State Clearinghouse, as well as, to each of the agencies and persons listed in Exhibit 1.

3.3 State Clearinghouse Notification

The State Clearinghouse was sent ten (10) copies of the DPEIR pursuant to CEQA Guidelines. A copy of the Acknowledgment is included as Exhibit 5.

4.0 COMMENTS RECEIVED AND RESPONSES TO COMMENTS

A list of entities that submitted written comments on the DPEIR is included in this section. They are listed as follows:

ENTITY COMMENT LETTER	NO.
Mojave Desert Air Quality Management District	1.0
Office of Planning and Research	2.0
Department of Transportation	3.0
San Bernardino Associated Governments	4.0
Department of Conservation	5.0
City of Victorville	6.0
Mojave Water Agency	7.0
Department of Water and Power	8.0
Department of Water Resources	9.0
Victor Valley Wastewater Reclamation Authority	10.0

The letters are included as unnumbered pages in this document. The Comments are identified in the left margin by numbers 1.1, 1.2 etc. The response to comments follow the comment letters.

EXHIBIT 4

SCH#_____

Notice of Completion

Mail to: State Clearinghouse, 1400 Tenth Street, Sacramento, CA 95814 916(445-0613)

Project Title: City of Adelanto, General Plan Update, 1994
Lead Agency: City of Adelanto
Street Address 11600 Air Base Road
City: Adelanto, CA 92301

Contact Person: Patricia A. Chamberlaine
Phone: 619.246.8606
County: San Bernardino

Project Location

County: San Bernardino
Cross Streets: Hwys 18 & 395
Assessors Parcel No.: Various
Within 2 Miles: State Hwy#: 395 & 18
Airports: George AFB

City/Nearest Community: City of Adelanto
Zip Code: 92301
Sections: 126
Waterways: Mojave River
Railways: GAFB Ext.

Total Acres: 81,000
Twn: T5&6N Range: R5W Base: SBBM
Schools: Adelanto School District

Document Type

CEQA: __ NOP __ Supplement/Subsequent
__ Early Cons __ EIR (Prior SCH No.)_____
__ Neg Dec __ Other_____
X Draft EIR

NEPA: __ NOI Other: __ Joint Document
__ EA __ Final Document
__ Draft EIS __ Other_____
__ FONSI

Local Action Type

X General Plan Update
__ General Plan Amendment
X General Plan Element
__ Community Plan
__ Specific Plan
__ Master Plan
__ Planned Unit Development
__ Site Plan
X Rezone
X Prezone
X Use Permit
X Land Division (Subdivision, Parcel Map., Tract Map, etc.)
X Annexation
X Redevelopment
__ Coastal Permit
__ Other_____

Additional actions will be taken to implement the General Plan Update, 1994. This DEIR is intended to analyze those actions.

Development Type

X Residential: Units: 59,163 Acres: 22,597
__ Office: Sq.Ft _____ Acres_____ Employees_____
X Commercial: Sq.Ft._____ Acres: 3,050 Employees_____
X Industrial: Sq.Ft _____Acres: 10,426 Employees _____
X Educational: Supporting Schools_____
X Recreational: Supporting Parks & Open Space

X Water Facilities: Type: Wells MGD____
X Transportation: Type: Circulation Element
__ Mining: Mineral_____
X Power: Type: Electricity Watts___
X Waste Treatment: Type: Treatment Plant
__ Hazardous Waste: Type_____
__ Other:_____

Project Issues Discussed in Document

X Aesthetic/Visual
__ Agricultural Land
X Air Quality
X Archaeological/Historical
__ Coastal Zone
X Drainage/Absorption
X Economic/Jobs
__ Fiscal
X Flood Plain/Flooding
X Forest Land/Fire Hazard
X Geologic/Seismic
X Minerals
X Noise
X Population/Housing Bal.
X Public Services/Facilities
X Recreation/Parks
X Schools/Universities
X Septic Systems
X Sewer Capacity
X Soil Erosion/Compact/Grading
X Solid Waste
X Toxic/Hazardous
X Traffic/Circulation
X Vegetation
X Water Quality
X Water Supply/Groundwater
X Wetland/Riparian
X Wildlife
X Growth Inducing
X Land Use
X Cumulative Effects
__ Other_____

Present Land Use/Zoning/General Plan Use

The 1985 General Plan provided for 24,700 residential units with a population of 47,840. The proposed General Plan Update, 1994 provides for 59,163 residential units with a population of 156,189.

Project Description The proposed project is a Program EIR for the General Plan Update, 1994 and all of the General Plan Elements. The proposed project also includes all subsequent projects that conform to the goals, policies and programs of the General Plan Update and the Elements, including, but not limited to, rezonings, use permits, variances, subdivisions, parcel maps, specific plans, redevelopment plans, surface mining and reclamation plans, public works projects, water facilities and acquisition, assessment districts, other financings, annexations, sphere of influence additions, and other similar activities. The General Plan has been prepared in accordance with the requirements established under the Government Code of the State of California as presented in the State of California General Plan Guidelines, as amended by Chapter 1009, Statute of 1984, the Government Code requires that seven mandatory elements be included in a City or County General Plan. These elements are as follows: Land Use, Housing, Circulation, Conservation/ Open Space, Noise and Safety Element. The City has also prepared a Parks and Recreation Element, a Public Facilities Element and a Community Design Element

Reviewing Agencies Checklist

__ Resources Agency
__ Boating & Waterways
__ Coastal Commission
__ Coastal Conservancy
__ Colorado River Board
__ Conservation
X Fish & Game, Region 5
__ Forestry
__ Office of Historic Preservation
__ Parks & Recreation
__ Reclamation
__ S.F. Bay Conservation & Development Commission
/ Water Resources (DWR)
Business, Transportation & Housing
__ Aeronautics
__ California Highway Patrol
X CALTRANS District # 8
/ Department of Transportation Planning (headquarters)
/ Housing & Community Development

__ **Food & Agriculture**
Health & Welfare
__ Health Services _____
State & Consumer Services
__ General Services
__ OLA (Schools)

KEY
S = Document sent by lead agency
X = Document sent by SCH
/ = Suggested distribution

Cal-EPA
/ Air Resources Board
S APCD/AQMD
/ California Waste Management Board
__ SWRCB: Clean Water Grants
__ SWRCB: Delta Unit
__ SWRCB: Water Quality
/ SWRCB: Water Rights
X Regional WQCB #_____ (Lahontan)
Youth & Adult Corrections
__ Corrections

Independent Commissions & Offices
__ Energy Commission
__ Native American Heritage Commission
__ Public Utilities Commission
__ Santa Monica Mountains Conservancy
__ State Lands Commission
__ Tahoe Regional Planning Agency

X Other: Mojave Water Agency

Public Review Period (to be filed by lead agency)

Starting Date: **August 31, 1994**

Ending Date: **October 21, 1994**

Signature _____
Patricia A. Chamberlaine, Planning Director

Date: September 2, 1994

Lead Agency (Complete if applicable):
Consulting Firm: Michael J. Wagner & Assoc., Inc.
Address: 2111 Yucca Avenue
City/State/Zip: Fullerton, CA 92635
Contact: Michael J. Wagner
Phone: 714.680.5751

Applicant: City of Adelanto
Address: 11600 Air Base Road
City/State/Zip: Adelanto, CA 92301
Phone: 619.246.8606

For SCH Use Only:
Date Received at SCH _____
Date Review Starts _____

Date to Agencies _____
Date to SCH - _____
Clearance Date _____

Notes:

Revised October 1989

EXHIBIT 5

ACKNOWLEDGEMENT
State of California
Project Notification and Review System
Office of the Governor
(916) 445-0613

SCH NUMBER: 94082081
TITLE: CITY OF ADELANTO, GENERAL PLAN UPDATE, 1994
SCH Contact:
Department Date: 08/31/94
Clearance Date: 10/14/94

(If document recieved after 10 AM review starts on next day.)

Please use the State Clearinghouse Number on future correspondence with this office and with agencies approving or reviewing your project. This card does not verify compliance with environmental review requirements. A letter containing the State's comments or a letter confirming no State comments will be forwarded to you after the review is complete.

Mojave Desert
Air Quality Management District

MDAQMD

15428 Civic Drive, Suite 200, Victorville, CA 92392-2383
(619) 245-1661 Fax No. (619) 245-2699

Charles L. Fryxell
Air Pollution Control Officer

October 4, 1994

Patricia A. Chamberlaine
City of Adelanto
11600 Air Base Road
Adelanto, CA 92301

COMMENT LETTER 1.0

Re: **1994 General Plan Update Draft Program Environmental Impact Report**

Dear Ms. Chamberlaine:

The Mojave Desert Air Quality Management District (MDAQMD) appreciates the opportunity to review and comment on the 1994 City of Adelanto General Plan Update, Draft Program Environmental Impact Report (EIR). MDAQMD recommends that the following items be addressed in the EIR:

1.1 • MDAQMD operates several monitoring stations near the Adelanto Planning Area: in Victorville, Phelan and Barstow. SCAQMD does not operate any monitoring stations within the MDAQMD. Please refer to the attached summary for a review of state and federal air quality designations and classifications.

1.2 • The SCAQMD 1991 AQMP does not apply to our District, including the Adelanto Planning Area.

1.3 • In addition to the requirements of the 1991 AQAP (California Clean Air Act), the EIR should address the requirements of the Rate-Of-Progress Plan (Federal Clean Air Act), adopted in March, 1994.

1.4 • Under Direct Impacts, identify vehicle-related and other emissions, and determine whether they are consistent with the emissions forecast in the Rate-Of-Progress Plan.

1.5 • Under Cumulative Impacts, determine whether the population, housing unit and employment forecasts contained in the 1994 General Plan Update are consistent with the socioeconomic projections used to forecast emissions in the Rate-Of-Progress Plan. Inconsistent projections would result in an adverse cumulative air quality impact which could negate MDAQMD efforts towards attainment of the National Ambient Air Quality Standards.

CITY OF ADL
RECEIVED
OCT 11 1994

RECEIVED
OCT 11 1994

MDAQMD appreciates the opportunity to provide comments on the City of Adelanto General Plan Update. If you have any questions regarding these comments, please contact **Christian N. Ihenacho**, Supervising Air Quality Planner.

Sincerely,

Alex Guilin
Deputy Air Pollution Control Officer

AG:CNI:ajd

adgpupd.let

Comment Letter 1.0 Mojave Desert Air Quality Management District

1.1 SCAQMD Monitoring Stations

The MDAQMD indicates that the SCAQMD does not operate any monitoring stations in the MDAQMD. Page 39 of the EIR, second paragraph, will be revised as follows: "~~The South Coast Air Quality Management District and~~ *[T]he Mojave Desert Air Quality Management District operates air quality monitoring stations at Barstow, Hesperia, Phelan, Trona, 29 Palms and Victorville.* ~~on the high desert~~."

1.2 The SCAQMD 1991 Plan Does Not Apply.

Page 39 of the EIR, third paragraph, is removed from the EIR as follows:

~~The 1991 Air Quality Management Plan (AQMP) requires that local governments adopt an air quality element or its equivalent addressing air pollution control measures and growth management issues. Non-compliance with the AQMP could result in some level of preemption by the South Coast Air Quality Management District. It is required that the City of Adelanto make reasonable progress in implementing local government responsibilities as outlined in the AQMP and the San Bernardino Air Quality Attainment Plan.~~

1.3 Rate of Progress Plan

The EIR should address the requirements of the Rate of Progress Plan. Page 44 of the EIR adds the following text before Section 3.2.2 Impacts:

> *Pursuant to the Federal Clean Air Act (FCAA), the MDAQMD prepared a 15% Reasonable Further Progress Demonstration, otherwise called a Rate-Of-Progress (ROP) Plan, as a revision to the State Implementation Plan (SIP). On March 23, 1994, the Governing Board of the Mojave Desert Air Quality Management District (MDAQMD) properly adopted the elements of the ROP and the associated CEQA documentation. The ROP elements adopted on March 23, 1994 included: (1) the 1990 Baseline Volatile Organic Compounds (VOC) Emission Inventory; (2) 1996 Forecasted VOC Emission Inventory; (3) Control Measures; and (4) Contingency Measures.*
>
> *On April 13, 1994, USEPA revised the finding of non-submittal to a finding of incompleteness for the District's ROP SIP revision. The finding of incompleteness requires the District to submit a complete ROP SIP revision by January 25, 1995 to avoid a lapse in conformity determinations, and by July 25, 1995 to avoid federal sanctions. A completeness finding requires the District to submit all ROP Committal measures in adopted form as District rules and regulations to implement the ROP control and contingency measures; and to provide proof of*

adoption of the 1990 emission inventory. In addition, since the adoption of the ROP, additional information has been provided that requires the District to revise portions of the ROP.

On August 11, 1994, the Federal Highway Administration (FHWA) informed the Southern California Association of Governments (SCAG) that the 1994 Regional Mobility Element (RME) and 1993/99 Regional Transportation Improvement Plan (RTIP) must conform to the ROP's emission budget. The existing RME and RTIP conformity determination lapses on November 16, 1994. Transportation projects in the existing RTIP will not be able to proceed after November 16, 1994, unless SCAG makes conformity determinations for the new RME and RTIP.

SCAG has informed the District that they cannot show conformity for the RME and RTIP with the ROP's existing emission budget. SCAG has recommended that the District revise the ROP's on-road mobile source emission inventory and emission budget to be consistent with the RME and RTIP's emission analysis. This would enable SCAG to show conformity with the ROP and fund new RTIP projects in the District.

The proposed revisions to the ROP will: (1) revise the VOC on-road emission inventory and emission budget; (2) revise the 1990 VOC baseline and the respective 1996 forecasted emission inventory; (3) revise the 1996 VOC emission reduction target level; (4) revise the expected VOC emission reduction; (5) establish a 1990 Oxides of Nitrogen (NOx) baseline and 1996 forecasted emission inventory; (6) establish a NOx on-road mobile source emission budget; (7) revise NOx substitution; and (8) eliminate the proposed amendments to Rule 1114 - Wood Products Coating.

1.4 Direct Impacts

Identify vehicle-related and other emissions and determine if they are consistent with the Rate of Progress Plan. The following is added to Section 3.2.2 on page 45 of the EIR.

The vehicle-related and other emissions are estimated on Page VII-23 of the referenced General Plan Update and on Page 44, paragraph 4 of the Draft EIR. A total of 63 tons per day in 2014 and 188 tons per day at buildout are estimated. Based on a projected increase in population in 1993 of 12,038 to 15,164 in 1996, (General Plan Update, Page III-16) ROC is estimated to increase from 1.13 tons per day (2,271 pounds per day from Page VII-23 of the General Plan Update) to 1.42 tons per day in 1996. NOx is expected to increase from 2.1 tons per day (4,372 pounds per day from Page VII-23) to 2.64 tons per day in 1996. The 1990 Baseline Emission Inventory for VOC is 46.4 tons per day and the NOx Baseline is 113.65 tons per day. The 1996 VOC Forecasted

Emissions Inventory totals 43.3 tons per day, and the NOx Forecasted is 110.55 tons per day.

At 3.69 percent of the 1990 Barstow-Victorville division population (8,517/230,461) the ratio of VOC would be 1.60 tons per day (.0369 x 43.3) and NOx would be 4.08 tons per day (110.55 x .0369) or greater than the projected 1.42 tons and 2.54 tons, respectively. This will not result in emissions greater than the Rate of Progress Plan.

1.5 Cumulative Impacts

A comparison of cumulative population, housing and employment characteristics is added to Section 4.3.1 of the EIR on Page 154 as follows:

Revised ROP Growth Codes (Appendix A-45) shows that Housing Units and Population are projected by MDAQMD to grow at 45 percent from 1990 to 1996 or about 6.4 percent per year and that Employment will grow at 26 percent or about 3.85 percent per year (See table below). In the Adelanto General Plan, population is projected at about 52,000 in 2014. At 52,000 the growth rate is about 7.83 percent from 1990 to 2014. This rate would exceed the MDAQMD Rate of 6.40 percent. Housing is directly reflective of the population, so it will be the same as population.

While the City will be promoting industrial development and jobs during the planning period it would be lucky to have a growth rate in excess of 3.85 percent per year. If the area does exceed job creation by the projected rate, the emissions could actually result in a net reduction, if the industrial/commercial employment uses were cleaner than the vehicle emissions currently generated by long commutes into the SCAQMD air basin.

ADELANTO GENERAL PLAN UPDATE
MDAQMD Revised ROP Growth Codes

	MDAQMD Rate		Adelanto	Adelanto	Cumulative	Cumulative
	Emp.	Pop & Ho.	Population	Housing	Population	Housing
YEAR	3.85%	6.40%	7.83%	2.64/Unit	6.40%	6.40%
1990	1	1	8517	2881	145688	49261
1991	1.04	1.06	9184	3479	155012	52414
1992	1.08	1.13	9903	3751	164933	55768
1993	1.12	1.20	10678	4045	175489	59337
1994	1.16	1.28	11514	4362	186720	63135
1995	1.21	1.36	12416	4703	198670	67176
1996	**1.26**	**1.45**	13388	5071	211385	71475
1997			14437	5468	224913	76049

1998	*15567*	*5897*	*239308*	*80916*
1999	*16786*	*6358*	*254623*	*86095*
2000	*18100*	*6856*	*270919*	*91605*
2001	*19517*	*7393*	*288258*	*97468*
2002	*21046*	*7972*	*306707*	*103706*
2003	*22694*	*8596*	*326336*	*110343*
2004	*24470*	*9269*	*347221*	*117405*
2005	*26386*	*9995*	*369444*	*124919*
2006	*28452*	*10777*	*393088*	*132914*
2007	*30680*	*11621*	*418246*	*141420*
2008	*33083*	*12531*	*445013*	*150471*
2009	*35673*	*13512*	*473494*	*160101*
2010	*38466*	*14571*	*503798*	*170348*
2011	*41478*	*15711*	*536041*	*181250*
2012	*44726*	*16942*	*570348*	*192850*
2013	*48228*	*18268*	*606850*	*205192*
2014	*52004*	*19699*	*645688*	*218324*

The cumulative impacts are difficult to determine because it is difficult to estimate the percentage of buildout of the surrounding communities in the year 2014. At the MDAQMD rate of 1.45, the population of Adelanto, Apple Valley, Hesperia and Victorville will be 645,688 in the year in the year 2014. This would represent 77 percent of the total buildout under the existing General Plans for these communities (645,688/830,637, Page 157 of the EIR). It is unlikely that development in the four communities would exceed 77 percent of buildout by the year 2014, therefore, the Rate of Progress Plan is not exceeded.

The responses to MDAQMD are not considered by the City of Adelanto to include new significant information that would change the EIR or deprive the public of the opportunity to comment on any substantial adverse environmental impact or a feasible way to mitigate or avoid such an impact. The information provided in the responses above do not identify any new substantial environmental impacts not considered in the EIR, new mitigation measures proposed to be implemented not already included in the EIR, and the information provided does not increase the severity of any environmental impact not previously discussed in the EIR. No feasible alternatives or mitigation measures are proposed that would lessen environmental impacts, the draft EIR is fundamentally and basically adequate, and the conclusions contained in the draft EIR do enable meaningful public comment on the draft EIR, as evidenced by the comments themselves.

STATE OF CALIFORNIA

PETE WILSON, *Governor*

GOVERNOR'S OFFICE OF PLANNING AND RESEARCH
1400 TENTH STREET
SACRAMENTO, CA 95814

October 14, 1994

PATRICIA A. CHAMBERLAINE
CITY OF ADELANTO
11600 AIR BASE ROAD
ADELANTO, CA 92301

COMMENT LETTER 2.0

Subject: CITY OF ADELANTO, GENERAL PLAN UPDATE, 1994 SCH #: 94082081

Dear PATRICIA A. CHAMBERLAINE:

The State Clearinghouse has submitted the above named draft Environmental Impact Report (EIR) to selected state agencies for review. The review period is now closed and the comments from the responding agency(ies) is(are) enclosed. On the enclosed Notice of Completion form you will note that the Clearinghouse has checked the agencies that have commented. Please review the Notice of Completion to ensure that your comment package is complete. If the comment package is not in order, please notify the State Clearinghouse immediately. Remember to refer to the project's eight-digit State Clearinghouse number so that we may respond promptly.

Please note that Section 21104 of the California Public Resources Code required that:

> "a responsible agency or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency."

Commenting agencies are also required by this section to support their comments with specific documentation.

These comments are forwarded for your use in preparing your final EIR. Should you need more information or clarification, we recommend that you contact the commenting agency(ies).

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact Kristen Derscheid at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Michael Chiriatti, Dr.
Chief, State Clearinghouse

RECEIVED
OCT 19 1994
CITY OF ADELANTO

Enclosures
cc: Resources Agency

SCH# 94082081

Notice of Completion

Mail to: State Clearinghouse, 1400 Tenth Street, Sacramento, CA 95814 916(445-0613)

Project Title: City of Adelanto, General Plan Update, 1994
Lead Agency: City of Adelanto — Contact Person: Patricia A. Chamberlaine
Street Address: 11600 Air Base Road — Phone: 619.246.8806
City: Adelanto, CA 92301 — County: San Bernardino

Project Location

County: San Bernardino — City/Nearest Community: City of Adelanto
Cross Streets: Hwys 18 & 395 — Zip Code: 92301 — Total Acres: 61,000
Assessors Parcel No.: Various — Sections: 126 — Twn: T5&6N Range: R5W Base: SBBM
Within 2 Miles: State Hwy#: 395 & 18 — Waterways: Mojave River
Airports: George AFB — Railways: GAFB Ext. — Schools: Adelanto School District

Document Type

CEQA: __ NOP; __ Early Cons; __ Neg Dec; X Draft EIR; __ Supplement/Subsequent; __ EIR (Prior SCH No.)_____; __ Other_____

NEPA: __ NOI; __ EA; __ Draft EIS; __ FONSI; Other: __ Joint Document; __ Final Document; __ Other_____

Local Action Type

X General Plan Update; __ General Plan Amendment; X General Plan Element; __ Community Plan; __ Specific Plan; __ Master Plan; __ Planned Unit Development; __ Site Plan; X Rezone; X Prezone; X Use Permit; X Land Division (Subdivision, Parcel Map., Tract Map, etc.); X Annexation; X Redevelopment; __ Coastal Permit; __ Other_____

Additional actions will be taken to implement the General Plan Update, 1994. This DEIR is intended to analyze those actions.

Development Type

X Residential: Units: 59,163 Acres: 22,597
__ Office: Sq.Ft.____ Acres_____ Employees_____
X Commercial: Sq.Ft.____ Acres: 3,050 Employees_____
X Industrial: Sq.Ft.____ Acres: 10,426 Employees_____
X Educational: Supporting Schools_____
X Recreational: Supporting Parks & Open Space

X Water Facilities: Type: Wells MGD____
X Transportation: Type: Circulation Element
__ Mining: Mineral_____
X Power: Type: Electricity Watts____
X Waste Treatment: Type: Treatment Plant
__ Hazardous Waste: Type_____
__ Other:_____

RECEIVED AUG 31 1994

Project Issues Discussed in Document

X Aesthetic/Visual; __ Agricultural Land; X Air Quality; X Archaeological/Historical; __ Coastal Zone; X Drainage/Absorption; X Economic/Jobs; __ Fiscal
X Flood Plain/Flooding; X Forest Land/Fire Hazard; X Geologic/Seismic; X Minerals; X Noise; X Population/Housing Bal.; X Public Services/Facilities; X Recreation/Parks
X Schools/Universities; X Septic Systems; X Sewer Capacity; X Soil Erosion/Compact/Grading; X Solid Waste; X Toxic/Hazardous; X Traffic/Circulation; X Vegetation
X Water Quality; X Water Supply/Groundwater; X Wetland/Riparian; X Wildlife; X Growth Inducing; X Land Use; X Cumulative Effects; __ Other_____

Present Land Use/Zoning/General Plan Use

The 1985 General Plan provided for 24,700 residential units with a population of 47,640. The proposed General Plan Update, 1994 provides for 59,163 residential units with a population of 156,189.

Project Description The proposed project is a Program EIR for the General Plan Update, 1994 and all of the General Plan Elements. The proposed project also includes all subsequent projects that conform to the goals, policies and programs of the General Plan Update and the Elements, including, but not limited to, rezonings, use permits, variances, subdivisions, parcel maps, specific plans, redevelopment plans, surface mining and reclamation plans, public works projects, water facilities and acquisition, assessment districts, other financings, annexations, sphere of influence additions, and other similar activities. The General Plan has been prepared in accordance with the requirements established under the Government Code of the State of California as presented in the State of California General Plan Guidelines, as amended by Chapter 1009, Statute of 1984, the Government Code requires that seven mandatory elements be included in a City or County General Plan. These elements are as follows: Land Use, Housing, Circulation, Conservation/ Open Space, Noise and Safety Element. The City has also prepared a Parks and Recreation Element, a Public Facilities Element and a Community Design Element

CLEARINGHOUSE CONTACT: Michael Chiriatti, Jr.
(916) 445-0613

STATE REVIEW BEGAN: 8-31-94
DEPT REV TO AGENCY: 10-7
AGENCY REV TO SCH : 10-12
SCH COMPLIANCE : 10-14

PLEASE NOTE SCH NUMBER ON ALL COMMENTS

PLEASE FORWARD LATE COMMENTS DIRECTLY TO THE LEAD AGENCY ONLY

AQMD/APCD: 33 (Resources: 9/3)

CMT SNT
__ X Resources
[redacted]
__ __ Conservation
__ X Fish & Game 5
[redacted]
__ X DWR
[redacted]
__ X Caltrans # 8
__ X Trans Planning
__ X Housing & Devel
[redacted]

CMT SNT
State/Consumer Svcs
[redacted]
__ X ARB
__ X CA Waste Mgmt Bd
[redacted]
__ X Reg. WQCB # 6VIC
[redacted]
__ __ Rtns
__ X State Lands Comm
[redacted]

("S" = sent by lead / "" = sent by SCH)

Comment Letter 2.0 Office of Planning and Research

No response is required.

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY PETE WILSON, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 8, P.O. BOX 231
SAN BERNARDINO, CALIFORNIA 92402
TDD (909) 383-5959

COMMENT LETTER 3.0

10-14-94

September 27, 1994

SBd-08-395-Var
SBd-08-18-Var
SCH# 94082081

RECEIVED
SEP 30 1994
STATE
CLEARINGHOUSE

Mr. Michael Chiriatti, Jr.
State Clearinghouse
Office of Planning & Research
1400 10th Street
Sacramento, CA 95814

Dear Mr. Chiriatti:

Draft Environmental Impact Report for the
Proposed City of Adelanto General Plan Update

Regarding the above-referenced document, please refer to our June 16, 1994 letter, as well as San Bernardino Associated Governments letter dated June 14, 1994. Both are attached for your reference.

3.1 We still need a copy of the requested Traffic Study when it is available. Please send it to:

Diane Keel
Transportation Planning, CEQA/IGR
California Department of Transportation
P.O. Box 231
San Bernardino, CA 92402

If you have any questions, please contact Diane Keel at (909) 383-6908 or FAX (909) 383-7934.

Sincerely,

Maisoon Afaneh for

HARVEY J. SAWYER, Chief
Office of Transportation
Planning San Bernardino
County

Attachments (2)

cc: Bob Wirts, SANBAG

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY PETE WILSON, Governor

DEPARTMENT OF TRANSPORTATION
DISTRICT 8, P.O. BOX 231
SAN BERNARDINO, CALIFORNIA 92402
TDD (909) 383-5959

June 16, 1994

08-SBd-395-Var.
08-SBd-18-Var.

Ms. Patricia Chamberlaine
Director of Planning
City of Adelanto
11600 Air Base Road
Adelanto, CA 92301

Dear Ms. Chamberlaine:

Notice of Preparation of a Draft Environmental Impact Report for the Proposed City of Adelanto General Plan Update

We have reviewed the above-referenced document and request consideration of the following comments:

3.2 • A traffic study is needed for the Draft Environmental Impact Report and should include the following from a worst case scenario viewpoint: existing and future average daily traffic (ADT) volumes, traffic generation (including peak hour), traffic distribution, analysis of peak hour demand and capacity using delay methodology for intersections along with current and projected capacities of local roads, state highways and freeways that might be impacted. Special attention should be given to state Route 395 (SR 395), State Route 18 (SR 18) and all utilized intersections.

3.3 • Figure V-3, page V-16, shows an underestimated projection of the year 2014 average daily traffic volume on the segment just north of SR 18; and an overestimated traffic volume just north of Caluse Road. According to Caltrans, these volumes should be 50,000 ADT at the first mentioned segment compared to the report's 28,000 ADT, and 30,000 ADT at the second segment compared to the report's 60,000 ADT.

3.4 • The proposed 395 freeway may not be constructed by the year 2014. Until a final alignment for the freeway is approved and the freeway construction project is programmed, the following should be maintained:

- Preservation of the needed right-of-way for future improvement of the existing facility as needed to accommodate future growth in the area. A six lane facility will require a minimum right-of-way of 134 feet.

- Access to the State highway should be limited to road connections at one-half mile spacing. Driveways and other road type connections will be limited to right turn-in/right turn-out only.

- The freeway location as shown in the circulation map should only be considered as approximate location.

- Improving access to the freeway cannot be considered a mitigation measure for impact on the existing facility.

3.5 • Concerning drainage, care should be taken when developing this plan to preserve and perpetuate the existing drainage pattern of the state highway. Particular consideration must be given to cumulative increased storm runoff to insure that a highway drainage problem is not created.

3.6 • It is recognized that there is considerable public concern about noise levels adjacent to heavily traveled highways. Certain types of land use may not be appropriate near a major highway and/or may require special noise attenuation measures. Development of this property should include any necessary attenuation measures as mitigation for noise impacts.

3.7 • Should any work be required within State highway right of way, Caltrans would be the responsible agency, and may require that certain measures be provided as a condition of permit issuance.

When available, please send the DEIR to:

Maisoon Afaneh
Transportation Planning, CEQA/IGR
California Department of Transportation
P.O. Box 231
San Bernardino, CA 92402

If you have any questions, please contact Maisoon Afaneh at (909) 383-5928 or FAX (909) 383-7934.

Sincerely,

MA

Original Signed by Harvey J. Sawyer

HARVEY J. SAWYER, Chief
Transportation Planning
San Bernardino County
Coordination Branch

MA:cl

STATE OF CALIFORNIA—BUSINESS, TRANSPORTATION AND HOUSING AGENCY

PETE WILSON, *Governor*

DEPARTMENT OF TRANSPORTATION
DISTRICT 8, P.O. BOX 231
SAN BERNARDINO, CALIFORNIA 92402
TDD (909) 383-5959

October 6, 1994

SBd-08-395-Var.

Ms. Patricia A. Chamberlaine
City of Adelanto
11600 Air Base Road
Adelanto, CA 92301

Dear Ms. Chamberlaine:

City of Adelanto General Plan Traffic Study

We have reviewed the above-referenced document and request consideration of the following comments:

3.8 • The proposed 395 freeway may not be constructed by the year 2014. Therefore, the traffic impacts should also be evaluated with only the existing 395 facility in place.

3.9 • Until a final alignment for the freeway is approved and the freeway construction project is programmed, the freeway location as shown in the traffic distribution figures should only be considered as an approximate location.

If you have any question, please contact Diane Keel at (909) 383-6908 or FAX (909) 383-7934.

Sincerely,

HARVEY J. SAWYER, Chief
Office of San Bernardino
County Transportation
Planning

RECEIVED
OCT 11 1994
CITY OF ADELANTO

Comment Letters 3.0 Department of Transportation

September 27, 1994

3.1 Traffic Study

Upon receipt of the request for the Traffic Study, the City of Adelanto General Plan, Traffic Study, prepared August 9, 1991 by Kunzman Associates was transmitted to Ms. Diane Keel of the Department of Transportation. The Circulation Element of the referenced General Plan Update was based on this Traffic Study. The Traffic Study reviews the proposed land uses, establishes the circulation system and traffic zones, describes the existing traffic conditions, projects the General Plan land use traffic, including traffic generation (Fifth Edition ITE and others), traffic volumes, traffic distribution and assignment. The Study also reviews through traffic, future traffic volumes, daily volume/capacity ratios, impacts, mitigation measures and other considerations. The Traffic Study was based on an earlier, more intensive land use alternative than proposed in the current General Plan Update and made projections to the year 2010 rather than 2014. The Traffic Study was slightly modified to fit the requirements of the proposed General Plan Update. No revisions to the EIR are necessary.

June 16,1994

3.2 Traffic Study

Refer to response 3.1 above. The City of Adelanto's Traffic Study envisions the development of an International Airport as the worst case traffic generator. This alternative, which is the basis for the impact analysis may generate more traffic than the estimates of Caltrans, but is nevertheless the worst case as estimated by the City and required by CEQA. No revisions to the EIR are necessary.

3.3 Projection Differences

The City of Adelanto, under the International Airport proposal envisions substantial traffic on the new Freeway 395 and on the old Highway 395. While Caltrans estimates the average daily traffic on Highway 395 at Colusa Road at 30,000 and at Highway 18 at 50,000 the City envisions a much different land use pattern and traffic generation situation as the worst case analyzed in its EIR. (The 60,000 as stated by Caltrans, shown in Figure V-3 on Page V-16 of the Circulation Element is incorrect. It is actually 6.0 or 6,000). The City envisions a New Freeway 395 with offramps at Desert Flower Road, El Mirage Road, Air Base Road, Mojave Drive and Palmdale Road as necessary to accommodate the traffic that the City anticipates. The streets at these intersections are expected to have traffic levels of 45,000, 50,000, 55,000, 61,000 and 35,000, respectively. Freeway 395 southbound is expected to have traffic volumes of 77,000

and old Highway 395 is expected to have 28,000. Without a new Freeway 395 the old Highway 395 will have over 100,000 average daily traffic and the Highway will have to be at least ten lanes wide. *Figure V-3 of the Circulation Element will be revised to show 6.0 rather than 60.* This will not increase any impacts. No other revisions to the EIR are necessary.

3.4 No Freeway Before 2014

The State Department of Finance estimates the population of the State on January 1, 1993 to be 31,552,000. According to Caltrans the State has 15,158 centerlane one way highway miles with a total of 49,138 lane miles (or 3.24 lanes per center lane mile). The State also has 2,292 centerline one way miles of Interstate Highways. At 3.24 lanes per mile the Interstate System can be estimated to have at least 7,426 miles. The total lane miles in the State can be estimated at 56,564 lane miles (49,138 + 7,426). The total lane miles divided by the total population indicates that there are 1.79 lane miles per 1,000 persons throughout the State (56,564/31,552).

The projected 2014 population of the City of Adelanto of 52,000 persons would entitle that population to approximate 93 lane miles as their "Fair Share" (1.79 x 52). With a distance of 12 miles from the City of Adelanto to Interstate 15 the City's Fair Share would be the equivalent of 7.75 lanes.

Since the residents of Adelanto will be paying the same tax for highways as any other residents of the State (and perhaps higher, as they drive longer distances than the average State resident) they should encourage the State Department of Transportation (Caltrans) to construct the facilities that they need to relieve the projected congestion from the City to Interstate 15. This Freeway should be developed when Caltrans observes that the City is actually implementing its General Plan Update and the actual traffic is overloading a six lane Highway 395.

The City of Adelanto will preserve the existing Highway 395 as a six lane super arterial with 124 feet of right of was as shown on Figure V-5, Page V-21 of the Circulation Element. Access will be limited to half mile intersections and right in/right out until the 395 Freeway is developed. The Freeway 395 location will be considered as approximate only. The existing Highway 395 would require widening to 10 lanes to accommodate projected traffic unless the new Freeway 395 is developed. The City will encourage Caltrans to develop the New Freeway as traffic conditions warrant. No revisions to the EIR are necessary.

3.5 Drainage

The existing drainage pattern is preserved and enhanced as illustrated in Figure X-9 of the Public Facilities Element. The Drainage Plan considers the effect of urbanization on run off rates. No revisions to the EIR are necessary.

3.6 Noise Impacts

Noise impacts are described for major roadways and freeways on Page 75 of the EIR. Mitigation measures incorporated into the project to mitigate noise impacts to a level of insignificance are listed on Pages 77 through 81 of the EIR. Measures that may be most appropriate include Item Nos. 4, 5, 9, 10, 11, 20, 33, 35, and 36. No revisions to the EIR are necessary.

3.7 State Highway Work

The City of Adelanto will refer any proposed projects that are within the State Highway right-of-way to the Department of Transportation for approval as lead agency. This revision will be added as mitigation measure No. 13 on Page 113 of the EIR and to the Mitigation Monitoring Program (Appendix A).

October 6, 1994

3.8 No Freeway Before 2014

See response 3.4 above.

3.9 Approximate Location

See response 3.4 above.

The responses to Department of Transportation are not considered by the City of Adelanto to include new significant information that would change the EIR or deprive the public of the opportunity to comment on any substantial adverse environmental impact or a feasible way to mitigate or avoid such an impact. The information provided in the responses above do not identify any new substantial environmental impacts not considered in the EIR, new substantial mitigation measures proposed to be implemented not already included in the EIR, and the information provided does not increase the severity of any environmental impact not previously discussed in the EIR. No feasible alternatives or mitigation measures are proposed that would lessen environmental impacts, the draft EIR is fundamentally and basically adequate, and the conclusions contained in the draft EIR do enable meaningful public comment on the draft EIR, as evidenced by the comments themselves.

San Bernardino Associated Governments

San Bernardino County Transportation Commission
San Bernardino County Transportation Authority
San Bernardino County Congestion Management Agency
Service Authority for Freeway Emergencies

472 North Arrowhead Avenue, San Bernardino, California 92401-1421
(909) 884-8276 FAX: (909) 885-4407

June 14, 1994

Ms. Patricia A. Chamberlaine
Director of Planning
City of Adelanto
11600 Air Base Road
Adelanto, California 92301

COMMENT LETTER 4.0

Re.: General Plan Update - Circulation Element
SANBAG IGR No. I9400027

Dear Ms. Chamberlaine:

We appreciate the opportunity to review the proposed General Plan update and to comment on the Circulation Element.

Our analysis indicates that the proposed General Plan requires a Traffic Impact Analysis following the procedures of the land use/transportation analysis program of the Congestion Management Program (CMP) for San Bernardino County, and as adopted in Resolution No. 93-45 by the City Council of the City of Adelanto. The traffic study in the General Plan uses procedures found in capacity manuals and circulars that are not approved for San Bernardino County and do not meet the requirements of the CMP. (Please refer to Section 4-12 of the 1993 CMP update.) The adopted guidelines may be found in Appendix C of the CMP.

We wish to point out that the new Victor Valley Transportation Model providing future network traffic forecasts will be available for use on June 20, 1994 through the SCAG Inland Empire office in Riverside. Also, the predominate methodologies to determine LOS for arterial streets and freeways in urbanized areas are found in the 1985 Federal TRB (Transportation Research Board) Highway Capacity Manual - Special Report 209, Chapters 3 and 9.

Should you desire further information concerning the above comments, please contact Deborah Barmack, Ty Schuiling, or myself at your convenience.

Sincerely,

Robert W. Wirts
Traffic Engineer

M:\PC940614.BW
cc.: Harvey Sawyer, Caltrans

Comment Letter 4.0 San Bernardino Associated Governments

4.1 Congestion Management Planning

The EIR, Page 113 indicated on Mitigation Measure No.12 that Adelanto would comply with the law (Government Code Section 65088 et seq.) if legally required. The City of Adelanto has provided SANBAG with information that the General Plan Update was initiated prior to November 4, 1992, the adoption date of the Congestion Management Plan for San Bernardino County. On May 12, 1995 the City of Adelanto received information from SANBAG that a TIA report in conformance with the CMP guidelines is not required for the 1994 General Plan Update.

The City intends to require specific development proposals to complete the required Traffic Impact Analysis a Condition of Approval, when legally required to do so.

The Traffic Study that was prepared for the General Plan Update (See Response 3.1 above) indicated that the traffic would not exceed Level of Service D either as proposed or with mitigation measures (Page 110 and 112 of the EIR). The LOS threshold in Section 65089 (b)(1)(B) is LOS E.

Although the City of Adelanto's Traffic Study included all forms of projected traffic Section 65089.3 (c) of Congestion Management Planning law indicates that the City does not have to include interregional travel, or traffic generated by low and very low income households. The City of Adelanto General Plan Housing Element (a Referenced Document) Page IV-36 through 39 indicates that all multi-family housing in the City qualifies as low and very low income housing and that 25 percent (two out of eight) single family units in the City are low and very low income housing. With these substantial reductions it seems impossible to exceed LOS E.

Mitigation measures to improve air quality already included in the EIR are on Pages 45 through 51. Congestion Management Section 65089 (b)(3) requires the City to promote carpools, vanpools, transit, bicycles, park and ride lots, and ,job/housing balance. These are included as mitigation measures in the EIR on Page 47 and 48 in Items 1 through 17. In addition the City has established an aggressive industrial recruitment program with its Redevelopment Agency and is successfully providing jobs to the area.

The responses to San Bernardino Associated Governments are not considered by the City of Adelanto to include new significant information that would change the EIR or deprive the public of the opportunity to comment on any substantial adverse environmental impact or a feasible way to mitigate or avoid such an impact. The information provided in the responses above do not identify any new substantial environmental impacts not considered in the EIR, new substantial mitigation measures proposed to be implemented not already included in the EIR, and the information

provided does not increase the severity of any environmental impact not previously discussed in the EIR. No feasible alternatives or mitigation measures are proposed that would lessen environmental impacts, the draft EIR is fundamentally and basically adequate, and the conclusions contained in the draft EIR do enable meaningful public comment on the draft EIR, as evidenced by the comments themselves.

State of California THE RESOURCES AGENCY

MEMORANDUM

To: Project Coordinator
Resources Agency

Date: September 21, 1994

Ms. Patricia A. Chamberlaine
City of Adelanto
11600 Air Base Road
Adelanto, CA 92301

COMMENT LETTER 5.0

From: **Department of Conservation**
Governmental and Environmental Relations

Subject: City of Adelanto General Plan Update DEIR - SCH# 94082081

The Department of Conservation's Division of Mines and Geology (DMG) has reviewed the Draft Environmental Impact Report (DEIR) for the General Plan Update. DMG has special expertise regarding geologic/seismic hazards and mineral resource issues, and has responsibility under Government Code Section 65302(g) to review and provide information to the lead agency for the Safety Element portion of the draft General Plan update prior to its adoption.

General Information:

According to current General Plan Guidelines published by the Office of Planning and Research, a Safety Element should include mapping of known seismic and other geologic hazards, including areas of significant potential for damaging earthquake-induced ground shaking, liquefaction, settlement, slope instability, and flooding. It should also address appropriate land-use policies, standards, and ways to mitigate identified hazards to minimize the risks of these hazards to the public.

Pursuant to Government Code Section 65302 (b), a City or County shall consult with the Department of Conservation's Division of Mines and Geology (DMG) prior to preparing or revising a draft General Plan Safety Element and submit the draft Safety Element (or Safety Element amendment) as well as any technical studies used in its development to DMG for review at least 45 days prior to the element's adoption. DMG then reviews the draft Safety Element and may provide comments to the City or County within 30 days of its receipt for consideration prior to the element's adoption. Lastly, the City or County must provide DMG with a copy of the final Safety Element (or amendment) once adopted.

In addition, Public Resources Code Section 2697 states that cities and counties shall require, prior to approval of projects located in seismic hazard zones (including zones of potential seismically-induced ground failure) described by a Safety Element, geotechnical reports addressing such hazards. A copy of each approved geotechnical report shall be submitted to DMG within 30-days of the report's approval.

Comments and Recommendations:

Please note that the DEIR makes reference to the draft Safety Element, as well as pertinent maps provided in the draft General Plan, which were not transmitted to the Department with the DEIR. Therefore, comments provided in this review are not comprehensive for the purposes of the draft Safety Element. The City should expect additional suggestions for the draft General Plan/Safety Element when the Safety Element is provided to DMG. The Department looks forward to assisting the City in the development of its Safety Element.

The DEIR indicates that earthquake shaking (primarily from the San Andreas fault) and ground failure resulting from liquefaction are potentially significant hazards within the City. The DEIR indicates that the City has a comparatively high level of seismic hazard awareness, and a number of worthy policies and standards are proposed or suggested in order to minimize such impacts. As listed under the Earth Resources section of the DEIR, these include adherence to the Uniform Building Code (UBC), requirements for site-specific evaluation of building sites within identified areas of potential liquefaction susceptibility, development of site liquefaction evaluation guidelines, restriction of development in areas subject to flooding and slopes exceeding 15%, and use of specific siting investigation and structural design measures for large-scale buildings and high-occupancy structures. However, the DEIR indicates that areas of potentially-significant liquefaction susceptibility are not well known at this time and that some of these policies are only under consideration (p.37).

The Department encourages the proposal by the City to require engineering geologic/geotechnical reports for proposed developments where geologic hazards are identified (p.38, #10), and for tall, critical, or high-occupancy developments (p.38, #14), as well as the adoption of UBC seismic design standards. The 1994 UBC contains some new and/or revised provisions regarding seismic design of structures, as well as seismic/ geotechnical site evaluation of building sites as part of grading/excavation and foundation design, that the City may wish to review. Also note that the UBC addresses developments having a wide range of occupancy ratings and use categories, including conventional structures.

The Department also makes the following suggestions:

1) Consider adding language to the Safety Element/EIR pertaining to policy and standards that certain critical facilities (hospital, public school, and essential service structures) have siting and/or design requirements addressed by the Education Code, Health and Safety Code, and State Building Code (Title 24 of the California Administrative Code). Such projects are reviewed/approved by State Agencies including the Department of Education, the Division of the State Architect, the Office of Statewide Health Planning and Development, and the State Fire Marshall.

2) Regarding the DEIR discussion of liquefaction (p.37), consider clarifying the nature of the phenomenon. Liquefaction occurs when fluid-saturated *cohesionless* soils (e.g., sands, gravels, some silts, and mixtures thereof) loose *shear strength* (i.e., begin to become fluid-like) as the result of seismic shaking. The results include loss of soil bearing capacity, ground-surface settlement/ differential settlement, enhanced ground shaking, high fluid pressures in the soil, lateral spreading of ground where unconfined. Potential effects to structures and public works includes lateral displacement, tilting or sinking of building and bridge foundations; flow-failures of slopes, dams, levees, or excavations; disruption of public utility and transportation corridors; and floating of lightweight subsurface structures (such as pipelines, culverts, basements).

3) The definition of liquefaction hazard zones for planning purposes is done in consideration of several factors, including the occurrence of geologically-recent (i.e., Holocene-aged) sandy alluvial soils, and the depth to perched or other groundwater. A useful reference addressing this approach is "Evaluating Liquefaction Potential", p.263-315 of U.S. Geological Survey Professional Paper 1360 ("Evaluating Earthquake Hazards in the Los Angeles Region"). This document also addresses the definition of various other types of geologic/seismic hazards, which the City may wish to review.

The depth to groundwater may be a critical factor governing liquefaction hazard zonation because regional geologic mapping examined by DMG does not differentiate Holocene-age soil deposits in and around Adelanto. The City may wish to consider formulating a policy regarding the appropriate groundwater level to consider for liquefaction evaluations of development sites, given that the DEIR indicates that current groundwater levels are significantly below historic levels. We recommend that the City consider the potential that groundwater might rise in the future as a result of changing water management policies or groundwater recharge measures. Rising groundwater can significantly increase the amount of saturated granular soils, thereby increasing the potential liquefaction hazard.

4) DMG recommends that the City review the 1986 "Geologic Map of the San Bernardino Quadrangle", published by DMG (scale 1:250,0000), which provides information on the geology and faults of the region of interest, as well as references that may provide more detailed accounts of local geologic materials.

5) Re: p.3-38, Mitigation Measure #10. In general, qualified experts capable of developing soils and geologic reports to be submitted for proposed developments include licensed *engineering geologists* and *geotechnical engineers*.

6) Re: p.3-38, Unavoidable Adverse Impacts. The DEIR states, "*The only unavoidable adverse impacts which may not be reduced to insignificance and for which no mitigation measures are proposed are the seismic safety hazards to the project population, structures, and infrastructure*". We note that many mitigation measures appear to be proposed or under consideration by the City that would minimize seismic safety hazards.

We hope the above comments may be helpful to you in finalizing the EIR for the City of Adelanto's General Plan update. If you have any questions regarding these comments, please contact me at (916) 445-8733. For specific, geologic assistance in developing the Safety Element, please contact Jeff Howard, Division of Mines and Geology, Environmental Review Project Manager, at (916) 323-4399.

Jason Marshall
Environmental Analyst

cc: Jeff Howard, Division of Mines and Geology

Comment Letter 5.0 Department of Conservation

The Department of Conservation has made numerous recommendations to the City of Adelanto for the continued study of geologic issues in the future. The City appreciates these comments and will review and consider them as specific development projects are considered. No changes to the EIR are necessary.

The City of Adelanto pursuant to State law did send the Department of Conservation, Division of Mines & Geology Headquarters, 801 K Street, Mail Station12-30 a copy of the Notice of Preparation, Initial Study and a copy of the Draft General Plan Update (including Safety Element). The Element was mailed certified, return receipt requested. The document was delivered May 29, 1992 and signed for by Mike Marion (sp).

CITY OF
VICTORVILLE

619-955-5000
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14343 Civic Drive
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October 21, 1994

COMMENT LETTER 6.0

City of Adelanto
Ms. Patricia Chamberlaine, Director of Planning
P. O. Box 10
Adelanto, CA 92301

Re: Draft Program Environmental Impact Report - City of Adelanto General Plan

Dear Ms. Chamberlaine:

On September 6, 1994, the City of Adelanto released a Draft Program Environmental Impact Report (EIR) for public review that addressed the City's General Plan Update. The EIR was prepared to provide adequate information regarding the potential significant adverse environmental effects of adopting and implementing the City's proposed General Plan Update. The EIR is identified as a program document that is intended to address the potential impacts from "all subsequent projects that conform to the goals, policies, and programs of the General Plan Update and the Elements, including, but not limited to, rezonings, use permits, variances, subdivisions, parcel maps, specific plans, redevelopment plans, surface mining and reclamation plans, public works projects, water facilities, and acquisition, assessment districts, other financing, annexations, sphere of influence additions, and other similar activities." This letter will serve as the City of Victorville's comments on the Draft EIR and serves to identify the deficiencies and inadequacies in the content of this document.

6.1 After reviewing the whole document, some general observations are appropriate at this point since they apply to the overall content of the document and across-the-board to each of the individual topics addressed in the EIR. The first issue is the failure of the Draft EIR to provide an adequate project description from which to make impact forecasts. Specifically, the State California Environmental Quality Act (CEQA) Guidelines require "general description of the project's technical, economic, and environmental characteristics" (Section 15124). Further, project is defined as "the whole of an action, which has a potential for resulting in a physical change in the environment, directly or ultimately" (Section 15378).

6.2 The City's General Plan Update EIR does not provide an adequate project definition from which to forecast impacts. First, the EIR document does not contain nor does it provide sufficient information to define the project. For example, the EIR does not contain a land use map illustrating the distribution of proposed land uses. No map is provided of the existing land use designations and no map is provided of existing developed and undeveloped property. Some of this information is referenced in the EIR as being available in the

6.3 General Plan Update and is incorporated by reference. This violates Section 15125 of the State CEQA Guidelines because it does not include "a description of the environment in the vicinity of the project, as it exists before the commencement of the project" in these two most essential aspects, i.e., the existing land uses on the ground throughout the project area and the existing land use designations throughout the 81,000 acre "Planning Area".

6.4 The limited information provided in the EIR that is incorporated by reference is not adequately summarized for use in the EIR impact forecasting process. Land uses proposed by the General Plan Update are listed in an unreferenced table on page 84 of the EIR. No data are provided in the EIR on the uses allowed under each designation with or without conditional use permits (particularly the most intense uses permitted under each designation), and the specific areas of allowable development or disturbance under each designation. It is only with this land use information that the impacts from the adopting and implementing the General Plan Update can be forecast.

6.5 The second major deficiency that pervades this EIR is a failure to provide any meaningful analysis of impacts. The standard of adequacy for an EIR is outlined in Section 15151 of the State CEQA Guidelines: "An EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes into account environmental consequences," and in Section 15384, "'Substantial evidence' as used in these Guidelines means enough relevant information and reasonable inferences from this information that a fair argument can be made to support a conclusion, even though other conclusions might be reached....Mere uncorroborated opinion or rumor does not constitute substantial evidence." In this instance we are looking at uncorroborated conclusions which pervade this EIR.

6.6 Further, in describing the level of forecasting required, Section 15144 of the State Guidelines provides the following guidance: "While foreseeing the unforeseeable is not possible, an agency must use its <u>best efforts to find out and disclose all that it reasonably can</u>" (emphasis added). This EIR is fraught with failure to find out and disclose the adverse environmental impacts of the City's General Plan Update. Not only is there rarely any analysis, there is never any criteria or threshold of significance provided, and in most instances the data provided is descriptive in nature, not analytical. The document also fails because it rarely compares the proposed uses with the site specific resources in question. The impact conclusions in the EIR could have been written about any City in southern California because there is no specific analysis of the consequences of implementing the General Plan Update.

6.7 The third general issue of concern is the presumption that this program EIR can address "all subsequent projects that conform" with the General Plan Update. Aside from the fact that very little site specific resource information is provided in the General Plan Update from which to make this conclusion, the CEQA establishes specific limits on use of program EIRs

with future projects. First, none of the future projects are defined as to location, design, and potential activities when developed. Second, this EIR does not provide a data base that is adequate to make judgments regarding actual site specific impacts of a project. Third, standards and criteria, i.e. external circumstances, commonly change that alter the definition of what is or is not significant. The best example is the listing of a new species as threatened or endangered and the need to avoid impacts to individuals of the species, as well as to essential habitat. Third, the analytical data in the General Plan must be of sufficient detail to demonstrate how a specific project's impacts have been included in the forecast contained in the General Plan Update EIR.

6.8 Specifically, Section 15168 in the State CEQA Guidelines, (c)(3) and (4) states: "Where subsequent activities involve site specific operations, the agency should use a written checklist or similar device to document the evaluation of the site and the activity to determine whether the environmental effects of the operation were covered in the program EIR. A program EIR will be most helpful in dealing with subsequent activities if it deals with the effects of the program as specifically and comprehensively as possible. With a good and detailed analysis of the program, many subsequent activities could be found to be within the scope of the project described in the program EIR, and no further environmental documents would be required." The City's General Plan EIR provides little or no specific information and certainly does not provide a comprehensive evaluation of environmental impacts as described in our subsequent comments. In any case, the City is woefully offbase to imply in this document that CEQA compliance is being accomplished for all future projects that may be considered by the City. This would not be possible with a most detailed General Plan Update EIR, and it is certainly rendered less feasible with the inadequate document distributed for review.

6.9 The following comments are provided on the specific content of the General Plan Update EIR. The comments are provided in the same order as the issues discussed in the EIR.

P. 6, para. 2: As noted in the general comments, this EIR provides very little specific data for the 80,000 acres contained in the City's Planning Area (PA). Having reviewed the whole document, this EIR does not provide any information on the existing land uses throughout the project area and does not provide any information on the existing land use designations assigned to all areas of the PA at the present time. This information is required by Sections 15125 and 15126 as the basis for making impact forecasts. As a result, the majority of the impact forecasts are either not provided with any substantiation or are inaccurate throughout the document, as will be amply demonstrated in subsequent comments. Also, the lack of specific information for many resources makes it impossible to forecast the impacts of future development or future projects contemplating development.

P. 7, para. 1: The use of existing conditions data in the General Plan Update through incorporation by reference in this EIR severely harms its ability to inform the reviewer of adverse impacts. One reason for this is that the EIR does not contain a sufficient summary of the data being incorporated for it to be used in making an impact forecast. A second reason relates more

to the ability of the average reviewer to follow the reasoning regarding a specific impact which must contain some semblance of logic, i.e. this project will destroy cultural resources, therefore the project has a significant impact on the cultural resources component of the environment. Without sufficient information in the EIR itself, whether intrinsic to the document or summarized from a document being used under the incorporation by reference provision of CEQA, it is not possible for a reviewer to follow the rational train of logic that leads to the impact conclusion. The net result of relying upon data in the General Plan Update, without an adequate summary of the data in the EIR, is that it is not possible to independently verify the impact conclusions presented in the EIR. Due to its approach, the City has eliminated or not fulfilled the key reason for preparing the EIR and submitting it to the public for peer review, i.e. to provide information to decision-makers regarding a project's potential significant adverse environmental impacts which has undergone such peer review. The EIR needs to be corrected by incorporating sufficient data for each resource category before it can be considered adequate.

P. 8, Table 1: This table will need to be totally revised based on our comments as it fails to summarize the actual adverse impacts accurately.

P.12, para. 3: Some discussion needs to be provided regarding the reasons for selecting the PA boundaries. There are probably 20+ sections of land at the north end of the PA that are either open space or very low density rural living uses. As they currently exist and as proposed in the City's General Plan Update, these lands are unlikely to ever require City services. The only ostensible rationale for incorporating them in the City PA is to give the impression that the City is making a "big" commitment to open space when in fact it really is not making such a commitment. The same could be stated for the Open Space area along the Mojave River. This area will be retained for open space uses for both biological habitat and flood control purposes. It will never require City services and its incorporation in the PA seems suspect.

This paragraph addresses current efforts to revise spheres of influence and a City comment regarding this proposed revision. It glaringly fails to summarize the current status (existing environmental conditions for land use) of "decisions" already made by LAFCO which placed George Air Force Base into the City of Victorville's Sphere and approved annexation to the City. These issues may still be in litigation, but according to the CEQA, Paragraph 21167.3, in the absence of an injunction, the project should be presumed to comply and the project can proceed at the "applicant's risk pending final determination of such action or proceeding." In essence, the land uses adopted in the City of Victorville's Specific Plan and the Interim Airport Operating Plan being implemented by the Victor Valley Economic Development Agency constitute the "existing environment" from which impact forecasts must be made for all uses of the Base included in the General Plan Update.

Further, the EIR is inadequate and inaccurate for not summarizing the existing situation and evaluating the environmental consequences, including the social and economic consequences, of attempting to alter the existing environmental circumstances, including the use of Redevelopment Funds that may not be available to meet the 20% set aside for low income housing and other required uses. The steps that must be undertaken to obtain control of the Base, which as noted above must be presumptively concluded to be in the City of Victorville's Sphere of Influence, and the environmental consequences of these changes, many of them potentially significant, have been ignored in this EIR.

P. 12, para. 6: The comment regarding future projects being included in this EIR applies again to the statements in this paragraph. For instance, based on a complete review of the EIR, no evaluation of surface mining plans is provided in this document, particularly issues such as air quality, noise and land use compatibility. The section which purports to evaluate mineral resources, utterly fails to mention mineral resource exploitation impacts in the impact section. See page 94. Whenever this comment is made it must be qualified by the requirements of the CEQA which mandates that sufficient data be contained in the EIR to justify evaluating future projects (this document is wholly inadequate in this area) and must perform independent reviews of projects in the future.

P. 15, para. 4: The City uses a 20-year planning horizon for making one set of impact forecasts, but the City is not relieved from evaluating all direct and indirect consequences of the whole project, which is full implementation of the General Plan Update in the future over the whole 80,000 acres. In many instances, pointed out below, the impact analysis addresses only the 20-year planning horizon, and not the actual build-out of the Update. The whole of the project must be evaluated as stated in the State CEQA Guidelines, "'Project' means the whole of an action, which as potential for resulting in a physical change in the environment, directly or ultimately..." The whole of this project is the PA established by the City of Adelanto and it must identify the existing environmental setting (resources) for the whole PA and forecast all of the environmental consequences of implementing the General Plan Update with the identified land uses based on the "relevant information" available. This EIR fails to meet this "substantial evidence" test on the whole and for specific issues being evaluated.

P. 16, para. 6: As noted above, since incorporation of George AFB into the City is highlighted as a City Goal, it must evaluate all the actions and consequences of these actions required to achieve this goal. This issue cannot be ignored since the circumstances surrounding this goal are exceptional. The consequence of making this a component of the General Plan Update project is that the City of Adelanto must examine the environmental consequences of all actions required to achieve the goal. This must include possible physical effects on the City from expending funds for litigation, replacing the existing land use designations with those proposed by the City, and evaluating the impacts of the City's proposed use of the Base relative to the existing facilities and activities being conducted at the Base. The impacts to adjacent cities of disbanding VVEDA and of modifying recently adopted legislation (AB3755) which designates VVEDA as the reuse agency for George Air Force Base also need to be considered. None of this information is included in the EIR and this is a critical deficiency that must be corrected before an accurate picture of environmental consequences of the General Plan Update can be presented to the City Council in making its decision on the Update, or the merits of excluding the Base from the Update.

P. 16, para. 7: It is essential that Goals 1 and 7 (see page 17) be measured relative to the existing environment to inform the public about the consequences of implementing these goals relative to existing environmental conditions. These goals have impacts as outlined in the previous comment that relate to including the Base within the PA while it is being managed under the City of Victorville's jurisdiction.

P. 19, para. 5: As we understand it, the County no longer has a functional Airport Land Use Commission. What Airport Authority? Does such an authority exist? If not, how is it proposed to come

into being? What changes in the environment, including land use jurisdictional changes, must come about for such an authority to be created?

P. 20, ADD 1: This policy must be measured against the existing land use designations, the existing Interim Airport Operating Plan, and existing activities at the airport. No existing setting data on these factors has been provided in this document and no evaluation is provided.

P. 21: ADD 3, AP 1, AP 2, AP3 goals and policies all require evaluation relative to the existing environmental setting at the Base. No data or evaluation is provided in this document.

P. 22, para. 3: In the next to last line change the word "relievers" to "receivers". We doubt if the Maverick relievers are on the list for Section 8 certificates.

P. 26, CIR 5: This policy must be measured against the existing land use designations, the existing Interim Airport Operating Plan, and existing activities at the airport, as previously noted.

P. 26, CIR 9: This policy must be measured against the existing land use designations, the existing Interim Airport Operating Plan, and existing activities at the airport, as previously noted.

P. 31, bottom: The previous comments regarding applicability of this EIR to future projects applies again to the discussion beginning on the bottom of this page and ending on the next page.

P. 32, bottom: The project description is more notable for what it does not contain than what it does contain. The project is the adoption and implementation of a new General Plan Update document. This document is intended to establish development policies which are described, but their potential for altering the environment is not described. More importantly it establishes the future land uses that will replace the existing land uses. The distribution of these land use designations is not shown or discussed in the text. The distribution of existing land uses and the potential changes that will result if the General Plan Update is adopted are not provided or discussed. The existing land use designations, including those for land outside the City limits, have not been described or displayed in this document. Finally, the specific intensity and/or type of development allowed under each land use designation has not been described in detail or in summary. Without this information it is impossible to forecast adverse impacts because the level of impact that could occur from implementing those land uses allowed in the General Plan Update cannot be compared to any existing setting. It is therefore impossible to make a meaningful forecast of impacts of the proposed project (the Update), let alone any future projects that may be considered in the future. Therefore, we submit that this EIR contains inherent fatal flaws that cannot be corrected in responses to comments, but must be addressed in a completely revised EIR that contains adequate information to make a forecast that meets the requirements of Sections 15144, 15151, 15378, and 15384 of the State CEQA Guidelines. Fundamentally, the project description is fatally flawed and this failure affects all subsequent sections of the EIR, making them inherently inadequate because no forecast is made of impacts from implementing the proposed project relative to the existing land uses and land use designations.

P. 35, para. 1: It is standard for the seismic and geologic hazard environmental setting section of a general plan EIR to address not only faults, but maximum probable and credible seismic events on relevant faults and then forecast the level of groundshaking that can occur if either of these

events occur during the life of the plan. None of this information is provided in any professional manner. Further, the potential for mass wasting, liquefaction, erosion, and other geologic/soil hazards is not identified in this environmental setting discussion, nor is it in the General Plan Update data. Without this information, for the whole planning area, the City cannot responsibly or substantively evaluate the seismic or geologic hazards impacts of the proposed land uses. Similarly without comparing the proposed uses to the existing on-the-ground and designated uses, no impact forecast can be made with any informative content.

P. 35, para. 2: There are good geology and soil reports available for the Victor Valley. No existing environment data is provided in this discussion on the geology and soils found in the area underlaying the PA. Again, without any data on the existing environmental setting it is not possible to make a meaningful impact forecast that withstands the substantive evidence test.

P. 35, para. 3: The impact forecast in this paragraph could have been written for any location in southern California. It does not contain any data regarding those seismic and other geologic hazards that may exist within the Update PA. Further, it assigns full mitigation to the Unified Building Code (UBC) seismic requirements. There is no data presented that shows the UBC seismic design requirements are adequate to address all of the seismic and geologic hazards within the Update PA, if for no other reason than we are not informed of the level of groundshaking by a qualified professional or registered engineer or geologist and what level of protection is provided by the UBC. Fundamentally, there is no evaluation of factual information and none of the conclusions in this impact assessment are substantiated with any factual data. The validity or inaccuracy of the conclusions cannot be tested by a reviewer because of the paucity of data. Again, as previously stated, the conclusions in this section are unsubstantiated and are not the product of any "best efforts to find out and disclose all that it [Adelanto] reasonably can." (Section 15144 State CEQA Guidelines) No evaluation is provided of the quality of soil resources, the soil resource constraints, or the effect of implementing the Update on the soils in the project area.

P. 35, para. 4: This paragraph contains a number of falsehoods and hyperbole that is inappropriate in an EIR. For example, awareness of seismic hazards does not reduce hazards; the hazards remain the same; awareness increases the ability of the community to deal with consequences of hazards after they occur. Awareness is not mitigation for geologic hazards. It is exaggeration, at a minimum, to state that modern seismic design and construction creates a "positive environment" for the total community. Modern seismic design and construction can reduce the impacts of exposure to seismic and geologic hazards, but it cannot turn an absolute negative impact to the community into a positive environment. After a severe earthquake no one in Adelanto is going to go around and say what a positive experience it has been. This type of editorializing has no place in an EIR and is indicative of the content of much of the remainder of this document which continually attempts to temporize regarding the severity of adverse environmental impacts.

P. 36, para.1&2: The figures identify major faults, not the type and level of earthquakes that may occur and the level of groundshaking to which various portions of the City may be exposed. No soils data is presented. No evaluation of erosion sensitivity of the soils is presented. No data on potential subsidence from ground water withdrawals is provided.

P. 36, para. 4: The region may have been subject to general subsidence from ground water extractions. This conclusion is not validated. Erosion is common throughout the City and many of the soils identified in the Soil Conservation Service study for the Victor Valley are highly erosive. The susceptibility to erosion is ignored, both existing conditions, susceptibility, and future potential for both wind and water erosion.

P.36, para. 5: The City knows that soils are contaminated on the Base which is a part of the project. Further, existing soil contamination data should have been obtained from the County and RWQCB. Data on the landfill contained within the City's boundary to the north should also have been summarized. This is a shoddy attempt to treat the issue generically rather than provide a best effort at obtaining and summarizing soil contamination data for the City to allow a potential impact forecast in terms of constraints.

P. 37, para 1: The potential liquefaction areas are discussed in the text with no basic data to support the discussion and then are not shown on the referenced map, Figure IX-2. Again, the lack of a good geologic and soil evaluation by a qualified engineer or geologist prevents the City from being able to make any meaningful impact forecast for geology and soil impacts. Further, no discussion of the susceptibility of particular land uses to geologic and soil constraints is provided in this document. This is an essential component of making an impact forecast between the existing geology and soils environment and current land use designations and the proposed land use designations.

P. 38, bottom: As might be expected when no impact analysis is performed, it is "easy" to make a finding that the potential adverse impacts can be reduced to nonsignificance. In fact, there is no evaluation of the degree to which the various mitigation measures reduce impacts to and from geology and soil resources. No discussion is provided on removing many tens of thousands of acres from productivity and converting them to only one use, building or infrastructure support. No evaluation is provided regarding the adequacy of UBC design measures to control the impacts to structures constructed under various land use designations because the EIR does not present any information regarding the maximum size, height, and seismic design requirements. No discussion is provided as to the degree or effectiveness of mitigation that would be achieved by each of the measures listed for the geology and soils issues. Many of the mitigation measures are not actual measures. For example, encouraging strengthening of facilities requiring upgrading does not provide any mitigation. It is simply wishful thinking. Requiring studies without specifically requiring them to address specific problems and mandating implementation of these measures results only in a study, not mitigation. Finally, no evaluation of the potential impacts from implementing mitigation measures has been provided in the text. For example, if standard grading practice in the City (City Grading Ordinance) requires mass grading, it can result in significant fugitive dust emissions as graded and denuded property sits undeveloped. The EIR makes a mockery of the requirement to provide "enough relevant information" to make a fair argument regarding geology and soil impacts.

P. 43, para. 2: This section must discuss the current nonattainment designations for PM_{10} in the Victor Valley portion of the SEDAB. The referenced material is approximately three years old and does not reflect the current environmental setting as assigned to the project area. This factor has very significant implications for air quality impact forecasting for the proposed project.

P. 44, para. 1: The description of the existing air quality setting totally fails to address the other key issue (aside from actual ambient air quality in the Victor Valley) that must be included in the EIR in order to make an impact forecast. That is, a description of the existing land uses, existing stationary source permits for the City and PA, an estimate of the existing mobile source emissions from existing uses, and an estimate of the potential emissions from the land uses designated within the currently adopted General Plan. As previously noted, it is not possible to make an impact forecast with any meaning without such data. These emissions should then be compared to total emissions within the MDAQMD or Victor Valley portions of the SEDAB to get a relative feeling for the City's contribution to total emissions, and indirectly to the air quality violations that occur within the region.

P. 44, para. 3: The first sentence is exactly the type of editorial comment that misleads the public and decision-makers regarding air quality impacts. Without an actual quantification of the air quality budget for both the City, Victor Valley and the whole MDAQMD, it is impossible to make a conclusion regarding the significance of air emissions from the existing City activities, or from the allowable uses under the existing General Plan.

P. 44, para. 4: The referenced tables are essential to understanding the air quality impacts, regardless of the actual validity. These tables have been prepared without any consideration to the type of uses that would be permitted in the City. No background data are provided to justify the assumed electricity consumption for each use, assumed natural gas consumption for each use, assumed trips and VMT for each trip, and the emission factors used for Table VII-5. Here is an example of the worst kind of impact forecast. The tables essential to understanding the impact, two pages worth, are left out of the EIR and the reviewer who cannot obtain a copy of the General Plan Update, is forced to accept the validity of these numbers, even though they are unsubstantiated. The reviewer who obtains a copy of the General Plan Update and who reviews these tables finds that no back-up data are provided to independently validate the values used. Further, the EIR and General Plan Update documents do not contain any detailed discussion of the type of uses permitted under each land use district to verify that the emission forecasts have any inherent conservatism (worst-case) forecast.

Another insult to the reviewers intelligence is that the total emissions from build-out of the General Plan Update is totally ignored in this document. No data, tables or other information is provided. Finally, the data presented is just the quantified emissions with no context other than the thresholds. Logic would require that the potential emission in the year 2014 would be compared to the emission thresholds for meeting air quality standards contained in the AQAP. This is not done; therefore, the data are meaningless. Annual emissions are not even quantified and compared, or identified. Without the General Plan Update how is one to know what type of emissions produce 63 tons per day or 188 tons per day. And on an annual basis 188 tons per day equates to 68,620 tons per year, which gives a wholly different scale of significance relative to the 25 ton per year threshold. It is about 2,745 times the threshold.

The final insult is that the impact forecast totally ignores PM_{10} emissions from the activities that generate fugitive dust. These activities include construction, driving on dirt roads, OHV play on the land, and other activities. This lack of any PM_{10} evaluation makes the document totally inadequate.

P. 44, para. 5: This paragraph appears to provide excuses for airport emissions, rather than evaluating the potential adverse impact. The City failed to provide any modeling or overall context for understanding the City's future contributions to ambient air quality. In this instance the City appears to have deliberately avoided providing data that was contained in the Closure and Reuse EIS for George Air Force Base. That study indicated that concentrated emissions associated with aircraft operations could cause a localized violation of the NO_x standards. The Interim Airport Operating Plan flight levels, which were dramatically lower than that envisioned in the City's General Plan Update, indicated the NO_x standard might be exceeded and that emission offsets could be required, although just marginally. Comments from the City of Adelanto on that EIR essentially asked the VVEDA where they would get offsets. A minor quantity of offsets are available from Emission Reduction Credits from George's closure that can offset VVEDA proposed airport operations. However, no such emission offsets are available for the City's proposed level of airport operations. The Update EIR does not contain any evaluation of these modeled impacts and the means of reducing potential NO_x air quality violations. This is a gross oversight in the EIR that will need to be corrected and based on data available it will indicate a new significant impact for which no mitigation is available. Thus, under the City's proposal it could subject its citizens living near the airport and the citizens of surrounding cities to a new, significant air quality violation.

P. 46, bottom: As in the case for soils and geology, there is no evaluation of the degree to which the various mitigation measures reduce impacts to air quality resources from the first 18 mitigation measures proposed for the project. No discussion is provided of the degree or effectiveness of mitigation that would be achieved by each of the measures listed for the air quality issues. Many of the mitigation measures are not actual measures. For example, encouraging use of support facilities in office complexes does not accomplish any mitigation. It must be required. Requiring air quality studies without specifically requiring them to address specific problems and mandating implementation of these measures only obtains a study, not mitigation. Finally, no evaluation of the potential impacts from implementing mitigation measures has been provided in the text. For example, if standard water practice requires consumption of large quantities of water, what would be the impact. The purpose of evaluating the impacts of implementing mitigation measures is to provide the decision-makers with information regarding tradeoffs between different environmental impacts associated with different environmental media. Using water to control fugitive dust causes water resource impacts and transport to the VVWRA plant to obtain treated effluent for water spraying causes additional combustion emissions. The EIR probably makes a correct conclusion regarding the unavoidable significant impact to air quality resources from implementing the General Plan Update, but it totally fails to present the totality of these impacts or to place them in any meaningful context for decision-makers to weigh the environmental consequences of the Update relative any perceived benefits. The air quality section of the EIR is totally inadequate as presented; the conclusions presented are unsubstantiated; and the EIR fails to address all of the pertinent air quality issues that must be addressed, including aircraft impacts on ambient air quality from the proposed airport operations in the Update, fugitive dust, and the build-out scenario.

P.52, para. 1&2: The discussion on surface water and drainage does not provide the basic information required to determine whether the project will have significant surface water and drainage impacts. The "Setting" description is a sales pitch about the regional storm drainage plan and flood hazards in general. Again, no specifics are provided for the PA. This document

fails to identify the existing natural and man-made surface runoff channels. The EIR does not describe the volumes of existing flows throughout the PA when surface runoff occurs. It does not provide any information on those areas within the PA that are currently exposed to flood hazards under standard flood evaluation criteria, such as 100-year floods or the Corps of Engineer's standard project flood for the area. No information is provided on the level of runoff that would be anticipated under the existing General Plan land use designations. The existing setting discussion utterly fails to provide the information essential to forecasting how the General Plan Update will modify conditions.

P.53, para. 3&4: These paragraph are a continuation of the existing environmental setting; it does not describe adverse impacts attributable to the proposed project. The same can be said for the final paragraph on the page.

P.54, para. 1&2: A generic statement in the EIR indicates that portions of the project area will be subject to flooding when it rains heavily or that urban development will increase runoff. The purpose of the General Plan Update and the EIR must be to state what areas will be subject to flooding; what volume of flood flows are expected; what type of channel will be required to handle the flood flows; what land uses may be exposed to flood hazards; and how implementation of the Update land uses will alter flows and the facilities required to handle such flows. The key issue being ignored in this impact forecast is quantitative data. For example, if the natural flows can be handled within the undeveloped channels that currently exist the impact of flooding is nonsignificant. But, if a several hundred foot wide maintained flood channel must be constructed to control flood hazards for downstream flood sensitive land uses because of development allowed or facilitated by the General Plan Update, then the indirect impact of loss of biological habitat must be taken into account as part of the adverse impacts of the project. The surface water/flood impact analysis contained in these two paragraphs is totally inadequate. It does not provide any quantitative data that is normal and considered essential to understanding flooding and surface water impacts of adopting and implementing the Update EIR.

P.54, para. 3&4: It is beyond reason that this document concludes that "Paving and development will increase the volume of good quality storm water runoff." Runoff from natural areas does not contain any man-made pollutants. The sediment load is about the only natural pollutant and it is not adverse, since it forms the alluvial fans that underlay the City. Roads and urban development cause nonpoint source pollution that can severely degrade surface water quality. The evaluation of urban runoff impacts on water quality in these two paragraphs totally fail to characterize the issue. Further, the failure to discuss the status of surface water quality in the area under the existing setting makes it impossible to provide a meaningful impact forecast for surface water quality impacts. To provide such a forecast the City needs to confer with the RWQCB in Victorville and determine the status of current nonpoint source pollution and related water quality. Then, using some factoring based the amount of increased land under each land use designation, the City needs to make an impact forecast based on semi-quantitative or quantitative data. The use of retention/detention basins to control storm runoff and water quality has to be implemented very carefully; otherwise it can result in creating a sump where pollutants collect and cause adverse health impacts or water quality degradation. This is an instance where mitigation may result in worse impacts than the impact itself and such sumps need to be carefully examined and appropriate management plans implemented before such mitigation is implemented.

P.55, para. 1: The nonpoint source pollution from residential areas is ignored in this paragraph. Given the requirement for Industrial NPDES surface runoff permits, the greatest potential water quality impacts to ground water resources may be from residential area.

P.56, para. 7: Deferring the drainage study for the General Plan Update as a mitigation measure contradicts the recent case law regarding the City's obligation to fully evaluate and describe all potential adverse environmental impacts. Such deference to the future is a violation of CEQA. In *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296 [248 Cal. Rptr. 352], the agency asserted that it could rely on future mitigation to address potential impacts on the environment. However, the court held that the agency could not defer its CEQA obligations by relying on other agencies. By failing to present data essential to the impact forecast and then identifying only generic mitigation associated with future studies, the public has been deprived of its opportunity to peer review the potential impacts and the mitigation measures required to reduce impacts below a significant level. The impacts from constructing drainage facilities, both direct and indirect, and the feasibility of mitigation of these build-out drainage improvements must be made available in the current EIR and not deferred to the future. The potential environmental consequences are potentially significant and must be addressed in a revised EIR.

P.57, para. 2: Please refer to the comment above. How does a Detention/Retention basin and treatment facilities mitigate water quality impacts? Has any thought been given to the cost and to the adverse consequences of operating such facilities? This is not a simple measure to implement and could result in more adverse impacts to the environment, depending on the nature of pollutants. Treatment as source of generation is the preferred method, but this does not address nonpoint source pollution.

P.58 The conclusion that surface runoff, flood hazard and water quality impacts can be mitigated below a significant level is not justified based on the information presented. It is simply an unsupported assertion as demonstrated above in the discussion of the lack of quantitative data regarding surface runoff, increases in surface runoff from future development, and degradation of surface and ground water quality. The water resources section of the EIR needs to be completely revised and incorporated into a revised EIR for additional peer review.

P.62, para. 3: This paragraph addresses uses in a riparian corridor and potential future development which mixes the impact discussion with the existing setting. Aside from being confusing, there is no basis for discussing the these impacts and mitigation measures in this section.

P.63, para. 1: It is impossible to evaluate the value of natural drainage courses that will remain since no data are provided to identify the channels that will remain. Without making the forecasts of surface runoff after development (both the interim (2014) and build-out) it is not possible to assess the impacts to natural channels. The EIR must be expanded to address these issues, beginning with adequate forecasts of runoff into these channels.

P.63, para. 6: The desert tortoise has been listed as Threatened after the emergency listing ran its course.

P.67, para. 1: The existing setting for biological resources is totally generic, i.e. the location of the various plant communities and wildlife habitats have not been defined within the PA. Combined with the lack of a description of the existing land uses in the PA (including open space),

and an estimate of the potential area encompassed by the land uses designated within the currently adopted General Plan, an inadequate environmental setting has been identified for making an impact forecast. As previously noted, it is not possible to make an impact forecast with any meaning without such data. These biological resources, particularly sensitive or listed resources, need to be compared to the existing resources within the Mojave Desert. Without such a data base the EIR cannot provide an adequate evaluation of biological resource impacts.

P.67, para. 2: As noted at the beginning of these comments, it is not clear why the City is including open space in the northwest portion of the PA because it is already designated at such low density that it cannot be developed. Further, those areas within flood control boundaries and power line easements will be disturbed by maintenance for surface runoff and by off road play because they have access roads to them. Therefore, the overall habitat value of these areas will be diminished, perhaps significantly. Since these areas do not require urban services, the basis for including them (the northwest, northern, and eastern boundaries of the PA) in the PA appears to be only to provide open space within the City to offset the 72,000 acres of proposed development. No evaluation of allowable uses in the formal open space is provided because the allowable uses have not been identified. Therefore, no evaluation of conflicts with the biological resources in open space area and within surface runoff and power easements is possible. Such areas may provide some value for human recreation, but it is doubtful that it will serve as a high quality natural ecosystem.

P.67, para. 3: The City identifies substantial consumption of water resources out of the River. The potential impact from these extractions is not addressed in the EIR. Potential increases in water consumption can draw down the water table within this corridor and adversely affect significant wetlands and wildlife habitat.

P.68, para. 5: Without any analysis the text in this paragraph concludes that there are actions which can reduce plant community impacts below a significant level. After reviewing the mitigation measures, this conclusion is based on relocation of certain sensitive plants and animals. Some plants can be relocated, but most Joshuas cannot be relocated because they are too large. Further, the project provides no evaluation of the amount of habitat that will actually be eliminated by the proposed project and the loss of wildlife associated with elimination of this habitat. It is unlikely that the loss of many tens of thousands of acres of habitat relative to the existing developed area within the PA can be considered a nonsignificant or mitigable biological resource impact. The conclusion appears in error, and it is not based on any factual evaluation of impacts to biological resources. The conclusions presented in the EIR are unsubstantiated and based on no analysis of actual biological resources.

P.69, para. 1: Tortoises cannot be relocated at present because of the potential to spread upper respiratory tract disease and because it has not yet been shown that tortoises can be relocated without adverse impacts on the populations where they might be relocated. Assuming that biological resources can be relocated without adverse impacts is an incorrect assumption contained in this document, and further invalidates its conclusions. Both tortoise and Mojave ground squirrel impacts will be so great from implementing the General Plan Update, that it appears impossible to mitigate these impacts below a significant level.

P.71, para. 1: As a side comment, "anadromous" fish are those which swim up a river or stream, usually from the ocean. Do not expect any such species within the PA.

P.71, para. 3: The conclusion that biological resource impacts can be mitigated below a significant level is not justified based on the information presented. It is simply an unsupported assertion as demonstrated above in the discussion of the lack of quantitative data regarding the location and acreage of each habitat, the actual loss of acreage caused by the proposed project, the listing of inappropriate or unimplementable mitigation. The biological resources section of the EIR needs to be completely revised and incorporated into a revised EIR for additional peer review. Based on a cursory review of the data, it appears that the loss of biological resources, particularly plant communities, wildlife habitat, and listed species, attributable to the proposed project must be determined a significant adverse impact.

P. 73, para. 3: There is no aircraft activity at the Base and the representation of this noise as an existing setting condition is incorrect.

P. 73, para. 5: The noise setting is fatally flawed in the same manner as the previous sections of the EIR. As part of the General Plan Update, the City is required to prepare existing noise contours to be used in forecasting future noise contours, primarily along major roadways, but also in areas of high noise. The City cites general noise levels for certain activities, but does not provide any specific noise data for the PA based on empirical noise readings or modeling of existing activities. As previously noted, it is not possible to forecast adverse impacts if the current data base has not been established for the existing environmental setting, or the noise setting of the current General Plan designations.

P.74, para. 1: If construction activity is continuous, as it should be based on the scope of the General Plan, the short-term noise impacts are potentially significant within the community as a whole. The EIR fails to address the scope of the construction noise impacts, particularly in relation to sensitive noise receptors, over the life of the project.

P.74, para. 3: Figure VIII-2 is undecipherable. In addition, the EIR does not provide a description of the land uses that may be exposed to noise levels. Mitigation through relocation of incompatible uses is suggested, but only if the City controls the airport. CEQA does not allow the City to ignore mitigation for areas that might be affected by airport activities, regardless of who operates the airport. The City is responsible for addressing mitigation within its boundaries regardless of who owns and operates a future commercial airport. Therefore, the City is obligated to make available those measures that will reduce noise impacts below a significant level. As previously noted, the environmental setting is identified in both the Interim Airport Operating Plan and the VVEDA Redevelopment Plan. It is incumbent upon the City to evaluate this alternative, and if mitigation will be required to identify those measures that can be implemented to reduce those impacts. This is an obligation under CEQA and to the citizens of the City of Adelanto that cannot be passed off because the City does not control the airport. When this issue, which has been totally ignored in the EIR and the General Plan Update, is addressed, it should be considered in a revised EIR made available to the public for peer review.

P.75, para. 1: What uses exist or are proposed in the noise impact area that might be incompatible with the airport activities? The EIR does not provide any data of what conflicts or

incompatibilities will occur under any of the alternatives considered in this EIR. This data needs to be provided in order to provide an adequate evaluation of this issue in the EIR.

P.75, para. 2: Please refer to the discussion on page 74, paragraph 3. The EIR does not forecast specific noise levels adjacent to major noise sources, except the airport. Only generic data are provided. Each major thoroughfare must be analyzed and the uses along that thoroughfare evaluated for potential adverse impact based on the adjacent uses. This is not possible because the project does not provide adequate data to evaluate the impacts. It may not be possible to avoid all exposure to conflicting noise levels and the EIR does not provide sufficient data to make a determination on this issue.

P.75, para. 4: This paragraph launches into a discussion of mitigation measures without describing the impacts that require mitigation. This contradiction needs to be rectified by first providing all the quantitative noise data and then determining whether mitigation measures are actually available to reduce potential noise impacts below a significant level. Insufficient data is available to make such evaluations and conclusions in this EIR.

P.76, para. 5: The information provided for both industrial and construction noise is all qualitative. It does not provide the quantitative data required in the General Plan and EIR and no evaluation of potential conflict areas between industrial areas and noise sensitive uses is provided in the EIR. Because no analytical data are provided, no forecast of noise impacts is possible. The EIR is inadequate in describing noise impacts and must be substantially augmented before an adequate depiction of noise impacts will be possible.

P.81, para. 4: A wealth of mitigation measures are described in the EIR for noise issues, but without knowing where noise will occur, what noise levels will be generated, and what adjacent land uses are, it is not possible to determine the effectiveness of the proposed mitigation measures. It is not possible to quantify or estimate the degree of noise mitigation that can be achieved by these measures, and it is not possible to make a substantive conclusion regarding the level of adverse noise impact after mitigation is applied within the PA. As previously noted, measures identified as providing mitigation do not adequately mitigate impacts (requiring noise attenuation features where feasible) and no evaluation is provided of what the consequences would be of providing such noise attenuation features. Again, the tradeoff issue is ignored and the effects of such tradeoffs are ignored in the EIR, thereby depriving the decision-makers of information needed before they can make a fully informed decision.

P.82, para. 1: The environmental setting ignores actual lighting levels within the PA. Unsupported statements regarding light levels in undeveloped areas of the PA are not supported with any substantiation. The light levels within developed areas, where lighting can be perceived as an impact, are ignored. No thresholds are established as to what is potential significant light and glare and what is not. Thus, the existing setting for lighting does not provide a basis for making any impact forecast and this evaluation is inevitably inadequate.

P.82, para. 2: The primary light and glare concerns are defined, but no impact analysis is provided in this section. The document completely fails to provide the essential light and glare impact forecast for the proposed project, i.e. the land uses permitted by the General Plan Update. The mitigation measure provided at the end of the page cannot be evaluated since no impact data are available and the whole analysis is inadequate to make any impact

determination. This section of the EIR must be totally revised to incorporate actual data for the current light and glare conditions and an evaluation of how the proposed project will alter these circumstances.

P.88, para. 4: None of the discussions of proposed land use designations provide sufficient information regarding intensity of uses, the allowed uses and those uses that are permitted with a conditional use permit. In essence, for many of the land use designations, industrial uses for instance, certain uses can cause much greater impacts than others. No information is provided on such specific uses and which uses have been used to make impact forecasts for such issues as air quality and traffic. For instance, a manufacturing plant will have much greater air emissions and many more employees that will a warehouse that is mostly used for storage. None of these factors have been incorporated into the existing land use description for the PA or into the impact forecast for the Update land uses within the PA. The Specific Plan Area which surrounds the Base is totally devoid of any designations and it would appear to be impossible to make any impact forecasts based upon this designation. Because of these deficiencies in the environmental setting and the lack of data on existing land use designations, it is not possible to make any valid impact forecasts.

Land use impacts are not only significant when they are inconsistent with existing plans; they are also significant when land use patterns, which have not been evaluated, create conflicts between adjacent uses. Note that the proposed uses have not been evaluated relative to the existing and planned uses for the project area. However, it is clear that the City of Adelanto's proposals for the Base are inconsistent with the existing land use designations under the City of Victorville's Specific Plan and the VVEDA Redevelopment Program. This issue has been totally ignored in the EIR and must be included in a revised EIR on this topic. Further, the specific plan designation and the airport development district conflict with existing land use designations. These are only two examples of inconsistencies, and without a more detailed evaluation in the EIR, it will not be possible to determine the total extent of inconsistencies within the City. The inadequacies noted for this section are consistent with those found in all the previous sections.

P.94 As in the case of noise, a wealth of mitigation measures are described in the EIR for land use issues, but without knowing potential land uses versus existing land uses and without access to an evaluation of potential land use incompatibilities, it is not possible to determine the effectiveness of the proposed mitigation measures. It is not possible to quantify or estimate the degree of incompatibility that can be mitigated by these measures, and it is not possible to make a substantive conclusion regarding the level of adverse land use impact after mitigation is applied within the PA. As previously noted, measures identified as providing mitigation do not adequately mitigate impacts and no evaluation is provided of what the consequences would be of providing such land use mitigation. As before, the tradeoff issue is ignored and the effects of such tradeoffs are ignored in the EIR, thereby depriving the decision-makers of information needed before they can make a fully informed decision.

P.95, para. 2: Mineral resource locations need to be identified on maps so the potential land use conflict issues can be addressed. No data are provided on this topic in the EIR. What mineral resources exist within the ADD area that could be developed and what type of mining and processing activity would be required to utilize such resources. Mining can be compatible with the airport, but that depends on the type of mining activity and the types of emissions

associated with such activities. This data is not provided and it will be needed in order to evaluate potential adverse environmental impacts.

P.95, para.3&4: The setting discussion indicates that mineral resource impacts would be evaluated in the impact discussion, but this issue is not even addressed. The document fails to provide an adequate evaluation of potential adverse environmental impacts related to mineral resource use within the PA. No impact analysis, beyond the most generic type of forecast, is possible without providing the data identified in the previous paragraph.

P.97 The conclusion regarding adverse natural resource impacts has no basis in fact because no facts are provided to support such a conclusion. No estimate of the quantity of renewable or nonrenewable resources that might be consumed in implementing the General Plan Update is provided and no discussion of mineral resource impacts is provided in any case. The no adverse impact conclusion needs to be reevaluated with sufficient data before any conclusion can be reached and such data needs to be included in a revised EIR circulated for additional public review.

P.98 The risk of upset evaluation also does not contain any substantiating data for its conclusions. There is no discussion of the type of land uses that would be permitted under those land use designations that might use materials that could create significant risks of upset. The programs for managing such materials and controlling such risks, it is not possible to make a forecast of the level of potential risk without a detailed risk assessment based on the types of uses that would be permitted under the General Plan Update. The impact evaluation, the effectiveness of mitigation, and the impact conclusion for risk of upset are not substantiated and need to be totally revised in order to provide an adequate set of information to the decision-makers.

P.99, para. 3: No discussion of the population allowed under the existing General Plan land use designations is provided in the setting section. This information is needed in order to compare the proposed project to the existing General Plan circumstance.

P.100: The impact analysis does not place the potential population growth under the General Plan in an context for evaluation. Specifically, the SCAG Growth Forecast for the region is not discussed and the project's forecast growth relative to the Forecast or relative to the previous General Plan is not described. Further, the adverse impact of the forecast population growth is not accurately analyzed. All of the significant adverse impacts of this project, air quality, water resources are dependent upon the population growth that would be enabled by the proposed General Plan Update. Thus, population is indirectly tied to already identified significant adverse impacts which cannot be avoided. Under this circumstance it is incorrect to assume that the population impacts are nonsignificant since they indirectly contribute to these significant impacts.

P. 103: The cultural resources evaluation also does not contain any substantiating data for its conclusions. Although specific locations of known cultural resources should not be published, it is possible to identify such resources by general locale on maps. Then it would be possible to compare potential cultural resource sites with the type of land uses that would be permitted under the General Plan Update. An impact forecast would then be possible and if significant, unavoidable cultural resource impacts could occur, the information could be provided to the decision-makers. As the EIR is written, it is not

possible to make a forecast of the level of potential cultural resource impacts based on the types of uses that would be permitted under the General Plan Update. The impact evaluation, the effectiveness of mitigation, and the impact conclusion for cultural resources are not substantiated and need to be totally revised in order to provide an adequate set of information to the decision-makers.

P.105, para. 2: The nomenclature used in this description is somewhat unusual. State Highway 58 is located ten miles north of the City's PA which seems slightly more than "just north" as stated in this paragraph.

P.106, para. 4: This is one of the few issues where some data are provided for evaluation of impacts. Figure V-1 in the General Plan Update provides some road capacity data. However, no information on intersection performance is provided in this analysis. Further, there is no description of the overall circulation system contained within the existing General Plan.

P.108, para. 5: The impact forecast for the year 2014 is based on assumptions beyond the control of the City. First, airport traffic impacts are based on control of the airport which does not exist at this time and therefore, it cannot be supported by any rational assumptions. Second, there is no basis for assuming that a high speed rail system will be available to serve the area. This facility is completely speculative as the rail system is not contemplated by any agency and the impacts from constructing such a rail system would be a significant impact in its own right. An appropriate traffic impact forecast, by a qualified engineer, would require a conservative analysis that would not include any circulation component that could not be funded and developed by the City alone and such a rail system a major undertaking that is beyond the financial capability of the City. It is probably unreasonable to assume that the 395 Freeway will be in place prior to the year 2014. Again, no schedule is in place for constructing this freeway and the impact forecast should be based on facilities that the City can fund.

The impact forecast relies upon traffic generation rates that have not been validated for all of the proposed land use designations based on the uses allowed under the General Plan Update. The traffic impact forecast does not provide any evaluation of the build-out scenario and the road system that will be required when the Plan Update is fully implemented. Based on these reasons alone, the traffic impact evaluation is not adequate and probably reaches an inappropriate conclusion regarding the significance of future traffic impacts. Another issue not addressed is the Adelanto contribution to regional transportation system which was identified as being an essential component of Adelanto's future. Some evaluation of trips on Interstate 15 and on State Highway 58 should be provided in the revised EIR.

P.109, para. 1: Table V-5 of the General Plan Update fails to take into account trips generated from commercial and industrial facilities and the loading they would place on the local roads. It appears from the way that the data is presented that about 76% of the total traffic generated locally is not accounted for on the future (year 2014) circulation system in the PA. This error would result in a significant under estimate of potential impacts to the City circulation system.

P.110, para. 3: The data presented in the tables and figures simply provides numbers, it does not provide any evaluative data for peer review and it does not provide any analysis of road segment

impacts (levels of service) or intersection analyses to genuinely ascertain the adequacy of traffic flow on the PA circulation system proposed in the General Plan Update.

P. 114: The previous sections of the EIR discuss different levels of adverse impact under several different scenarios. Since the City cannot fund all the necessary improvements, it has no choice but to conclude that the propose project has potential to cause a significant impact on the future circulation system in the PA. Further, the EIR did not evaluate the future population levels relative to the circulation system without these improvements. Therefore, the analysis of circulation system impacts must be revised to incorporate the revised circulation system design and to assign all of the potential traffic to the road system. Further, the traffic generation numbers need to be revalidated, and the basis for generation factors needs to be verified, particularly for the airport under the Specific Plan Area land use designation. Mitigation measures need to be restated in a manner which ties them to actual traffic volumes on the system which cause certain components of the system to be at unacceptable levels of service. This data needs to be provided in a revised EIR made available for additional public review.

P.115, para. 5: The school setting description fails to address the capacity of the affected school systems, and further it fails to provide any background school capacity data for the Victor Valley Joint Union High School District. The lack of this data makes it impossible to make an accurate and quantifiable impact forecast.

P.116, para. 5: The solid waste setting description also fails to address the capacity of the existing landfills serving the City and their projected life based on the County's Solid Waste Management Plan. The lack of this data makes it impossible to make an accurate and quantifiable impact forecast for this issue.

P.118, para. 1: The EIR fails to provide any forecast of the demand for additional law enforcement personnel at build-out. This data needs to be provided in a revised EIR made available for public review.

P.118, para3&4: The number of students generated by implementing the General Plan Update will overwhelm the existing school system capacity at both the elementary and secondary levels. Impacts on the Victor Valley Unified High School District were not provided in the EIR. Thus, the analysis of school impacts is inadequate. Given the potential significant impact to the District and school capacity over the long-term of the project, the failure of this document to adequately characterize impacts creates a major deficiency in the EIR. Further, no mitigation is proposed by the City to offset these impacts, although such measures do exist in the form of Mello-Roos districts and other funding mechanisms. These issues have been ignored in the EIR, and this fails to comply with the CEQA which requires all potential mitigation to be considered, regardless of economic considerations. The schools section is, therefore, inadequate. No build-out impacts are forecast for schools and this oversight also needs to be corrected in a revised EIR recirculated for public comment.

P.119, para.6: This paragraph provides some additional setting data, but it does not provide any analysis of adverse impact on landfill capacity. The landfill is scheduled to be closed by 1997 and the waste management issue looks significant at this point in time. The City offers no mitigation to reduce or eliminate this potential significant impact to the existing solid waste system. This section of the document also fails to examine the build-out impacts of the

project. The solid waste section of the EIR is, therefore, inadequate. These impacts need to be addressed in a revised EIR recirculated for public comment.

P.124, para.1: The water rights issue is not yet resolved since it is in litigation and the City has not yet prevailed in its attempt to condemn the water rights and facilities previously owned and operated by George Air Force Base. An accurate summary of status must be provided on this issue in order to make an accurate water consumption impact forecast.

P.124, para. 4: It is not clear how the 25% right to ground water and underflow pumpage is obtained. There is inadequate data to substantiate this value, and equally important, the nature of this right is questionable since a certain quantity of water must be delivered from the Alto Subbasin to the Centro Subbasin. Please clarify this issue.

P.127, para. 1: The Mojave Water Agency (MWA) has finalized and adopted the Regional Water Management Plan. It is under litigation, but MWA is proceeding to implement its recommendations at this time. Adelanto has challenged the Management Plan, while duplicitously incorporating it into their mitigation program to offset water consumption impacts.

P.127, para. 3: This section of the document does not provide any of the data on current water consumption by the City or the current General Plan water consumption data. The setting section focuses on the volume of water that can be pumped, not what is pumped. Further, no analysis is provided on the current overdraft status, the contribution of the City to this overdraft, and the volume of water available to the City without contributing to the acknowledged existing overdraft. Extensive litigation is underway regarding water rights, water consumption, and the City should report the volume of water allocated to it by the adjudication and the future cutbacks that may have to be made to bring extractions into balance with recharge within the Mojave River Basin.

P.127, para. 4: The discussion in this paragraph does not provide any environmental setting data. It launches into an impact discussion without any foundation for making an impact forecast. Without this information it is not possible to accurately forecast impacts on the sewage management system, including the collection and treatment components of the system.

P.128, para. 4: The setting discussion does not provide any data on current drainage system flows and flood hazard areas under current land uses. As previously stated, without this information it will not be possible to make an impact forecast that will address conflicts between drainage areas and land uses and future surface runoff and the required drainage system to support such flows.

P.128, para5&6: No capacity data are provided for the electricity and gas systems that currently supply the city with these energy resources. Without these data it will not be possible to make an impact forecast that can be substantiated.

P.131, para. 1: The document contains no forecasts on the amount of disturbance that will be required to provide adequate storage reservoirs for the City's water system and adequate water lines as outlined in the General Plan Update.

P.132, top: The total amount of sewage generated in the year 2014 is inaccurate. It should be revised to reflect approximately 13 million gallons of sewage being generated by the City by 2014.

P.134, para. 1: No volumes of runoff and no sizing are provided for the drainage system impact forecast. Without any impact analysis it is not possible to substantiate the findings regarding the adequacy of the drainage system to meet future runoff requirements. This section of the document needs to be modified and the information made available in a revised EIR which can be recirculated for public comment.

P.134, para. 3: This section does not contain any impact analysis of consumption caused by implementing the General Plan Update. If SCE and SCG have concluded that energy resources can be provided with no significant impact on the environment, it is necessary to provide a citation for the individual that provided this information so that it can be independently verified. As the impact evaluation currently stands, there is no way to verify the unsubstantiated conclusion in the EIR for these two energy resources.

P.140, tables: The EIR does not provide any data that substantiates the reductions in water consumption that are listed in these tables. The water consumption reductions appear to be arbitrary and unverifiable without a detailed discussion in the EIR of how the measures proposed will accomplish such reductions. The EIR is inadequate in this area and needs to be augmented. The seriousness of the impact to water resources appears to be understated until such information is presented that Adelanto City residents and other users can reduce their consumption by as much as 33%.

P.146: The only adverse impact discussed on this page is water. All of the other utility issues have been ignored and need to summarized. Note again, that there is insufficient data to substantiate conclusions regarding impacts for drainage, electricity, and natural gas.

P.147, para 3: The growth inducing section does not address provide any conclusions regarding whether the General Plan Update will cause significant growth. The key issue is whether the Update induces growth that would exceed the capacity of the any of the resources discussed thus far. In fact, the growth added by this Update, relative to the existing land uses and existing General Plan, will be substantial and will contribute to significant adverse impacts for numerous resource issues, air quality, water supply, and others. This section needs to be revised to reflect this potential for significant growth inducement associated with adopting and implementing the Update.

P.153, tables: The adequacy of the data presented as Adelanto's contribution to air emissions has been questioned in previous comments. It is believed that the emission values used in the EIR are too low, and if implemented, the Update will contribute to continued violations of ozone and PM_{10} standards, and perhaps the NO_x standard in the vicinity of the airport. The cumulative air analysis does not provide an assessment of air contaminant concentrations which creates a fatal flaw for the City's EIR. Further, no linkage with concentrations modeled by the AQMD is provided in this document.

P.154: The cumulative water analysis appears to have been abstracted from the recently adopted VVEDA Interim Airport Operating Plan EIR which accurately summarizes potential significant water supply impacts accurately.

P.157: The cumulative noise data also appear to have been abstracted from the same document, and it accurately forecasts cumulative noise impacts.

P.161, para.3: No data or citation is provided to substantiate the conclusion that adequate energy resources will be available through build-out for the project. This information needs to be provided, because it is not obvious that adequate energy resources will be available over this time frame.

P.164, para. 1: The discussion regarding loss of open space is really a discussion of biological resource impacts. The impact to biological resources from build-out of the Victor Valley will likely be significant as indicated.

P.166, para. 2: One of the major failures of this document is to ignore the potential impacts from the existing General Plan. It should be noted that this "no project" discussion does not solve the problem, because it does not provide an comprehensive analysis of the impacts associated with building-out the area under the current General Plan. No land use data is presented and no specific impacts are discussed. Not even a relative comparison between the existing General Plan and the General Plan Update is provided in this EIR. This issue requires correction, and a revised EIR should be circulated for public review.

P.167, para. 3: No evaluation of environmental impacts is presented for this alternative. Each of the issues, air quality, noise, water supply, biological resources must be evaluated in order to make an acceptable comparative evaluation of this alternative. This lack of data is serious and creates a fatal flaw for the document. It must be corrected in a revised EIR circulated for public review.

P.168, para. 3: No evaluation of environmental impacts is presented for this alternative. Each of the issues, air quality, noise, water supply, biological resources must be evaluated in order to make an acceptable comparative evaluation of this alternative. This lack of data is serious and creates a fatal flaw for the document. It must be corrected in a revised EIR circulated for public review.

P.168, para, 4: It is not clear why this alternative, which was included as part of the project, is being readdressed as an alternative. Alternative No. 3 does not appear to be a new alternative. However, if it is, it is subject to the same level of impact forecast as identified for the previous two alternative cases.

P.170, para. 2: These three subalternatives cannot be rejected on economic grounds alone. First there needs to be some analysis to show that they are economically infeasible; No such data is contained in the EIR. Since a general plan with lower populations could be approved by the City it must be considered a feasible, albeit, not preferred alternative. No evaluation of environmental impacts is presented for these alternative. Each of the issues, air quality, noise, water supply, biological resources must be evaluated in order to make an acceptable comparative evaluation of these alternative with the proposed project. This lack of data is serious and creates a fatal flaw for the document. It must be corrected in a revised EIR circulated for public review.

P.170, para. 3: Although clearly an environmentally superior alternative, it is still necessary to provide some substantiation for this conclusion. No evaluation of environmental impacts is

presented for this alternative. Each of the issues, air quality, noise, water supply, biological resources must be evaluated in order to make an acceptable comparative evaluation of this alternative. This lack of data is serious and creates a fatal flaw for the document. It must be corrected in a revised EIR circulated for public review.

Conclusion

The deficiencies in the Update EIR noted in these comments are legion and many fatal flaws in the analysis have been identified. This document contains too many conclusions that are baseless opinions or general environmental truths that do not necessarily apply the proposed project area. Many suggestions have been made for incorporating essential analyses, correcting inaccurate impact forecasts, and providing reasonable substantiation for the conclusions in the EIR. However, the extent of the deficiencies and the scope of the changes required in the EIR will require the City to make massive revisions in the content and conclusions contained in this EIR. The existing EIR must be revised and recirculated for a second round of public comment. Failure to do so will eliminate a very important source of information that we believe is essential if the City Council is to make a fully informed and environmentally sound decision on the General Plan Update.

Thank you for the opportunity to submit these comments and please provide copies of the revised draft or responses to comments in accordance with regulations which will allow time to adequately respond to the Final EIR.

Sincerely,

John R. Hnatek
Director of Planning and Development

JRH:gb

cc: James L. Cox, City Manager
Henry Kraft, City Attorney
Chris Garrett, Latham and Watkins

Comment Letter 6.0 City of Victorville

6.1 Project Description

Section 15150 of the State Guidelines permits the incorporation by reference of all or portions of another document which is a matter of public record or is generally available to the public. Copies of the General Plan Update were provided to the public agencies in May 1994 together with the Notice of Preparation and the Initial Study and were available for review at City Hall and the Library (EIR Appendix A). Page 7 of the EIR, in the Introduction indicates that the "EIR has been prepared utilizing the information contained in the General Plan Update, and incorporates the appropriate Elements/Sections by reference, thereby eliminating the necessity of repeating the existing conditions information." Page 12 of the EIR, Project Description indicates that proposed project includes the General Plan Update and all of the General Plan Elements. The General Plan Update and all of the General Plan Elements more than adequately describe the project's technical, economic, and environmental characteristics, as well as, the whole of the action, which has the potential for resulting in a physical change in the environment, directly or indirectly. Also see Section 6.2 beow. No changes to the EIR are required.

6.2 Adequate Project Definition/Impacts

See 6.1 above. The EIR is a Program EIR under Section 15168 of the CEQA Guidelines. Under Section 15168 (c) Subsequent activities in the Program must be examined in the light of the Program EIR to determine whether an additional environmental document must be prepared. If a later activity would have effects that were not examined in the Program EIR, a new initial study would need to be prepared leading to either an EIR or a negative declaration. If the City of Adelanto finds that pursuant to Section 15162, no new effects could occur or no new mitigation measures would be required, the City can approve the activity as being within the scope of the project covered by the Program EIR, and no new environmental document would be required. The City will incorporate the feasible mitigation measures and alternatives developed in this Program EIR into subsequent actions in the Program. Where the subsequent activities involve site specific activities the City will use a written checklist or similar device to document the evaluation of the site and activity to determine whether the environmental effects of the operation were covered in the Program EIR. This Program EIR is adequate to deal with subsequent activities because it deals with the effects of the General Plan Update as specifically and comprehensively as possible. With this analysis many subsequent activities can be found to be within the scope of the project described in the EIR and no further environmental documentation will required. No changes to the EIR are required.

The referenced General Plan Update includes color land use map as Exhibit A of the Land Use Element. No changes to the EIR are required.

6.3 Environment in Project Vicinity

The referenced General Plan Update discusses in detail the existing environment of the City of Adelanto beginning on page I-3 through I-6 of the Introduction and continuing in the Housing Element (IV-6 through IV-41), the Circulation Element (V-1 through V-7), the Parks and Recreation Element (VI-3 through VI-7), the Conservation/Open Space Element (VII-6 through VII-21), the Noise Element (VIII-4 through VIII-8), the Safety Element (IX-4 through IX-14), and the Public Facilities Element (X-1 through X-7). The Existing 1985 General Plan is also summarized in Table III-1 (Page III-3). No changes to the EIR are required.

6.4 Referenced General Plan Update

The referenced General Plan Update provides all of the information on the proposed project that is available for the proposed project. The General Plan Land Uses are clearly designated as "for the General Plan Update" immediately above the table. The Building Intensities as required by State law are listed on the referenced General Plan Update on Page III-17 through 20. More than adequate information is provided to forecast the impacts. It is from this information that the impacts discussed in the EIR are presented. No changes to the EIR are required.

6.5 Analysis of Impacts

This is a vague and non specific comment without any citations to specific deficiencies. Each topical area in the EIR attempts to quantify impacts the extent feasible. For example Air Quality impacts are quantified on Page 44 at 63 tons per day in 2014 etc., Biology impacts to 73,000 acres (Page 67), including 8,000 acres of sensitive habitat (Page 69), Noise impacts (Page 74) illustrated in the General Plan Update, Figures VIII-1 and VIII-2, Land Use impacts listed on Page 84, Population impacts (Page 100) at 52,000 in 2014 and 156,000 at buildout, Housing impacts at 19,400 units in 2014 and 59,000 at buildout (Page 102), Traffic impacts from 12 Zones as shown in the General Plan Update Circulation Element (Page 107), as well as the impacts that are quantified on Pages 106 through 112, Public service impacts from 50-55 fulltime firefighters (Page 117), 65-70 police officers, 16,000 students (Page 118), solid waste at 33,700 tons (Page 119), Water impacts of 20,153 acre feet per year in 2014 and 60,460 acre feet per year by buildout, Sewer impacts at 13.01 MGD in 2014 and 39.02 at buildout (Page 132). The impact to the environment from these quantities is discussed in the detail necessary for the decision makers to make informed decisions on the impact of the project on the environment. No changes to the EIR are required.

6.6 Analysis/Thresholds

This EIR is for a major project that exceeds most known thresholds of significance. The EIR readily acknowledges that most of the impacts are significant and unavoidable.

While thresholds may be useful in the preparation of an EIR on a small project, or a Negative Declaration, they are meaningless when considering the levels of impacts that are considered in this EIR. As an example the MDAQMD threshold of significance for Air Quality (Page 44 of the EIR) is 25 tons per **year**. The proposed project is worst case estimated at 63 tons per **day** in 2014 and 188 tons per day at buildout. Also see 6.5 above. No changes to the EIR are required.

6.7 Subsequent Projects

See 6.2 above. The future projects are those development proposals that conform to the General Plan. For example subdivisions located in the Single Family Residential Land Use Districts of the Land Use Element (Exhibit A) have the impacts that are discussed in the EIR. Public works projects are discussed in detail in the Public Facilities Element including location, size, etc. However, these projects must comply with Section 15168 of CEQA. No changes to the EIR are required.

6.8 Program EIR

See 6.2 above. This Program EIR provides as detailed analysis of future projects as in currently possible. The City agrees that future projects will be subject to Section 15168 as discussed in 6.2 above. No changes to the EIR are required.

6.9 Specific Content of the EIR.

The City of Adelanto will use the identification as listed by the City of Victorville to respond to the balance of the Victorville comments.

P.6, para.2:

See 6.1 above. No changes to the EIR are required.

P.7, para.1

The referencing of the General Plan Update, which was widely distributed prior to the Draft EIR is permitted by State law as a way to reduce duplicative paper work. The draft EIR should be read alongside the General Plan Update. The Draft EIR identifies the sections of the General Plan Update that are to be referred to as appropriate. Although not required, the reader/reviewer would benefit from reading the General Plan Update prior to the EIR. No changes to the EIR are required.

P.8, Table 1

Table 1 is a brief summary, and only a summary of the impacted area, impacts,

mitigation measures and significance and is adequate under the terms of CEQA. The summary is as clear and simple as is reasonably practical. No changes to the EIR are required.

P.12, para. 3

The 1990 State General Plan Guidelines, Page 7 indicate that the Planning Area Boundary "encompasses incorporated and unincorporated territory bearing a relation to the city's planning. Where desirable the planning area may extend beyond the sphere of influence." (Government Code 65300). The Planning Area was selected because in the judgment of the City of Adelanto it bears relation to its planning.

The definition of "existing environment" by the City of Victorville conflicts with the Environmental Planning and Information Council, where the Court faulted a lead agency for not considering the "existing physical conditions" in the "actual environment upon which the proposal will operate." (131Cal.App. 3d at 354[182Cal.Rptr.317]. The City of Adelanto believes that it would be inappropriate to focus on the City of Victorville's Specific Plan and the Interim Airport Operating Plan because they may result in a future condition that has not yet occurred.

The Adelanto General Plan Update makes no specific claim to George Air Force Base. The City of Adelanto acknowledges that the airport is within the City of Victorville. The Specific Plan in Adelanto's General Plan Update is the Sepcific Plan adopted by the City of Victorville for the airport. The Adelanto General Plan merely recognizes this fact. It only designates it as in its Planning Area because it has had a major impact on the City in the past including noise and land use and may have a major impact in the future. At the present time it is having no direct impact on the City of Adelanto because no airplanes are taking off over the City. The 20 percent set aside for redevelopment has no environmental bearing on GAFB and this General Plan Update EIR. No changes to the EIR are required.

P12, para.6:

See 6.2 above. No changes to the EIR are required.

P15, para.4

The General Plan Update will be updated and revised in approximately 2004. The State General Plan Guidelines suggest a 15 to 25 year horizon as the long term horizon. In those cases where the City can reasonably project the 2014 and the "buildout" the EIR has done so. Buildout impacts are included for potentially significant impacts in the EIR for Air Quality at 188 tons per day (Page 44), Biology at 73,000 acres (Page 67), Noise (Page 74), Land Use (Page 84), Natural Resources at 73,000 acres (Page 95), Population at 156,000 (Page 100), Housing at 59,000 units (Page

101), Firefighters at 160-170 (Page 117), Water at 60,460 AFA (Page 129 &140), Sewer at 39.02 MGD (Page 132 &142). No changes to the EIR are required.

P16, para.6

Paragraph 6 states the following: "The opportunity of the George AFB closure has generated tremendous momentum for the General Plan and the City is committed to the incorporation of the airport into ***the General Planning process***. (emphasis added). To include GAFB in the General Plan process is completely appropriate for the City of Adelanto. Being located at the end of the runways this facility has, and will probably have, a significant impact on the City of Adelanto. To ignore GAFB in the General Planning process would be in violation of common sense planning practices and would violate CEQA's requirement to consider the existing physical environment. No changes to the EIR are required.

P16, para.7:

Refer to P16, para.6 above. No changes to the EIR are required.

P.19, para.5

The intent of Objective No. 9 is to work with the Airport Authority, to reduce the impact of the airport operations on the City of Adelanto. No changes to the EIR are required.

P.20, ADD1

The ADD classification's purpose and impact is discussed on Page 87 of the EIR. The purpose of the District is to assure that future land uses do not develop within the area that conflict with the development of an International Airport. Of all the objectives in this General Plan the ADD classification is most certainly in the interest of the airport and the Airport Authority. The alternative land uses that are considered in the EIR would develop the ADD area to commercial and residential land uses and would forever limit the expansion of GAFB into an international facility. No changes to the EIR are required.

P.21

ADD 3, refer to P.20, ADD 1 above. The AP goals do not apply to the Base. They are for the existing Airport Park that is located in the vicinity of Richardson Road and Holly Road. No changes to the EIR are required.

P.22, para.3

The EIR is amended as follows: ~~relievers~~ to "*receivers*"

P.26,CIR 5

If the GAFB facility is to develop as a major airport it is important to improve the access to the facility. The Traffic section of the EIR (Page 105) analyzes traffic impacts in depth. No changes to the EIR are required.

P.26, CIR 9:

See P.26,CIR 5 above. No changes to the EIR are required.

P.31 Bottom:

Refer to 6.2 above. No changes to the EIR are required.

P.32, Bottom

Refer to 6.2 above. The comment is generally vague and no response is possible. See also, 6.1 above. The land use designations are given in detail in the referenced General Plan Update. The intensity is described in detail in the General Plan Update (Pages III-17 through III-20). See analysis of impact response in 6.5 above. The referenced General Plan Update together with the Project Description is more than adequate to meet the requirements of CEQA. No changes to the EIR are required.

P.35, para.1

There is no legal requirement to give the occurrence and size of earthquakes on each fault in the area. The Safety Element on Page IX-4 and Page 36, of the EIR recognizes that the most likely earthquake in the future is on the San Andreas Fault which will have an 8.0 Richter magnitude earthquake, which is likely to occur in the next 30 years. The most recent earthquake occurred on the Johnson Valley Fault in June 1992 with a magnitude of 7.5 centered near Landers, California. The description in the Safety Element is adequate and no longer than necessary to allow the reviewer to have an understanding of the significant effects of the proposed project. No changes to the EIR are required.

P.35, para. 2

The City of Adelanto believes that its existing environment description is more than adequate to an understanding of the significant effects of the proposed project, however, the City is more than willing to add to the EIR the information below in response to the comment.

> *The Planning Area is located in the Mojave Desert geomorphic province. The Mojave Desert occupies approximately 25,000 square miles and is bound by the*

San Andreas fault and the Transverse Ranges to the southwest, and the Garlock fault and the Tehachapi Mountains to the north. This province extends into the southern Nevada and western Arizona to the east (Norris and Webb 1990).

The Mojave Desert formed from movements on the San Andreas and Garlock faults during the Cenozoic era (65 million years ago to present). The area is dominated by broad alluvial basins that receive nonmarine sediments from adjacent uplands. Erosional features dominate the Mojave Desert; Quaternary (1.8 million years ago to present) erosion has lowered the land surface as much as 600 feet in some areas (Norris and Webb 1990). The region is also characterized by numerous playas, or ephemeral lakebeds in internal drainage basins.

The oldest rocks exposed in the regional area include Jurassic-age (208-144 million years ago) granitic rocks that form rugged mountains and hills. Younger outcrops include nonmarine siltstone and sandstone deposits that are likely Pliocene in age (5.3-1.6 million years ago) and are often overlain by unconsolidated gravel.

Quaternary (1.8 million years ago to present) alluvial deposits dominate the landscape in the region. Semiconsolidated older alluvium consists of sandstones and conglomerates that form gently sloping low hills throughout the desert region; thick accumulations of unconsolidated younger alluvium are deposited as broad alluvial fans that slope gently to the northeast. Clay and fine silt are continuously deposited in the numerous playas in the area (Irvine and Hill 1993).

Soils north of Highway 18 and east of Highway 395 are entirely Mojave-Adelanto Varients consisting of sandy loam to a depth of 32 inches with slight to moderate erosion potential and low to moderate shrink swell potential. West of Highway 395 soils consist of Mojave Adelanto Varients, Anthony-Cajon, Cajon (in the El Mirage area), and Rock Land in the Shadow Mountains to the north. The Anthony-Cajon soils are fine sandy loam-grey sand that are 40 inches in depth with slight to moderate erosion potential and low shrink-swell potential. The Cajon soil type is 40 inches of sand with moderate to high erosion potential and low shrink-swell potential.

P. 35, para. 3

Seismic activity for most of Southern California is in Seismic Risk Zone 3. This zone is considered to experience major damage in the event of earthquakes. This potential is adequately discussed in the EIR.

The Department of Conservation is the responsible agency for reviewing the Safety Element. "The Department encourages the proposal by the City of Adelanto to require engineering geologic/geotechnical reports for proposed developments where geologic

hazards are identified (p.38 #10)[of the EIR], and for tall, critical or high-occupancy developments (p.38,#14), as well as the adoption of UBC seismic design standards. The 1994 UBC contains some new and/or revised provisions regarding seismic design of structures, as well as seismic/geotechnical site evaluation of building sites as part of the grading/excavation and foundation design, that the City may wish to review."

The Department has suggested and the City is herein incorporating into the EIR as mitigation measure No. 16 on Page 38 "*That certain critical facilities such as hospitals and public schools have siting and/or design requirements that are addressed by the Education Code, Health and Safety Code, and the State Building Code (Title 24 of the California Administrative Code) be reviewed by State Agencies including the Department of Education, the Division of State Architect, the Office of Statewide Health Planning and Development, and the State Fire Marshal.*"

P. 35, para. 4

Awareness of seismic hazard in the first step in reducing the impact. As a result of the Landers quake the general population of the region has been exposed to a variety of earthquake safety mitigation measures in the media, pamphlets, etc. As a result of this awareness, residents are securing water heaters, book shelves, etc., storing water bottles, keeping batteries fresh, putting thick shoes under the bed along with the crowbar, and taking other steps that have resulted from a "high level of seismic awareness." Modern seismic design and construction technology will result in developments that are better able to withstand groundshaking from earthquakes. This does mitigate an adverse impact, but as the EIR readily admits this impact can not be reduced to a level of insignificance. No changes to the EIR are required.

P. 36, para. 1&2:

Refer to P. 35, para. 1 above and P. 35, para. 2 above. No changes to the EIR are required.

P. 36, para. 4

The Mojave Water Agency is the agency with the most information on the groundwater basin. This Agency, in its EIR on the Regional Water Management Plan does not discuss subsidence and has not found any subsidence to be significant. No change to the EIR is required.

P36, para. 5

The Final Environmental Impact Statement, March 1992 for the Disposal and Reuse of George Air Force Base, California describes Hazardous Materials/Hazardous Waste Management on pages 3-55 through 3-84 for George AFB. The FEIS on Page 3-72 states that "In addition to the mandates of the IRP [Installation Restoration Process],

prior to the transfer of any property at George AFB, the Air Force must also comply with the provisions of CERCLA S120. CERCLA, 120h specifically requires that before federal property can be transferred from federal ownership, the United States must provide notice of specific hazardous waste activities on the property and include in the deed a covenant warranting that 'all remedial action necessary to protect human health and the environment with respect to any [hazardous] substance remaining on the property has been taken before the date of such transfer.' furthermore the covenant must also warrant that 'any additional remedial action found to be necessary after the date of such transfer shall be conducted by the United States.' To ensure that money is available to conduct environmental restoration at military installations scheduled for closure, Congress appropriated $100 million to the Defense Base Closure Account for fiscal year 1991 to be used exclusively for that purpose."

The United States, which has jurisdiction and authority, does not consider the hazardous waste at the base to have a significant impact on the environment that can not be mitigated.

The sanitary landfill located within the Planning Area at Koala Road, Purple Sage Street and Stevens Street is approximately 180 acres. This landfill is under the jurisdiction of, and operated by the County of San Bernardino. The site is currently closed. The Solid Waste Management Division has never received complaints on the property, does not have any water quality information on the site, has not conducted any water quality monitoring on the site, and has not conducted any gas migration monitoring on the site. The County of San Bernardino, the responsible agency for this landfill, does not consider the facility to have any adverse impacts on the environment. There is no data available from the County to summarize. No changes to the EIR are required.

P. 37, para. 1

Unconsolidated alluvial deposits in desert regions are rarely saturated because the depth to the water table and are thus less susceptible to liquefaction than unconsolidated alluvium adjacent to streams and rivers. As a result, the large alluvial deposits in the Planning Area generally exhibit low liquefaction potential. Localized areas along the Mojave River exhibit moderate to high liquefaction potential. This is discussed in the EIR. No changes to the draft EIR are required.

P. 38, bottom

The City of Adelanto has considered the effect of the proposed project on geology and soil resources. No information provided in either the comments or the responses has an effect on the impacts discussed. The City of Adelanto is not qualified to review the work of the State of California on the UBC. The City of Adelanto has proposed mitigation measures that will reduce impacts to the environment. While measurable mitigation measures are the most effective, the City does not want to abandon a

mitigation measure just because it may be difficult to measure. Mitigation measures, which the City believes will reduce impacts, have been included in the EIR. This applies to all topical sections of the EIR. No changes to the EIR are required.

P. 43, para.2

The Planning Area is in non attainment for both ozone and particulates (PM_{10}). That is why the EIR discusses Ozone on Page 41 and Particulates on Page 42. It is for this reason that the City of Adelanto is proposing the Fugitive Dust Ordinance that begins on Page 49. Page 42 of the EIR, para. 5 will be changed state that the *"Air basin is in non compliance with Federal air quality standards for particulates (PM_{10})."* The physical characteristics of the quality of air has not changed dramatically in the last 3 years. No changes to the EIR are required.

P. 44, para.1:

See responses to MDAQMD in Comment Letter 1.0 above. No changes to the EIR are required.

P.44, para. 3

The first sentence is the position of the MDAQMD in relation to the Transport issue that is discussed on Page 40, para. 2 of the EIR. The City of Adelanto has assumed that the MDAQMD has adequate data to take such a position. The City of Adelanto has no reason to challenge the conclusions of the MDAQMD especially when they seem to be reasonable conclusions. No changes to the EIR are required.

P. 44, para.4

The General Plan Update was widely distributed and referenced in the EIR pursuant to the requirements of State law. The Tables were based on the proposed land uses. Table VII-5 is based on the output from Tables VII-2, 3 and 4. The City of Adelanto clearly stated its assumptions for the air quality analysis on Pages VII-22 and VII-23. The Building Intensities and Land Uses are very well detailed in the Land Use Element, Pages III-17 through III-39. The buildout impacts are totaled on Page 44, para. 4. See also response 6.6 above. The whole concept of proposing the Mitigation Measures Added By Lead Agency beginning on Page 49 is to respond in the best way possible to the need to reduce PM_{10} emissions. No changes to the EIR are required.

P. 44, para. 5

The City's estimate of 3 percent, as stated, is based on emission studies at the airports listed. The MDAQMD, the agency responsible for air quality in the area, provided the comments in Comment Letter 1.0 above, to which the City of Adelanto responded. The General Plan Update is not the environmental document under which an international

airport would be constructed. Either the Final EIS for the closure of George AFB would be an appropriate environmental document, or some other EIR. No changes to the EIR are required.

P. 46, bottom

In a policy document like the General Plan Update it is difficult to propose mitigation measures that are legally binding on specific projects and easy to measure. The South Coast Air Quality Management District in their CEQA Air Quality Handbook, April 1993 has attempted to quantify the impact of specific mitigation measures for specific projects (Pages 11-13 through 11-30 of the Handbook). Examples of similar mitigation measures proposed by the City of Adelanto may result in the following PM_{10} reductions; 1) watering active grading sites at least twice daily can reduce PM_{10} impacts by 34 to 68 percent, 2) applying water to a dirt road three times per day can reduce PM_{10} by 45 to 85 percent, and 3) covering haul vehicles can reduce impacts to PM_{10} by 7 to 14 percent. The SCAQMD has evaluated over 100 mitigation measures. To relate each mitigation measure to the improvement in air quality requires extensive modeling for each specific project. The average detailed air quality analysis, that can be provided by consultants, on just one specific project is in excess of $100,000. The City desires to implement mitigation measures that reasonably reduce actual impacts and to comply with the requirements of the MDAQMD, the jurisdiction responsible for air quality in the region. No changes to the EIR are required.

P. 52, para 1 & 2

The existing drainage conditions in the Planning Area are discussed on Page 52. The referenced General Plan Update further describes the drainage system, both by narrative and graphically on Pages X-7 through X-9 of the Public Facilities Element. The flows are given in the referenced 1985 hydrology study (Master Plan of Regional Sotrm Drainage Channels). No changes to the EIR are required.

P. 53, para. 3 & 4

The General Plan Update will result in specific projects that may have an impact on the environment. To review and evaluate these projects is an impact of the proposed General Plan Update project. As development is implemented the proposed drainage system will be implemented. The proposed General Plan Update project will also have an impact on the County of San Bernardino as a result of the revised drainage plan. No changes to the EIR are required.

P. 54, para. 1 & 2

The EIR states that the areas subject to flooding are illustrated in the referenced General Plan Update on Figure IX-2. The flow volumes are listed in the referenced 1985 Master Plan of Regional Storm Drain Channels, as well as the size and type of

channels to accommodate the projected flows. The channels are proposed to be left in a natural condition, as much as is possible, as discussed in the mitigation measures. The impact to the biology is discussed in the Biology section of the EIR. The EIR analysis, including the referenced General Plan Update and the 1985 Master Plan of Regional Storm Drain Channels are adequate. No changes to the EIR are required.

P. 52, para. 3 & 4

The context of the comment that "Paving and **permitted** development will increase the volume of good quality storm water runoff," is only to the extent that industrial uses that use hazardous materials on natural ground are much more capable of contaminating soils and groundwater than industrial uses that are located on paved areas and have proper permits. Paving, as well as, permitted development (i.e. developments with proper water quality permits) reduce adverse impacts. The EIR indicates that the City will comply with the requirements of the Lahontan RWQCB the agency responsible for water quality in the region. The use of hazardous materials is one of the most regulated areas by government and is resulting in the proper use of these materials. No changes to the EIR are required.

P. 55, para. 1

Site specific construction projects, which would also include residential projects, are approved by the City of Adelanto. The City, as required by law, complies with the NPDES permitting requirements. No changes to the EIR are required.

P. 56, para. 7

The Sundstrom case was successful in the Court of Appeal because 1) the developer, not the City, was proposing the future studies, and 2) the mitigation measures that were proposed (sludge disposal) might be hard to achieve. The City of Adelanto will undertake the required study as the decision making body, and based on the past experience of the City of Adelanto the successful outcome of the proposed mitigation measure is easy to predict. The facts of the Sundstrom case are very different from the conditions and facts in the City of Adelanto and the proposed project. The General Plan Update was widely distributed and the 1985 Master Plan of Regional Storm Drain Channels is readily available from the City Engineer at City Hall to any person wishing to review it. No changes to the EIR are required.

P. 57, para. 2

See response above. Detention/Retention and treatment facilities, including bio-remediation are accepted mitigation measures for stormwater runoff as discussed in the NPDES permitting requirements. No changes to the EIR are required.

P. 58

The City of Adelanto is complying with the RWQCB requirements and the NPDES requirements. The RWCQB and the NPDES permitting process, as required by existing laws, will mitigate water quality impacts to the level of insignificance. The flood control facilities in the General Plan Update and the 1985 Master Plan of Regional Storm Drain Channels will reduce flooding impacts to a level of insignificance. Copies of the referenced documents are available at City Hall to any persons who wish to review them. No changes to the EIR are required.

P. 62, para. 3

The permitted uses in riparian corridors are what is permitted by the California Department of Fish and Game and are part of the existing environment. No changes to the EIR are required.

P. 63, para. 1

The natural drainage courses are shown in the Public Facilities Element, Page X-9. While most of the channel bottoms will be left natural it is impossible to predict exactly which courses will be left natural or concrete lined. The current system is designed to be natural, however, some developments have elected to further concentrate the flow as a way to increase usable land and install concrete channels. The runoff from each channel was calculated in the 1985 Master Plan of Regional Storm Drain Channels. No changes to the EIR are required.

P. 63, para. 6

The EIR will be revised from "Endangered" to "*Threatened.*"

P. 67, para. 1

The location of biological resources is shown on Page VII-10 and VII-13 of the referenced General Plan Update, Conservation/Open Space Element. As stated on Page 68 of the EIR, Figure VII-3, Page VII-25 of the Element shows the location of the Mojave River Corridor, the El Mirage Cooperative Management Area, and the natural drainage channels. Land Uses are shown in color, in Exhibit A of the Land Use Element. The land use pattern completely ignores the location of the biological communities. The following will be added to the EIR, Page 60 at the end of Paragraph 2: "*According to the Natural Diversity Data Base, 1993 of the Bureau of Land Management there are no Special Status Plants in the Planning Area. According to the U.S. Bureau of Land Management, Joshua Tree Woodland is located in a 1-1.5 mile "S" shaped swath, cutting through the center of the Planning Area and covering most of the area south of Air Base Road. The northeast corner of the Planning Area consists of*

Desert Saltbrush Scrub. The rest of the Planning Area consists of Cresote Bush Scrub." The impacts discussed on Pages 67 through 69 of the EIR adequately describe the effects of the General Plan Update on the environment, which will be significant as concluded on Page 71.

P. 67 para. 2:

See P. 12, para. 3 above regarding selection of the Planning Area. The claim in the EIR is to preserve Open Space of which the flood control and utility easements are a part. The roads that are within the utility rights-of-way are part of the existing environment. The Open Space uses are designated on Page III-36 of the referenced General Plan Update. The impacts to the Mojave River Corridor, the El Mirage Cooperative Management Area, the Natural Drainage Channels and the Utility Rights of Way are discussed on Pages 67 and 68 of the EIR. No changes to the EIR are required.

P.67, para. 3

Water rights and production within the Mojave River Basin are currently the subject of litigation (City of Barstow, et al. v. City of Adelanto, et al., Case No. 208568, Riverside Superior Court). The City of Adelanto is attempting to have its legal water rights recognized by the Court. The City claims water rights in the amount of approximately 5,000 acre-feet per year. This amount is sufficient to serve a population of about 25,000 persons. Other parties to the water rights adjudication have signed a stipulation for judgment which fails to recognize Adelanto's rights and establishes a system of assessments for existing and future water production. The Court recently heard arguments from all parties during a trial in February and March, 1995. A decision is expected during the month of June 1995.

With the pending litigation, it is uncertain whether the General Plan Update can rely upon Adelanto's water rights to serve a population of 25,000. If the Court does not affirm the water rights of the City of Adelanto an adequate water supply will have to be acquired for the General Plan Update to proceed to a population of 25,000. For the population to exceed 25,000 irrespective of the Courts decision additional water will have to be acquired.

The City of Adelanto is also involved in a dispute with the U.S. Government concerning a portion of the water rights which they are attempting to assert in the water rights adjudication. A portion of these rights has historically been used to serve the former George Air Force Base. Under the terms of agreement contained in the government's contract with Adelanto, the government is required to turn over the water facilities upon base inactivation. The government has failed to fulfill this condition and the City is pursuing enforcement of the terms of its contract through the Armed Services Board of Contract Appeals and in court. The outcome of this litigation could also impact the City's ability to serve the proposed project.

The Victor Valley Water District, the City of Hesperia, Apple Valley Ranchos, San Bernardino County Services Area 64-Spring Valley Lake, San Bernardino County Services Area 42-Oro Grande, San Bernardino County Services Area 70C-Silver Lakes, Spring Valley Homeowners Association, Barstow and others, according to the City, pump water from the Mojave River underflow, do not have licenses or permits from the State Water Resources Control Board, have not filed statements of diversion and use with the State Water Resources Control Board and are depleting or threatening to deplete the supply of underflow water upon which Adelanto depends and which Adelanto has the right to use.

The City of Adelanto will have to come to an arrangement with the Mojave Water Agency in order to implement a General Plan that exceeds 25,000 persons. The General Plan Update, up to 25,000 persons, will alone not result in drawdown of the water table. Any existing drawdown is the result of other water extractions by other persons and/or agencies. A future arrangement with the Mojave Water Agency will be necessary to allow implementation of a General Plan Update that exceeds 25,000 persons. This arrangement will result in adequate water for the Mojave River. No changes to the EIR are required.

P. 68, para. 5

This section which starts on Page 67 readily admits that the proposed project will impact 73,000 acres of habitat and that this is significant. Page 71 clearly states that the 73,000 acres can not be mitigated to a level of insignificance. No changes to the EIR are required.

P. 69, para. 1

The City of Adelanto requires tortoise studies for every land development project that it approves. Of the over 100 studies completed to date by qualified biologists, the City has yet to observe even one tortoise. The section which starts on Page 67 readily admits that the proposed project will impact 73,000 acres of habitat and that this is significant. Page 71 clearly states that the 73,000 acres can not be mitigated to a level of insignificance. No changes to the EIR are required.

P. 71. para. 1: No response is necessary.

P. 71, para. 3

According to U.S. Fish and Wildlife, Reno, Ms. Sherry Barrett at 702-784-5227 mitigation measures are possible for Desert Tortoises. Applicants must prepare a habitat conservation plan and secure a permit. The applicant must also comply with NEPA. The process usually requires three months for an assessment and 12 months for an EIS. According to the "Procedures for Endangered Species Act Compliance for

the Mojave Desert Tortoise, USDI Fish and Wildlife, October 1992" the Habitat Conservation Plan (HCP) must specify, 1) the anticipated impacts likely to result of listed species, 2) the mitigation and monitoring measures that the applicant will undertake to alleviate the impacts of the taking, 3) alternative actions to such taking that were considered, 4) why these alternatives were not employed, 5) funding that will be provided to implement the mitigation measures and attendant conservation plan (usually a binding written agreement), and 6) additional measures that the Service may require as necessary or appropriate for the conservation of the species.

As an example that mitigation is feasible, on July 24, 1991 the Service issued a 3-year permit (PRT 756260) to Clark County Nevada and the cites of Las Vegas, North Las Vegas, Henderson and Boulder City for an incidental take up to 3,710 desert tortoises on up to 22,352 acres of land in the Las Vegas Valley and Boulder City. The Service encourages local or State governmental entities to prepare jurisdictional plans.

Joshua Trees are under the jurisdiction of the County of San Bernardino. Their Ordinance permits the relocation of Joshua Trees.

P. 73, para. 3

The Base is currently closed and no aircraft are taking off over the City of Adelanto. The historic noise levels are etched in the minds of the residents of the City. The existing and proposed land use pattern for the City of Adelanto is based on the overwhelming impact of noise on the community. No changes to the EIR are required.

P. 73, para 5

The referenced General Plan Update, Noise Element Figures, which are cited on Page 74 of the EIR under the Impact section provided the requested information. The referenced General Plan Update also lists the contour locations for major highways on Table VIII-1 on Page VIII-7 of the Noise Element and Table VIII-4 on Page VIII-15. No changes to the EIR are required.

P.74, para. 1

The impact of Construction Noise is discussed on Page 76 of the EIR. Construction noise will move around within the Planning Area over the long-term, however its impact on individual receptors will be only over the short-term. No changes to the EIR are required.

P. 74, para. 3

The illustrated Noise Map is from the Page VI-7 of the Adelanto Base Reuse Plan, High Desert International Airport. Unfortunately the map is not much better in the original illustration. For clarification however, the northern 65 CNEL contour is approximately 8

miles north of the existing northerly boundary of George AFB, and extends approximately 4 miles west of Highway 395 (the diagonal line). Page 75, para. 2 describes the sensitive area that is impacted by the proposed international airport. This area consists of existing residential and commercial uses as well as vacant parcels. The major area of impact is designated as suitable for industrial uses which are generally less sensitive to noise levels. The City acknowledges that it may not acquire the airport, but will use available means to force mitigation of noise impacts including relocation. The Interim Airport Operating Plan is only Phase I of an International Airport and Adelanto alleges that said EIR violates the purpose of CEQA by not including the whole project. No changes to the EIR are required.

P. 75, para. 1

Page VIII-8 of the General Plan Update, Noise Element discusses the Land Use Compatibility. The categories discussed are sensitive, moderately sensitive, relatively insensitive and insensitive. Insensitive uses are compatible with the Airport Development District and the Industrial District, which Districts primarily underlay the noise contours from the worst case international airport alternative. Land Use Comparability is also presented in the referenced Table VIII-2 of the Noise Element. The Future 2010 Projected noise contours for the major arterials in the City are listed in Table VIII-4 of the Noise Element. No changes to the EIR are required.

P. 75, para. 4:

See response to P. 75, para. 1 above. No changes to the EIR are required.

P.76, para. 5

The impact information is quantified to the extent necessary. Circulation impacts are projected as high as 86 dB CNEL at 60 feet from centerlane of major roadways and the dB for construction equipment is given. The noise contours for the airport are shown in the General Plan and the contours for the major highways are listed in the referenced Noise Element. No changes to the EIR are required.

P. 81, para. 4

The mitigation measures when applied to specific projects will reduce noise impacts to acceptable levels. The EIR recommends that the uses within the George AFB International Airport 65 CNEL contours be either protected or removed. The impact from major highways can be reduced to acceptable levels by requiring air conditioning, double glazed windows and staggered stud walls with absorbent blankets for homes that abut the perimeter of subdivisions. The City routinely requires that subdivision perimeter walls be constructed of solid block. These measures have been demonstrated in acoustical studies and reports by HUD and Caltrans to be acceptable

ways to mitigate noise impacts to levels of insignificance. No changes to the EIR are required.

P. 82, para. 1

Lighting in Adelanto is just not a major item. Complaints from lighting are usually very limited in scope and can in most cases be mitigated. The most major cumulative impact from lighting that has resulted in complaints in Southern California is the impact of development in north San Diego County to the Palomar Observatory. There are no observatories in the Adelanto area. The second most noticed source of light is stadium lighting from baseball and football fields. This lighting rarely results in complaints because it is limited to reasonably early night time hours, usually on Friday nights. Most jurisdictions find that the electric bill for these stadium lights is significant so the lights are turned off at reasonable hours. Other minor impacts are discussed in the EIR. No changes to the EIR are required.

P. 82, para. 2:

See P.82, para.1 above. No changes to the EIR are required.

P. 88, para. 4

The buildout of uses is summarized by use, zone and acres on Page 84 of the EIR. The Building Intensities are clearly referenced in the General Plan Land Use Element. The Land Uses are clearly defined on Pages 85 through 89. The impacts are projected for air quality and traffic, as well as other topical areas, directly from the Land Use categories on Tables VII-2 through VII-5 of the Conservation/Open Space Element using generation factors that are usually used in EIR's. The assumptions are readily stated and reviewers are free to challenge the assumptions. The land use plan shown on Exhibit A of the Land Use Element, and discussed in other topical sections of the EIR is very sensitive to land use compatability. The most obvious example of this is the Airport Development District and the Manufacturing/Industrial District that are situated in such a manner as to be responsive to the needs of an international airport. The Specific Plan Area was designated to reflect the Specific Plan of the City of Victorville/VVEDA. The Specific Plan developed by Victorville/VVEDA is now the Specific Plan that is designated in the Adelanto General Plan Update. No changes to the EIR are required.

P. 94

The proposed land uses are designated in the Land Use Element of the referenced General Plan Update. The land uses from the 1985 General Plan are clearly listed on Page III-3 of the Land Use Element. Other than discussing the acreages of the land uses it is very difficult to quantify the impacts and to quantify the impact of individual mitigation measures. Most of the mitigation measures are taken from other topical

areas. The City of Adelanto believes that it has prepared a land use plan that does have compatible land uses. The review of individual projects will result in conditions of approval based on the mitigation measures that reduce land use impacts to a level of insignificance. No changes to the EIR are required.

P.95, para. 2

As indicated in the setting, much of the Planning Area has sand and gravel resources and may have other precious metals in small quantities. The City of Adelanto is located on a large alluvial plain that is approximately 2,000 feet deep. Except for the rock formations of the Shadow Mountains, the entire Planning Area could be extracted for sand and gravel resources. Surface mining activities would be subject to the proposed Fugitive Dust Ordinance that is included in the Air Quality section of the EIR. This Ordinance would reduce PM_{10} on all but the windiest of days. No changes to the EIR are required.

P. 95, para. 3 & 4:

Refer to Response 6.2 and P.95, para. 2 above. No changes to the EIR are required.

P. 97

The proposed project will not have a significant impact on natural resources. If mining projects are proposed, they will be subject to the requirements of Response 6.2 above and the Surface Mining and Reclamation Act. No changes to the EIR are required.

P. 98

Hazardous wastes are discussed under the Solid Waste section of the EIR on Page 119 and mitigation measures listed on Page 122 reduce the impact of hazardous waste to a level of insignificance. No changes to the EIR are required.

P. 99, para. 3

The existing population is given for 1990. The estimated buildout population for the 1985 General Plan was 58,310, and the 20 year horizon in 2005 was 21,660 (37.1 percent). The population projection for 2005 from the 1994 General Plan Update is 30,314 or approximately 30 percent greater than the 1985 General Plan forecast for the same year. No changes to the EIR are required.

P100

Regardless of development of George AFB into a major international airport, Adelanto and the rest of the High Desert region will experience a tremendous amount of growth between now and 2014. Without the airport, SCAG projects that there will be 441,800

residents living in the High Desert by 2010. This compares to the 230,500 that resided there in 1990. The SCAG growth rate is about 3.5 percent per year until 2010. Adelanto is projecting 7.83 percent per year or about 38,466 in the year 2010. This rate is over twice the rate of SCAG, however for the region, Adelanto expects population not to exceed the MDAQMD rate of 6.4 percent per year.

Revised ROP Growth Codes (Appendix A-45) of the Mojave Desert AQMD Rate of Progress Plan shows that Housing Units and Population are projected by MDAQMD to grow at 45 percent from 1990 to 1996 or about 6.4 percent per year and that Employment will grow at 26 percent or about 3.85 percent per year. In the Adelanto General Plan, population is projected at about 52,000 in 2014. At 52,000 the growth rate is about 7.83 percent from 1990 to 2014. This rate would exceed the MDAQMD Rate of 6.40 percent. Housing is directly reflective of the population, so it will be the same as population.

The cumulative impacts are difficult to determine because it is difficult to estimate the percentage of buildout of the surrounding communities in the year 2014. At the MDAQMD rate of 1.45, the population of Adelanto, Apple Valley, Hesperia and Victorville will be 503,798 in 2010 and 645,688 in the year in the year 2014. This would represent 77 percent of the total buildout under the existing General Plans for these communities (645,688/830,637, Page 157 of the EIR). It is unlikely that development in the four communities would exceed 77 percent of buildout by the year 2014, therefore, the Rate of Progress Plan is not exceeded.

The Adelanto projected population for the High Desert, based on the MDAQMD rate of 6.4 percent is 503,798 in 2010. This exceeds the SCAG forecast of 441,800 by 12.3 percent.

The EIR clearly recognizes the adverse impacts of the other topical areas on Page 100. No changes to the EIR are required.

P. 103

Appendix C of the EIR is the complete, unedited report of the San Bernardino County Museum, Archaeological Information Center. The attached November 5, 1993 memorandum states that "the locations of cultural resources are confidential. California Government Code Section 6254.10 exempts archaeological site information from the California Public Resources Act which requires that public records be open to public inspection." No changes to the EIR are required.

The City of Adelanto estimates that the major cultural sites are located along the Mojave River and that the development along this river will be substantially limited by this General Plan Update as discussed on Page 69 of the EIR.

P. 105, para. 2: Comment noted, no response is necessary.

P. 106, para. 4

Volume capacity ratios for road segments were calculated for major roads by Kunzman Associates, in 1991. At that time State Route 18 was at .66, Air Base was .94 and Highway 395 was .94 south of State Route 18, 1.00 north of State Route 18, 1.04 between Rancho Road and Air Base Road, 1.12 between Air Base Road and Bartlette Avenue, and .76 north of El Mirage Road. The overall circulation system is described in the EIR on Page 105, para.2 and illustrated in Figure V-1 on Page V-3 of the Circulation Element. No changes to the EIR are required.

P. 108, para. 5

The City of Adelanto's General Plan Update and related Traffic Study envisions the development of an International Airport as the worst case traffic generator. This worst case has been slightly downgraded by considering the development of a high speed rail system. This alternative, which is the basis for the impact analysis may generate more traffic than prior estimates, but is nevertheless the worst case as estimated by the City and required by CEQA.

The City realizes that future development of the General Plan Update including the International Airport, the High Speed Rail and all of the proposed land uses are speculative to the extent that they are based on a variety of limitations including the overall market for such facilities, availability of water to the City and the region, the construction of adequate transportation facilities over the next 20-30 years, etc. The proposed General Plan Update is a project that plans for these facilities, but can not make them happen. However, without such a plan they will never happen.

The City of Adelanto, under the International Airport proposal envisions substantial traffic on the new Freeway 395 and on the old Highway 395. While Caltrans estimates the average daily traffic on Highway 395 at Colusa Road at 30,000 and at Highway 18 at 50,000 the City envisions a much different land use pattern and traffic generation situation as the worst case analyzed in its EIR. (The 60,000 ADT as shown in Figure V-3 on Page V-16 of the Circulation Element is incorrect. It is actually 6.0 or 6,000). The City envisions a New Freeway 395 with offramps at Desert Flower Road, El Mirage Road, Air Base Road, Mojave Drive and Palmdale Road as necessary to accommodate the traffic that the City anticipates. The streets at these intersections are expected to have traffic levels of 45,000, 50,000, 55,000, 61,000 and 35,000, respectively. Freeway 395 southbound is expected to have traffic volumes of 77,000 and old Highway 395 is expected to have 28,000. Without a new Freeway 395 the old Highway 395 will have over 100,000 average daily traffic and the Highway will have to be at least ten lanes wide.

The State Department of Finance estimates the population of the State on January 1, 1993 to be 31,552,000. According to Caltrans the State has 15,158 centerlane one way highway miles with a total of 49,138 lane miles (or 3.24 lanes per center lane mile). The State also has 2,292 centerline one way miles of Interstate Highways. At 3.24 lanes per mile the Interstate System can be estimated to have at least 7,426 miles. The total lane miles in the State can be estimated at 56,564 lane miles (49,138 + 7,426). The total lane miles divided by the total population indicates that there are 1.79 lane miles per 1,000 persons throughout the State (56,564/31,552).

The projected 2014 population of the City of Adelanto of 52,000 persons would entitle that population to approximately 93 lane miles as their "Fair Share" (1.79 x 52). With a distance of 12 miles from the City of Adelanto to Interstate 15 the City's Fair Share would be about 7.75 lanes.

Since the residents of Adelanto will be paying the same tax for highways as any other residents of the State (and perhaps higher, as they drive longer distances than the average State resident) they should encourage the State Department of Transportation (Caltrans) for the facilities that they need to relieve the projected congestion from the City to Interstate 15. This Freeway should be developed when Caltrans observes that the City is actually implementing its General Plan Update and the actual traffic is overloading a six lane Highway 395.

The City of Adelanto will preserve the existing Highway 395 as a six lane super arterial with 124 feet of right of was as shown on Figure V-5, Page V-21 of the Circulation Element. The existing Highway 395 would require widening to 10 lanes to accommodate projected traffic unless the new Freeway 395 is developed. The City will encourage Caltrans to develop the New Freeway as traffic conditions warrant. No City in the history of California has been required to construct a new freeway.

The Traffic Study for the City of Adelanto General Plan Update was prepared August 9, 1991 by Kunzman Associates. The Circulation Element of the referenced General Plan Update was based on this Traffic Study. The Traffic Study reviews the proposed land uses, establishes the circulation system and traffic zones, describes the existing traffic conditions, projects the General Plan land use traffic, including traffic generation (Fifth Edition ITE and others), traffic volumes, traffic distribution and assignment. The Study also reviews through traffic, future traffic volumes, daily volume/capacity ratios, impacts, mitigation measures and other considerations. The Traffic Study was based on an earlier, more intensive land use alternative than proposed in the current General Plan Update and made projections to the year 2010 rather than 2014. The Traffic Study was slightly modified to fit the requirements of the proposed General Plan Update. No changes to the EIR are required.

P. 109, para.1

Table V-4 is the summary of all trips that could be generated. Table V-5 is the inter/intrazonal residential traffic that is necessary to adjust the traffic generation factors so that the residential trips are not double counted. Total inter/intrazonal traffic (within the Adelanto General Plan Update area) will reduce the total trip generation to approximately 440,780 trips. The Traffic Study by Kunzman Associates (based on slightly different land uses that will not effect the overall outcome of the existing Adelanto General Plan Update) made the following assumptions.

1. All local residential trips (i.e. work, shopping and other) were assumed to be within the General Plan area.

2. Due to the large amount of planned employment (i.e. business park and manufacturing/industrial land uses) and the distance to other employment centers it was assumed that 30 percent of the residential regional work trips would be within the General Plan area.

3. Due to the distance to other regional facilities, 20 percent of the other residential regional trips were assumed to be within Adelanto (includes trips to the airport and hotel uses).

4. Due to the typical nature of downtown activities, 75 percent of the trips generated by the Central Business district were assumed to be to/from land uses within the General Plan area.

5. Non residential trips were reduced by 25 percent to reflect internal travel between these land uses (e.g. commercial to business park, airport to manufacturing/industrial, etc.)

   These assumptions indicate that approximately 48 percent of the non-residential trips will be external to Adelanto.

No changes to the EIR are required.

P. 110, para.3

The Traffic Study for the General Plan Update by Kunzman Associates assumed 1) that the proposed U.S. 395 Freeway would be a 6 lane facility, 2) that Super Arterials would be 6 lane divided arterials, 3) that Major Arterials would be 4 lane divided streets, and 4) that Major Collectors would be 4 lane undivided streets. Kunzman then modeled the traffic generation into this system and determined the volume to capacity ratio for each segment. When the volume to capacity ratio exceeded .90, they recommended the

additional streets proposed as mitigation measures 1 through 4 of the EIR on Page 112. No changes to the EIR are required.

P. 114

No city in the history of California has been required to fund all of the improvements necessary to mitigate regional traffic impacts. If this were the case there would be no need to have the State Department of Transportation (Caltrans), and no need to collect taxes on motor fuels. The Kunzman Traffic Study included the mitigation measures listed on Page 112 of the EIR as necessary to adequately mitigate traffic impacts to a level that is not significant. The traffic analysis is adequate because the traffic generation factors are from ITE, Fifth Edition, are reasonably adjusted for inter/intrazonal traffic (i.e. traffic within the General Plan Update area), are properly distributed to the proposed street system and the mitigation measures recommended to provide an adequate traffic system are incorporated into the Circulation Element of the General Plan Update. No changes to the EIR are required.

P. 115, para. 5

The EIR readily admits that there is insufficient existing capacity of the local school systems to handle the number of students that will be generated by the General Plan Update. Any further discussion of capacity, other than that given, would be meaningless. The EIR on Page 116 clearly indicates that the General Plan Update would generate approximately 16,000 students and the need for 533 additional classrooms. No changes to the EIR are required.

P. 116, para. 5

The EIR readily admits that there is insufficient existing capacity of the local or regional solid waste systems to handle the amount of solid waste that is projected by the General Plan Update. Any further discussion of capacity, other than that given, would be meaningless. The EIR does adequately describe the amount of waste currently generated on Page 116 and further clearly indicates that the General Plan Update would generate approximately 33,000 tons of waste per year in 2014. Additional capacity to accommodate solid wastes, even after recycling will have to be secured by the County of San Bernardino, which is the current responsible agency. In the event that the County is unable to perform, the City or private industry would have to secure a landfill site with adequate capacity.

According to the Solid Waste Management Department the County Solid Waste Management Plan will be replaced with the Countywide Integrated Waste Management Plan which is expected to be completed by November 1996. The landfill which currently serves the Adelanto area is the County operated Victorville landfill site which is projected to close in 1998. The County is working with the Bureau of Land

Management to acquire additional land adjacent to the Victorville landfill to ensure adequate future capacity. No changes to the EIR are required.

P. 118, para. 1

As with almost all of the impacts discussed in the EIR the 2014 estimates are 33 percent of the buildout impact. At buildout of the police staffing needs are then projected at 195-210 persons (65 x 3 - 70 x 3). No changes to the EIR are required.

P. 118, para. 3 & 4

The EIR readily admits that there is insufficient existing capacity of the local school systems to handle the number of students that will be generated by the General Plan Update. The General Plan Update would generate approximately 8,000 high school students and the need for 266 additional classrooms. Neither the Adelanto School District, nor the Victor Valley Unified School District, the agencies responsible for schools, commented on the General Plan Update or the EIR, even though they were given copies of the documents.

The "Financing Public Improvements" section on Pages 113 and 114 of the EIR indicates that the methods given are also possible for public services, utilities and public works improvements. No changes to the EIR are required.

P.119, para. 6:

See P. 116, para. 5 above. At buildout solid waste is expected to triple to over 100,000 tons per year. No changes to the EIR are required.

P. 124, para 1

The water issues are in active litigation. However, this situation does not effect the amount of water that the proposed General Plan Update will need in order to be implemented. In addition, the City of Adelanto is confidant that the existing water rights will be upheld by the Courts, and that it will have adequate water to serve a population of up to 25,000 persons. If additional water is not available to the City of Adelanto, the implementation of the General Plan Update will stop at 25,000 persons until such time as water becomes available. No changes to the EIR are required.

P. 124, para. 4

The actual pumpage for 1993 was approximately 2,500 acre feet. The actual wastewater sent to VVWRA was 630 acre feet. While the VVWRA is the legal owner of the wastewater under Section 1210 of the Water Code the City of Adelanto believes that it can pump 125 percent of its legal entitlements because 25 percent (2,500/630) is actually returned to the water basin. No changes to the EIR are required.

P. 127, para. 1

The City of Adelanto is litigating the Mojave Water Agency Plan because it does not recognize the water rights that Adelanto believes that it has perfected over the years. The City has no problem of dividing up the water of the Victor Valley after the rights of Adelanto are recognized. As stated above, the City of Adelanto believes that it has water rights to serve a population of 25,000. After this, the City of Adelanto will have to have some type of arrangement with the Mojave Water Agency if it is to continue to implement this General Plan Update. Since the General Plan Update considers a 20 year horizon it is only appropriate that Adelanto utilize some of the mitigation measures from the Water Management Plan. No changes to the EIR are required.

P. 127, para. 3

The City pumped approximately 2,500 acre feet during 1993 and had a population of 12,039. In 1990 the City had a population of 8,517 and pumped 1,574. At approximately 5 persons per acre foot per year the 1985 General Plan which proposed 58,310 persons at buildout would require 11,662 acre feet per year. The 1985 General Plan projected 21,660 persons by the year 2005. This population would require 4,332 acre feet per year.

The Victor Valley Water District, the City of Hesperia, Apple Valley Ranchos, San Bernardino County Services Area 64-Spring Valley Lake, San Bernardino County Services Area 42-Oro Grande, San Bernardino County Services Area 70C-Silver Lakes, Spring Valley Homeowners Association, Barstow and others according to the City pump water from the Mojave River underflow, do not have licenses or permits from the State Water Resources Control Board, have not filed statements of diversion and use with the State Water Resources Control Board and are depleting or threatening to deplete the supply of underflow water upon which Adelanto depends and which Adelanto has the right to use. No changes to the EIR are required.

P. 127, para. 4

The existing water system, the existing sewer system and the existing drainage system are described in the General Plan Update, Public Facilities Element, Pages X-1 to X-10. This reference will be added to Page 124 of the EIR under Section 3.15.1 Setting.

P. 128, para. 4:

See P. 127, para. 4 above. No changes to the EIR are required.

P. 128, para. 5 & 6

Southwest Gas Company does not anticipate any future restrictions to natural gas service because a 30-inch, high pressure, natural gas pipeline (owned by Southern California Gas Company) has an existing tap near the intersection of Rancho Road and Adelanto Road within the Planning Area. Although the existing tap is not yet in service (1991), this line could be used by Southwest Gas Company to provide service to the area. Southern California Gas Company has a 30 inch tap at Rancho Road and Koala Road

According to Southern California Edison, Rosemead there is a major substation in the City of Adelanto at the northeast corner of Delecious Street and Lawson Avenue that will have no problem serving a population of 52,000 by the year 2014. No changes to the EIR are required.

P. 131, para. 1

Approximately 90 miles of 12-inch backbone water line will be required and approximately 3 acres for reservoir sites will be disturbed. The water mains will mostly be in proposed major arterial and collector street right of ways. No changes to the EIR are required.

P132, top

The EIR will be revised to correct 3,006,988 to *13,066,988.*

P. 134, para. 1

Volumes and sizing of facilities are contained in the referenced 1985 Master Plan of regional Storm Drain Channels available from the City Engineer at Adelanto City Hall. The Plan is currently being revised by the San Bernardino County Flood Control District as indicated on Page 134 of the EIR. No changes to the EIR are required.

P. 134, para. 3

Consumption calculations are presented in the referenced General Plan Update, Conservation/Open Space Element, Page VII-22. For no significant impact on Adelanto for 52,000 population over the next 20 years on electricity contact Southern California Edison, Mr. Paul Fraijo at 619-951-3213. Further, according to Mr. Fraijo, if a million persons moved into the High Desert, Southern California Edison would build the facilities necessary to serve that population. For no significant impact on gas for millions and millions of persons contact Mr. Mike Hoyt at 619-245-1601. No changes to the EIR are required.

P. 140, tables

The acre feet per year estimates for 2014 and buildout are consistent with the existing consumption figures of the City of Adelanto using existing conservation measures. According to Roy C. Hampson & Associates the City's Consulting Water Engineer, in their March 2, 1994, Water Supply Report, Page 7, a population of 32,000 would require 7,300 acre feet per year, and a population of 100,000 would require 23,000 acre feet per year. As stated previously the City of Adelanto believes that it has adequate water for 25,000. To implement this General Plan Update additional water will be required. No changes to the EIR are required.

P. 146

The only significant impact is water. Adequate gas and electricity are available to service the proposed project. The 1985 Drainage Plan is adequate until the County of San Bernardino completes its proposed revised plan. No changes to the EIR are required.

P. 147, para. 3

The EIR will be revised as follows: *The impacts discussed in this EIR are the direct result of the growth of the City of Adelanto under this proposed project and as the result of the population growing to approximately 52,000 persons by 2014 and to about 159,000 persons at buildout. The impacts of this growth are well documented in this EIR. This growth, as indicated in most of the topical discussions, is significant and unavoidable.*

P. 153, Tables:

Refer to Response 1.5 above. No changes to the EIR are required.

P. 154: No response necessary.

P. 157 No response necessary.

P. 161, para 3:

See P.134, para. 3 above. No changes to the EIR are required.

P. 164, para. 1: No response necessary.

P. 166, para. 2

The impacts from the existing General Plan, 1985 have been reviewed in the Environmental Impact Report for that project (SCH No. 84073008). This EIR focuses on the existing physical conditions in the actual environment upon which the proposal will operate. A comparison of the impacts from the 1985 General Plan to this General Plan Update, 1994 is not consistent with the requirements of CEQA. No changes to the EIR are required.

P. 167, para. 3

The EIR must describe a range of reasonable alternatives to the project that could feasibly attain the basic objectives of the project, and must evaluate the comparative merits of the alternatives. Significant environmental effects of the alternatives must be discussed, but the discussions may be in less detail than the effects of the proposed project. The City of Adelanto in its discussion of alternatives has not looked at the relative differences of all topical areas, but has made relative evaluations of the impacts of the major topical areas. The alternatives selected are reasonable alternatives, the relative impacts are discussed, and the reasons for rejection are given. For example, Alternative No.1 is analyzed on Page 167, para. 7, Alternative No. 2 on Page 168, para. 2, Alternative No. 3 is the proposed project and the preferred alternative and its impacts are considered in the main part of the EIR, and Alternative No. 4 considers three alternative population options. The first is more intense and would result in greater impacts to the environment, and the other two are less intense and would result in less impact to the environment. The impacts from the alternatives are generally related to the number of persons that will be residing in the city in the future. Alternative No. 5 is the superior alternative based on a population of 25,000 and the relative impact on land is given on Page 170 of the EIR. No changes to the EIR are required.

P. 168, para. 3:

See P. 167, para. 3 above. No changes to the EIR are required.

P. 168, para. 4

This alternative is the proposed project. No changes to the EIR are required.

P. 170, para. 2

Alternative No. 4 considers three alternative population options. The first is more intense and would result in greater impacts to the environment, and the other two are less intense and would result in less impact to the environment. The impacts from the alternatives are generally related to the number of persons that will be residing in the

city in the future. The first option would increase the population from 156,189 to 248,233 or increase the intensity all of the impacts in the EIR by 58 percent. The other two options would reduce the population from 8 percent growth to 6 percent growth and reduce the intensity of all of the impacts by 30 percent.. The third option would reduce the intensity of impacts by about 50 percent by reducing growth from 8 percent to 4 percent. No changes to the EIR are required.

P. 170, para. 3

Alternative No. 5 is almost the same population levels as Option No. 3 of Alternative No. 4 above (27,432 vs. 25,000). All of the impacts for this Alternative would be approximately one-half the intensity of all the impacts discussed in the EIR. For example the following impacts would be reduced by 50 percent:

> Air Quality impacts on Page 44 at 63 tons per day in 2014, Biology impacts of 73,000 acres (Page 67), the areas exposed to noise would be reduced, as illustrated in the General Plan Update, Figures VIII-1 and VIII-2, Land Use impacts listed on Page 84, Population impacts (Page 100) at 52,000 in 2014 and 156,000 at buildout, Housing impacts at 19,400 units in 2014 and 59,000 at buildout (Page 102), Traffic impacts from 12 Zones as shown in the General Plan Update Circulation Element (Page 107), as well as the impacts that are quantified on Pages 106 through 112, Public service impacts from 50-55 fulltime firefighters (Page 117), 65-70 police officers, 16,000 elementary students (Page 118), solid waste at 33,700 tons (Page 119), Utilities impacts of 20,153 acre feet per year in 2014 and 60,460 acre feet per year by buildout, Sewer impacts at 13.01 MGD in 2014 and 39.02 at buildout (Page 132).

No changes to the EIR are required.

The responses to the City of Victorville are not considered by the City of Adelanto to include new significant information that would change the EIR or deprive the public of the opportunity to comment on any substantial adverse environmental impact or a feasible way to mitigate or avoid such an impact. The information provided in the responses above do not identify any new substantial environmental impacts not considered in the EIR, new mitigation measures proposed to be implemented not already included in the EIR, and the information provided does not increase the severity of any environmental impact not previously discussed in the EIR. No feasible alternatives or mitigation measures are proposed that would lessen environmental impacts, the draft EIR is fundamentally and basically adequate, and the conclusions contained in the draft EIR do enable meaningful public comment on the draft EIR, as evidenced by the comments themselves.

Mojave Water Agency

COMMENT LETTER 7.0

Ms. Patricia Chamberlaine
City of Adelanto Planning Department
11600 Air Base Road
PO Box 10
Adelanto, California 93201

VIA HAND DELIVERY

October 20, 1994

RE: Draft Program Environmental Impact Report
City of Adelanto General Plan Update

Dear Ms. Chamberlaine:

Thank you for the opportunity to comment on the referenced Draft Program EIR (DEIR). The Notice of Availability transmitted with the DEIR indicated that no public hearings have yet been scheduled for consideration of the document. The MWA requests notification in advance of any future hearings on the DEIR or the General Plan, and that this letter and attachments be entered into the administrative record for the DEIR and General Plan.

7.1 As noted in the MWA comments submitted on the NOP for this project dated June 21, 1994 (copy attached), it is still unclear as to how the City proposes to use the Program EIR for future projects. Although the document does explain that future projects could be subjected to additional environmental review, there are passages in the DEIR that further confuse the intent. Specifically, page 62 of the DEIR discusses riparian corridors within the City planning area. The section does not map the areas so defined, but lists a number of "permitted uses" within riparian corridors. Included are: recreation, education, interpretive trails, fish and wildlife management activities, necessary water supply projects, pipelines, flood control projects, "resource consumptive use", and bridges when supports are not in significant conflict with corridor resources. Most of these activities would have significant near or long-term effects on riparian resources, and would require careful environmental review. By

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George R. Parker Division #1 | Carl N. Dalton Division #2 | Bill A. Christopher Division #3 | Peggy Sartor Division #4 | Thomas H. Irwin Division #5
Beverly J. Lowry | John H. Russell | Larry W. Rowe, P.E.

characterizing these uses as "permitted " in the DEIR, the impression is given that no additional analysis or mitigation would be required other than that contained within the EIR, which is not sufficient. If this impression is incorrect, the document should clarify that aspect. Any project impacting riparian resources, proposals to develop water supply within these resource areas, or any aspect of General Plan implementation with potential site specific environmental impacts should be appropriately analyzed under CEQA.

7.2 Pages 124 through 127 contain information which the City purports to support the claim to a "legal" right to pump sufficient water to supply a maximum population of 25,000 persons. The claims made by the City have not been adequately substantiated and are the subject of legal challenge, and it may be found that the City has over-produced what license it may have acquired from the State Water Resources Control Board. Active litigation which affects the City claims to water rights include both the pending water rights trial in Riverside County Superior Court Case 208568 (City of Barstow et al. v. the City of Adelanto et al.), and litigation between the City of Adelanto and the Federal Government over water rights and water facilities located at George Air Force Base. The EIR does not reference that the City of Adelanto has submitted an application for additional water supply appropriation from the Mojave River, which has not been acted upon by the State Water Resources Control Board because the Mojave River has been previously declared fully appropriated. The EIR therefore overstates the availability of water supply in light of the existing and future overdraft, and the unsubstantiated claims to water rights made by the City.

7.3 The DEIR discusses the Mojave Basin area adjudication and the resulting Stipulated Judgment, but it does not acknowledge the City of Adelanto's' active opposition to the Stipulated Judgment and the MWA Regional Water Management Plan. However, review of DEIR pages 140 and 154-156, which appear to rely upon the RWMP and the Stipulated Judgment, would suggest that the City supports the efforts of the adjudication and the MWA Regional Water Management Plan in order to allow growth in the City.

7.4 It is noted that the DEIR considered an alternative General Plan land development scenario that would limit development to the level of 25,000 persons that the City alleges to have secured water rights to. The alternative (No. 5, page 170) is stated to be superior for the purpose of environmental analysis, but is rejected by the City in favor of the proposed General Plan "...because of the political consequences of having only a limited number of voters. The cities with substantial population in the Victor

Valley wield superior power in the region and are able to dominate the dispersion of resources, decision making, spheres of influence, annexations, services, etc. If Adelanto is ever able to compete in this very important arena it must have a population exceeding 150,000 persons with the commensurate voting power. If the City were limited to 25,000 persons it would not be able to compete politically in the Victor Valley and may not even be able to survive as a viable City. The proposed project has been selected because it provides a balanced community at an efficient size that will be able to successfully compete in the region."

7.5 There are two important aspects about the above statement by the City. First, as noted, the availability of water for the City for up to 25,000 persons is the subject of legal challenge. Additionally, the overriding consideration in the City's statement is the need to amass political power for the City, and there is no basis in the DEIR to justify the accelerated and unmitigated overdraft to the regional water supply which would be required to do so.

7.6 The EIR analysis of cumulative impacts to the region's water supply contains incorrect interpretation from the MWA Regional Water Management Plan (RWMP). On page 154, item 3 states that if no action is taken to reduce overdraft, the ground water basins in the Mojave River Basin will be depleted by an estimated 1,860,000 acre feet by 2015. This estimate would actually be in <u>addition</u> to water which has been depleted from storage. The DEIR then assumes that the remaining 1,140,000 acre-feet would be available for domestic use, and concludes that supply would last until 2028. This estimate does not account for agricultural use which could still be viable and therefore would also utilize available supply, and does not account for potential decreased quality (and therefore limited use) as groundwater levels continued to lower. The DEIR does not contain the factual basis to support the theory proposed that water supply would be available through 2028, and the MWA would like to see the supporting data. A copy of the MWA RWMP and EIR for the RWMP are enclosed for your use in assessing the regional implications of new development, and are incorporated by reference.

7.7 Page 155 of the DEIR includes discussion of the relative water demand of the MWA service area and the Metropolitan Water District of Southern California (MWD), and notes that the MWA demand is 8 percent of the MWD demand. The DEIR then concludes that because of differential water demand between the two State Water Project Contractors, that an adjustment of allocated water between the two will provide the water supply needs of the MWA area. This analysis has no bearing on the facts associated with allocation of State Water Project supplies. The same passage states that

the State Water Project allocation to MWA will have to be doubled to meet future demand. That estimate obviously does not account for the water supply for municipal and industrial uses that would be transferable from in-basin agricultural uses under the stipulated Judgment.

7.8 Page 129 of the DEIR discusses potential impacts to water supply from development under the proposed General Plan. The associated summary of land uses and water use indicates that single family and medium density residential uses require 396 gallons per dwelling per day. Assuming only 2.6 persons per dwelling, this would equate to approximately 152 gallons per person per day, which is a very low per capita use figure if it expresses demand and not consumptive use, particularly considering that single family and large lot type (desert) development are included in the figure. Because the 2014 water use is projected using these estimates, the actual water demand is underestimated. These factors are also inherent in the subsequent table which summarizes projected water use at buildout, which would also result in underestimation. On pages 139-140, the DEIR discusses reduced future water needs due to mitigation measures contained in the document. The summary assumes that mitigation will reduce water demand to 240 gallons per dwelling unit per day. If 2.6 persons reside in each unit on average, this would equate to 92 gallons per person per day, which is extremely low for this or any region. The resulting summary estimates of water use at 2014 and at buildout are therefore very low. The reduction of use attributed to non-residential uses should likewise be revisited because reduction to an average use of 900 gallons per acre per day would also be very low. Additionally, the growth inducement section of the DEIR does not quantify resulting potential increase to water demand; and, the referenced tables also do not appear to estimate water needs for community facilities, such as parks, public landscaping, and water availability to provide fire fighting capability.

7.9 The discussion on impacts to water supply identifies the Mojave Water Agency and the imported water supply from the State Water Project as the water supply for future growth in Adelanto, including the provision of in-basin transfers, acquisition of out of basin rights, and reclaimed water. The document asserts that the construction of potable water treatment plants using water from the State Water Project as identified in a MWA Master Plan for water delivery defines the infrastructure that would be needed to supply the City. The Master Plan discussed appears to be the 1990 analysis prepared for the MWA by Malcolm-Pirney, Inc. Please note that the MWA has since prepared a Regional Water Management Plan (copy attached), which did not incorporate the

Mojave Water Agency

treatment plant facilities described in the Malcolm-Pirney study, and is therefore not currently a viable option.

7.10 It is worthwhile to note that written communications from the City to the Mojave Water Agency, regarding the MWA Regional Water Management Plan and proposed Ordinance No. 9, attempt to convince the MWA that there is no hope that the MWA will ever acquire sufficient imported water supply to meet current and future water supply needs. The Mojave Water Agency does not agree with these assertions, but it is necessary to reconcile the tremendous level of new development and boundary expansion proposed by the City General Plan, the concomitant water demand increase, and the City activities regarding water supply issues. The concept stated in the DEIR that imported water supply from the State Water Project will supply future growth in the City is entirely inconsistent with the position taken by the City regarding future water supplies for the region. If the City truly believes the referenced assertions, how can the City then assume that there is any future water supply to provide for growth in the City? As examples of these inconsistent assertions by the City, I have attached three letters from your Consultant, Roy C. Hampson and Associates; two dated April 8, 1994, and the third dated July 6, 1994.

7.11 The inconsistency between the assertions by the City regarding water supply and the contemplation of new development and increased water use by the City is further exemplified by the Cross-Complaint filed by the City in Riverside County Superior Court Case No. 208568 (City of Adelanto, Cross Complainant v. Mojave Water Agency et. al). That document (copy attached) specifically requested a Court-ordered moratorium on new water usage.

7.12 The City of Adelanto also has apparent difficulty meeting immediate water supply needs, regardless of desires for new growth. Attached are four articles recently appearing in local newspapers describing the City's need to require residents to reduce their water use by 50 percent due to inability to meet health standards and emergency supply requirements. If these reports are correct, how is it possible for the City to approve new development which will require additional water supply when the City cannot provide a safe and reliable water supply to existing residents of the City? This alone would render City claims to "adequate legal water to serve a population of 25,000..." effectively moot and of no meaning whatsoever to the potential for increased development in the City of Adelanto.

Mojave Water Agency

Ms. Patricia Chamberlaine
GP Update DEIR
10/20/94
Page 6

7.13 The summary section of the DEIR (page 7) states that "The major issue to be resolved prior to implementation of the General Plan Update, beyond a population level of 25,000 persons within the project area, is the availability of water. This issue not only effects the City of Adelanto, but also all of the Victor Valley cities." First, as has been noted, the "legal" right to water for the stated 25,000 persons is a point of legal contention, and this argument avoids the principle requirement of CEQA that the EIR analyze significant adverse impacts, feasible and reasonable mitigation, and alternatives analysis. Additionally, it is important to note that the other cities and the County have acknowledged the overdraft problem, worked to develop a solution to the overdraft, and have stipulated to the resulting Mojave Basin Area Adjudication Stipulated Judgment, which we believe provides adequate mitigation to the overdraft. The Stipulated Judgment provides mechanisms for assessment and funding of supplemental water purchases, reduction of groundwater overdraft, transfers of water supply from agriculture to municipalities, and mitigation for riparian habitat. The City of Adelanto has not participated in the referenced process, has challenged the Stipulated Judgment and the MWA RWMP, and has not identified alternative means to address the overdraft or to acquire imported water supply to provide for growth in the City. Therefore, it is not correct to state that the same water supply issues face the City of Adelanto and the other Cities in the area.

7.14 The DEIR identifies the alleged "sources" of water supply to the City, based upon a claim to a 4.5 cubic foot per second license to underflow, pumping of groundwater (stated as not requiring a license), water from wells at George Air Force Base, and water exchanges with George Air Force Base to trade fluoride contaminated water currently pumped by the City for potable water used to irrigate the Base golf course. Each of these sources of supply are impacted by the referenced controversy surrounding the claims to water supply by the City. Recent attempts by the City to acquire license and facilities associated with water historically produced at George Air Force Base through condemnation action, have been met by Court decision requiring environmental analysis before attempts by the City to condemn can proceed. This potential source for use by the City is therefore currently in doubt. In fact, the City has received correspondence from the Department of the Air Force dated June 23, 1994 (copy attached), stating that water currently provided to the City by the Air Force is an interim measure to temporarily aid the City with current water quality problems, and that this supply will only be available to the City until January 1, 1995. It should also be noted that the referenced means of supply discussed in the DEIR would require the cooperation of the then current owner of the George Air Force Base water facilities, voluntary transfer of ownership of the affected facilities to the City, or determination of

Mojave Water Agency

City ownership by a Court. Because none of these have yet occurred, the ability to use these facilities as identified is not yet possible. The DEIR also identifies a component of the supply as a groundwater "credit" for water originating in the City subsequently discharged to the Mojave River by the Victor Valley Waste Water Reclamation Authority. This would also require institutional arrangements not yet existing.

7.16 Page 134 of the DEIR states that the City will "Coordinate with all local agencies providing water service and protection to achieve effective local and regional planning." The Mojave Water Agency would be the appropriate Agency to address regional water supply problems. In fact, Government Code Sections 65302(d) and 65352 et seq. requires that the City cooperate with the MWA in preparation of the General Plan Update regarding water resources issues. The City has not accomplished this. The City also has not identified the potential water quality impacts that would result from the significant increase to groundwater pumping proposed, which would also be manifested in changes to surface and groundwater quantity, increased imported water supply needed, changes to rate and direction of groundwater movement, and substantial reduction of water supplies (both native and imported) that would otherwise be available for public use. The DEIR should carefully address these issues, and should include evidence to support your findings.

7.17 There are significant near and long term water supply issues currently facing the City of Adelanto which require resolution prior to embarking on major development activity. Consideration of the large scale of development envisioned by the General Plan is premature at this time.

Again, thank you for the opportunity to comment. Please call me at 240-9201 if you have any questions.

Sincerely,

N. T. Caouette

Norman T. Caouette
Director of Planning and Resource Development

c. Planning/Res. Dev. Comm

Mojave Water Agency

Attachments: Letter from N. T. Caouette of MWA to City of Adelanto dated June 21, 1994; Letter from Craig Morgan of Roy C. Hampson and Associates dated April 8, 1994; Letter from James Kuykendall of Roy C. Hampson and Associates dated April 8, 1994; Letter from James Kuykendall of Roy C. Hampson and Associates dated July 6, 1994; four media articles regarding Adelanto water supply; City of Adelanto Cross-Complaint, RE: Riverside County Superior Court Case No. 208568; MWA RWMP; RWMP EIR; Stipulated Judgment for Riverside County Superior Court Case No. 208568; Letter dated 6/23/94 from Department of the Air Force to Adelanto

L.D

DEPARTMENT OF THE AIR FORCE
HEADQUARTERS AIR FORCE BASE DISPOSAL AGENCY

AFBCA/SP
1700 North Moore Street
Arlington, VA 22209-2802

JUN 23 1994

Ms Patricia Chamberlaine
Adelanto City Manager
11600 Air Base Road
Adelanto, California 92301

Dear Ms Chamberlaine:

After considering your request for water and the constraints presently effecting our ability to respond to your request, we can increase the quantity of water made available to Adelanto as follows: (a) beginning two days after Adelanto agrees to the terms set out below, we will increase the period we are making water available to Adelanto at Booster Station No. 1 from eight hours per day five days per week to twelve hours per day seven days per week, and (b) beginning with the inception of a new agreement relating to the provision of caretaker services for George AFB, we will make water available 24 hours per day seven days per week. We anticipate that we will be able to begin the 24 hours per day level of service by October 1, 1994. Until then we will endeavor to ensure that water will be available at Booster Station No. 1 between the hours of 7:00 a.m. and 7:00 p.m. and expect that you will staff your equipment accordingly.

I regret that we are unable to provide greater support, however. As we previously explained, we are constrained by existing contracts and limited funding in addition to concerns with the capacity of the physical plant to operate at increased levels. We do not believe it is in either of our interests to risk the integrity of the system and we will use the next several months to evaluate the capacity of the system and need for repair or enhanced maintenance.

While we believe we can perform as indicated above, nothing in this letter should be construed as a contractual obligation to do so. We are making water available to you solely in response to your health-based request. We will, of course, require reimbursement for the additional costs incurred in providing water during these periods. Mr. Collins' staff is preparing cost estimates in anticipation that this is acceptable to you.

I must reiterate that we can offer only a temporary solution to Adelanto's water quality problem. <u>We will provide water as indicated above only until January 1, 1995</u>. It is our belief that this will provide Adelanto adequate time to develop other permanent solutions to this

problem. We do not believe it is in either of our interests to allow this emergency to develop into a situation where Adelanto becomes dependent on the United States' water. While we have, from time to time, supplied water to Adelanto to meet emergency requirements, these acts of good will were in no way intended to convey an interest in water rights held by the United States or establish a permanent entitlement. Furthermore, the United States needs its water at George AFB for purposes consistent with the Record of Decision and the conversion of the facility. The water is an asset of the United States and it will be used in a manner consistent with the best interests of the United States, including all the citizens of Victor Valley. The ROD clearly sets forth the decision to ensure the continued availability of water for use at George AFB to aid the conversion process and we must preserve our water for such purposes. However, in assisting you in developing a permanent solution, we are willing to discuss an early transfer of the existing Air Force wells to Adelanto--if the United States is able to obtain an alternate and dependable source of water to meet its continuing needs at George AFB.

If you have any questions, concerning this letter, please contact Mr. Collins, Site Manager, George AFB at (619) 246-5360. Your consideration is appreciated.

Sincerely,

John E.B. Smith

Mojave Water Agency

Ms. Patricia Chamberlaine
City of Adelanto Planning Department
11600 Air Base Road
PO Box 10
Adelanto, California 93201

June 21, 1994

RE: Notice of Preparation of a Draft Program Environmental Impact Report
City of Adelanto General Plan Update

Dear Ms. Chamberlaine:

Thank you for the opportunity to comment on the referenced Notice of Preparation, which was received by our office on May 24, 1994. Your transmittal requests comment on the Notice of Preparation of an Environmental Impact Report, and it is therefore anticipated that the General Plan Update and Draft EIR will both be circulated for review and comment at a latter date. The Agency requests the opportunity to provide additional comment regarding the General Plan and the DEIR at that time.

Page 23 (section 2.3.12) of the Initial Study incorporated with the Notice of Preparation discusses "Subsequent Projects". This section states "Projects that conform to the goals, policies and programs of this General Plan Update and also conform to the requirements of the Adelanto Zoning Code and the Standard Conditions of the City including residential projects, subdivisions, commercial projects, industrial projects and capital improvement projects are intended to be included in this Program Environmental Impact Report." The intent of this section is not clear, but it could be interpreted to mean that all of the referenced projects (essentially all development and capital improvement projects in the City), would receive environmental review by the General Plan Program EIR sufficient to allow construction to proceed without additional environmental analysis (or circulation for review and comment). This would not be permissible under the Public Resources Code, which defines the content and function of a program EIR.

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George R. Parker Division #1 | Carl N. Dalton Division #2 | Bill A. Christopher Division #3 | Peggy Sartor Division #4 | Thomas H. Irwin Division #5
Beverly J. Lowry Division #6 | John H. Russell Division #7 | Larry W. Rowe, P.E. General Manager / Chief Engineer

A program EIR is prepared for an agency program or a series of actions (such as a General Plan) that are closely related, including phased projects, agency plans, policies and regulatory programs. When subsequent activities are proposed, an Initial Study must be used to determine whether an additional CEQA document must be prepared because of significant effects not examined in the program EIR. The purposes of a program EIR are to provide a more exhaustive consideration of effects and alternatives than would be practical in an EIR on an individual action; to ensure consideration of cumulative impacts that might be slighted in a case-by-case analysis; to avoid duplicative reconsideration of basic policy considerations; and, to allow the lead agency to consider broad policy alternatives and program-wide mitigation measures at an early stage of the process when the City would have greater flexibility to deal with basic problems or cumulative impacts. These are the objectives which the draft EIR should achieve in the analysis of the proposed General Plan Update. The current NOP, and the General Plan Update upon which it relies, do not contain the substance necessary to address the issues of significance to the Mojave Water Agency.

The issues of most significant concern to the Mojave Water Agency are the potential for the proposed General Plan Update to impact water supply and water quality within the local area and the region. Section 3.11 on page 38 of the Initial Study states that the population within the planning area is projected to increase to 52,000 by the Year 2014. Objective 3 on page 8-9 indicates that "...median islands should be planted and border area planting areas should be increased." The passage also indicates that drought-tolerant landscape materials are to be emphasized, but unless these planned additions are limited to native plants, then additional water demands will result for landscape irrigation, particularly considering the need to add additional recreation facilities. Pages 1-4 of Section 10 within the General Plan Update document provided states that the "...City currently has enough water supplies under current legal rights and current legal groundwater supplies to supply approximately 5,500 acre-feet a year and serve a population of approximately 24,000 people, or almost double the current population." Even if those statements were correct, it is apparent that the claimed 5,500 acre-feet of "legal" right is insufficient to meet the projected population of 52,000 and any new demand from increased landscaping and recreation area irrigation.

Neither the Initial Study nor the General Plan update passage referenced above acknowledge that the "right" claimed is the subject of active litigation, which includes a potential finding that the City may have in fact over-produced what right it may have acquired from the State Water Resources Control Board. The referenced litigation includes not only the pending water rights trial in Riverside County Superior Court

Case 208568 (City of Barstow et al. v. the City of Adelanto et al.), but also litigation between the City of Adelanto and the Federal Government over water rights and water facilities located at George Air Force Base. The referenced facilities at George Air Force Base are the same as those that the General Plan Update allege are the source of available water supply for the City of Adelanto.

Additionally, the Notice of Preparation and the General Plan Update do not reference that the City of Adelanto has submitted an application for additional water supply appropriation from the Mojave River, which has not been acted upon by the State Water Resources Control Board because the Mojave River has been previously declared fully appropriated. The documents provided therefore overstate the availability of water supply in light of the existing and future overdraft which would be induced by the proposed General Plan, and the unsubstantiated claims to water rights made by the City. The NOP and the General Plan Update also do not acknowledge the City of Adelanto's active opposition to the Mojave Basin Area Adjudication Stipulated Judgment, which provides mechanisms for assessment for supplemental water, reduction of groundwater overdraft, transfers from agriculture to municipalities, and mitigation for riparian habitat. Instead, the NOP and General Plan Update rely on a supposition that the State will somehow increase the MWA entitlement of State Project Water.

Section 3.3 on page 34 acknowledges that the proposed General Plan Update will result in an increase to water consumption and that additional overdraft "may" result. It does not, however, indicate specific steps to be taken by the City in lieu of stipulating to the referenced Judgment to address the overdraft (which would be tremendously increased by the high degree of growth proposed by the General Plan). The document only suggests that policies to aid programs to increase imported water supplies for the area from the State Water Project and the Colorado Aqueduct (to which the area does not have direct access), and through water transfers, will provide the needed water supply. It is worthwhile to note that these methods of securing additional water for the region have been described by the City as implausible in recent communications to the MWA regarding the Agency's Regional Water Management Plan.

The Initial Study document states on page 9 (Objective 8) that the City will "Work with San Bernardino County to resolve regional problems such as...water supply...and other issues." The Mojave Water Agency would be the appropriate Agency to address regional water supply problems. In fact, Government Code Sections 65302(d) and 65352 et seq. requires that the City cooperate with the MWA in preparation of the

General Plan Update regarding water resources issues. The City has not accomplished this. The City also has not identified the impacts that would result from the significant increase to groundwater pumping proposed, which would be manifested in changes to surface and groundwater quantity, changes to water quality from decreased groundwater in storage and increased imported water supply needed, changes to rate and direction of groundwater movement, and substantial reduction of water supplies (both native and imported) that would otherwise be available for public use. The Program EIR should carefully address these issues, and should include evidence to support your findings.

The large amount of development proposed, development of linear park facilities along natural and developed storm channels, and proximity to the Mojave River and it's tributaries could also result in significant water quality impacts. These impacts could be in the form of contamination from sedimentation and toxic fertilizers and pesticides, runoff from surface streets and parking lots, and industrial land use activities. The Program EIR should assess the potential impacts to water quality from these and other sources, and develop appropriate mitigation measures. The general availability of adequate quality water for drinking water supplies should also be assessed.

The land use map in the General Plan document indicates potential future development in close proximity to areas along the Mojave River which contain significant stands of riparian vegetation/habitat. Prior discussions with the Department of Fish and Game has indicated a keen interest on their part regarding impacts to these areas. The Agency recommends that the City consult with the Department of Fish and Game regarding development and potential impact to these areas due to toxic materials and sedimentation, or due to reduced groundwater levels induced by the City in order to supply the projected development. The Initial Study indicates on page 41 (section 3.19, Recreation) that recreation opportunities are and will be partially met through access to open space along the Mojave River. The increased use of the referenced riparian areas by people for recreation should also be assessed by the Program EIR and reviewed with the Department of Fish and Game.

The General Plan Update describes several capital improvement programs that are stated as necessary in order for the large amount of development desired. The referenced capital facilities include new water supply systems, flood control facilities, waste water treatment, and reclamation facilities. The Program EIR should assess the cumulative effects of these facilities and increased ground water pumping on the local and regional hydrologic systems. The General Plan program should also indicate how

the City will finance needed capital improvements and the acquisition of imported water that would be needed.

Cumulative impacts in general should be assessed for the project relative to other projects planned within the area, and associated impacts on natural resources, particularly water supply. The cumulative analysis of water supply impacts should assess the impacts to "downstream" water users, and water users in the area in close proximity to where the City would locate new wells or other water facilities to supply the new growth in the City. Attention should also be given to the water supply factors that caused downstream entities (City of Barstow and the Southern California Water Company) to file the initial lawsuit claiming injury to their water supply due to growth and groundwater production by water producers in the areas upstream. The information in the General Plan Update currently only provides a cursory discussion of Victor Valley water supply issues.

As noted, the documents provided estimate the City population to increase to 52,000 by 2014. The Program EIR should consider the cumulative and growth inducing impacts associated with such a significant rate of growth in the context of other known projects in the region, growth projections for the area by the Southern California Association of Governments, and other regional programs (air quality, waste management, transportation planning, etc.). The Draft EIR should also assess the potential for construction activities, cumulative effects and growth inducement to impact water resources (quantity and quality), vegetation and wildlife resources, transportation and circulation, noise, air quality, population and housing, human health, and changes to land use patterns.

Page 27 of the Initial Study (checklist item 5.b) states that the General Plan will not result in reduction of the numbers of any unique, rare or endangered species of animals. This is inconsistent with potential for development to displace or "take" desert tortoise. Page 35 of the same document states that over 8,000 acres of sensitive habitat area will be significantly altered by the General Plan, including tortoise habitat which will require "relocation". These processes will require a take permit from the Fish and Wildlife service, and would likely result in the reduction of the number of tortoises.

Page 41 of the Initial Study (3.20, Cultural Resources) indicates that no significant cultural resources exist in the area, other than at George Air Force Base. The checklist items 20 a.-d. indicate the same conclusion. The environmental impact analysis

conducted for the MWA Regional Water Management Plan found the Mojave River corridor to be the most sensitive area for potential cultural resources within the RWMP boundaries. A records search conducted for that area at the San Bernardino County Museum Archaeological Information Center and the BLM indicated that only a small portion of the area has been adequately surveyed, but that areas north of Victorville along the River corridor have significant potential for historic and cultural resources. If fact, this conclusion and the potential for impacts to the riparian vegetation and habitat areas discussed above, caused the Agency to reconsider potential alignments for the proposed Mojave River Pipeline. The General Plan Update Program EIR should address the potential to impact cultural and/or historic resources within potentially sensitive areas.

Again, thank you for the opportunity to comment. Please call me at 240-9201 if you have any questions.

Sincerely,

N. T. Caouette

Norman T. Caouette
Director of Planning and
Resource Development

c. Planning/Res. Dev. Comm

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April 8, 1994

Mr. Larry W. Rowe, General Manager
Mojave Water Agency
P.O. Box 1089
Apple Valley, California 92307

Re: Mojave Water Agency's Final Draft Regional Water Management Plan, September 1993

Dear Mr. Rowe:

Thank you for the opportunity to comment on the Final Draft Regional Water Management Plan (Draft Plan) prepared for the Mojave Water Agency (MWA) by Bookman-Edmonston Engineering, Inc. My comments on the Draft Plan are submitted on behalf of the City of Adelanto.

In general, the Draft Plan is more a concept than a real implementable plan. By this I mean that the Draft Plan does not provide a detailed specific project, but rather a list of possible measures and ideas. The Draft Plan provides a laundry list of alternatives for distributing water within the Mojave Basin, but fails to address the broader issues. Those broader issues are: 1) where will the water come from; 2) how much water is needed; 3) who will pay for it; and 4) what are the water importation alternatives? These broader issues should be specifically defined and addressed in the plan.

The Draft Plan's biggest flaw is that it makes the assumption that there is sufficient water available through water transfers to meet anticipated demand through the year 2015. The Draft Plan projects that total annual consumptive use in the Mojave River Area will reach 160,500 acre-feet by the year 2015. The Draft Plan estimates the safe yield of this area to be 55,800 acre-feet per year. This is approximately 10,000 acre-feet higher than the safe yield estimate of the Department of Water Resources in Bulletin No. 84. Assuming the Draft Plan's figure of 55,800 acre-feet per year is correct, a deficit of 104,700 acre-feet per year results which must be imported or approximately 45,000 acre-feet per year more than the Mojave Water Agency's State Water Project maximum entitlement of 50,800 acre-feet.

The assumption that water transfers can readily be accomplished is wrong in that there are many obstacles to their implementation and the majority of past transfers completed were accomplished during the drought on an emergency basis.

By assuming that water will be made available, the Draft Plan then considers the alternatives of supplying water within the MWA boundaries. This approach runs the risk of building pipeline facilities with no water to put in it. The plan must address the broader issues of water supply before identifying alternatives for distributing water within the agency's boundaries.

A specific permanent transfer must be identified as part of the Draft Plan if the MWA is going to accept the responsibility of supplying the projected water needs of the high desert. Alternatives to the proposed project which should then be considered are: 1) The supply of only MWA's 50,800 acre-feet allotment (40,000 acre-feet estimated annual average), 2) The supply of 50,800 acre-feet plus an additional amount to alleviate the current overdraft with no additional growth, 3) meeting supply needs through transfers of waters within the Mojave River Basin plus MWA's 50,800 acre-feet, and 4) The No Project Alternative.

The following specific comments on the Draft Plan are made:

1. The Draft Plan estimates the "safe yield" of the Mojave River area as 55,800 acre-feet per year. This is 10,000 acre-feet higher than the safe yield estimate made by the Department of Water Resources in Bulletin No. 84. The reason for the discrepancy is that the Draft Plan estimates the water requirements for riparian habitat at a much smaller quantity than did the Department of Water Resources.

2. The Draft Plan estimates that the current annual overdraft is 68,000 acre-feet. This is lower than the previously reported 90,000 acre-feet figure provided by Bookman-Edmonston in March of 1992. The reasons for this discrepancy are differences in the consumptive use estimates made for agricultural and, again, the reduced estimate of the amount of water required for riparian habitat.

3. The Draft Plan recommends the construction of recharge facilities to store imported water. On page 58 it is stated that these "facilities should be located near the upstream ends of the Alto, Centro and Baja subareas in the Mojave River alluvial aquifers to take advantage of dewatered ground water storage capacity within each subarea and to reduce the potential for increasing amounts of rising water at the downstream ends of the subareas."

   In order to maintain recharge to the City of Adelanto's wells located near the river, surface flow through the Lower Narrows must be maintained. The Draft Plan's statement concerning rising waters at the end of the subareas is in conflict with Adelanto's needs. It is also indicative of the plan's lack of concern over riparian habitat which requires rising water conditions and near surface flow.

The City of Adelanto must be assured that at least historic flow rates are maintained at the Lower Narrows. The current stipulation does not provide for this. Rather, the stipulation provides that historic flow rates be maintained downstream just below the discharge of the Victor Valley Regional Wastewater Reclamation Plant. Hence, the Narrows could be dry, providing no recharge to Adelanto's wells, and all water commitments to the Centro subbasin could be met through wastewater discharges.

4. On page 62, the plan suggests that stormwater outflows below Afton Canyon be reduced to the "minimum feasible flow". "Minimum feasible flow" is not defined. Waters would be recharged higher on the river by constructing instream recharge facilities rather than be allowed to flow past Afton Canyon. This could adversely effect or eliminate the Mohave Tui Chub located downstream at Soda Springs.

5. On page 65, the Draft Plan states that the MWA "may be able to obtain additional water supplies through water transfers from other agencies or individuals" [emphasis added]. The term may is the correct term to use in describing the possibility of obtaining water transfers. However, in no way can the high desert area rely on an action which is only conceivable and not absolutely assured. Again, there is the need to identify a specific permanent water transfer as part of this plan.

6. The Draft Plan states on page 124 that data will be needed on all parameters that affect the hydrologic inventory such as surface flows, groundwater pumpage, groundwater levels, wastewater discharges, water quality, and water storage. It is envisioned that new wells will be constructed to determine groundwater flow quantities. The cost of this program is estimated at $300,000 per year which would be used to hire additional staffing. No money is included for well construction or cooperative studies with the U.S.G.S.

7. The Draft Plan recommends that water be released to the Mojave River from the Morongo Basin Pipeline. In order to accomplish this, a four mile pipeline from the Morongo Pipeline upstream to a 400 to 500 acre recharge facility within the Mojave River Channel is proposed. There is no information presented in the report identifying how the 400 to 500 acre figures were determined. The maps in the report erroneously show very small areas for recharge. Five hundred (500) acres is an area approximately 1/4 mile by 3 miles in dimension. Another plan alternative is to release water from the Morongo Pipeline to recharge facilities below the pipeline. The costs of these alternatives are estimated at $25.9 and $14.1 million dollars respectively and include the cost of enlarging the first reach of the Morongo Basin Pipeline.

The specific method of payment for this project is not noted. It is unknown whether the City of Adelanto would be responsible for a portion of the costs.

8. Channel improvements are to be made in the Baja Subarea. It is proposed that temporary sand dams be constructed across segments of the river. These improvements would reduce flow through Afton Canyon.

9. The Draft Plan proposes four water conveyance facilities: Morongo Basin Pipeline Extension, Morongo Basin Pipeline Turnout to Lucerne Valley, Mojave River Aqueduct, and El Mirage Turnout. The plan provides that the benefitting area must pay for the cost of constructing and operating the conveyance facilities. This would be done through the establishment of Improvement Districts. There is no information provided as to who the benefitting parties are to these facilities. Is it expected that the City of Adelanto will participate in both the Mojave River Pipeline and the recharge to the river from the Morongo Basin Pipeline? It is unknown whether Adelanto would directly benefit from the construction of any of these facilities.

10. The Draft Plan identifies three potential methods of payment for imported water: 1) the method identified in the proposed stipulation for judgment; 2) the formation of Zones of Benefit; and 3) production assessments. The plan should specify which of these methods are to be used.

In closing, the continued growth and economic stability of the high desert area depend upon an adequate and reliable water supply. This supply does not presently exist. Planning for water supply needs must focus on specific actions. The Draft Plan needs to identify a specific water transfer project if it is to achieve its desired ends.

Again, thank you for the opportunity to comment on the Final Draft Regional Water Management Plan. If you have any questions concerning these comments, please contact our office at (916) 541-1912.

Very truly yours,

Craig W. Morgan
Professional Civil Engineer

REGISTERED PROFESSIONAL ENGINEER
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cc: City of Adelanto/ Patricia Chamberlaine
Michael B. Jackson, Esq.
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April 8,1994

Mr. Larry W. Rowe, General Manager
Mojave Water Agency
P.O. Box 1089
Apple Valley, California 92307

SUBJECT: Draft Program Environmental Impact Report for the Mojave Water Agency Regional Water Management Plan

Dear Mr. Rowe:

Thank you for the opportunity to comment on the Draft Program Environmental Impact Report (EIR) concerning the Mojave Water Agency (MWA) Regional Water Management Plan (RWMP) prepared by Jones & Stokes Associates. Our comments on the EIR are submitted on behalf of the City of Adelanto.

The EIR shares many of the same problems as the RWMP. A separate comment letter addresses that document. Many of the comments contained in that letter are also appropriate to this document. A copy of that letter is attached for your convenience.

GENERAL COMMENTS

Safe yield numbers used in the document are not consistent with those developed by the Department of Water Resources (DWR) in Bulletin 84. Also, numbers related to water usage and imported water are not used consistently even within the document itself. Specific reference to areas such as this are listed below. The document does not attempt to clarify issues, it apparently intends to confuse the facts.

The assumption is made throughout the document that 40,000 acre-feet of the 50,800 acre-feet allocation from the State Water Project (SWP) will be availableon a long term basis. The fact that most contract agencies nave been trying unsuccessfully to buy their full allotment for years is ignored in the document. The increasing pressure to keep more water in the Sacramento-San Joaquin Delta to maintain water quality in the Bay-Delta system is also totally ignored. The probability that any water from this source will be available to the Mojave Water Agency via the SWP on a long term basis is minimal.

The issues related to legal requirements are not addressed in the document. Examples include water conservation mandated by state law, the illegal transfer of riparian water rights to non-riparian lands, and the transfer of any water right without approval from the State Water Resources Control Board (SWRCB).

The RWMP and the Draft EIR virtually ignore the existing overdraft levels. The fact is that almost half of the existing groundwater storage has been depleted and there is no provision made to replace that water with the RWMP. It is also only mentioned in passing in the EIR. This is one of the most important cumulative impact issues that must be addressed in this document.

SPECIFIC COMMENTS

Page 2-7

The numbers used in the "Water Demand in the RWMP Area" are inconsistent. The third paragraph on this page concludes that approximately 113,700 af/y is the potential supply for the entire MWA area. Addition of the numbers listed earlier in the paragraph are:

Mojave River area	71,700 af/y
Morongo Basin area	2,000 af/y
Johnson Valley area	2,300 af/y
SWP	40,000 af/y
TOTAL	116,000 af/y

After some review it becomes clear that the total potential supply does not include the component identified from Johnson Valley. If the intent is to clarify issues, then the explanation of these statements should be routinely included.

Page 2-8 Table 2-2

The consumptive use figure for "Phreatophytic Use" in the table is listed as 7500 af/y. This number has never been adequately justified and is significantly different than the number developed by DWR and listed in Bulletin 84. The methodology used by DWR to develop their value was clearly documented. Those numbers are:

Upper Basin	22,100 af/y
Middle Basin	7,318 af/y
Lower Basin	10,636 af/y
TOTAL	40,054 af/y

Subsequent studies for MWA during the early to mid 1980's devloped other values for consumptive use by "native vegetation" in the Mojave River area. A clear explanation

of the methods used to calculate those values was included in each docment. A summary of those numbers are:

Upper Basin	24,512 af/y
Middle Basin	2,650 af/y
Lower Basin	3,000 af/y
TOTAL	30,162 af/y

All of these numbers are for riparian areas, basically the flood plain of the Mojave River. There is no evidence to indicate that the river flood plain has been so radically altered that 90 percent of the riparian vegetation in the upper reach of the river has been removed in the last ten years. The use of more reasonable numbers for support of riparian vegetation increases the value for "Phreatophytic Use" by between 20,000 to 30,000 af/y. This will also dramatically changes the annual level of the existing overdraft.

Page 2-9

The first paragraph again identifies the 50,800 af/y from the SWP as the source of water for recharge of the Mojave River groundwater basins. There is no long term assurance of the water. The concept of purchasing "surplus water" from the SWP system when they cannot meet their existing contracts is not assured.

"Annual local surface water flow in the Mojave River area for the 60-year period (1931-1990) averages 68,200 af." This is comprised of 65,000 af/y inflow to the Alto area, 1700 af/y to the Este area, and 1500 af/y to the Oeste area. The best information we have available is the USGS data from the Forks area from 1936 to 1991. The flow at this area averaged 67,460 for that period.

Page 2-11 Table 2-3

Subarea	Total Operational Storage Capacity	Available Groundwater Storage	Water in Storage (1990)
Alto	2,086,000	1,126,000	960,000
Centro	740,000	340,000	400,000
Baja	1,544,000	371,000	1,173,000
Este	530,000	110,000	420,000
Total	4,900,000	1,947,000	2,953,000

The column headed as Available Groundwater Storage, can be read as existing level of overdraft. Neither the RWMP nor the EIR describes any method for reversing that level of overdraft. Unless the overdraft is reversed, the adverse impacts will not only continue at existing levels but will spread to additional areas in the future.

Page 2-12 ALTERNATIVES SCREENING PROCESS

The alternatives listed are contrived. Some examples are listed below:

- The no project alternative does not include the legally mandated conservation elements required to be implemented by urban water districts and irrigation districts.
- The concept of SWP entitlement at an estimated 40,000 af/y does not reflect reality.
- The idea that additional water can be transferred into the area does not identify any potential sources of water.

Page 2-17

"A permanent transfer of water supply from outside the MWA must be approved by the California State Water Resources Control Board (SWRCB) and would require environmental documentation."

The permanent transfer of any water right, not just one from outside the MWA area, requires both environmental documentation and approval by the SWRCB.

Page 2-24

Rampdown to 80% of the base annual production is not realistic if correction of the overdraft is to be accomplished. The idea that replacement water can routinely be acquired at $ 107 per acre-foot does not appear possible. A realistic estimate should be included.

Page 3-4

The statement that "DWR can deliver 66-75% of the total SWP entitlements through the California aqueduct.", is at best misleading. The aqueduct may be able to carry the water, if the water could be found to fill the aqueduct. The present circumstances in the Delta do not indicate that the SWP will be able to fulfill their existing commitments let alone add an agency, like MWA, that has not routinely exercised their option for water purchases in the past.

Page 3-9

The issuance of Waste Discharge Requirements is through the appropriate California Regional Water Quality Control Board not the SWRCB.

Page 3-17

"The safe yield of each subarea was estimated in the RWMP by subtracting the average annual amount of overdraft from the consumptive use for irrigation and municipal purposes."

This is not one of the accepted methods of calculating safe yield. The overdraft numbers are also questionable. Accepted methods should be used or the close relationship of this method to routine methods must be clearly demonstrated. The other pieces of the equation must also be well documented.

Page 3-18 Table 3-4

With the phreatophytes numbers from Bulletin 84, the overdraft is more appropriately estimated in Alto area at 36900 af/y, the Centro area at 14718 af/y, and the Baja area at 37636 af/y. The total overdraft for then becomes approximately 100,000 af/y. When these numbers are analyzed in the full context of the RWMP, the changes in items like Rampdown and other aspects of the plan are dramatic.

Page 3-23

No source of water is identified nor is the problem of getting that water though the Delta discussed. Without such a discussion, the document fails in its mission to fully disclose environmental impacts.

Page 3-27

The statement that reduction of interior use does not change consumptive use is not completely accurate. The pumping of the water to the surface or near surface zone in the desert environment will potentially increase the evaporation. An example would be that a septic tank-leachfied would allow icreased evaporation as a result of proximity to the ground surface and the ground surface temperature, especially in the summer.

water rights case in September 1993. The purpose of the stipulated judgment has been summarized as follows: "(1) create incentives to conserve local water, (2) guarantee that downstream producers will not be adversely affected by upstream production, and (3) assess producers to obtain funds to purchase imported water. The judgment does not place any pumping restrictions on the producers. Instead it relies upon conservation of local water, purchase of imported water and transfers among producers to, in time, eliminate the groundwater overdraft."

The MWA's RWMP (pages 2 through 6) identifies specific actions that can be implemented by the MWA and water users within the Mojave River Basin to fully correct overdraft in accordance with the stipulated judgment. The Plan contains cost estimates for correcting the overdraft, including purchase of imported water, is estimated to be $26.8 million in 2015. Full correction of overdraft could be accomplished by the year 2000 for an estimated cost of $21.7 million. Based on this data, the cumulative adverse water resource impacts can be reduced below a significant level by implementing the "Regional Water Management Plan."

This measure is beyond the ability of the Adelanto to implement and it is not within Adelanto's jurisdiction to ensure that all the measures outlined in MWA's Management Plan can be funded at this stage of its review and implementation. Therefore, Adelanto concludes that a cumulative significant water resource impact may occur if the proposed Adelanto General Plan and cumulative development occurs as forecast in this document with full implementation of the above mitigation measures.

The City of Adelanto estimates that the total demand within the Victor Valley by the year 2010 is 154,135 acre-feet. As illustrated in the Table below, 35 percent of the total demand in the Victor Valley area is a result of agricultural users. The reduction of agricultural uses would allow more water for domestic uses. The demand within the MWA boundaries is approximately 320,000 acre feet. Comparatively the demand within the Metropolitan Water District (MWD) boundaries, which serve the Metropolitan Los Angeles, Orange, Riverside, San Bernardino, and San Diego areas, is over 3.8 million acre-feet. The demand within the Mojave Water Agency boundary is approximately 8-percent of the total MWD demand. This would indicate that with adjustments in the allocation of this water, the needs of the Victor Valley through the year 2014 can be met.

VICTOR VALLEY WATER DEMAND PROJECTIONS - 2014

UPPER BASIN	AG. DEMAND	DOMESTIC DEMAND
Adelanto Area		20,153
Victorville Area		18,093
Apple Valley Area		33,087

Hesperia Area		16,571
Phelan/Baldy Mesa Area		12,131
Subtotal	54,100	100,035
TOTAL DEMAND (AF/YR)		154,135

Source: Adelanto demand from General Plan and Master Plan for Delivery of Imported Water, Pirnie, November, 1989.

Additional sources for the entire Southern California region, of which Adelanto and the Victor Valley are a part, consist of: reallocating State Water Project water, construction of additional storage capacity along the State Water Project, desalination plants along the coast, extensive emphasis on water conservation (both domestic and major agricultural users) and expanded systems for the use of treated wastewater. All of these issues are regional in nature. Alternative or additional sources of water must be developed to ensure the future economic vitality of the entire Southern California area.

If State Project water is not introduced to the water system on an annual basis, and if urbanization continues with its related use of water and drawdown of the groundwater basin, there will be a significant impact on the rare and endangered species of the Mojave River system. Without the addition of State Project water, the local ability to approve development projects may be withdrawn under the requirements of CEQA and the Federal Endangered Species Act.

The cumulative impact on water is significant. The total population of the proposed project together with the population projections of the General Plans of Victorville, Hesperia and Apple Valley is approximately 825,000 persons. Based on available local sources and existing allocated State Project water the basin has adequate water for only about 455,000 persons. With the implementation of conservation/mitigation measures this may increase to 550,000 persons. For Adelanto and the surrounding cities to implement their respective general plans the State Project water allocation will have to be doubled. For Adelanto to fully implement the proposed General Plan project additional sources of water will have to be secured. Implementation of the area General Plans without additional State Project Water would be a adverse and significant impact on water resources.

Mitigation Measures

The mitigation measures are detailed in the mitigation monitoring program attached hereto as Appendix A.

Finding: Impact Infeasible to Mitigate

The City of Adelanto finds that while the mitigation measures listed in Appendix A reduce impacts from the proposed project, they do not reduce impacts to a level if

insignificance and that no feasible mitigation measures exist to reduce the impacts to a level of insignificance. This impact will require adoption of a Statement of Overriding Considerations as a condition of project approval. (Refer to Section 6.0).

3.4 Biological Resources

Impacts

Proposed land use policy allows the development of over 73,000 acres of the Planning Area and quasi-urbanized land uses. The remaining 8,500 acres, or 11% of the Planning Area is dedicated to open space, either natural (4,026 acres of open space and 2,414 acres flood control and power easements) or recreational. This percentage represents a substantial dedication by the City to the preservation of open spaces and creates a vast amount of recreational opportunities for residents.

Mitigation Measures

The mitigation measures are detailed in the mitigation monitoring program attached hereto as Appendix A.

Finding: Impact Infeasible to Mitigate

The City of Adelanto finds that while the mitigation measures listed in Appendix A reduce impacts from the proposed project, they do not reduce impacts to a level if insignificance and that no feasible mitigation measures exist to reduce the impacts to a level of insignificance. This impact will require adoption of a Statement of Overriding Considerations as a condition of project approval. (Refer to Section 5.0).

3.5 Natural Resources

The construction of the urban landscape will result in the consumption of fossil fuel resources for electricity, heating and cooling , transportation and construction. Refer to Tables VII-2, VII-3 and VII-4 of the Conservation/Open Space Element. As development occurs in accordance with the Land Use Element of the General Plan non- renewable energy and mineral resources will be consumed. The reader should refer to the other sections of this Environmental Impact Report including (1) Biological Resources , (2) Cultural Resources, (3) Air Quality, (4) Water Resources, (5) Open Space/Recreation, (6) Earth Resources, and (7) Mineral Resources. that discusses these subjects.

Open space will be consumed as a result of implementing the Land Use Element. Over 73,000 currently vacant acres will be developed to urban uses, however, implementing the policies of the Conservation/Open Space Element will substantially improve the remaining open space for human use.

In a regional and Statewide context, the level of consumption is not considered significant. However, any increase in the level of non-renewable resources should be considered adverse.

Mitigation Measures

The mitigation measures are detailed in the mitigation monitoring program attached hereto as Appendix A.

Finding: Impact Infeasible to Mitigate

The City of Adelanto finds that while the mitigation measures listed in Appendix A reduce impacts from the proposed project, they do not reduce impacts to a level if insignificance and that no feasible mitigation measures exist to reduce the impacts to a level of insignificance. This impact will require adoption of a Statement of Overriding Considerations as a condition of project approval. (Refer to Section 6.0).

3.6 Population

The number of units as designated in each of the General Plans for the region and the respective population projections at 2.639 persons per unit is as follows:

CUMULATIVE POPULATION IMPACT

AREA	TOTAL UNITS	POPULATION
Adelanto	59,163	156,188
Victorville	111,936	295,508
Apple Valley	37,481	98,949
Hesperia	103,058	272,070
Other Projects	3,000	7,920
Total	314,638	830,637

Source: Total Units from General Plans

The region has more than enough land to support this number of persons.

The short-term impact of the closure of the Base on the Victor Valley area has been a loss of population to the area of approximately 14,600 military and civilian personnel associated with the Base (U.S. Air Force, 1991c). In the long-term, implementation of the General Plans of the region will stimulate population growth. Estimates made by the U.S. Air Force in evaluating the environmental impact of the proposed reuse as a regional/commercial airport indicate that approximately 30,000 people will be added to the Victor Valley population by the year 2013 under the commercial growth alternative. Growth in population based on change of existing land uses in conformance with the

General Plans of the local land use jurisdictions and assuming General Plan build-out could increase as much as 157,123.

The short-term employment impact on Victor Valley caused by Base closure could result in the loss, either directly or indirectly, of approximately 8,500 jobs. Reuse of the Air Base as a commercial airport would stimulate the entire Victor Valley economy. In addition to the jobs generated directly through construction and operation of the new airport, the GAFB Final EIS estimates that some 26,000 additional jobs would be added to the two-county region of impact (San Bernardino and Los Angeles Counties) as a result of regional spending for goods and services by both the direct on-site workers and by the various companies and agencies operating from the airport site. Approximately 15,000 of these secondary jobs would be located in the Victor Valley and are anticipated to be concentrated in the services and retail trade sectors of the local economy (U.S. Air Force, 1991c). Employment generated as a result of General Plans build-out, could produce an increase of approximately 214,000 jobs. However, this projection is based on an assumption of General Plans build-out within the greater Victor Valley and it is difficult at this time to predict when, or if, that might occur because of the uncertainty of the exact nature, timing, and extent of activity within the Region.

Consultations with economists and review of current commercial and industrial absorption rates indicate General Plan buildout may not be achieved for 70-80 years, if then. Nevertheless, growth in the number of jobs in the Victor Valley is considered a beneficial impact in view of the existing low jobs-to-housing ratio and the impending loss of jobs due to the closure of the Base.

Mitigation Measures

The mitigation measures are detailed in the mitigation monitoring program attached hereto as Appendix A.

Finding: Impact Infeasible to Mitigate

The City of Adelanto finds that while the mitigation measures listed in Appendix A reduce impacts from the proposed project, they do not reduce impacts to a level if insignificance and that no feasible mitigation measures exist to reduce the impacts to a level of insignificance. This impact will require adoption of a Statement of Overriding Considerations as a condition of project approval. (Refer to Section 6.0).

3.7 Housing

The number of units as designated in each of the General Plans for the region is as follows:

CUMULATIVE HOUSING IMPACT

AREA	TOTAL UNITS
Adelanto	59,163
Victorville	111,936
Apple Valley	37,481
Hesperia	103,058
Other Projects	3,000
Total	314,638

Source: From General Plans

The region has more than enough land to support this number of housing units.

Long-term demand for housing as a direct result of the reuse of the Base is projected to reach 10,500 additional units by 2013 (U.S. Air Force, 1991c). Averaged over 20 years this is an average annual demand of approximately 525 housing units per year. Given the availability of some 6,647 vacant units in 1990, an average vacancy rate of approximately 10 percent and a high projected annual building rate, no significant impact is foreseen. No mitigation is required or proposed.

Mitigation Measures

The mitigation measures are detailed in the mitigation monitoring program attached hereto as Appendix A.

Finding: Impact Infeasible to Mitigate

The City of Adelanto finds that while the mitigation measures listed in Appendix A reduce impacts from the proposed project, they do not reduce impacts to a level if insignificance and that no feasible mitigation measures exist to reduce the impacts to a level of insignificance. This impact will require adoption of a Statement of Overriding Considerations as a condition of project approval. (Refer to Section 6.0).

3.8 Traffic and Circulation

Impacts

The traffic/circulation impacts of the proposed project on the City and surrounding communities may create serious traffic problems for the project area and surrounding sub-region. Much of this problem is due to existing conditions that will be further

impacted. The estimated cumulative impact from traffic in 2014 for the region totals 55 Million Average Daily Trips as follows:

CUMULATIVE TRAFFIC IMPACT

AREA	PERCENT POP.	MADT
Adelanto	19	10.35
Victorville	36	19.61
Apple Valley	12	6.53
Hesperia	33	17.97
Other Projects		.54
Total	100	55.00

Source: Pro-rata of Adelanto from EIR Impacts.

These estimates are based on the relatively high existing trip lengths of 10 and 20 miles contained in Table VII-4 of the Conservation Element. As urbanization continues these trip lengths will substantially shorten thereby lessening the projected impact to VMT. Other reports (Dwight French & Associates,1992) estimate buildout average daily VMT at 21.150 million.

The local and regional transportation facilities will require substantial improvement over the lives of the General Plans for the region. Implementation of the mitigation measures contained in this EIR for the City of Adelanto would mitigate local traffic levels to a level of insignificance. Regional traffic may be significant if additional freeways are not constructed to serve the High Desert area.

At the regional level, the cumulative impact forecast for build-out conditions described in indicates that the regional circulation system will likely incur cumulative significant adverse traffic impacts that will be unavoidable. The air quality impact analysis forecast 54 million total miles (other studies forecast 21 million) will be traveled each day in the Victor Valley which cannot be handled on the existing or proposed circulation system in the various general plans for the Victor Valley. Thus, a cumulative significant regional traffic impact is forecast to occur and based on data available at this time, the other area communities do not have the resources to reduce this cumulative significant traffic impact below a below a significant level.

Mitigation Measures

The mitigation measures are detailed in the mitigation monitoring program attached hereto as Appendix A.

Finding: Impact Infeasible to Mitigate

The City of Adelanto finds that while the mitigation measures listed in Appendix A reduce impacts from the proposed project, they do not reduce impacts to a level if insignificance and that no feasible mitigation measures exist to reduce the impacts to a level of insignificance. This impact will require adoption of a Statement of Overriding Considerations as a condition of project approval. (Refer to Section 6.0).

3.9 Public Services

Impacts

Implementation of the Land Use Plan will have significant implication for public safety needs. Over seventy thousand acres are designated for some level of urban use which result in as many acres of some level of soil disturbance over the next few decades. As the population grows from some ten thousand to tens of thousands, the City will be challenged to keep up with the demand for police and fire safety services and facilities. The City must find ways to minimize flood, seismic, erosion and waste hazards to its citizens, to the maximum extent possible. The City will need to assure adequate health facilities exist for its citizens.

Fire Protection

Implementation of land use policies will result in an increase in urban development, which will extend farther from the urban core of the City. As the number of urban structures increases, so does the potential for structural fires. Increased urban development will result in a loss of open rangeland which may be subject to wildfires. However, this will also reduce the possible buffer area between potential wildfires and urban uses, while increasing the total urban perimeter that must be protected from fires.

By 2014 there will be a need for 50-55 fulltime firefighters and 4-6 new fire stations. At buildout 10-12 fire stations will be required and 160-170 full time fire fighters will be required.

Assistance is available from other fire protection agencies in the area, including George Air Force Base (staffed by March AFB), Victorville, and San Bernardino County. As development extends from the urban core, some uses may be located outside acceptable response times from the existing two stations, resulting in potentially significant impacts. As industry development continues to expand, special fire protection impacts may result from the use and storage of hazardous materials and wastes as new industries. Such incidents require special handling and may pose severe threats to the general public.

Fires present a unique threat in the City of Adelanto, particularly during summer months when temperatures exceed 100 degrees Fahrenheit and precipitation is almost non-existent. The abundance of brush and poor access contribute significantly to wildfires and may present significant danger to residents and structures.

Figure IX-4 of the Safety Element, Emergency Services Locations Map, and Figure IX-5, Emergency Evacuation Routes Plan, will assist residents and public safety agencies in case of natural disasters or fires.

Police Protection

As implementation of land use polices takes place increased demand for police services will be required. The domestic requests for emergency assistance will increase proportionately with the increase in development. The current trend of new construction is occurring in the southern portion of the Planning Area, which is several miles from the urban core of Adelanto. This distance will begin to place added stress to the police staff who must provide protection for the area. It is imperative that upgraded police services be provided for the newly developing areas of the City.

As the City of Adelanto grows, it will be exposed to increasing levels of crime. In order to assure that a safe living and working environment is sustained, adequate police services must be incorporated into the City structure. By 2014, 65-70 full time officers with support staff and facilities will be required.

Schools

The School District intends to reopen Sheppard School under another name and then relocate those students to the now being developed Desert Trails Elementary School located at Bellflower and Seneca.

There are no immediate plans for other additional schools, although the City of Adelanto will work closely with the School District on any future school sitings or developments. By 2014 there will be a need for facilities to accommodate approximately 16,000 students. At 30 students per classroom this would total 533 classrooms.

Fiscal constraints on school facility acquisition, development and operation are extremely difficult. The Adelanto School District currently depends on the Leroy Green State Funding Process for funds and has no bonding capability. Limited funds are available for school facility maintenance. Enrollment has increased at a rate of approximately 7% per year, over the past 5 years. Affordable housing costs are expected to support opportunities in Adelanto for continued growth. The majority of new housing is expected to have relatively high student generation rates.

Government

As population increases the need for government services will also increase. As implementation of land use polices takes place increased demand for government services will be required. Requests for assistance will increase proportionately with the increase in development.

Solid Waste

According to City records the City of Adelanto disposed of approximately 4,780 tons of solid waste in the year 1990. This figure will increase along with the increase in population.

The area within the Adelanto city boundary is presently served by one refuse hauler. Estimates of trash collected are listed in the Safety Element based upon approximate figures from AVCO Disposal

Landfill sites have limited capacities. Resource recovery as an alternative to landfill disposal will increase the life expectancy of any site. Other benefits such as waste to energy, and conversion of waste materials into new products are results of resource recovery which the City intends to promote.

The per capita generation rate represents the amount of solid waste generated by each person each day. According to City records Adelanto had a per capita generation rate of 3.075 pounds per capita-day in 1990. This rate, times the 1990 population of 8,517 results 4,780 tons of refuse generated every year in Adelanto. Based upon the maximum 2014 population forecast of 60,000, an estimated 33,700 tons of reprocessable waste will be produced by Adelanto per year. The potential quantities of solid wastes warrant the investigation of resource recovery systems. The City intends to study and consider the economic feasibility of implementing resource recovery projects. The resource recovery section of this plan contains the policies adopted by the City of Adelanto.

The City of Adelanto has adopted its Source Reduction and Recycling Element (SRRE) and Household Hazardous Waste Element (HHWE). The SRRE will reduce solid waste by 34.5 percent by 1995 and by 52.3 percent by 2000.

Many cities and counties are now expressing concern over the toxic waste problem. The City of Adelanto has the jurisdiction within the City limits to adopt and enforce hazardous waste regulations. The City has adopted policies toward maintaining a safe environment for its citizens.

There are no Class 1 (hazardous waste) disposal sites in San Bernardino County. Legal disposal of most hazardous waste must be accomplished by exporting the wastes

to a Class 1 site outside of the County. Some hazardous material is removed from the waste stream by reclamation and recycling, while a few industries treat their own wastes on site. Even though hazardous waste sites do not exist in the County several thousands of gallons of hazardous household wastes are deposited into non-hazardous landfill sites each year.

The date no generators of hazardous wastes in Adelanto have filed for permits with San Bernardino County. According to the County's Hazardous Waste/Toxic Control Section, the annual amount of hazardous wastes from any generators is unknown at this time. The total quantities of hazardous wastes from the 1990 County Solid Waste Management Master Plan may more accurately reflect the hazardous wastes being generated in Adelanto. That projection shows an increase of about 40% in hazardous wastes generated during the decade 1980-1990. These wastes include cleaning agents, poisons, insecticides, etc.

Currently Adelanto's non-hazardous wastes are deposited in the County landfill site located outside of the City. This Class II landfill comprises 80 acres and has a total landfill capacity of 2.6 million cubic yards. Approximately 1 million cubic yards capacity remain with an estimated use expectancy until 1995. Additional capacity or new landfills will be required during the planning period. Septic tank pumpings are placed in well isolated areas which have not been utilized in the landfill operation. Hazardous household wastes are deposited into this landfill as well. This practice will probably continue until these items are separated out at the resident waste source.

Funding and facilities will be necessary to reduce the impact to schools and solid waste facilities to a level of insignificance. These services and facilities are dependent on the actions of the County of San Bernardino and the School Districts, and may include, but are not limited to, new elementary, junior high and high schools and new landfills and/or landfill capacity. Without sufficient funding, schools will be significantly impacted. Without additional landfill capacity or new landfills, solid waste will be significantly impacted.

Mitigation Measures

The mitigation measures are detailed in the mitigation monitoring program attached hereto as Appendix A.

Finding: Impact Infeasible to Mitigate

The City of Adelanto finds that while the mitigation measures listed in Appendix A reduce impacts form the proposed project, they do not reduce impacts to a level if insignificance and that no feasible mitigation measures exist to reduce the impacts to a level of insignificance. This impact will require adoption of a Statement of Overriding Considerations as a condition of project approval. (Refer to Section 6.0).

3.10 Utilities

Impacts

Cumulative impacts for the regional area for sewers, natural gas, electricity and solid waste are discussed below.

The cumulative impact for sewer capacity is 206 million gallons per day as follows:

CUMULATIVE SEWER IMPACT - BUILDOUT

AREA	PERCENT POP.	MGD
Adelanto	19	39.02
Victorville	36	73.83
Apple Valley	12	24.72
Hesperia	33	67.97
Other Projects		2.04
Total	100	206.56

Source: Pro-rata of Adelanto from EIR Impacts.

To accommodate the cumulative sewer needs the regional capacity will have to be expanded by 10 times, from the planned 20 MGD to 205 MGD over the life of the proposed General Plans for the region. If the treatment plant is not expanded, or new facilities constructed, development will cease.

The cumulative impact on natural gas supplies is 191 million cubic feet per day as follows:

CUMULATIVE GAS IMPACT - BUILDOUT

AREA	PERCENT POP.	MCFD
Adelanto	19	36.00
Victorville	36	68.11
Apple Valley	12	22.81
Hesperia	33	62.71
Other Projects		1.89
Total	100	191.52

Source: Pro-rata of Adelanto from EIR Impacts.

The mitigation measures contained in this Environmental Impact Report if implemented by the regional jurisdictions would mitigate the use of natural gas to the extent feasible. The gas company will be required to install significant facilities over the next 30-40 years. This will greatly improve their business opportunities.

Natural gas service to the area is provided by Southwest Gas Company. The City of Adelanto, as well as other Agencies in the area, has evaluated the adequacy of energy resources for build-out of the Victor Valley and concluded that adequate energy resources could be made available. The distribution systems will have to be expanded (not the transmission systems) but this is normally done when individual development projects are constructed. It is anticipated that development will fund most distribution system improvements as part of growth and other mitigation mechanisms as required.

The cumulative impact of electrical usage for all of the local jurisdictions is 47.8 million kilowatt hours per day as follows:

CUMULATIVE ELECTRICITY IMPACT - BUILDOUT

AREA	PERCENT POP.	MKWHD
Adelanto	19	9.00
Victorville	36	17.03
Apple Valley	12	5.70
Hesperia	33	15.68
Other Projects		.47
Total	100	47.88

Source: Pro-rata of Adelanto from EIR Impacts.

The mitigation measures contained in this Environmental Impact Report if implemented by the regional jurisdictions would mitigate the use of electricity to the extent feasible. The electric company will be required to install significant facilities over the next 30-40 years. This will greatly improve their business opportunities.

Electricity is provided to the Victor Valley area by the High Desert District of Southern California Edison (SCE). The District consisted of 101,000 metered customers in 1990. The region is currently utilizing alternative electrical generating techniques including the solar thermal projects at Daggett, Harper Dry Lake and Kramer Junction.

The cumulative impact of solid waste generation for the region is 466,712 tons per year as follows:

CUMULATIVE SOLID WASTE IMPACT - BUILDOUT

AREA	PERCENT POP.	TPY
Adelanto	19	87,726
Victorville	36	165,977
Apple Valley	12	55,576
Hesperia	33	152,812
Other Projects		4,620
Total	100	466,712

Source: Pro-rata of Adelanto from EIR Impacts.

The total tons per year of solid waste will be approximately 50 percent of this total due to the effects of AB 939, (50 percent by 2000 recycling law).

Existing landfill capacity will have to be substantially increased or new landfill sites established to accommodate this cumulative impact. If capacity is not increased, cumulative impact will be adverse and significant.

This section also discusses the potential impacts of existing contaminated sites on GAFB, and the potential for environmental impacts caused by hazardous materials/waste management practices associated with reuse. Hazardous materials/wastes, IRP sites, storage tanks, asbestos, pesticides and herbicides, PCB's, radon, and medical/biohazardous wastes are covered by this discussion.

The U.S. Air Force is committed to the remediation of all contamination at George AFB due to past Air Force activities. The DMT will remain after base closure to coordinate cleanup activities. Delays or restrictions in reuse or disposal of property may occur due to the extent of contamination and the results of both the risk assessment and remedial designs determined for contaminated sites. Examples of possible land use restrictions would be the capping of landfills and the constraints from methane generation and cap integrity; as well as the location of long-term monitoring wells. These restrictions would have to be considered in the layout of future development. Options to developers include creation of parks, greenbelts or open spaces over and around such areas. Regulatory standards and guidelines will be applied in determining the impacts caused by hazardous materials/waste. The following criteria were used to identify potential impacts:

Accidental release of friable asbestos during the demolition or modification of a structure.

Generation of 100 kilograms (or more) of hazardous waste or 1 kilogram (or more) of an acutely (California Health and Safety Code Chapter 6.95, Section

25532) hazardous waste in a calendar month, resulting in increased regulatory requirements.

New operational requirements or service for all UST and tank systems.

Any spill or release of a reportable quantity of a hazardous material.

Manufacturing of any compound that requires notifying the pertinent regulatory agency

Exposure of the environment or public to any hazardous material through release or disposal practices.

The U.S. Air Force is committed to continue IRP activities under DERP, CERCLA and the FFA between the U.S. Air Force, U.S. EPA, California DHS, and the California water quality control board. IRP activities will be coordinated by the DMT and the aforementioned agencies.

The extent of contamination is being delineated and both the risk assessment and remedial designs will be a result of this work. Proposed disposal and reuse of some George AFB properties may be delayed or limited due to the extent of contamination as well as ongoing and future IRP activities. This process will also identify current and future monitoring of well locations and consider land use limitations as a result of their presence.

Ultimate decisions on what type of future land use will be implemented at areas overlying or adjacent to an IRP site will greatly depend on the overall characterization of risk to human health posed by the IRP site. This risk assessment is an integral part of the remedial investigation to be conducted at IRP sites. Part of the risk assessment involves estimates of exposure to contaminants under future land use conditions at the site. This assessment provides an understanding of the potential exposures to contaminants in the future and may reveal that the site will not support some potential future land uses.

Mitigation Measures

The mitigation measures are detailed in the mitigation monitoring program attached hereto as Appendix A.

Finding: Impact Infeasible to Mitigate

The City of Adelanto finds that while the mitigation measures listed in Appendix A reduce impacts form the proposed project, they do not reduce impacts to a level if insignificance and that no feasible mitigation measures exist to reduce the impacts to a

level of insignificance. This impact will require adoption of a Statement of Overriding Considerations as a condition of project approval. (Refer to Section 6.0).

3.11 Open Space

Impacts

The cumulative impact of the build-out of the Victor Valley will substantially disturb or eliminate an additional 205,000 acres of native habitat, primarily creosote bush scrub. The cumulative impact of developing the remainder of the Victor Valley is considered a significant adverse impact. Mitigation can be implemented on a case-by-case basis for certain species, but the large amount of acreage lost and the reduction in wildlife supported by this habitat results in a significant, unavoidable adverse biological resource impact. Open space lost to urban uses is as follows:

CUMULATIVE LOST OPEN SPACE IMPACT

AREA	ESTIMATED ACRES
Adelanto	73,000
Victorville	33,300
Apple Valley	43,000
Hesperia	56,000
Other Projects	0
Total	205,300

Source: General Plans.

Mitigation Measures

The mitigation measures are detailed in the mitigation monitoring program attached hereto as Appendix A.

Finding: Impact Infeasible to Mitigate

The City of Adelanto finds that while the mitigation measures listed in Appendix A reduce impacts from the proposed project, they do not reduce impacts to a level if insignificance and that no feasible mitigation measures exist to reduce the impacts to a level of insignificance. This impact will require adoption of a Statement of Overriding Considerations as a condition of project approval. (Refer to Section 6.0).

4.0 SIGNIFICANT IMPACTS REDUCED TO A LEVEL OF INSIGNIFICANCE WITH MITIGATION MEASURES

4.1 Noise

Impacts

Other than George AFB there are no other major airports that will contribute to community noise impacts. The City of Adelanto is considering the development of an auto raceway, however this facility would have only local impact in the central western area of the City. The long-term cumulative noise impacts from traffic will be significant on certain roadways within the region (such as Bear Valley Road). This is an unavoidable significant impact of building out the Victor Valley through infill of existing underdeveloped areas. While Adelanto believes that its proposed land use pattern and noise mitigation measures will reduce noise to levels of insignificance, mitigation in other communities may not reduce noise in certain instances and may not totally eliminate exposure to significant noise in the future.

If George Air Force Base is developed by the VVEDA the noise impacts to the City of Adelanto may not be adequately controlled or mitigated to levels of insignificance.

Mitigation Measures

The mitigation measures are detailed in the mitigation monitoring program attached hereto as Appendix A.

Finding: Impact Feasible to Mitigate

The City of Adelanto finds that the mitigation measures listed in Appendix A reduce impacts from the proposed project, to a level if insignificance. This impact will not require adoption of a Statement of Overriding Considerations as a condition of project approval.

4.2 Light and Glare

Impacts

Of primary concern is the effect of the Project Area's long-term land use and infrastructure development patterns will have on adjacent residential properties. Three potential impacts could include, (1) the effect of street lights on nearby residential properties, (2) glare from reflective building materials frequently used on mid-rise office buildings, and (3) the effect of headlights from vehicles using the Project Area roadways.

Mitigation Measures

The mitigation measures are detailed in the mitigation monitoring program attached hereto as Appendix A.

Finding: Impact Feasible to Mitigate

The City of Adelanto finds that the mitigation measures listed in Appendix A reduce impacts from the proposed project, to a level if insignificance. This impact will not require adoption of a Statement of Overriding Considerations as a condition of project approval.

4.3 Land Use

Impacts

Land Use impacts will not be significant when the City of Adelanto approves this General Plan Update, 1994.

Mitigation Measures

The mitigation measures are detailed in the mitigation monitoring program attached hereto as Appendix A.

Finding: Impact Feasible to Mitigate

The City of Adelanto finds that the mitigation measures listed in Appendix A further reduce potential non significant impacts from the proposed project. This impact will not require adoption of a Statement of Overriding Considerations as a condition of project approval.

4.4 Risk of Upset

Impacts

The City of Adelanto, as well as other Agencies in the area, has evaluated the hazardous material issues in the Victor Valley with reference to build-out effects. Although the region will utilize substantial quantities of hazardous materials and generate substantial quantities of hazardous wastes in the future, the regional cumulative impact evaluation concluded that adequate controls on development exist within the current hazardous material/waste regulatory framework and the current general plans of the various jurisdictions. Implementing these measures, many of them mandatory so they require no mitigation requirement, are adequate to mitigate cumulative hazardous material impacts to a nonsignificant level as growth occurs. The

Adelanto General Plan Update contributes to cumulative impacts to the region's hazardous material requirements, but mitigation will be implemented by Adelanto, as outlined in the impact section above, to control the potential impacts to a level of nonsignificance

Mitigation Measures

The mitigation measures are detailed in the mitigation monitoring program attached hereto as Appendix A.

Finding: Impact Feasible to Mitigate

The City of Adelanto finds that the mitigation measures listed in Appendix A reduce impacts from the proposed project, to a level if insignificance. This impact will not require adoption of a Statement of Overriding Considerations as a condition of project approval.

4.5 Cultural Resources

Impacts

The City of Adelanto, as well as other Agencies in the area, have evaluated the cultural resources in the Victor Valley with reference to build-out effects. Although the region has significant cultural values, the regional cumulative impact evaluation concluded that adequate controls on development exist within the current general plans of the various jurisdictions and adequate mitigation is available to mitigate cumulative cultural resource impacts to a nonsignificant level as growth occurs. No significant cultural resource impact is forecast to occur with the implementation of the mitigation measures described in General Plans and in previous EIRs.

Mitigation Measures

The mitigation measures are detailed in the mitigation monitoring program attached hereto as Appendix A.

Finding: Impact Feasible to Mitigate

The City of Adelanto finds that the mitigation measures listed in Appendix A reduce impacts from the proposed project, to a level if insignificance. This impact will not require adoption of a Statement of Overriding Considerations as a condition of project approval.

5.0 MITIGATION MONITORING PROGRAM

The Mitigation Monitoring Program is contained in Appendix A.

6.0 STATEMENT OF OVERRIDING CONSIDERATIONS

CEQA requires the decision maker to balance the benefits of the project against its unavoidable environmental risks in determining whether to approve the project. If the benefits of a project outweigh the unavoidable adverse effects, those effects may be considered "acceptable" (State CEQA Guidelines Section 15093(a)). However, CEQA requires the agency to support, in writing, the specific reasons for considering a project acceptable when significant impacts are infeasible to mitigate. Such reasons must be based on substantial evidence in the FPEIR or elsewhere in the administrative record (State CEQA Guidelines Section 15093 (b)). The agency's statement is referred to as a "Statement of Overriding Considerations".

The City of Adelanto is proposing so approve the General Plan Update,1994 Plan and has prepared and certified an FPEIR that satisfies the requirements of CEQA. The adverse impacts of the project and of cumulative development in the Victor Valley are considered significant and unavoidable, both individually and cumulatively, based on the DPEIR, FPEIR, MMP, and the findings discussed previously in Section 3.0 of this document:

The General Plan Update project exhibits these characteristics and others consistent with the Goals of the City of Adelanto. The project will provide over 19,700 residential units by the year 2014 and over 59,000 units at buildout, 3,400 acres of industrial development by the year 2014 and 10,400 acres by buildout, and approximately 1,000 acres of commercial space by the year 2014 and 3,000 acres by buildout.

Employment

The project would also be a source of employment in the Adelanto area, generating an estimated 44,000 commercial jobs by the year 2014 (1,000 acres x 44 jobs per acre) and over 130,000 commercial jobs by buildout. The number of industrial jobs by 2014 is estimated at 85,000 (3,400 acres x 25 jobs) and over 250,000 jobs at buildout.

Housing

The project would provide additional opportunities for new housing in Adelanto, including 46,900 single-family, units and 12,200 multifamily and mobile home units.

Recreation

The project would provide for the creation of approximately 156 acres of parks and recreation facilities by the year 2014 and 468 acres by buildout. At buildout there will be approximately 5 lighted baseball diamonds, 31 softball diamonds, 8 swimming pools, 15 soccer fields, 8 football fields, 8 tracks, 31 basketball courts, 1 golf course and Maverick Stadium.

TRANSPORTATION, AIR QUALITY AND WATER AVAILABILITY CONSIDERATIONS

The most significant and difficult impacts to mitigate from the General Plan Update project are transportation, air quality and water availability problems. The projected buildout of Adelanto anticipates that collector, arterial and freeway improvements will be necessary to handle additional traffic. It will be very important to have the new 395 Freeway constructed prior to 2014. Compliance with air quality standards will be difficult if the South Coast Air Basin does not reduce its pollution levels. Without additional water resources the General Plan Update will stop implementation when the population of the City of Adelanto reaches 25,000 persons. The General Plan Update will stop implementation at even a lower level of polulation if the Court does not recognize Adelanto's existing water rights, or if other sources of water are not made available.

CONCLUSION

The General Plan Update provides a beneficial mix of industrial and commercial employment, local serving commercial, housing, recreation, and open space uses, which outweighs the unavoidable environmental impacts. Therefore the City has adopted this statement of overriding considerations.

PROGRAM ENVIRONMENTAL IMPACT REPORT

CITY OF ADELANTO

GENERAL PLAN UPDATE

MITIGATION MONITORING PROGRAM

APPENDIX A

The Mitigation Monitoring Program reviews each mitigation measure in the General Plan Update 1994, Environmental Impact Report and designates the Department, Agency and/or Applicant that is responsible for implementation of the mitigation measure, the City Department or Agency that is responsible for monitoring the mitigation measure and the Time of Verification for each mitigation measure.

3.1 Earth Resources

1. All grading within the project area must be accomplished in accordance with the appropriate requirements set forth in the City of Adelanto Grading Ordinance and Standard Conditions as approved by the City Engineer including dust control measures.

2. The sampling, analysis, and remediation of any contaminated soils must be performed in accordance with all State and Federal regulations pertaining to the methods for evaluating solid and hazardous wastes.

3. Site specific soil studies may be necessary to evaluate the potential for liquefaction at any given building site. For new construction, most liquefaction problems can be resolved by proper identification of the problem and appropriate foundation design. Specific guidelines shall be developed for the collection of data for determination of liquefaction potential at a site. The guidelines should include: minimum depth of bore holes, minimum lapse time for observation of water level, sample types and frequencies, and the appropriate soils test for evaluation of suspect soil types.

4. Review as necessary, site design and construction requirements for proposed facilities, and encourage the strengthening of selected facilities not meeting current standards.

5. All new development must comply with the Building Code, the Zoning Ordinance, the Subdivision Ordinance, and established seismic safety standards.

6. The City operates its own Police Department, allowing for immediate expansion capability as the need arises.

7. The City operates its own fire/rescue services and can expand these resources as demand increases.

8. The City will restrict development in those areas where slope exceeds 15 percent and in those areas subject to flooding.

9. Any development which is proposed in the Mojave Corridor area (liquefaction) will be required to complete a site specific geologic study.

10. The City will require all proposed developments to submit a soils and geologic report prepared by a certified geologist which shall include mitigation if any geologic hazards are identified.

11. The City will require all residents to pay a pro rata share of the costs for public safety needs to be generated by the development.

12. The City will adopt a program designed to implement State requirements for the identification and reinforcement of any and all unreinforced masonry buildings.

13. The Zoning and Building Codes will be updated and maintained to reflect current seismic information and development standards. The Uniform Building Code shall be utilized as the basis for construction standards relating to seismic safety.

14. Require special soils and structural investigation for all proposed structures of large scale buildings or, involving large groups of people.

15. Continue the Code Enforcement Program and require correction or demolition of structures found to be dangerous.

16. That certain critical facilities such as hospitals and public schools have siting and/or design requirements that are addressed by the Education Code, Health and Safety Code, and the State Building Code (Title 24 of the California Administrative Code) be reviewed by State Agencies including the Department of Education, the Division of State Architect, the Office of Statewide Health Planning and Development, and the State Fire Marshal."

Recommended Monitoring

Implementation of the Mitigation Measures will be by the following Departments, Agencies and/or Applicant as follows:

[ ] City Council: Nos.
[ ] Planning Commission: Nos.
[X] Administrative Staff: Nos. **11**
[X] Planning Department: Nos. **8**
[X] Police Department: Nos. **6**
[X] Fire Department: Nos. **7**
[ ] Engineering Department: Nos.
[X] Building Department: Nos. **4, 12, 13**
[X] Other City Department, Redevelopment: Nos. **15**
[X] Applicant: Nos. **1-3, 5, 9, 10, 14**
[ ] Other State Agencies Nos. **16**

Monitoring of the Mitigation Measures will be by the following Departments/Agencies as follows:

[X] City Council: Nos. **11-13**
[X] Planning Commission: Nos. **8, 5, 15**
[ ] Administrative Staff: Nos. **16**
[ ] Planning Department: Nos.
[X] Police Department: Nos. **6**
[X] Fire Department: Nos. **7**
[X] Engineering Department: Nos. **1-3, 9, 10**
[X] Building Department: Nos. **4, 14**
[ ] Other City Department _____ Nos.
[ ] Applicant: Nos.
[ ] Other Agency _____ Nos.

The Timing of Verification for the Mitigation Measures shall be as follows:

[X] During project approval: Nos. **2, 8, 9**
[X] During plan checking: Nos. **1, 3, 14**
[X] Prior to issuance of building permit: Nos. **4,10**
[X] During construction: Nos. **5**
[X] Ongoing requirements: Nos. **6, 7**
[X] City implemented measures: Nos. **11-14**

3.2 Climate and Air Quality

Mitigation measures to reduce impacts to the air quality environment are as follows:

1. The City shall continue to work with the Mojave Desert Air Quality Management District and any other agencies in order to enforce and implement regional air quality plans.

2. The City will review, as necessary, all new developments to determine the potential air quality impacts, as well as any other environmental analysis deemed appropriate by the City.

3. The City will continue to work with the California State Air Resources Board and the Air Quality Management District to improve the implementation of the California Clean Air Act.

4. The City will organize land uses wherever possible to create a desirable jobs/housing balance for the region.

5. The City will consider dedicated truck routing in circulation plans and delivery scheduling for new and existing industries which are separated from the peak traffic hours.

6. The City will consider all feasible means of reducing vehicle miles traveled by City employees and residents.

7. The City will encourage the use of support facilities in office complexes and commercial areas to promote pedestrian commuting.

8. The City will require projects to consider land use alternatives that include mixed uses and pedestrian access improvements.

9. The City will monitor approved projects to determine conformance to the San Bernardino County Air Quality Attainment Plan.

10. Initiate contact with other cities in the high desert and San Bernardino County to coordinate sub-regional efforts for air quality planning.

11. Review those measures of the Air Quality Management Plan (AQMP) which call for local government implementation.

12. Participate with San Bernardino County on efforts to implement the AQMP, which will help the City toward achieving better air quality.

13. The City will evaluate the San Bernardino Air Quality Attainment Plan (AQAP) to assess the possible implications that each measure in the AQAP will have to the economic conditions of Adelanto. For AQAP measures that the City feels are unacceptable or otherwise detracting from City objectives, the implications of non-compliance must be further identified and, if possible, mitigated.

14. Develop and distribute a list of actions based on the AQMP, that employers and citizens should use to assist in air quality improvement.

15. The City will monitor efforts of the Mojave Desert Air Quality Management District, South Coast Air Quality Management District, and the State of California Air Resources Board in improving air quality in the Los Angeles Basin.

16. The City will promote the inclusion of "clean industry" within the Manufacturing/Industrial District of Adelanto.

17. The City will provide a comprehensive open space/trails network that links residential areas with the job rich industry park areas, allowing more opportunity for residents to walk or bicycle to work.

18. Improved air quality includes coordination between the City and the MDAQMD, incorporating appropriate policy direction. The goal is to participate at the regional level in order to establish the most cost effective emissions reductions.

Other mitigation measures that the City will pursue to reduce air quality impacts include the following:

19. Participate with regional transit agencies in a cooperative program to increase transit services with existing equipment, and expand services through transit facility improvements.

20. Coordinate with regional transit agencies to increase funding for transit improvements to supplement other means of travel.

21. Require new development to incorporate design features which facilitate transit service and encourage transit ridership such as bus pull-out areas, covered bus stop facilities, efficient trail system through projects to transit stops, designation of special on-site parking spaces beyond base requirements for commuter park-n-ride purposes, and incorporation of pedestrian walkways that pass through subdivision boundary walls.

22. Support efforts to establish a region-wide bus transit pass.

23. To the extent feasible, implement staggered, flexible and compressed work schedules in public agencies.

24. Implement home-based telecommuting programs in public agencies.

25. Encourage the use of the telecommunication center in Apple Valley.

26. Encourage a video conferencing facility in new industrial park developments.

27. Limit the provision of on-street (curbside) parking along principal arterial roadways to increase the traffic carrying capacity of the roadway.

28. Identify and prioritize system improvements needed to increase mobility, such as signal synchronization and establish a program for the orderly implementation of such improvements.

29. Require circulation improvements prior to, or concurrent with development.

30. Remove illegally parked and stalled cars and accidents from roadways to immediately minimize blockage.

31. Require specific plans and other mixed-use projects to provide an internal system of trails linking schools, shopping centers, transit and other public facilities with residential areas.

32. Require bicycle parking facilities as a percentage of auto parking spaces or as a ratio to square feet in new non-residential development.

33. Require pedestrian walkways and bicycle lanes to connect each building in new non-residential development with the local system of pedestrian/bicycle paths.

34. Contribute to a bicycle route system, either by contributions from new development or provision of bike way segments.

35. Require new residential subdivisions over 160 acres to include supportive commercial uses, including retail uses and services, that are conveniently accessible to pedestrians and bicyclists.

36. Incorporate strategies into design guidelines and development standards which promote a pedestrian scale environment, encourage the use of transit, and reduce dependency on the automobile.

37. Implement plans and programs to phase in energy conservation improvements, equipment and facilities.

38. Adopt incentives and regulations to encourage energy conservation for private development, including the use of site planning techniques, landscaping, building orientation, and building design.

39. Manage paved roads to produce the minimum practicable level of particulates.

40. Minimize particulate emissions during road, parking lot and building construction phase.

41. Control particulate emissions from unpaved roads, vehicle maneuvering areas and parking lots.

42. Establish cooperative programs to improve the business climate and competitive edge of cities within the High Desert area, as well as improving jobs/workers balance by considering cooperative economic development programs and cooperative agreements to improve area wide jobs/workers balance through mutually acceptable efforts.

43. Support the accelerated use of reformulated or cleaner-burning gasoline.

44. Support County, regional, and State efforts to increase emissions inspections of motor vehicles and the required maintenance to bring emissions up to standards.

45. Support legislation that requires pollution control equipment on construction vehicles.

46. Support legislation that expedites the ability of phone companies to create the infrastructure required for teleconferencing facilities.

47. Support legislation that provides tax credits for investments in home computers to enable employees to work at home.

48. Support legislation that provides tax credits and other incentives for setting-aside land or providing facilities for telecommunication centers.

49. Establish an ongoing air quality implementation program, adapting it as necessary to local circumstances, resources and procedures.

50. Participate with regional transit agencies in defining and implementing a Congestion Management Program for the High Desert area by November 1994.

51. Identify existing sources of State and Federal funds for air quality planning and public education, including the federal funds associated with the Intermodal Surface Transportation Efficiency Act (ISTEA).

52. Identify and remove barriers to the use of State and Federal funds for air quality improvement purposes.

53. Seek to increase the overall funding availability for local emissions reduction programs.

54. Seek to insure 100 percent funding of State and Federal air quality program mandates.

Mitigation Measures Added By Lead Agency

The City of Adelanto acting as Lead Agency will adopt a Fugitive Dust Ordinance within the Fiscal Year that will include the following reasonably available control measures for high winds:

55. Earth-moving dust: (a) cease all active operations; or (b) apply water to soil not more than 15 minutes prior to moving such soil.

56. Disturbed surface areas: on the last day of active operations prior to a weekend, holiday, or any other period when active operations will not occur for not more than four consecutive days; (a) apply water with a mixture of chemical stabilizer diluted to not less than 1/20 of the concentration required to maintain a stabilized surface for a period of six months; or (b) apply chemical stabilizers prior to wind event; or (c) apply water to all unstabilized disturbed areas 3 times per day; or (d) establish vegetative cover within 30 days after active operations have ceased; or (e) maintain soil moisture content at 12 percent; or (f) continue watering to prevent visible emissions from extending more than 100 feet beyond the active cut or mining area unless area is unaccessible to watering vehicles due to slope conditions or other safety conditions; or (g) apply dust supressants in sufficient quantity and frequency to maintain a stabilized surface.

57. Unpaved roads: (a) apply chemical stabilizers prior to wind event; or (b) apply water once per hour during active operation; or (c) stop all vehicular traffic.

58. Open storage piles: (a) apply water once per hour, or (b) install temporary coverings.

59. Paved road track-out: (a) cover all haul vehicles; or (b) comply with the vehicle freeboard requirements of Section 23114 of the California Vehicle Code for both public and private roads.

The Ordinance will also include provisions for large operations and exemptions as follows:

60. Any person who conducts or authorizes the conducting of a large operation shall either: (a) take the actions specified above in 1 through 5 and (i) notify the City Engineer not more than 7 days after qualifying as a large operation, (ii) maintain daily records to document the specific actions taken; (iii) maintain such records for a period of not less than 6 months; and (iv) make such records available to the City Engineer upon request; or (b) prepare a fugitive dust plan for submittal to the City Engineer which includes the name address and phone number of the person responsible for the submittal and implementation of the plan, a description of the operation including a map depicting the site, a listing of all sources of fugitive dust emissions within the property lines, and a description of reasonable available control measures that will be utilized and/or installed during periods of active operations. A large operation will include any active operation which contains in excess of 100 acres of disturbed surface area or any earth moving which exceeds daily earth moving or throughput of 10,000 cubic yards three times in any 365 day period. Any person who elects to obtain an approved fugitive dust emission control plan must submit the plan to the City Engineer no later than 30 days after the activity becomes a large operation.

61. The fugitive dust ordinance will not apply to unpaved roads, provided such roads: (i) are used for the maintenance of wind-generating equipment; or (ii) meet all of the following criteria: [a] are less than 30 feet in width at all points along the road; [b] are within 25 feet of the property line; and [c] have a traffic volume less than 20 vehicle-trips per day.

62. The fugitive dust ordinance will not apply to: (a) any active operation, open storage pile, or disturbed surface area for which necessary fugitive dust preventive or mitigative actions are in conflict with the Federal Endangered Species Act; (b) to non-routine or emergency maintenance of flood control channels and water spreading basins; (c) blasting operations which have been permitted by the California Division of Industrial Safety; and (d) motion picture, television, and video production activities when dust emissions are required for visual effects. (In order to obtain this motion picture etc. exemption, the City Engineer must receive notification in writing at least 72 hours in advance of any such activity).

As an additional mitigation measure the City will not issue Building Permits without proof of compliance with MDAQMD requirements.

Recommended Monitoring

Implementation of the Mitigation Measures will be by the following Departments, Agencies and/or Applicant as follows:

[ ] City Council: Nos.
[ ] Planning Commission: Nos.
[X] Administrative Staff: Nos. **1, 3, 6, 7, 10, 13, 15, 16, 18, 23, 24, 42-48, 50**
[X] Planning Department: Nos. **2, 4, 8, 9, 11, 12, 14, 17, 21, 25, 26, 31-33, 36, 38, 49, 51-54**
[X] Police Department: Nos. **30**
[ ] Fire Department: Nos.
[X] Engineering Department: Nos. **5, 27-29, 39**
[X] Building Department: Nos. 37
[X] Other City Department, Transit: Nos. **19,20,22**
[X] Applicant: Nos. **32, 34, 35, 40, 41, 55-62**
[ ] Other Agency _____ Nos.

Monitoring of the Mitigation Measures will be by the following Departments/Agencies as follows:

[X] City Council: Nos. **1, 3, 5-7, 10-13, 15, 17-20, 22-24, 28, 37, 42-48**
[X] Planning Commission: Nos. **2, 4, 8, 9, 16, 21, 27, 29, 31-33, 36, 38**
[X] Administrative Staff: Nos. **14, 25, 26, 30, 39, 51-54**
[X] Planning Department: Nos. **32, 34, 35**

[ ] Police Department: Nos.
[ ] Fire Department: Nos.
[X] Engineering Department: Nos. **40,41,55-62**
[ ] Building Department: Nos.
[ ] Other City Department _____ Nos.
[ ] Applicant: Nos.
[ ] Other Agency _____ Nos.

The Timing of Verification for the Mitigation Measures shall be as follows:

[X] During project approval: Nos. **2, 8, 9, 21, 27, 29, 31-35**
[ ] During plan checking: Nos.
[ ] Prior to issuance of building permit: Nos.
[X] During construction: Nos. **40, 55-62**
[X] Ongoing requirements: Nos.**1, 3, 10, 11-13, 15, 16, 18-20, 23, 25, 26, 28, 30, 37, 39, 41, 44-49, 51-54**
[X] City implemented measures: Nos. **4-7, 14, 17, 22, 36, 38, 42, 43, 50**

3.3 Water Resources

Since the FEMA mapping and studies do not yet identify all flood hazard areas in the entire City, the following shall be required:

1. Programs for the continuous evaluation and designation of floodway, floodplain and drainage areas shall be identified and financed.

2. The City will increase public awareness in regard to the potential hazards resulting from storm runoff, use of storm water for ground water recharge, and emergency measures during flood disasters.

3. The City will coordinate land use and flood control planning through continued improvement of staff contacts between the County Flood Control District and cities within the area.

Since drainage from adjacent development contributes to flood hazards, the following shall be required:

4. Surface run-off from new development shall be controlled by proper facilities to reduce downstream flood hazards.

5. Structural controls and restrictions regarding changes in topography, removal of vegetation, creation of impervious surfaces, and periods of construction, such that the need for off site flood and drainage control improvements is minimized and such that run-off from the development will not result in downstream flood hazards.

Flood control and drainage measures are part of the overall community improvement program and should advance the goals of recreation, resource conservation, preservation of natural riparian vegetation and habitat, and the preservation of the scenic values of the City's streams and creeks. The City shall:

6. Consider ecological significance and aesthetic quality of natural drainage channels in the design of all drainage projects.

7. Preserve designated drainage channels and water courses such as creeks and river beds as resource management areas or linear parks and recreation trails, when possible.

Since the funding of necessary flood control and drainage facilities is a major concern, the City shall continue to develop local area drainage plans and establish appropriate funding mechanisms.

Since individual developments may be subject to spot flooding from small streams or unmapped areas adjacent to mapped flood areas, the City shall require specific hydrology and hydraulic studies to be prepared at the time the developments are proposed. These studies shall:

8. Identify existing buildout drainage conditions of the General Plan update and measures which must be taken within the development project or downstream from the project to preclude impacts on the proposed development or increase impacts to downstream development. This includes the identification of primary (Master Plan) and secondary drainage facilities. These studies should be submitted and reviewed by the City Engineer and the City Manager.

9. Fully account for all planned flood-control facilities within or adjacent to the project site. When sections of flood-control facilities cannot be constructed, provision should be made for their ultimate construction, that is rights-of-way reserved and construction funds secured. Additionally, interim facilities must be provided which will be able to handle the additional runoff from the proposed development until the planned flood control facilities are constructed.

10. Develop the drainage system in a natural state where possible.

Mitigation measures for groundwater include:

11. Adherence to appropriate hazardous materials storage and handling plans will also be required per exposure limitations set by the Occupational Safety and Health Administration (Title 29, CFR) and per storage and disposal requirements set by the U.S. EPA (Title 40, CFR).

12. A system of Detention/Retention basins and treatment facilities are recommended to be placed within the manufacturing/industrial areas of the City to mitigate any contamination impacts that could occur.

As public education plays a vital role in minimizing flood hazard, the City shall:

13. Establish a public information system through the Fire and Police Departments outlining emergency operations plans and measures to reduce losses in the event of a flood disaster.

14. Encourage property owners to check with the Engineering Department at City Hall to review flood hazard information.

15. Require the storm waters be used for groundwater recharge when possible.

Since flood protection is both local and regional in nature, the City shall:

16. Continue the development of intergovernmental coordination with adjacent cities, County Flood Control District, the Army Corps of Engineers, and other agencies which have an interest in flood control projects that cross jurisdictional boundaries.

17. Coordinate land use and flood control planning through continued improvement of staff contacts between the County Flood Control District, and cities within the areas, and through annual review of the Capital Improvements Program.

Mitigation Measures Added By Lead Agency

18. As an additional mitigation measure the City Fire Department will require adherence to appropriate hazardous materials storage, and handling plans will also be required per exposure limitations set by the Occupational Safety and Health Administration (Title 29, CFR) and per storage and disposal requirements set by the U.S. EPA (Title 40, CFR).

Recommended Monitoring

Implementation of the Mitigation Measures will be by the following Departments, Agencies and/or Applicant as follows:

[ ] City Council: Nos.
[ ] Planning Commission: Nos.
[ ] Administrative Staff: Nos.
[ ] Planning Department: Nos.
[X] Police Department: Nos. **13**
[X] Fire Department: Nos. **13**

[X] Engineering Department: Nos. **1-3, 7,16,17**
[ ] Building Department: Nos.
[ ] Other City Department _____ Nos.
[X] Applicant: Nos. **4-6, 8-15, 18**
[ ] Other Agency _____ Nos.

Monitoring of the Mitigation Measures will be by the following Departments/Agencies as follows:

[X] City Council: Nos. **1, 2, 7**
[ ] Planning Commission: Nos.
[X] Administrative Staff: Nos. **3, 13, 16, 17**
[ ] Planning Department: Nos.
[ ] Police Department: Nos.
[X] Fire Department: Nos. **11, 18**
[X] Engineering Department: Nos. **4-6, 8-10, 12, 14, 15**
[ ] Building Department: Nos.
[ ] Other City Department _____ Nos.
[ ] Applicant: Nos.
[ ] Other Agency _____ Nos.

The Timing of Verification for the Mitigation Measures shall be as follows:

[X] During project approval: Nos. **5, 6, 8, 12, 15**
[X] During plan checking: Nos. **4, 7, 9**
[ ] Prior to issuance of building permit: Nos.
[X] During construction: Nos. **10**
[X] Ongoing requirements: Nos. **1-3, 11, 13, 14, 16**
[X] City implemented measures: Nos. **13,17**

3.4 Biological Resources

Mitigation measures incorporated into the General Plan Update to reduce impacts on the environment include the following:

1. The City will encourage the use of native vegetation and drought tolerant trees to enhance the environment within the City.

2. Maintain drainage courses and utility rights of way in open space uses that do not conflict with those needs, but provide an attractive open space for the community, such as linear parks, trails, etc.

3. Require clean-up and maintenance of vacant parcels before development to avoid visual blight.

4. Areas of the Shadow Mountains shall be retained as open space to protect their integrity as a unique habitat as well as wildlife movement corridor.

5. The Mojave River, as well as other major streamcourses, shall remain as open space to be managed as wildlife movement corridors.

6. All land development projects shall be reviewed for consistency with the Land Use Map, which incorporates the above-mentioned mitigations/ implementation strategies. The City may consider the offer of preferential assessments on real property as an incentive for retaining open space or conservation easements to protect sensitive species and their habitats.

7. The City shall require the applicant for a proposed project within or potentially affecting the resources of a Riparian Corridor or the Planning Areas natural drainage channels to enter into an agreement with the California Department of Fish and Game, as applicable, pursuant to Chapter 6 of Division 2 of the Fish and Game Code.

8. The City shall consult with the California Department of Fish and Game on any project that could affect a species which is listed or in fact rare, threatened or endangered (CEQA Guideline Section 15380, as identified by the biological survey).

9. The City will only allow development which minimizes or eliminates destruction of or damage to any and all significant biotic resources. i.e.., the Mojave River corridor, Fremont Wash.

10. The City will require the development of open space and recreation areas within all new residential developments as determined by the City.

11. The City shall designate, as may be appropriate, washes, drainage channels, utility easements and transportation rights of way as linear parkways. These linear parkways shall, to the extent feasible, provide linkages and access to the other open space and recreational areas within the City.

12. To the extent feasible, the City shall acquire and maintain up to date information concerning County, State, and Federal ordinances, codes, laws, and studies in the area of biological resources. This information is to be available for public use.

13. The City shall implement measures to ensure the protection and safety of all natural environments, especially those along the Mojave River corridor.

14. In an effort to guide citizens and developers towards greater understanding of biological environment and the values of integrating wildlife into the planning process, an information booklet on desert native plants, sensitive animal species, and their habitats shall be secured and made available to land owners. This is particularly important for the Desert Tortoise and Mojave Ground Squirrel, which are both State listed, and likely to be found in areas of potential development.

15. The City of Adelanto shall acquire and maintain current available data regarding the status and location of sensitive biological elements (species and natural communities) within the Planning Area.

16. The City of Adelanto will consider available options and work with other government agencies and public utilities for the acquisition, protection, and maintenance of open space and other financial assistance from appropriate public agencies at each level of government and private entities to acquire necessary open space lands and to provide for their continued maintenance. Additional alternatives include (1) acquisition of easement interests; (2) leasing: (3) tax incentives; (4) lease-purchase agreements; (5) joint acquisition; (6) purchase and resale; and (7) land swapping. Funding sources may include the General Fund, exactions from new development projects, wildlife enhancement assessment districts, private donations, and State programs (Land and Water Conservation Fund, Environmental License Plate Fund, Wildlife Conservation Board Program).

17. The City shall prohibit unnecessary activities and uses that could endanger the environmental quality and natural character of all open space areas.

18. Implement a Relocation Program per the California Desert Native Plant Act (CDNPA).

Mitigation Measures Added By Lead Agency

19. As an addition to Mitigation Measure No. 7 above, the City shall require that any development adjacent to riparian corridors minimize removal of vegetation; minimize erosion, sedimentation and runoff by appropriate protection or vegetation and landscape; provide for sufficient passage of native and anadromous fish as specified by the California Department of Fish and Game regarding wastewater discharges and entrapment; prevention of groundwater depletion or substantial interference with surface and subsurface flows; and provision of natural vegetation buffers.

Recommended Monitoring

Implementation of the Mitigation Measures will be by the following Departments, Agencies and/or Applicant as follows:

[ ] City Council: Nos.
[X] Planning Commission: Nos. **4, 5, 9-11, 17**
[X] Administrative Staff: Nos. **16**
[X] Planning Department: Nos. **1, 2, 8, 12-14, 18 (Qualified Biologist), 19**
[ ] Police Department: Nos.
[ ] Fire Department: Nos.
[X] Engineering Department: Nos. **15**
[ ] Building Department: Nos.
[X] Other City Department, Redevelopment: Nos. **3**
[X] Applicant: Nos. **6, 7 (Qualified Biologist)**
[ ] Other Agency _____ Nos.

Monitoring of the Mitigation Measures will be by the following Departments/Agencies as follows:

[X] City Council: Nos. **4, 5, 9-11, 16, 17**
[X] Planning Commission: Nos. **1, 2, 6, 13, 18, 19**
[X] Administrative Staff: Nos. **3, 12, 14, 15**
[ ] Planning Department: Nos.
[ ] Police Department: Nos.
[ ] Fire Department: Nos.
[ ] Engineering Department: Nos.
[ ] Building Department: Nos.
[ ] Other City Department _____ Nos.
[ ] Applicant: Nos.
[X] Other Agency, Fish and Game: Nos. **7, 8**

The Timing of Verification for the Mitigation Measures shall be as follows:

[X] During project approval: Nos. **1, 2, 6-11, 13**
[ ] During plan checking: Nos.
[ ] Prior to issuance of building permit: Nos.
[ ] During construction: Nos.
[X] Ongoing requirements: Nos. **3, 15, 16, 19**
[X] City implemented measures: Nos. **4, 5, 12, 14, 17, 18**

3.5 Noise

The following are specific mitigation that are incorporated into the General Plan that will lessen the significance of airport noise impacts to residents and business within the Adelanto Planning Area.

Strategies which are controlled by the operational characteristics of the airport to lessen the severity of noise impacts include:

1. Operational measures: Change take-off, climb-out, or landing procedures; change flight tracks, limit or rotate primary runway usage, enforce prescribed flight track use and fan out departure flight tracks. Prohibit or limit Stage II aircraft operations.

2. Preventive measures: Acquire undeveloped land adjacent to the runways that are exposed to aircraft noise levels of 65 dB or greater. Restrict new residential and hospital development to areas outside the 65 CNEL noise contour.

3. Management measures: Develop a noise monitoring system, and establish a community relations office.

4. Remedial measures: Acquire mobile home sites and single family homes exposed to aircraft noise of 65 CNEL or greater. Redevelop such uses to other more compatible uses related to the operations of the airport. Establish and conduct a sound attenuation program for single family residences, schools, hospitals, and churches in areas exposed to aircraft noise of 65 dB of greater.

Other mitigation measures to reduce noise within Adelanto include the following:

5. Set maximum allowable noise specifications for new City owned or operated vehicles.

6. Set noise emission and construction time limits on public work projects.

7. Limit siren usage, to the extent feasible, within populated areas by police, fire and ambulance vehicles.

8. Continue to require subdivision perimeter walls to be constructed as solid block walls, continue to require dual pane glass windows as part of energy conservation measures, and continue to install air conditioners in all homes as ways to reduce environmental noise and to meet State noise requirements.

9. Provide noise reduction retrofit equipment where effective and economically feasible.

10. Enforce State vehicle noise regulations (Sections 23130, 23130.5, 27150, 27151 and 38275 of the California Vehicle Code) to curtail the use of vehicles equipped with illegal or faulty exhaust systems and "hot rods" exhibiting tire squeal or excessive exhaust noise.

11. Require landscaped berm and barrier combinations where feasible.

12. Require all proposed barriers be not only dense enough to be effective but also properly designed and aesthetically compatible with the surrounding community.

13. Enforce the California Noise Insulation Standards (Title 25 California Administrative Code) for multi-family dwellings to ensure an acceptable maximum interior noise level of 45 CNEL in habitable rooms and maintain adequate noise insulation.

14. Incorporate measures into future residential projects which attenuate exterior noise levels in outdoor activity areas to a maximum of 65 CNEL.

15. Future projects approved within the City shall reflect adopted policies regarding the reduction of unnecessary noise near sensitive receptors such as parks, hospitals, libraries, schools and convalescent homes.

16. The City shall periodically review County and regional plans for land use, transportation, airport operation, etc. to identify any potential noise impacts and develop strategies for the control of major noise sources on a county wide and regional basis.

17. Minimize noise emissions from all local government controlled or sanctioned activities via enforcement of the City Noise Ordinance.

18. Ensure that public buildings (schools libraries etc.) are sufficiently noise insulated to permit their intended function to be uninterrupted by exterior noise events.

19. Exercise discretion when requiring noise barriers to ensure that: (a) other methods of noise attenuation have been explored (b) landscaped berm and barrier combinations are proposed where feasible and (c) the proposed barrier is not only dense enough to be effective (a minimum mass of 4.5 lbs./sq. foot) but also properly designed and aesthetically compatible with the surrounding community.

20. Assist in the formation of special assessment districts or other funding opportunities as necessary, to install noise barriers or berm and barrier

combinations in areas where existing residences back up to major thoroughfares.

21. Ensure that the design and improvement of future master planned roadway links in the City are accomplished in a manner which minimizes noise impacts on adjacent educational facilities and adjoining neighborhoods.

22. Ensure through the General Plan process that objectives and policies provide for compatible noise environments for all existing and future land uses within the City.

23. Consider the following uses noise sensitive and discourage them in areas where exterior noise levels exceed 65 CNEL unless measures are implemented which reduce the noise exposure below this level:

    (a) single and multiple family residential uses

    (b) group homes

    (c) hospitals

    (d) schools and other learning institutions and

    (e) parks and open space areas where quiet is a basis for use.

24. Incorporate measures into future residential projects which attenuate exterior noise levels in outdoor activity areas to a maximum of 65 CNEL.

25. Encourage the Adelanto School District to design and locate schools so that exterior noise exposures do not exceed 65 CNEL and interior peak noise levels do not exceed 60 dBA as a result of exterior noise sources.

26. Ensure through the plan approval process that any branch library facilities are designed and located so that interior noise levels do not exceed 60 CNEL and average interior noise levels during business hours do not exceed 50 dBA.

27. Ensure through the plan approval process that interior noise levels for hospital and convalescent homes do not exceed 55 CNEL in interior living areas and 45 CNEL in interior sleeping areas.

28. Ensure through the plan approval process that recreational areas intended for quiet or passive activities are designed and located so that noise levels do not exceed 70 CNEL.

29. Ensure through the plan approval process that recreational areas intended for noisy or active uses are buffered from passive use areas and from surrounding noise sensitive land uses.

30. Ensure through the plan approval process that business and professional offices where effective communication is essential mitigate interior noise to 55 CNEL.

31. Ensure through the plan approval process that exterior noise levels at commercial and industrial areas do not exceed 75 dBA.

32. Ensure through the plan approval process that noise tolerant land uses are located in areas irrevocably committed to noise producing land uses such as transportation corridors or railroads.

33. Future projects approved within the City shall reflect adopted policies regarding the reduction of unnecessary noise near sensitive receptors such as parks, hospitals, libraries, schools and convalescent homes.

34. The City shall periodically review County and regional plans for land use transportation airport operation etc. to identify any potential noise impacts and develop strategies for the control of major noise sources on a County-wide and regional basis.

35. Noise sensitive land uses including residences, hospitals and long-term medical care facilities, educational facilities, libraries, churches and places of public assembly shall not be allowed near major stationary noise sources.

36. The application of noise insulation and other noise control techniques in new schools, hospitals and convalescent homes shall be consistent with State and Federal regulations.

37. Consideration shall be given to the effects of truck mix, speed limits and ultimate motor vehicle volumes on noise levels adjacent to master planned roadways when improvements to the circulation system are planned.

38. Enforce State vehicle noise regulations (Section 23130, 23130.5, 27150, 27151 and 38275 of the California Vehicle Code) to curtail the use of vehicles equipped with illegal or faulty exhaust systems and hot rods exhibiting tire squeal or excessive exhaust noise.

39. Specify that in Conditionally Acceptable areas applicants must submit an acoustical analysis of proposed residential developments prepared under the supervision of a person experienced in the field of acoustical engineering which evaluates existing and projected noise levels as well as the application of noise attenuation measures.

40. Enforce the California Noise Insulation Standards (Title 24 California Code of Regulations) for multi-family dwellings to ensure an acceptable maximum interior noise level of 45 CNEL in habitable rooms and maintain adequate noise insulation.

41. Acoustical privacy consistent with the California Noise Insulation Standards and all existing and future requirements outlined in the State Housing Code shall be strictly enforced for both single and multiple family residential construction.

42. Grading and construction activities will be limited in project Conditions of Approval by the City to week days between 7:00 a.m. and 6:00 p.m. This requirement will be enforced especially when the construction site is adjacent to existing residential uses.

43. Require the preparation of a Master Development Specific Plan for the long range operational requirements of the airport facility and the surrounding Airport Development District.

44. Require that all proposed development within the Airport Development District be in conformance with the Master Development Plan/Specific Plan.

45. Require all new development to conform to policies and regulations established for uses occurring within the 65 CNEL noise contour and the overflight areas of the proposed airport facility.

Recommended Monitoring

Implementation of the Mitigation Measures will be by the following Departments, Agencies and/or Applicant as follows:

[ ] City Council: Nos.
[ ] Planning Commission: Nos.
[X] Administrative Staff: Nos. **20**
[X] Planning Department: Nos. **11, 12, 15, 16, 19, 21, 22, 23, 32-35,44**
[X] Police Department: Nos. **7, 10, 38**
[X] Fire Department: Nos. **7**
[X] Engineering Department: Nos. **5, 6**
[X] Building Department: Nos. **13, 14, 18, 24, 27-31**
[ ] Other City Department _____ Nos.
[X] Applicant: Nos. **8, 9, 17, 37, 39-42, 45**
[X] Other Agency, Airport Authority: Nos. **1-4, 43**
School District: Nos. **25**
County Library: Nos. **26**

Monitoring of the Mitigation Measures will be by the following Departments/Agencies as follows:

[X] City Council: Nos. **1-4, 20, 25, 34, 43**
[X] Planning Commission: Nos. **11, 12, 15, 16, 19, 21-23, 26, 27-32, 35, 44, 45**
[X] Administrative Staff: Nos. **5-7, 10, 13, 14, 18, 24, 33, 38**
[X] Planning Department: Nos. **39**
[X] Police Department: Nos. **17**
[ ] Fire Department: Nos.
[X] Engineering Department: Nos. **42**
[X] Building Department: Nos. **8, 9, 37, 40, 41**
[ ] Other City Department _____ Nos.
[ ] Applicant: Nos.
[ ] Other Agency _____ Nos.

The Timing of Verification for the Mitigation Measures shall be as follows:

[X] During project approval: Nos. **8, 9, 11, 12, 15, 18-23, 25-33, 35, 39-41, 44, 45**
[X] During plan checking: Nos. **24, 37**
[X] Prior to issuance of building permit: Nos. **13, 14**
[ ] During construction: Nos.
[X] Ongoing requirements: Nos.**1-4, 6, 7, 10, 17, 38, 42, 43**
[X] City implemented measures: Nos. **5, 16**

3.6 Light and Glare

Mitigation measures included as part of Project approval include the following:

1. Industrial and commercial uses adjacent to residential units will be required to direct outdoor lighting away from existing and planned residential units.

2. Development projects will be required to use, as appropriate, (a) low pressure sodium lights where security needs permit, to minimize the impacts of glare, (b) limitations on height of lighting fixtures to reduce unwanted illumination, (c) directing light and shielding to minimize off-site illumination, (d) point by point lighting plans, as necessary, for commercial and industrial developments in the immediate vicinity of residential areas, and (e) regulation of land use compatibility for highly illuminated land uses, such as ballfields, tennis courts and outdoor stadiums through the City development review process.

Recommended Monitoring

Implementation of the Mitigation Measures will be by the following Departments, Agencies and/or Applicant as follows:

[ ] City Council: Nos.
[ ] Planning Commission: Nos.
[ ] Administrative Staff: Nos.
[ ] Planning Department: Nos.
[ ] Police Department: Nos.
[ ] Fire Department: Nos.
[ ] Engineering Department: Nos.
[ ] Building Department: Nos.
[ ] Other City Department _____ Nos.
[X] Applicant: Nos. **1, 2**
[ ] Other Agency _____ Nos.

Monitoring of the Mitigation Measures will be by the following Departments/Agencies as follows:

[ ] City Council: Nos.
[ ] Planning Commission: Nos.
[ ] Administrative Staff: Nos.
[ ] Planning Department: Nos.
[ ] Police Department: Nos.
[ ] Fire Department: Nos.
[ ] Engineering Department: Nos.
[X] Building Department: Nos. **1, 2**
[ ] Other City Department _____ Nos.
[ ] Applicant: Nos.
[ ] Other Agency _____ Nos.

The Timing of Verification for the Mitigation Measures shall be as follows:

[X] During project approval: Nos. **2**
[ ] During plan checking: Nos.
[ ] Prior to issuance of building permit: Nos.
[X] During construction: Nos. **1**
[ ] Ongoing requirements: Nos.
[ ] City implemented measures: Nos.

3.7 Land Use

Although no mitigation measures are required pursuant to the CEQA the following mitigation measures are recommended to insure that land use does not impact other topical areas.

Policies of the Land Use Element designed to reduce impact on the land use pattern of the City include the following:

1. The City will require "low flow" plumbing fixtures and other water conserving techniques to reduce overall per capita water consumption.

2. Require the preservation and relocation of endangered plants and animals which may be in jeopardy due to increased development activity.

3. Require that the Mojave River Corridor remain as an open space area, to be used for wildlife habitat and passive recreational activities.

4. Require the use of drought tolerant plant materials for all types of development, including the use of native California species.

5. Require new development to accommodate design criteria established in the Community Design Element.

6. Require that infrastructure be in place prior to the occupancy of new development.

7. Require that short term development demands are in balance with long range goals established by the General Plan.

8. Require that all developments within the City are designed to accommodate the "Buildout" road dedications at the time of approval.

9. Prepare a wastewater reclamation program for the use of treated water in appropriate land uses.

10. Provide residents with water conservation tips and education.

11. To manage growth according to the General Plan for land use, assuring that community services are adequate to meet existing and proposed community needs.

12. Encourage growth to occur according to the most efficient sequence from existing development to planned project areas.

13. Pursue annexations which serve to promote the balance of the community, the quality of development, improvement of the economic base, and foster the long range plans of Adelanto.

14. Allow for a range of street standards appropriate for the type and density of development, as well as the projected level of service of each roadway at buildout of the General Plan.

15. To provide a balanced mix of land uses and development patterns which provide the maximum flexibility to the development community.

16. Encourage the development of a variety of projects and project types that enhance the community image.

17. Offer a wide range of development opportunities for investors, developers, residents and businesses. The City encourages the development of mixed use projects, providing a balance of homes, jobs, and services.

18. Discourage the proliferation of "urban sprawl" by utilizing the general plan framework to foster a sense of community identity.

19. Require the implementation of varied setback lines and the use of appropriate buffers between incompatible or conflicting land uses.

20. Require the preparation of development plans that incorporate the design components contained in the Community Design Element.

21. Request all developers to plan projects according to the specified land uses contained in the General Plan. Otherwise, the City will request the preparation of development plans or a special plan in order to be considered.

22. To promote the transformation of George Air Force Base into a major airport.

23. Encourage the interests of domestic and international companies to locate in Adelanto's Airport Development District and promote the concept of an enterprise or foreign trade zone to stimulate business.

24. Coordinate all planning and design of Airport with the FAA, assuring that all Federal, State and local requirements are met.

25. Work to ensure that George Air Force Base property, after transfer from the Federal Government, will remain an aviation facility focused on serving the future air transportation needs of the region and/or Southern California.

26. Require the preparation of a Master Development Plan for the long range operation of the airport facility and the surrounding Airport Development District.

27. Require that all proposed development within the Airport Development District Zone be in conformance with the Master Development Plan for the Airport.

28. Require all land uses around the airport be in conformance with the plans, rules and regulations contained in a master Development Plan for the Airport.

29. Require all new and existing development to conform to policies and regulations established for uses occurring within the 65 CNEL and overflight areas of the proposed airport facility.

30. To promote industrial, business and commercial development that provides for increased jobs and strengthens the local economy.

31. Encourage the development of business parks, offices and R&D centers in appropriate zones located throughout Adelanto.

32. Encourage the appropriate development of commercial activity in areas designated "commercial" or in areas that have unique qualities indicating the need for a commercial land use.

33. Encourage "cluster" commercial development rather than "strip" or linear commercial development to minimize curb cuts and to foster individual identify of each commercial node.

34. Promote the revitalization of existing commercial areas located outside of the Airport Development District.

35. Continue an aggressive industrial development program, maximizing the use of the large manufacturing/industrial district.

36. Require all development within the Airport overflight area be subject to approval by City Council and the designated Airport Authority to ensure compatibility with airport operations. No high occupancy overnight uses shall be permitted within these areas.

37. Allow neighborhood commercial centers at major intersections within residential districts and at section and 1/2 section intersections, pending a Conditional Use Permit.

38. Request aggregation of small parcels to minimize incongruous development.

39. To provide for a conversion of the current U.S. 395 Corridor into a super arterial roadway and focus on the implementation of Freeway 395.

40. Coordinate U.S. 395 realignment efforts with Caltrans to obtain necessary dedications and rights of way for the proposed Freeway 395.

41. Continue efforts with surrounding communities on the U.S. 395 realignment, design and construction process in order to assure the implementation of Freeway 395.

42. Assure that the current U.S. 395 facility will be re-utilized as a high access roadway (business route).

43. Require that a comprehensive U.S. 395 Corridor Study be prepared to evaluate the necessary improvements needed to transform the current limited access roadway into a major arterial (business route) through Adelanto.

44. Initiate a cooperative dialogue with Victor Valley communities and CalTrans to speed up the process for implementation of the Freeway 395.

45. Promote the inclusion of safe, attractive, well-served and affordable housing to complement the presence of the industrial district, the airport complex and the commercial centers in Adelanto.

46. Encourage residential developments to contain a variety of product types, designs and features.

47. All residential developments, as necessary, will include the dedication of parklands as required by the Quimby Act and/or provide fees in lieu to be allocated to the City for park acquisition.

48. Drainage channels as shown on the Master Drainage Plan shall be considered as unalterable. No channels may be rerouted around development without prior approval by the City Council.

49. The City will encourage reverse design residential districts; those which do not front major streets, arterials or collectors.

50. Require multi-family and mobile home subdivisions to adhere to the same overall design standards that apply to other residential districts. These uses are also appropriate for infill areas within the City.

51. Enforce the requirements set forth in the Development Regulations section of this document to assure quality development and upkeep.

52. Require the use of streetscapes and edge treatments to buffer all homes along major and minor streets utilizing xeriscape landscape to the greatest extent possible.

53. Allow the incorporation of residential units above or behind commercial uses pending a Conditional Use Permit.

54. Promote low per capita water use through the use of low water consumptive plant materials/desert plants (xeriscape).

55. Retain natural drainage channels and assure construction of facilities necessary to accommodate flows generated by proposed development. Retention areas and spreading grounds are to be incorporated where feasible.

56. Promote the addition of wastewater recycling facilities and the reuse of treated water for appropriate purposes.

57. Promote architectural designs that give Adelanto a unique, positive community image as it relates to the desert environment.

58. Protect environmentally unique and fragile areas such as bluffs, Joshua Tree woodland, the Mojave River Corridor and sensitive wildlife habitat areas.

59. Other mitigation measures are included in the Land Use Element under the Land Use Descriptions, Goals and Policies, Section IV.

Recommended Monitoring

Implementation of the Mitigation Measures will be by the following Departments, Agencies and/or Applicant as follows:

[ ] City Council: Nos.
[X] Planning Commission: Nos. **11, 12, 15-18**
[X] Administrative Staff: Nos. **10, 13, 22, 23, 25, 30, 35, 41**
[X] Planning Department: Nos. **3-5, 7, 19-21, 26-26, 31-34, 37, 38, 45-47, 49-55, 57-59**
[ ] Police Department: Nos.
[ ] Fire Department: Nos.
[X] Engineering Department: Nos. **2, 9, 14, 48, 56**
[X] Building Department: Nos. **29**
[ ] Other City Department _____ Nos.
[X] Applicant: Nos. **1, 6, 8, 36**
[X] Other Agency, Airport Authority: Nos. **24**
Caltrans: Nos. **39, 40, 42-44**

Monitoring of the Mitigation Measures will be by the following Departments/Agencies as follows:

[X] City Council: Nos. **9-13, 15-18, 22-25, 30, 35, 36, 39-43, 48, 56**
[X] Planning Commission: Nos. **3-5, 7, 14, 19-21, 26-28, 31-34, 37, 38, 45-47, 49-55, 57-59**
[X] Administrative Staff: Nos. **2, 29, 44**
[ ] Planning Department: Nos.
[ ] Police Department: Nos.
[ ] Fire Department: Nos.
[X] Engineering Department: Nos. **6, 8**
[X] Building Department: Nos. **1**
[ ] Other City Department _____ Nos.
[ ] Applicant: Nos.
[X] Other Agency, Airport Authority: Nos. **36**

The Timing of Verification for the Mitigation Measures shall be as follows:

[X] During project approval: Nos. **3-5, 8, 11, 12, 14, 16-21, 37, 45-55, 57, 59**
[X] During plan checking: Nos. **1**
[X] Prior to issuance of building permit: Nos. **6.**
[X] During construction: Nos. **2**
[X] Ongoing requirements: Nos. **7, 10, 22-25, 29-36,38,56**
[X] City implemented measures: Nos. **9, 13, 15, 26-28, 39-44**

3.8 Natural Resources

Policies of the Conservation/Open Space Element designed to reduce impact on natural resources within the City include the following:

1. The City will continue requiring the underground placement of existing and future utility lines to reduce visual impact as projects are approved.

2. All new developments will be required to implement energy conservation techniques into the development design.

3. The City will restrict development in those areas which are determined to have significant reserves of natural resources, including gas, oil, and aggregate materials.

4. Conservation techniques shall be required for proposed development (both domestic and industrial) to minimize consumption levels of renewable and non-renewable natural resources including water resources.

5. The City will seek to identify potential natural resources which may occur within the Planning Area and to conserve and protect those resources which may have substantial value to residents.

6. The City of Adelanto, in cooperation with Federal, State, and County government agencies, as well as surrounding jurisdictions and responsible agencies, will implement programs to assure maintenance and improvement of water quality from local groundwater sources and improve availability of water.

7. The City will cooperate with the County of San Bernardino to implement measures of the Congestion Management Plan in an aim to reduce the number of vehicles per capita on roadway systems within the Planning Area and the region, thus reducing the per capita consumption of fossils fuel.

8. The City will encourage residential, commercial, industrial users to conserve the use of water and other renewable and non-renewable natural resources by incorporating conservation measures.

9. The City shall promote the development and use of alternative energy sources, such as passive solar in industrial, commercial and residential developments.

No additional mitigation measures, other than those contained in the other parts of this Environmental Impact Report are proposed.

Recommended Monitoring

Implementation of the Mitigation Measures will be by the following Departments, Agencies and/or Applicant as follows:

[ ] City Council: Nos.
[ ] Planning Commission: Nos.
[ ] Administrative Staff: Nos.
[X] Planning Department: Nos. **3, 5, 7, 9**
[ ] Police Department: Nos.
[ ] Fire Department: Nos.
[X] Engineering Department: Nos. **1**
[X] Building Department: Nos. **8**
[X] Other City Department, Water Sup.: Nos. **6**
[X] Applicant: Nos. **2, 4**
[ ] Other Agency _____ Nos.

Monitoring of the Mitigation Measures will be by the following Departments/Agencies as follows:

[ ] City Council: Nos.
[X] Planning Commission: Nos. **1, 3, 5, 7-9**
[X] Administrative Staff: Nos. **6**
[ ] Planning Department: Nos.
[ ] Police Department: Nos.
[ ] Fire Department: Nos.
[ ] Engineering Department: Nos.
[X] Building Department: Nos. **2, 4**
[ ] Other City Department _____ Nos.
[ ] Applicant: Nos.
[ ] Other Agency _____ Nos.

The Timing of Verification for the Mitigation Measures shall be as follows:

[X] During project approval: Nos. **1, 8, 9**
[X] During plan checking: Nos. **2**
[X] Prior to issuance of building permit: Nos. **4**
[ ] During construction: Nos.
[X] Ongoing requirements: Nos. **7**
[X] City implemented measures: Nos. **3, 5, 6**

3.9 Risk of Upset

Policies of the Safety Element designed to reduce impact on potential hazards within the City include the following:

1. The City will ensure that all appropriate construction and safety standards are incorporated into all new development.

2. The City will review all development proposals to determine the possible impacts of each development on emergency services.

3. The City will enforce all Federal, State, County and local laws requiring all users, producers, and transporters of hazardous materials and waste to clearly identify any materials in the event of a violation.

4. The City will require all land uses involved in the production, storage, transportation, handling or disposal of hazardous materials be located at a safe distance from land uses that may be adversely impacted by these activities.

Recommended Monitoring

Implementation of the Mitigation Measures will be by the following Departments, Agencies and/or Applicant as follows:

[ ] City Council: Nos.
[ ] Planning Commission: Nos.
[X] Administrative Staff: Nos. **2**
[ ] Planning Department: Nos.
[ ] Police Department: Nos.
[X] Fire Department: Nos. **3, 4**
[ ] Engineering Department: Nos.
[X] Building Department: Nos. **1**
[ ] Other City Department _____ Nos.
[ ] Applicant: Nos.
[ ] Other Agency _____ Nos.

Monitoring of the Mitigation Measures will be by the following Departments/Agencies as follows:

[ ] City Council: Nos.
[X] Planning Commission: Nos. **1**
[X] Administrative Staff: Nos. **2, 3, 4**
[ ] Planning Department: Nos.
[ ] Police Department: Nos.
[ ] Fire Department: Nos.
[ ] Engineering Department: Nos.
[ ] Building Department: Nos.
[ ] Other City Department _____ Nos.
[ ] Applicant: Nos.
[ ] Other Agency _____ Nos.

The Timing of Verification for the Mitigation Measures shall be as follows:

[X] During project approval: Nos. **1, 2**
[ ] During plan checking: Nos.
[ ] Prior to issuance of building permit: Nos.
[ ] During construction: Nos.
[X] Ongoing requirements: Nos. **3, 4**
[ ] City implemented measures: Nos.

3.10 Population

No mitigation measures other than those discussed throughout this report are recommended. The reader is referred especially to the mitigation measures in Climate and Air Quality, Water Resources, Biological Resources, Noise, Natural Resources, Traffic and Circulation, Housing, Public Services and Utilities sections of this Environmental Impact Report. Mitigation measures discussed in these sections will reduce the impact on the land, consume less open space, reduce noise levels and traffic congestion, improve air quality, consume less natural resources including fuel, wood, sand and gravel, use less gas, electricity and services and consume less water at home and at the job site.

Recommended Monitoring

No monitoring is required other that included in the Climate and Air Quality, Water Resources, Biological Resources, Noise, Natural Resources, Traffic and Circulation, Housing, Public Services and Utilities sections of this Mitigation Monitoring Program

3.11 Housing

The City of Adelanto will sponsor, encourage, and permit the development of housing to meet all the housing needs of the residents located in the City. No additional mitigation measures other than those discussed throughout this report are recommended. The reader is referred especially to the mitigation measures in Climate and Air Quality, Water Resources, Biological Resources, Noise, Natural Resources, Traffic and Circulation, Population, Public Services and Utilities sections of this Environmental Impact Report. Mitigation measures discussed in these sections will reduce the impact of housing and its related population on the land, consume less open space, reduce noise levels and traffic congestion, improve air quality, consume less natural resources including fuel, wood, sand and gravel, use less gas, electricity and services and consume less water.

Recommended Monitoring

No monitoring is required other that included in the Climate and Air Quality, Water Resources, Biological Resources, Noise, Natural Resources, Traffic and Circulation, Public Services and Utilities sections of this Mitigation Monitoring Program

3.12 Cultural Resources

The past discovery of Indian artifacts and the potential presence in the Planning Area of unknown artifacts and buildings which may have historical importance contribute to the City s recognition of the importance of preserving cultural and historical resources as reflected in the policies and programs contained in the General Plan.

1. The City will require that all archeological resources, historic or prehistoric be evaluated in accordance with CEQA regulations and appropriate California guidelines prior to the adoption of mitigation measures and the acceptance of conditions of approval and required permit approvals.

2. The City will place developers responsible for the destruction of historic and archaeologically significant resources on file with the County of San Bernardino and the State of California, Office of Historic Preservation.

3. As part of the City's land development review process and project environmental assessment, City staff will review proposed developments for sites that may have potential archaeological significance. If determined necessary by the City, an archeological survey will be performed by a licensed archaeologist and appropriate site specific mitigation measures shall be implemented, including possible extraction and cataloging of significant resources.

4. To preserve any known or undiscovered archaeological sites and/or artifacts which may be present within the Planning Area.

5. To assure that proposed development policies will not eliminate any significant archaeologic or historic resources.

6. To provide a mechanism for the identification and preservation of archaeologic or historic resources within the Planning Area.

7. To provide to the extent feasible cultural facilities (libraries, museums, historic sites, etc.) within the Planning Area to meet the needs of new and current residents of Adelanto.

8. The City will encourage the addition of new cultural facilities i.e., theaters etc., to meet the needs of ever growing community.

9. The City, will encourage new development to provide cultural amenities that will satisfy the demand for new residents.

10. The City will coordinate efforts with the Adelanto School District and the San Bernardino County Public Library in providing new library facilities within the Planning Area.

Recommended Monitoring

Implementation of the Mitigation Measures will be by the following Departments, Agencies and/or Applicant as follows:

[ ] City Council: Nos.
[ ] Planning Commission: Nos.
[X] Administrative Staff: Nos. **7, 8, 10**
[X] Planning Department: Nos. **2-6**
[ ] Police Department: Nos.
[ ] Fire Department: Nos.
[ ] Engineering Department: Nos.
[ ] Building Department: Nos.
[ ] Other City Department _____ Nos.
[X] Applicant: Nos. **1 (Qualified Archaeologist), 9**
[ ] Other Agency _____ Nos.

Monitoring of the Mitigation Measures will be by the following Departments/Agencies as follows:

[X] City Council: Nos. **7, 8, 10**
[X] Planning Commission: Nos. **3-5, 9**
[X] Administrative Staff: Nos. **2, 6**
[X] Planning Department: Nos. **1**
[ ] Police Department: Nos.
[ ] Fire Department: Nos.
[ ] Engineering Department: Nos.
[ ] Building Department: Nos.
[ ] Other City Department _____ Nos.
[ ] Applicant: Nos.
[ ] Other Agency _____ Nos.

The Timing of Verification for the Mitigation Measures shall be as follows:

[X] During project approval: Nos. **1, 3, 5, 9**
[ ] During plan checking: Nos.
[ ] Prior to issuance of building permit: Nos.
[ ] During construction: Nos.
[X] Ongoing requirements: Nos. **2, 4, 7, 10**
[X] City implemented measures: Nos. **6, 8**

3.13 Traffic and Circulation

The volume to capacity ratios analysis indicated the need to upgrade several street segments and provide additional streets in order to accommodate the projected Year 2014 traffic volumes. A facility was considered for mitigations when the volume to capacity ratio exceeded 0.90 or Level of Service D.

1. The airport and Airport Development District are estimated to generate approximately 106,000 trips/day, in 2014. To improve access to this area it will be necessary to provide additional streets and/or upgrade the El Mirage Expressway east of the 395 Freeway.

2. Existing Highway 395 shows the need for improvements between El Mirage Expressway and Air Base Road. This condition could be mitigated by improved access from this area to the proposed 395 Freeway.

3. Two segments of Air Base Road may need modifications. The section west of the 395 Freeway should be upgraded to a super arterial. The volumes on Air Base Road east of the 395 Freeway will require a four lane expressway.

4. The volumes on Mojave at the 395 Freeway suggest that this facility be upgraded to a six lane expressway with an on/off ramp at the new Freeway 395.

5. Establish all major rights of way according to the requirements of the buildout projections of the General Plan.

6. Develop a consistent design of roadways and landscape treatments that allow for improved visual quality.

7. Utilize high quality construction standards for all roadways, sidewalks and paved areas to increase the longevity of the system.

8. Allow the existing U.S. 395 roadway to become Adelanto's business route once the Freeway 395 plans are set forward.

9. Coordinate efforts with local agencies, CalTrans, the County Road Dept., and the Federal Transportation Department in the planning of a regional transportation system.

10. Investigate all options for the implementation of a high speed rail system from the Orange, Riverside and San Bernardino County areas to a new major airport.

11. Begin investigating the applicability of a local/subregional transit system and necessary rights of way needed in Adelanto and the surrounding area.

12. Prior to adoption of the General Plan Update, the City of Adelanto will prepare, if required by law and if the Victor Valley Transportation Model is available, a CMP Traffic Impact Analysis Report in accordance with City Resolution No. 93-45.

12a. The City of Adelanto will refer any proposed projects that are within the State Highway right-of-way to the Department of Transportation for approval as lead agency.

Regional transportation facilities will be necessary to reduce the impact of traffic to a level of insignificance. These facilities are dependent on the actions of the California Department of Transportation, surrounding cities and others and may include, but are not limited to, improvements to Highway 395, Interstate 15 and other regional connectors.

Financing Public Improvements

The following is a summary of the possible Financing/Funding sources of the traffic, public services and/or utilities future public works improvements identified in the General Plan Update. Financing of the improvements will be identified prior to the design and construction of the respective Capital Improvement Project. Developers will provide all internal and adjacent improvements for specific projects. Regional improvements, however, may require public financing. The City of Adelanto has the following funding sources and mechanisms available;

13. Require developers of a new project to pay a pro rata share ("pay as you go") of new water, sewer/wastewater, storm drainage system improvements necessitated by that development.

14. Establish "Developer Fees" for specific identified public improvements. Not limited to; traffic impact fees, drainage fees, and water and sewer connection fees. The purpose of the fee must be identified as part of the approval of the fees.

15. Direct benefit "Assessment Districts", in which those who benefit from infrastructure improvements pay a pro rata share of the costs through assessment liens. The assessment liens are financed through the issuance of bonds payable over a period of years, providing the advantage to the property owners of a loan or a deferred funding for the improvements. Two different procedures, the "1911 Act" and "1913 Act" are available.

16. The "Mello Roos Community Facilities Act of 1982" is a newer financing method which provides a method for a broad range of capital facilities.

17. The City of Adelanto has already created "Redevelopment Project Areas" within the City. A Redevelopment Agency can issue tax exempt redevelopment bonds for the construction of public works improvements within Redevelopment Project Areas.

18. "Government Obligation Bonds" could be raised for capital improvements, however, public debt requires two-thirds voter approval of the general populous within the City.

19. Other financing methods are "Certificates of Participation" and "Lease Revenue Bonds". These can be used to acquire and construct public land or buildings which can be subject to a lease.

With the implementation of the proposed mitigation measures no unavoidable adverse impacts will result from the proposed project at the local level.

Recommended Monitoring

Implementation of the Mitigation Measures will be by the following Departments, Agencies and/or Applicant as follows:

[ ] City Council: Nos.
[ ] Planning Commission: Nos.
[X] Administrative Staff: Nos. **10, 14-16, 18, 19**
[X] Planning Department: Nos. **8, 9, 12**
[ ] Police Department: Nos.
[ ] Fire Department: Nos.
[X] Engineering Department: Nos. **1-7**
[ ] Building Department: Nos.
[X] Other City Department, Transit: Nos. **11**
[X] Applicant: Nos. **13**
[X] Other Agency, Redevelopment: Nos. **17**
Caltrans Nos. **12a**

Monitoring of the Mitigation Measures will be by the following Departments/Agencies as follows:

[X] City Council: Nos. **6, 9-12, 14-19**
[X] Planning Commission: Nos. **1-5, 7, 8, 13**
[ ] Administrative Staff: Nos. **12a**
[ ] Planning Department: Nos.
[ ] Police Department: Nos.
[ ] Fire Department: Nos.
[ ] Engineering Department: Nos.
[ ] Building Department: Nos.
[ ] Other City Department _____ Nos.
[ ] Applicant: Nos.
[ ] Other Agency _____ Nos.

The Timing of Verification for the Mitigation Measures shall be as follows:

[X] During project approval: Nos. **12, 12a, 13**
[ ] During plan checking: Nos.
[ ] Prior to issuance of building permit: Nos.

[ ] During construction: Nos.
[X] Ongoing requirements: Nos. **5, 8-11**
[X] City implemented measures: Nos. **1-4, 6, 7, 14-19**

3.14 Public Services

Fire Protection

Mitigation measures for fire protection include the following:

1. The City shall evaluate and update annually its emergency preparedness plan to ensure that emergency shelters and evacuation routes are accessible to the residents of the city.

2. The City will assist in the provision of the police protection, requiring on-site security and defensible space, and other measures to be incorporated into new development.

3. The City will monitor, review and improve as needed, the City's, emergency response capabilities.

4. The City will require new development to incorporate sprinkler systems and smoke detectors, as appropriate and required by applicable codes.

5. The City will encourage improved fire insurance programs.

Police Protection

6. The City will require improved lighting in existing and potential crime problem areas.

7. The City will assist in the organization of Neighborhood Watch Programs in conjunction with improvement associations and encourage the cooperation between citizens and police.

8. The City will cooperate with police and probation departments in rehabilitation of Adelanto residents involved in crimes through employment assistance, counseling, and related programs.

9. The City will initiate programs to get youths involved in neighborhood improvement programs, sports, and leisure activities in order to become a vital part of the community.

Schools

Mitigation measures for schools include the following:

10. Continue to utilize joint use of school buildings and playgrounds for recreational uses on a non-interfering basis.

11. Achieve, by whatever cooperative means possible, quality maintenance of school facilities for joint use purposes.

12. School facilities such as auditoriums and gymnasiums should be located within centrally located schools where facilities could be made available to the community.

School siting requires a combination of various factors including but not limited to access, surrounding land uses and joint uses. The following factors should be used to locate future school facilities in concert with the Adelanto School District.

13. Joint use of school facilities should be evaluated.

14. Park sites and elementary schools facilities should share play areas to the greatest extent feasible.

15. School facilities should be located within residential areas.

16. Elementary and Junior High School facilities should be located on local or collection level roadways and should not be located on arterials.

17. Provide assistance in facility maintenance to ensure joint use of school facilities.

18. Work closely with the school district in anticipating school impacts of new housing and urban development.

19. Develop a School Facilities Master Plan based on projected land use and population projections established in the General Plan update.

Government

No mitigation measures are proposed for government facilities.

Solid Waste

The overall objective of this Solid Waste Management Plan is to provide a cost effective solid waste management system that integrates source reduction, storage,

[X] Applicant: Nos. **4, 6,**
[X] Other Agency, Schools: Nos. **10-17**
[X] Businesses/Residences: Nos. **7-9, 20, 27, 28, 31**

Monitoring of the Mitigation Measures will be by the following Departments/Agencies as follows:

[X] City Council: Nos. **1, 3, 5, 10-12, 21-28, 30-32**
[X] Planning Commission: Nos. **2**
[X] Administrative Staff: Nos. **29**
[ ] Planning Department: Nos.
[X] Police Department: Nos. **6-9**
[X] Fire Department: Nos. **4, 20**
[ ] Engineering Department: Nos.
[ ] Building Department: Nos.
[ ] Other City Department _____ Nos.
[ ] Applicant: Nos.
[X] Other Agency, Schools: Nos. **13-17**

The Timing of Verification for the Mitigation Measures shall be as follows:

[X] During project approval: Nos. **2, 4, 6, 12**
[ ] During plan checking: Nos.
[ ] Prior to issuance of building permit: Nos.
[ ] During construction: Nos.
[X] Ongoing requirements: Nos. **5, 7-11, 20-22, 24, 27-29, 32**
[X] City implemented measures: Nos. **1, 3, 23, 25, 26, 30, 31**

3.15 Utilities

Water

Since State, regional and local water authorities are jointly responsible for developing basin-wide water management plans for provision of potable water supplies, the following mitigation measures are required.

1. Coordination with all local agencies providing water service and protection to achieve effective local and regional planning.

2. Promote cooperation and sharing of information.

3. Provide mutual assistance in regional projects.

4. Assist in the development and implementation of regional water resource management plans and the incorporation of individual district plans.

5. Identify specific needs for recharge of overdraft groundwater basins and proceed with plans for development and management of such activities.

6. Prioritize and document critical areas of basins in overdraft, sole source basins, or quality degradation problems.

7. Provide programs that will maintain or enhance natural water recharge characteristics.

8. Continue a working relationship with MWA in the purchase and distribution of State Water Project water.

9. Provide and share information on supply and demand for water and projected service levels and capacities that can be utilized in infrastructure assessment models.

10. Since an adequate and reliable supply of water must be ensured to provide adequate fire flow, the City shall develop an Emergency Preparedness Plan to be enacted during water shortages due to mechanical or conveyance system breakdown or failure, insufficient water supply, or unacceptable water quality, which will:

    Develop temporary interconnections between retail water systems where appropriate.

    Prohibit nonessential water uses during declared emergencies in the directly affected water supply area, with coordination between County Department of Environmental Health Services and responsible authorities.

11. Because the development approval process may be dependent upon the location and size of water distribution facilities and the timing of their use, the City shall:

    Study the effect of development proposals and whether or not they should include the phased construction of water production and distribution systems; hydrologic studies may be required as appropriate.

    Develop a systematic, ongoing assessment of regional and local water supply needs and capabilities to serve planned land uses as defined in the General Plan.

12. Because water resources are limited, and the use of reclaimed wastewater and other non-potable water will play an important part in conserving water supplies, the City shall:

    Study water reclamation systems and the use of reclaimed wastewater and other non-potable water to the maximum extent feasible for:

    Industrial uses;
    Recreational uses;
    Landscape irrigation; and
    Groundwater recharge.

    Apply water conservation and water reuse (reclamation) measures which are consistent with policies/regulations on wastewater.

13. Water conservation measures are an important element in water management practices necessary to meet present and future needs, and the following shall be implemented by the City:

    Develop a water conservation and reclamation program to reduce water consumption and prevent loss or waste of water.

    Provide a public education program to increase consumer awareness about the need and benefit of water conservation.

    Develop lists of drought-resistant water conserving plants and encourage their use in new landscaping within the City.

    Require low-volume flush toilets and low-flow plumbing fixtures as conditions of approval for all new development pursuant to the Uniform Plumbing Code and State requirements.

    Develop and require landscape and irrigation plans which use water conserving irrigation systems and landscape design utilizing the following features:

    Minimize the use of water through the use of automatic rain sensors, giving attention to weather conditions (wind) and other water-use minimizing techniques.

    Incorporate low-output sprinkler heads and drip irrigation systems.

    Minimize runoff and evaporation.

    Maximize the use of drought-tolerant or low-water-use plants.

Use mulch and topsoil to improve the water holding capacity of the soil.

14. Certain types of major industrial or commercial development have the potential to consume vast quantities of water. A program shall be developed within the City to require such uses to recycle and/or provide offsets for water consumed.

15. Fire Flow requirements are a very important aspect for the protection of life and property within the City. The city shall coordinate its water improvements and developments with the Fire Department to assure that the Fire Department's minimum standards are met.

Mitigation Measures Added By Lead Agency

To further mitigate the impact on water resources the City acting as Lead Agency will adopt a Water Conservation Ordinance during this Fiscal Year that will require water-efficient plumbing fixtures in structures as follows:

16. Health and Safety Code Section 17921.3 requires low-flush toilets and urinals in virtually all buildings as follows:

    "After January 1, 1983, all new buildings constructed in this state shall use water closets and associated flushometer valves, if any, which are water-conservation water closets as defined by American National Standards Institute Standard A112.19.2. and urinals and associated flushometer valves, if any, that use less than an average of 1-1/2 gallons per flush. Blowout water closets and associated flushometer valves are exempt from the requirements of this section."

17. Title 20 of the California Administrative Code Section 1604(f) (Appliance Efficiency Standards) establishes efficiency standards that give the maximum flow rate of all new showerheads, lavatory faucets, and sink faucets, as specified in the standard approved by the American National Standards Institute on November 16, 1979. and known as ANSI A112.18,1M-1979.

18. Title 20 of the California Administrative Code Section 1606(b) (Appliance Efficiency Standards) prohibits the sale of fixtures that do not comply with regulations. No new appliance say be sold or offered for sale in California that is not certified by its manufacturer to be in compliance with the provisions of the regulations establishing applicable efficiency standards.

19. Title 24 of the California Administrative Code Section 2-5307(b) (California Energy Conservation Standards for New Buildings) prohibits the installation of fixtures unless the manufacturer has certified to the CEC compliance with the flow rate standards.

20. Title 24 of the California Administrative Code Sections 2-5352(i) and (i) address pipe insulation requirements, which can reduce water used before hot water reaches equipment or fixtures. These requirements apply to steam and steam-condensate return piping and recirculating hot water piping in attics, garages, crawl spaces, or unheated spaces other than between floors or in interior walls. Insulation of water-heating systems is also required.

21. Health and Safety Code Section 4047 prohibits installation of residential water softening or conditioning appliances unless certain conditions are satisfied. Included is the requirement that, in most instances, the installation of the appliance must be accompanied by water conservation devices on fixtures using softened or conditioned water.

22. Government Code Section 7800 specifies that lavatories in all public facilities constructed after January 1. 1985, be equipped with self-closing faucets that limit flow of hot water.

Interior requirements to be included in the Ordinance are as follows:

23. Supply line pressure: Water pressure greater than 60 pounds per square inch (psi) be reduced to 60 psi or less by means of a pressure-reducing valve.

24. Drinking fountains: Drinking fountains be equipped with self-closing valves.

25. Hotel rooms: Conservation reminders be posted in rooms and restrooms. Thermostatically controlled mixing valve be installed for bath/shower.

26. Laundry facilities: Water-conserving models of washers be used.

27. Restaurants: water-conserving models of dishwashers be used or spray emitters that have been retrofitted for reduced flow. Drinking water be served upon request only.

28. Ultra-low-flush toilets: 1-1/2-gallon per flush toilets be installed in all new construction.

Exterior requirements in the Ordinance will include:

29. Landscape with low water-using plants wherever feasible.

30. Minimize use of lawn by limiting it to lawn-dependent uses, such as playing fields. When lawn is used, require warm season grasses. Limit lawn area to 60 percent of landscaped area.

31. Group plants of similar water use to reduce overirrigation of low-water-using plants.

32. Provide information to occupants regarding benefits of low-water-using landscaping and sources of additional assistance.

33. Use mulch extensively in all landscaped areas. Mulch applied on top of soil will improve the water-holding capacity of the soil by reducing evaporation and soil compaction.

34. Preserve and protect existing trees and shrubs. Established plants are often adapted to low-water-using conditions and their use saves water needed to establish replacement vegetation.

35. Install. efficient irrigation systems that minimize runoff and evaporation and maximize the water that will reach the plant roots. Drip irrigation, soil moisture sensors, and automatic irrigation systems are a few methods of increasing irrigation efficiency.

36. Use pervious paving material whenever feasible to reduce surface water runoff and to aid in ground water recharge.

37. Grade slopes so that runoff of surface water is minimized.

38. Investigate the feasibility of using reclaimed waste water, stored rainwater, or grey water for irrigation,

39. Encourage cluster development, which can reduce the amount of land being converted to urban use. This will reduce the amount of impervious paving created and thereby aid in ground water recharge.

40. Preserve existing natural drainage areas and encourage the incorporation of natural drainage systems in new developments. This aids ground water recharge.

41. To aid in ground water recharge, preserve flood plains and aquifer recharge areas as open space.

Sewer

42. The proposed project lies within 600 feet of a sewer line to be constructed within 10 (ten) years per the City's approved Master Plan.

43. The RWQCB requires dry sewers as a condition of the waste discharge permit.

44. Require an updated sewerage system as development occurs within the City.

Since sewer systems are the preferred method of wastewater collection, connection to the sewer system shall be required for any proposed development or subdivision of land that exceeds the minimum requirements of the RWQCB. Exceptions may be approved subject to review by the Regional Water Quality Control Board for Package Wastewater Treatment Plants, individual onsite and multiple owner septic systems, holding tanks, and experimental systems.

Since there is a need to regularly inform and educate the public on the need, methods, and timing of septic tank system maintenance, the City shall cooperate with the County Department of Environmental Health Services (DEHS) to:

45. Publish educational materials on proper septic tank maintenance and distribute them to septic tank owners when requested.

46. Utilize septic tank maintenance districts where feasible to ensure an adequate level of maintenance.

Since the development approval process may be dependent upon the location and size of sewer facilities and the timing of their use, the City shall:

47. Actively work with the VVWRA to ensure planned capacity increases in locations where sewage facilities are approaching capacity.

48. Monitor and provide information to the VVWRA on a continual basis, compile an annual report on the capacity and condition of wastewater collection and treatment systems, and develop contingency plans for sewage management.

49. Actively work with VVWRA to monitor future development to ensure that development will proceed only when sufficient capacity or approved alternative wastewater treatment systems can be provided.

Since water resources are limited, and the use of reclaimed wastewater and other non-potable water will play an important part in conserving water supplies, the City shall encourage the local wastewater/sewering authority to:

50. Require water reclamation systems and the use of reclaimed wastewater and other non-potable water to maximum extent feasible for:

    Industrial uses;
    Recreational uses;
    Landscape irrigation; and
    Groundwater recharge projects.

51. Apply water conservation and water reuse (reclamation) measures which are consistent with policies and regulations on water quality.

Drainage

Since individual developments may be subject to spot flooding from small streams or unmapped areas adjacent to mapped flood areas, the City shall require specific hydrology and hydraulic studies to be prepared at the time the developments are proposed. These studies shall:

52. Identify existing buildout drainage conditions of the General Plan update and measures which must be taken within the development project or downstream from the project to preclude impacts on the proposed development or increase impacts to downstream development. This includes the identification or primary (Master Plan) and secondary drainage facilities. These studies should be submitted and reviewed by the City Engineer and the City Manager.

53. Fully account for all planned flood-control facilities within or adjacent to the project site. When sections of flood-control facilities cannot be constructed, provision should be made for their ultimate construction, that is rights-of-ways reserved and construction funds secured. Additionally, interim facilities must be provided which will be able to handle the additional runoff from the proposed development until the planned flood control facilities are constructed.

54. Develop the drainage system in a natural state where possible.

Since the FEMA mapping and studies do not yet identify all flood hazard areas in the entire City, the following mitigation measures will be required:

55. Programs for the continuous evaluation and designation of floodway, floodplain and drainage areas shall be identified and financed.

Since drainage from adjacent development contributes to flood hazards, the following shall be required:

56. Surface run-off from new development shall be controlled by on-site measures including but not limited to:

    Structural controls and restrictions regarding changes in topography, removal of vegetation, creation of impervious surfaces, and periods of construction, such that the need for off-site flood and drainage control improvements is minimized and such that run-off from the development will not result in downstream flood hazards.

Flood control and drainage measures are part of the overall community improvement program and should advance the goals of recreation, resource conservation, preservation of natural riparian vegetation and habitat, and the preservation of the scenic values of the City's streams and creeks. The City shall:

57. Consider ecological significance and aesthetic quality of natural drainage channels in the design of all drainage projects.

58. Preserve designated drainage channels and water courses such as creeks and river beds as resource management areas or linear parks and recreation trails, when possible.

Since the funding of necessary flood control and drainage facilities is a major concern, the City shall continue to develop local area drainage plans and establish appropriate funding mechanisms.

As public education plays a vital role in minimizing flood hazard, the City shall:

59. Establish a public information system through the Fire and Police Departments outlining emergency operations plans and measures to reduce losses in the event of a flood disaster.

60. Enact an ordinance that would require flood hazard information be recorded for each affected property so that all prospective buyers may be informed.

61. Require the storm waters be used for groundwater recharge when possible.

Since flood protection is both local and regional in nature, the City shall:

62. Continue the development of intergovernmental coordination with adjacent cities, County Flood Control District, the Army Corps of Engineers, and other agencies which have an interest in flood control projects that cross jurisdictional boundaries.

63. Coordinate land use and flood control planning through continued improvement of staff contacts between the County Flood Control District, and cities within the areas, and through annual review of the Capital Improvements Program.

Gas and Electricity

Mitigation measures for gas and electricity include the following:

64. The City will incorporate, as necessary, requirements into the Zoning Ordinance for the evaluation of new uses which consume very high levels of energy. The

Utility Financing

The following is a summary of the possible Financing/Funding sources of the future public works improvements identified in the General Plan Update. Financing of the improvements will be identified prior to the design and construction of the respective Capital Improvement Project. Developers will provide all internal and adjacent improvements for specific projects. Regional improvements, however, may require public financing. The City of Adelanto has the following funding sources and mechanisms available;

70. Require developers of a new project to pay a pro rata share ("pay as you go") of new water, sewer/wastewater, storm drainage system improvements necessitated by that development.

71. Establish "Developer Fees" for specific identified public improvements. Not limited to; traffic impact fees, drainage fees, and water and sewer connection fees. The purpose of the fee must be identified as part of the approval of the fees.

72. Direct benefit "Assessment Districts", in which those who benefit from infrastructure improvements pay a pro rata share of the costs through assessment liens. The assessment liens are financed through the issuance of bonds payable over a period of years, providing the advantage to the property owners of a loan or a deferred funding for the improvements. Two different procedures, the "1911 Act" and "1913 Act" are available.

73. The "Mello Roos Community Facilities Act of 1982" is a newer financing method which provides a method for a broad range of capital facilities.

74. The City of Adelanto has already created "Redevelopment Project Areas" within the City. A Redevelopment Agency can issue tax exempt redevelopment bonds for the construction of public works improvements within Redevelopment Project Areas.

75. "Government Obligation Bonds" could be raised for capital improvements, however, public debt requires two-thirds voter approval of the general populous within the City.

76. Other financing methods are "Certificates of Participation" and "Lease Revenue Bonds". These can be used to acquire and construct public land or buildings which can be subject to a lease.

Recommended Monitoring

Implementation of the Mitigation Measures will be by the following Departments, Agencies and/or Applicant as follows:

[X] City Council: Nos.
[X] Planning Commission: Nos.
[X] Administrative Staff: Nos. **72, 73, 75, 76**
[X] Planning Department: Nos. **64, 65, 67, 71**
[X] Police Department: Nos. **59**
[X] Fire Department: Nos. **9, 15, 59**
[X] Engineering Department: Nos. **12, 42-46, 55, 57-63**
[X] Building Department: Nos. **13, 16-28, 66**
[X] Other City Department, Water Sup.: Nos. **1-11, 13**
Redevelopment: Nos. **74**
[X] Applicant: Nos. **14, 52-54, 56, 68, 70**
[X] Other Agency, VVWRA: Nos. **47-51**
[X] Residents: Nos. **29-41, 69**

Monitoring of the Mitigation Measures will be by the following Departments/Agencies as follows:

[X] City Council: Nos. **15, 70, 71-76**
[X] Planning Commission: Nos. **29-44, 68**
[X] Administrative Staff: Nos. **1-13, 16-28, 45, 46, 55, 57-67, 69**
[ ] Planning Department: Nos.
[ ] Police Department: Nos.
[ ] Fire Department: Nos.
[X] Engineering Department: Nos. **47-54, 56**
[ ] Building Department: Nos.
[X] Other City Department, Water Sup.: Nos. **14**
[ ] Applicant: Nos.
[ ] Other Agency _____ Nos.

The Timing of Verification for the Mitigation Measures shall be as follows:

[X] During project approval: Nos. **14, 15, 29-44, 52-54, 56, 68, 70**
[X] During plan checking: Nos. **16-28**
[ ] Prior to issuance of building permit: Nos.
[ ] During construction: Nos.
[X] Ongoing requirements: Nos. **45-51, 57-63,69**
[X] City implemented measures: Nos. **1-13, 55, 64-67, 71-76**