Section 14.0
Comments and Responses

14.0 COMMENTS AND RESPONSES

14.1 CEQA REQUIREMENTS

Before taking action on a project, the California Environmental Quality Act (CEQA) requires the Lead Agency to prepare and certify a Final Environmental Impact Report (EIR). In accordance with Sections 15120 through 15132, and Section 15161 of the CEQA Guidelines, the Town of Yucca Valley has prepared an EIR for the Old Town Yucca Valley Specific Plan (SCH #2006061143). The Response to Comments section, combined with the Draft EIR, comprise the Final EIR.

The following is an excerpt from the CEQA Guidelines, Section 15132, Contents of Final Environmental Impact Report:

The Final EIR shall consist of:

(a) The draft EIR or a version of the draft.

(b) Comments and recommendations received on the draft EIR either verbatim or in summary.

(c) A list of persons, organizations and public agencies commenting on the draft EIR.

(d) The responses of the Lead Agency to significant environmental points raised in the review and consultation process.

(e) Any other information added by the Lead Agency.

This Comments and Responses section includes all of the above-required components and shall be attached to the Final EIR. As noted above, the Final EIR will be a revised document that incorporates all of the changes made to the Draft EIR following the public review period.

14.2 PUBLIC REVIEW PROCESS – DRAFT EIR

The Draft EIR was circulated for review and comment to the public, agencies, and organizations. The Draft EIR was also circulated to State agencies for review through the State Clearinghouse, Office of Planning and Research. A Notice of Availability was placed in the *Record Search Light*. The 45-day public review period occurred from January 22, 2007 to March 8, 2007. Comments received during the 45-day public review period have been incorporated into this section.

During the public review period, the public and local and State agencies submitted comments on the Draft EIR. During the public review period, two written comment letters on the Draft EIR were received.

14.3 FINAL EIR

The Final EIR allows the public and Lead Agency an opportunity to review revisions to the Draft EIR, the responses to comments, and other components of the EIR, such as the Mitigation Monitoring Program, prior to approval of the project. The Final EIR serves as the environmental document to support a decision on the proposed project.

After completing the Final EIR, and before taking action on a project, the Lead Agency must make the following three findings as required by Section 15090 of the CEQA Guidelines:

- The Final EIR has been completed in compliance with CEQA;
- The Final EIR was presented to the decision-making body of the Lead Agency, and that the decision-making body reviewed and considered the information contained in the final EIR prior to approving the project; and
- That the final EIR reflects the lead agency's independent judgment and analysis.

Additionally, pursuant to Section 15093(b) of the CEQA Guidelines, when a Lead Agency approves a project that would result in significant, unavoidable impacts that are disclosed in the Final EIR, the agency must submit in writing its reasons for supporting the approved action. This Statement of Overriding Considerations is supported by substantial information in the record, which includes the Final EIR. If a proposed project would result in significant, unavoidable impacts, the Lead Agency would be required to adopt a Statement of Overriding Considerations if it approves the proposed project. These certifications, the Findings of Fact, and the Statement of Overriding Considerations are included in a separate Findings document.

14.4 WRITTEN COMMENT LETTERS AND RESPONSES

Written comments on the Draft EIR were received from the following:

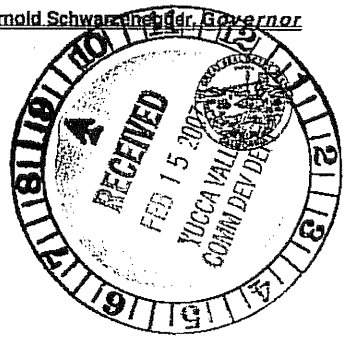
A. Native American Heritage Commission (Feb. 9, 2007)
B. County of San Bernardino, Department of Public Works (March 1, 2007)

All correspondence from agencies commenting on the Draft EIR are reproduced on the following pages. Where duplicate comment letters were received from the same commenter (i.e., via email and mail), only one copy of the comment letter was included. The individual comments on each letter have been consecutively numbered for ease of reference. Following each comment letter are responses to each numbered comment. A response is provided for each comment raising significant environmental issues. It should be noted that some comments provide information that does not directly challenge the Draft EIR or provide new environmental information. Additionally, some comments may include opinions regarding approval or disapproval of the project, which are not within the purview of the EIR. The comments are noted and will be forwarded to decision makers for their review and consideration.

COMMENT NO. A

STATE OF CALIFORNIA — Arnold Schwarzenegger, Governor

NATIVE AMERICAN HERITAGE COMMISSION
915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-6251
Fax (916) 657-5390
Web Site www.nahc.ca.gov
e-mail: ds_nahc@pacbell.net



February 9, 2007

Mr. Shane Stueckle
TOWN OF YUCCA VALLEY
58928 Business Center Dirve
YUucca Valley, CA 92284

Re: SCH#2006061143; CEQA Notice of Completion; draft Environmental Impact Report (DEIR) for **Old Town Yucca Valley Specific Plan**; Town of Yucca Valley; San Bernardino County, California

Dear Mr. Stueckle:

Thank you for the opportunity to comment on the above-referenced document. The Native American Heritage Commission is the state's Trustee Agency for Native American Cultural Resources. The California Environmental Quality Act (CEQA) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archaeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR) per CEQA guidelines § 15064.5(b)(c). In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE)', and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following action:

√ Contact the appropriate California Historic Resources Information Center (CHRIS). Contact information for the Information Center nearest you is available from the State Office of Historic Preservation (916/653-7278)/ http://www.ohp.parks.ca.gov/1068/files/IC%20Roster.pdf The record search will determine:

- If a part or the entire APE has been previously surveyed for cultural resources.
- If any known cultural resources have already been recorded in or adjacent to the APE.
- If the probability is low, moderate, or high that cultural resources are located in the APE.
- If a survey is required to determine whether previously unrecorded cultural resources are present.

√ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.

- The final report containing site forms, site significance, and mitigation measurers should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for pubic disclosure.
- The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.

√ Contact the Native American Heritage Commission (NAHC) for:

- A Sacred Lands File (SLF) search of the project area and information on tribal contacts in the project vicinity that may have additional cultural resource information. Please provide this office with the following citation format to assist with the Sacred Lands File search request: USGS 7.5-minute quadrangle citation with name, township, range and section; .
- The NAHC advises the use of Native American Monitors to ensure proper identification and care given cultural resources that may be discovered. The NAHC recommends that contact be made with Native American Contacts on the attached list to get their input on potential project impact (APE).

√ Lack of surface evidence of archeological resources does not preclude their subsurface existence.

- Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
- Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.

√ Lead agencies should include provisions for discovery of Native American human remains or unmarked cemeteries in their mitigation plans.

A1

* CEQA Guidelines, Section 15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American, identified by the NAHC, to assure the appropriate and dignified treatment of Native American human remains and any associated grave liens.

A1

√ Health and Safety Code §7050.5, Public Resources Code §5097.98 and Sec. §15064.5 (d) of the CEQA Guidelines mandate procedures to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

√ Lead agencies should consider avoidance, as defined in § 15370 of the CEQA Guidelines, when significant cultural resources are discovered during the course of project planning.

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,

Dave Singleton, Program Analyst

Cc: State Clearinghouse

Attachment: List of Native American Contacts

RESPONSES TO COMMENTS FROM THE NATIVE AMERICAN HERITAGE COMMISSION (NAHC), DATED FEBRUARY 9, 2007

A1. Comments are noted. The Native American Heritage Commission (NAHC) has not raised any new environmental information, or is challenging the information presented in the Draft EIR. The comment requests that project-related impacts on historical resources and archaeological resources are adequately assessed, and if a project were to have a "significant effect", mitigation is incorporated. Section 10, *Effects Found Not to be Significant*, of the Draft EIR adequately addresses the environmental consideration cited in the comment letter. No new environmental issues have been presented; therefore, no further response is necessary.

COMMENT NO. B

DEPARTMENT OF PUBLIC WORKS
FLOOD CONTROL • SOLID WASTE MGMT • SURVEYOR • TRANSPORTATION

COUNTY OF SAN BERNARDINO
PUBLIC AND SUPPORT
SERVICES GROUP

825 East Third Street • San Bernardino, CA 92415-0835 • (909) 387-8104
Fax (909) 387-8130

VANA R. OLSON
Director of Public Works

March 1, 2007

Mr. Shane Stueckle
Town of Yucca Valley
Department of Community Development
58628 Business Center Drive
Yucca Valley, CA 92284

File #10(ENV)-4.01

RE: PUBLIC REVIEW OF DRAFT EIR FOR OLD TOWN YUCCA VALLEY SPECIFIC PLAN

Dear Mr. Stueckle:

Thank you for giving the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project.

The following are comments on your proposal from our Water Resources Division:

The site is located in the central portion of the Town of Yucca Valley and includes Yucca Creek and Water Canyon Channel, Flood Control District facilities, plus one unnamed facility shown on the Master Plan of Drainage (Tettemer and Associates, June 1999) as K-01. According to the most recent FEMA Flood Insurance Rate Map, Panels 8115F, 8850F and 8860F, dated March 18, 1996, the site lies within Zones A, AE, X shaded and X unshaded.

1. In general, it appears that the Draft EIR has identified the major concerns of the Flood Control District.
2. Any development within the Specific Plan area include, and the Town enforce, the most recent FEMA regulations.
3. Allowing encroachments into the alignment of future Line K-01 (at Kickapoo Trail) will greatly increase future construction costs and may jeopardize funding of the project due to increased costs. One of the benefits of the Master Plan of Drainage is to identify the alignment of future drainage and flood control facilities. The Town should continue to use this document and allow development of the area while protecting the alignment of future drainage facilities. There may be some flexibility at this time regarding the alignment of Line K-01, and we recommend that you contact the Flood Control District's Planning Division at (909) 387-8120 for more information.
4. If any encroachment on District right of way is anticipated, a permit shall be obtained from the District's Flood Control Operations Division, Permit Section. Other on-site or off-site improvements may be recommended which cannot be determined at this time.

B1

The following are comments on your proposal from our Flood Control Operations Division:

The proposed Yucca Wash multi-use trail is a compatible use with Yucca Creek, a District facility. Prior to construction of said trail, a permit and agreement shall be obtained from the Flood Control Operations Division, Permit Section.

B2

The following are comments on your proposal from our Stormwater Section:

Potential pollutants and potential impacts from stormwater runoff are generally well-describe and evaluated for the project. However, additional information or evaluation should be provided to address the following:

1. What project categories or size thresholds trigger the "new or redevelopment requirements of the Colorado River Basin Region Plans, Regulations and Guidelines" (page 5.3-30)? B3
2. Mitigation Measure HYD-3 should describe the post-construction WQMP requirements and BMPs that are likely to be implemented. B4
3. The impact analysis under Section 5.3.5 on page 5.3-31 does not adequately evaluate the hydrologic impacts on drainage channels. For example, the Impact Analysis states that "Higher flows...would result in drainage and runoff impacts." There is insufficient explanation in the analysis to support the stated conclusion that no significant impacts will occur, or why no mitigation measures are recommended. Therefore, the "Level of Significance after Mitigation" finding in Section 5.3.6 is still in question pending further analysis. B5
4. Current regulatory requirements in southern California (e.g. Municipal Stormwater Permits for San Bernardino, San Diego, and Los Angeles Counties) suggest that standard channel hardening "improvements" to prevent erosion and flooding should be only a last resort, and that natural channels should be preserved. Although not described, it is likely that the development fees mentioned are intended to be used for channel hardening projects, which may conflict with the intent to preserve natural channels. B6

If you have any questions concerning these comments, please contact our office at 909-387-8109.

Sincerely,

Frank J. Molina

FRANK MOLINA, Supervising Planner
Environmental Management Division

FM:nh/CEQA Comments_Yucca Valley_Old Town Specific Plan

cc: Naresh Varma, Chief, Environmental Management
VRO/MK Reading File

B. RESPONSES TO COMMENTS FROM THE COUNTY OF SAN BERNARDINO DEPARTMENT OF PUBLIC WORKS, DATED MARCH 1, 2007

B1. Comments are noted. As referenced in Section 5.3, *Hydrology, Drainage, and Water Quality*, of the Draft EIR, all new development is required to comply with FEMA regulations. If new development resulting from adoption and implementation of the Specific Plan were to encroach into the County of San Bernardino Flood Control District's right-of-way, a permit would be required from the County of San Bernardino Flood Control District's Flood Control Operations Division, Permit Section.

B2. Comment is noted. Prior to construction of the proposed Yucca Wash multi-use trail, a permit would be required from the County of San Bernardino Flood Control District's Flood Control Operations Division, Permit Section.

B3. The Draft EIR states that thresholds in the Colorado River Basin Region Plans, Regulation and Guidelines are to be used for new development in the Specific Plan area. Page 5.3-28 and 5.3-30 through page 5.3-31 of the Final EIR has been updated as follows:

DRAINAGE AND RUNOFF

- **BUILDOUT OF THE SPA WOULD INCREASE THE TOTAL IMPERVIOUS AREA WITHIN THE PROJECT AREA, WHICH COULD RESULT IN INCREASED DRAINAGE AND RUNOFF IMPACTS.**

Impact Analysis: Drainage exists primarily within the local streets and is defined by the natural topography of the area. On the northern portion, flows occur in a northeastern direction and on the western portion of the SPA drainage flows in a northwestern direction.

Within the SPA, impervious areas are anticipated to increase, due to development on vacant lots and infill development on under developed parcels. The Town of Yucca Valley has a policy/standard of a no net increase in runoff from new development. Town standards require new development to submit a hydrology report, which indicated how the proposed development would provide for on-site retention, capture and dispose, or conveyance of generated runoff to a County of San Bernardino Flood Facility. These plans are reviewed and approved by the Town's Public Works Department at the entitlement phase, verified prior to issuance of the grading permit, and at post-construction.

The Master Plan of Drainage refers to proposed drainage facilities within the SPA, which have been determined necessary for capturing and treating flows in the Town of Yucca Valley. Their description and level of priority is discussed above in the existing conditions portion of this section.

Funding for these improvements would be attained through assessment fees pursuant to *Ordinance 173*, which would mitigate the affects of new development to downstream areas. Fees would pay for facility improvements and therefore impacts to the SPA would be reduced to a less than significant level.

Mitigation Measures: No Mitigation Measures are recommended.

Level of Significance: Less Than Significant Impact.

WATER QUALITY – LONG-TERM IMPACTS

- **IMPLEMENTATION OF THE PROPOSED SPECIFIC PLAN COULD RESULT IN LONG-TERM IMPACTS ON THE QUALITY OF STORMWATER AND URBAN RUNOFF, SUBSEQUENTLY IMPACTING WATER QUALITY.**

Impact Analysis: The general water quality of the SPA is not anticipated to be negatively impacted by project implementation due to the Town's no net increase stormwater standards, ~~expected to improve within the proposed SPA. This is due to the Project's potential to reduce the amount of flow conveyed in area streets with~~ incorporation of ~~required~~ BMPs into the design and operation of projects, and site specific mitigation measures ~~within the SPA~~.

Residential Development and Activities

Specific Plan implementation would result in the development of approximately 1,115 total residential units. As previously stated, residential uses typically generate pollutants such as sediments, pesticides, trash and debris, oil and grease, and bacteria and viruses. However, compliance with Town stormwater standards for on-site stormwater retention, r~~R~~egional plans, local standards and mitigation measures ~~and the BMPs~~ would reduce water quality impacts to a less than significant level.

Commercial and Industrial Development and Activities

The potential for pollution due to the proposed 2.9 million square feet of development would not increase relative to existing General Plan conditions. New development activities would be subject to in the Regional Water Quality Control Board and the Town of Yucca Valley's stormwater standards, which require on-site retention. Regulations require post-construction runoff to be less or equal to pre-construction conditions through on-site retention.

Additionally, m~~M~~ost commercial and industrial point sources are subject to an Industrial Storm Water General Permit, which serves as a regulatory mechanism for the monitoring, inspection, and enforcement of pertinent water quality regulations. ~~and mandates the use of BMPs. Consistent inspection and enforcement of Industrial Permit requirements effectively~~

~~reduce the potential harmful water quality effects of existing and proposed commercial and industrial activities~~.

Since 1990, the SWRCB has required that certain industrial businesses obtain a stormwater permit in order to discharge runoff into a Town's storm drain system or a local water body. The SWRCB adopted the current version of this storm water permit (SWRCB Water Quality Order No. 97-03-DWQ, or Industrial Permit) in 1997. The Industrial Permit mandates that regulated industrial businesses develop and implement programs to prevent the contamination of urban runoff draining off their site. The Industrial Permit is intended to cover all new or existing storm water discharges and authorized nonstormwater discharges, as required by Federal regulations. The Industrial Permit is administered by the SWRCB, and is generally enforced by the Regional Boards. ~~and separately through Municipal Permit Programs~~

Industrial permittees are required to collect and analyze samples of stormwater discharges for pH, TSS, TOC, specific conductance, toxic chemicals and other pollutants that are likely to be present in stormwater discharges in significant quantities. In addition, certain industries are required to test for specific analytes, such as metals, nitrate and nitrite, phosphorus, COD and TSS.

Permit compliance includes development and implementation of a SWPPP, and necessary BMPs. Consistent inspection and enforcement of Industrial Storm Water General Permit requirements effectively reduce the potential harmful water quality effects of existing and proposed commercial and industrial activities. In addition to plans, standards and other requirements, a mitigation measure requiring a Water Quality Management Plan has been included to further remove any potential water quality impact within the SPA.

~~In addition to Industrial Permit requirements, new or redeveloped commercial and industrial uses are subject to goals in the Regional Water Quality Control Board requirements and standards set by the Town's Public Works Department. The Town requires that project proponents for development and redevelopment projects that either 1) fall into Plans and guidelines state WQMP requirements for new projects in order to preserve water quality to the maximum extent practicable through the implementation of site design, source control and treatment control BMPs.~~

~~Appropriate BMPs be applied to new or redeveloped commercial sites within each proposed mixed-use district. New and redeveloped industrial and commercial land uses proposed as part of the Specific Plan would be required to comply with the statewide Industrial Permit.~~

~~development the SPA would require a Water Quality Management Plan (WQMP) to conform to the NPDES permit. With implementation of recommended mitigation, including preparation of an NOI and SWPPP, and compliance with post-construction BMP requirements, impacts would be reduced to less than significant.~~

Mitigation Measures:

HYD-3 A Water Quality Management Plan shall be prepared for each future development project and shall include Nonstructural/ Source Control and Structural/Treatment Best Management Practices to conform to the Town's Storm Water ~~Management Plan~~ standards and National Pollution Discharge Elimination System requirements ~~Permit~~.

Level of Significance: Less Than Significant Impact After Mitigation Incorporated.

B4. The commenter states that Mitigation Measure HYD-3 should describe post-construction Water Quality Management Plan (WQMP) requirements and BMPs that are likely to be implemented. The proposed project is seeking approval of a policy document (Specific Plan), which consists of new land use designations that are intended to guide future development within the project area. The level of detail in the Specific Plan is not sufficient to determine project specific WQMP requirements and/or BMPs for future development within the SPA.

The Final EIR does pose the following change to Mitigation Measure HYD-3 (page 5.3-31):

HYD-3 A Water Quality Management Plan shall be prepared for each future development project and shall include Nonstructural/Source Control and Structural/Treatment Best Management Practices to conform to the Town's Storm Water ~~Management Plan~~ standards and National Pollution Discharge Elimination System requirements ~~Permit~~.

B5. The commentor states that the analysis in the Draft EIR, Section 5.3, *Hydrology Drainage, and Water Quality* (page 5.3-31) for cumulative hydrologic impacts is inadequate. Page 5.3-32 of the Draft EIR has been updated in the Final EIR as follows:

~~Higher flows resulting from future development in the watershed would result in drainage and runoff impacts. Cumulative projects southeast of the SPA would discharge runoff into the Yucca Wash, which passes through a portion of the SPA and continues eastward off-site. Runoff from these projects would combine and interact with runoff from the SPA. Runoff from cumulative projects west of the SPA would utilize offsite drainage facilities that would not pass through the SPA or receive runoff from the SPA. Future development would be required to comply with *Ordinance 173*, which requires sufficient development impact fees to mitigate impacts. As a Master Plan has already been prepared to address impacts created by~~

~~cumulative development. Payment of fees would reduce impacts created by cumulative development to a less than significant level.~~

Increased impermeable surfaces resulting from future development in the SPA may increase runoff flows to existing drainage facilities, which manage drainage throughout the watershed. This may negatively impact the watershed's ability to manage hydrology and drainage in the area. Cumulative projects southeast of the SPA would discharge runoff into the Yucca Wash, which passes through a portion of the SPA and continues eastward off-site. Runoff from these projects would combine and interact with runoff from the SPA. Runoff from cumulative projects west of the SPA would utilize offsite drainage facilities that would not pass through the SPA or receive runoff from the SPA.

Future development would be required comply with Town of Yucca Valley's stromwater standards, which require on-site retention. Regulations require post-construction runoff to be less or equal to pre-construction conditions through on-site retention during peak flows.

Additionally, new development would be required to pay storm drain facility development impact fees pursuant to Chapter 3.40.040: Public Infrastructure Facilities (*Ordinance 173*) of the Town of Yucca Valley's Municipal Code. The Ordinance requires payment of fees as determined by the Town Council prior to receipt of building permit or occupancy permit. Development impact fees are used only for the purpose of acquiring, designing, constructing, improving, providing and maintaining, to the extent permitted by law, the general facilities, which would mitigate impacts of new development. Impact fees provide funding for drainage facility maintenance, improvements, and/or new facilities. The management of these facilities are outlined in the Town of Yucca Valley's Master Plan of Drainage, which is designed to address the need for flood control planning and floodplain management. The plan established policies and concepts based on published Town goals and objectives, which have anticipated future grow in Yucca Valley. The report is used as a guideline for future planning, design and construction of regional, secondary, and local drainage facilities within the Town of Yucca Valley and includes detailed hydrologic, hydraulic, and facility sizing calculations for the drainage systems. Compliance with Town standards and payment of fees on a project-by-project level would reduce impacts created by cumulative development to a less than significant level.

B6. As stated in the Draft EIR, development fees shall be required of all new projects in order to sufficiently mitigate impacts to hydrology and drainage. The management and improvement of facilities are outlined in the Town of Yucca Valley's Master Plan of Drainage, which is designed to address the need for flood control planning and floodplain management. The plan established policies and concepts based on published Town goals and objectives, and regional standards and guidelines that are to be used as a guideline for future planning, design, and construction of regional, secondary, and local drainage facilities within the Town of Yucca Valley. The Master

Plan of Drainage considers existing regulatory requirements, which suggest that standard channel hardening not be utilized. Therefore, the comments are noted by the Town.

14.5 ERRATA

Changes to the Draft Environmental Impact Report (DEIR) are noted below. A double-underline indicates additions to the text; strikeout indicates deletions to the text. Changes have been analyzed and responded to in Section 14.0, *Response to Comments*. The changes to the DEIR do not affect the overall conclusions of the environmental document. Changes are listed by page and, where appropriate, by paragraph.

This errata addresses a Water Supply Assessment prepared by the Hi-Desert Water District, which followed the DEIR public review, technical comments, as well as staff-initiated corrections on the DEIR, which circulated from January 23, 2007 through March 8, 2007. These clarifications and modifications do not result in any new or greater impacts than identified in the DEIR. Any changes referenced to mitigation measures contained in the DEIR text also apply to the Executive Summary in Section 2.0 of the DEIR. All mitigation measure modifications have been reflected in the project's Mitigation Monitoring and Reporting Program (MMRP).

Section 2.2, Page 2-9, Mitigation Measure HYD-3

HYD-3 A Water Quality Management Plan shall be prepared for each future development project and shall include Nonstructural/Source Control and Structural/Treatment Best Management Practices to conform to the Town's Storm Water ~~Management Plan~~ standards and National Pollution Discharge Elimination System requirements ~~Permit~~.

Section 5.3, Page 5.3-24

Stormwater Pollution Prevention Plan (SWPPP) is a fundamental requirement of stormwater permits which are necessary as of March 10, 2003 on all construction projects that disturb one acre or more of land or whose projects disturb less than one acre, but are part of a larger common plan of development. A SWPPP:

Section 5.3.4, Page 5.3-28, Paragraph 2

Within the SPA, impervious areas are anticipated to increase, due to development on vacant lots and infill development on underdeveloped parcels. The Town of Yucca Valley has a standard of a no net increase in runoff from new development. Town standards require new development to submit a hydrology report, which indicated how the proposed development would provide for on-site retention, capture and dispose, or conveyance of generated runoff to a County of San Bernardino Flood Facility. These plans are reviewed and approved by the Town's Public Works Department at the entitlement phase, verified prior to issuance of the grading permit, and post-construction.

Section 5.3.4, Water Quality – Long-Term Impacts, Pages 5.3-30 and 5.3-31

Impact Analysis: The general water quality of the SPA is not anticipated to be negatively impacted by project implementation due to the Town's no net increase stormwater standards, ~~expected to improve within the proposed SPA. This is due to the Project's potential to reduce the amount of flow conveyed in area streets with~~ incorporation of ~~required~~ BMPs into the design and operation of projects, and site specific mitigation measures ~~within the SPA~~.

Residential Development and Activities

Specific Plan implementation would result in the development of approximately 1,115 total residential units. As previously stated, residential uses typically generate pollutants such as sediments, pesticides, trash and debris, oil and grease, and bacteria and viruses. However, compliance with Town stormwater standards for on-site stormwater retention, r~~R~~egional plans, local standards and mitigation measures~~and the BMPs~~ would reduce water quality impacts to a less than significant level.

Commercial and Industrial Development and Activities

The potential for pollution due to the proposed 2.9 million square feet of development would not increase relative to existing General Plan conditions. New development activities would be subject to in the Regional Water Quality Control Board and the Town of Yucca Valley's stormwater standards, which require on-site retention. Regulations require post-construction runoff to be less or equal to pre-construction conditions through on-site retention.

Additionally, m~~M~~ost commercial and industrial point sources are subject to an Industrial Storm Water General Permit, which serves as a regulatory mechanism for the monitoring, inspection, and enforcement of pertinent water quality regulations. ~~and mandates the use of BMPs. Consistent inspection and enforcement of Industrial Permit requirements effectively reduce the potential harmful water quality effects of existing and proposed commercial and industrial activities~~.

Since 1990, the SWRCB has required that certain industrial businesses obtain a stormwater permit in order to discharge runoff into a Town's storm drain system or a local water body. The SWRCB adopted the current version of this storm water permit (SWRCB Water Quality Order No. 97-03-DWQ, or Industrial Permit) in 1997. The Industrial Permit mandates that regulated industrial businesses develop and implement programs to prevent the contamination of urban runoff draining off their site. The Industrial Permit is intended to cover all new or existing storm water discharges and authorized nonstormwater discharges, as required by Federal regulations. The Industrial Permit is administered by the SWRCB, and is generally enforced by the Regional Boards. ~~and separately through Municipal Permit Programs~~

Industrial permittees are required to collect and analyze samples of stormwater discharges for pH, TSS, TOC, specific conductance, toxic chemicals and other pollutants that are likely to be present in stormwater discharges in significant

quantities. In addition, certain industries are required to test for specific analytes, such as metals, nitrate and nitrite, phosphorus, COD and TSS.

Permit compliance includes development and implementation of a SWPPP, and necessary BMPs. Consistent inspection and enforcement of Industrial Storm Water General Permit requirements effectively reduce the potential harmful water quality effects of existing and proposed commercial and industrial activities. In addition to plans, standards and other requirements, a mitigation measure requiring a Water Quality Management Plan has been included to further remove any potential water quality impact within the SPA.

~~In addition to Industrial Permit requirements, new or redeveloped commercial and industrial uses are subject to goals in the Regional Water Quality Control Board requirements and standards set by the Town's Public Works Department. The Town requires that project proponents for development and redevelopment projects that either 1) fall into Plans and guidelines state WQMP requirements for new projects in order to preserve water quality to the maximum extent practicable through the implementation of site design, source control and treatment control BMPs.~~

~~Appropriate BMPs be applied to new or redeveloped commercial sites within each proposed mixed-use district. New and redeveloped industrial and commercial land uses proposed as part of the Specific Plan would be required to comply with the statewide Industrial Permit.~~

~~development the SPA would require a Water Quality Management Plan (WQMP) to conform to the NPDES permit. With implementation of recommended mitigation, including preparation of an NOI and SWPPP, and compliance with post-construction BMP requirements, impacts would be reduced to less than significant.~~

Mitigation Measures:

HYD-3 A Water Quality Management Plan shall be prepared for each future development project and shall include Nonstructural/Source Control and Structural/Treatment Best Management Practices to conform to the Town's Storm Water ~~Management Plan~~ standards and National Pollution Discharge Elimination System requirements ~~Permit~~.

Section 5.3.5, Cumulative Impacts, Page 5.3-31

~~Higher flows resulting from future development in the watershed would result in drainage and runoff impacts. Cumulative projects southeast of the SPA would discharge runoff into the Yucca Wash, which passes through a portion of the SPA and continues eastward off-site. Runoff from these projects would combine and interact with runoff from the SPA. Runoff from cumulative projects west of the SPA would utilize offsite drainage facilities that would not pass through the SPA or receive runoff from the SPA. Future development would be required to comply with *Ordinance 173*, which requires sufficient development impact fees to mitigate impacts. As a Master Plan has already been prepared to address impacts created by cumulative development. Payment of fees would reduce impacts created by cumulative development to a less than significant level.~~

Increased impermeable surfaces resulting from future development in the SPA may increase runoff flows to existing drainage facilities, which manage drainage throughout the watershed. This may negatively impact the watershed's ability to manage hydrology and drainage in the area. Cumulative projects southeast of the SPA would discharge runoff into the Yucca Wash, which passes through a portion of the SPA and continues eastward off-site. Runoff from these projects would combine and interact with runoff from the SPA. Runoff from cumulative projects west of the SPA would utilize offsite drainage facilities that would not pass through the SPA or receive runoff from the SPA.

Future development would be required comply with Town of Yucca Valley's stromwater standards, which require on-site retention. Regulations require post-construction runoff to be less or equal to pre-construction conditions through on-site retention during peak flows.

Additionally, new development would be required to pay storm drain facility development impact fees pursuant to Chapter 3.40.040: Public Infrastructure Facilities (*Ordinance 173*) of the Town of Yucca Valley's Municipal Code. The Ordinance requires payment of fees as determined by the Town Council prior to receipt of building permit or occupancy permit. Development impact fees are used only for the purpose of acquiring, designing, constructing, improving, providing and maintaining, to the extent permitted by law, the general facilities, which would mitigate impacts of new development. Impact fees provide funding for drainage facility maintenance, improvements, and/or new facilities. The management of these facilities are outlined in the Town of Yucca Valley's Master Plan of Drainage, which is designed to address the need for flood control planning and floodplain management. The plan established policies and concepts based on published Town goals and objectives, which have anticipated future grow in Yucca Valley. The report is used as a guideline for future planning, design and construction of regional, secondary, and local drainage facilities within the Town of Yucca Valley and includes detailed hydrologic, hydraulic, and facility sizing calculations for the drainage systems. Compliance with Town standards and payment of fees on a project-by-project level would reduce impacts created by cumulative development to a less than significant level.

Section 5.4-1, Pages 5.4-6 through 5.4-8

In accordance with Water Code Section 10910 and Senate Bill 610, a Water Supply Assessment (WSA) was prepared by RBF Consulting in December 2006. The Assessment is included in Appendix 15.5a, *Water Supply Assessment*. The primary reference for the WSA is the Hi-Desert Water District's Urban Water Management Plan (UWMP). In 2000, the HDWD~~District~~ submitted the Warren Valley Basin Management Plan along with an addendum to comply with the URMP provisions at that time. With the implementation of SB 610, and its impact to subsequent UWMP preparation, the HDWD provided supplements to the 2000 Plan. The HDWD then produced its stand-alone Urban Water Management Plan in 2005.

In early 2007 the Hi-Desert Water District (HDWD) began to draft all WSAs for new development/projects within the district. In May 2007, the Hi-Desert Water District prepared a Water Supply Assessment for the Old Town Yucca Valley Specific Plan.

The Assessment is included in Appendix 15.5b, *Hi-Desert Water District, Water Supply Assessment*. The Water Board adopted the final WSA and it's findings pursuant to SB610 at the HDWD Board of Directors meeting May 23, 2007.

Water Source

The Hi-Desert Water District (HDWD) serves the Town of Yucca Valley and would provide service to the specific plan area. (SPA). The HDWD utilizes two principal water sources to meet demands within its service area: imported surface water supplies from the California State Water Project (SWP) and domestic groundwater supplies. Natural recharge, stormwater and wastewater return flows further augment the HDWD's total water supply portfolio. ~~The primary source of domestic water supply for the HDWD's service area is groundwater.~~ The majority of the HDWD's groundwater water supply is pumped from the Warren Valley Groundwater Basin (WVB). This Basin provides 80 percent of the HDWD's domestic water source while a secondary groundwater Basin known as the Ames/Means Valley Basin, provides the remaining 20 percent of the HDWD's water source. Table 5.4-6, *Existing Water Supply Entitlements Rights and Contracts*, provides a brief overview of the HDWD's existing water, which are discussed in detail below.

Historical domestic groundwater production represents the amount of water pumped from the ground regardless of the source of recharge. Table 5.4-6, *Historical Domestic Groundwater Production,* summarizes the historical groundwater production by the HDWD since 1995. Table 5.4-6 also shows water imported from the Bighorn-Desert View Water Agency (BDVWA) in the mid-1990s, which is no longer in operation, and production by private pumpers in the Warren Valley.

Table 5.4-6
Existing Water Supply Entitlements Rights and Contracts

Supply	Acre-ft/year	Right	Contract
Warren Valley Basin	1,622	X	
Ames/Means Basin	800 + 0.5 for each new residential meter		X
SWP Supplies	4,282[1]		X
Source: High Desert Water District, Water Supply Assessment for Old Town Yucca Valley Specific Plan.			
1. Recharge to the Warren Valley Basin for later extraction.			

~~**Table 5.4-6**~~
~~**Historical Domestic Groundwater Production**~~

~~Year~~	~~Warren Valley Basin (acre-feet)~~		~~BDVWA Intertie~~	~~Ames/Means Valley Basin (acre-feet)~~	~~Total Groundwater Production (acre-feet)~~
	~~HDWD~~	~~Private Pumbers[1]~~			
~~1995~~	~~1,613~~	~~350~~	~~495~~	~~616~~	~~3,074~~
~~1997~~		~~424~~			~~3,165~~
~~2005~~		~~230~~			~~3,205~~
~~Source: RBF Consulting, Draft Waster Supply Assessment Old Town Yucca Valley Specific Plan, Town of Yucca Valley, December 2006.~~					
~~1. Includes Blue Skies Country Club, Institute of Mental Physics and individual private pumpers.~~					

Table 5.4-7
Warren Valley Basin Historical Domestic Groundwater Production

Year	Warren Valley Basin (acre-feet)		Total
	HDWD	Private Pumbers[1]	
1995	1,613	350	1,963
1996	1,366	330	1,696
1997	2,142	424	2,566
1998	1,677	353	2,030
1999	1,888	342	2,225
2000	2,213	258	2,471
2001	2,167	330	2,497
2002	2,305	503	2,808
2003	2,553	256	2,809
2004	2,378	207	2,585
2005	2,388	230	2,618

Source: RBF Consulting, Draft Waster Supply Assessment Old Town Yucca Valley Specific Plan, Town of Yucca Valley, December 2006.

1. Includes Blue Skies Country Club, Institute of Mental Physics and individual private pumpers.
2. Includes production of both adjudicated groundwater rights and contractual SWP supplies.

The HDWD currently maintains the following facilities, which provide water supply, storage, and transmission for the HDWD water system:

- 274 miles of pipeline ranging in diameter from 2 to 12 inches;
- 17 groundwater wells on the two basins capable of producing 7,000 gallons per minute;
- 16 storage tanks totaling 12.66 million gallons; and
- 2 percolation ponds atop the WVB.

Groundwater Sources

Warren Valley Basin. The Warren Valley Basin covers an area of approximately 26.9 square miles (17,200 acres). The Basin includes the water-bearing sediments beneath the Town of Yucca Valley and the surrounding area. The Basin is bounded on the north by the Pinto Mountain fault, on the south by the bedrock outcrop of the Little San Bernardino Mountains, on the east by a bedrock constriction called the "Yucca barrier", and on the west by a bedrock constriction and a topographic divide between Warren Valley and Morongo Valley. The productive water-bearing materials in this Basin consist of unconsolidated to partly consolidated Miocene to Quaternary continental deposits.

In 1950, the Warren Valley Basin began to overdraft. As significant growth occurred in the Yucca Valley area, this overdraft condition worsened and groundwater levels declined at an accelerated rate. During this time, the groundwater levels declined as much as 20 to 40 feet per year. This overdraft problem has been known for many years. In 1977 the groundwater Basin was approved and the HDWD was appointed

as the Watermaster. The ~~pumping~~ groundwater extraction rights established ~~with~~ by ~~the~~1997 adjudication are shown in Table 5.4-~~7~~8, *Warren Valley Groundwater Pumping Rights*. As a result of the HDWD's 1990 acquisition of the Yucca Water Company, the HDWD's adjudicated groundwater rights in the Basin total 1,622 AFY.

Table 5.4-~~7~~8
Warren Valley Groundwater Pumping Rights

Party to the Adjudication	Pumping Right (acre-foot/year)
Hi-Desert Waste District	896
Yucca Water Company[1]	726
Blue Skies Country Club	585
Institute of Mental Physics	80
16 Minimal Producers	16[2]
Total	2,303
Note: pumping rights exceed the native yield of the basin and are predicted on implementation of a Basin Management Plan.	
1. The HDWD acquired Yucca Valley Company in 1990. 2. This figure is being updated by the Warren Valley Watermaster.	

Section 5.4-1, Page 5.4-8, Paragraph 4

Ames/Means Valley Basin. The HDWD pumps groundwater from the Ames/Means Valley Basin, which includes portions of the Ames and Copper Mountain Valley Basins as designated by Department of Water Resources (DWR). Groundwater produced by the Ames/Means Basin is identified as a part of the HDWD's total water supplies. However, as required by the Ames Basin Agreement, water is only utilized to serve customers in the Ames/Means Basin area and would not be used to serve the SPA or any other HDWD demands in the Warren Valley Basin.

Section 5.4-1, Pages 5.4-9 through 5.4-13

Prior to this water source, the Mesa area utilized approximately 800 acre-ft/yr from the Warren Valley Basin. In 1989, the environmental issues related to this well resulted in complex litigation with the BDVWA. This litigation prevented the production of groundwater from the well. However, after prolonged negotiations with BDVWA, a settlement agreement, allowing the extraction of 800 acre-ft/yr as well as 0.5 acre-ft/yr for each new residential meter, was executed by both parties in January 1991. The settlement agreement prevents the export of groundwater from the Basin. ~~Well 24E was put into operation in 1993. Through informal agreement with BDVWA, the District limits its pumping from the Ames/Means Valley to about 650 acre-ft/yr until a recharge program is implemented.~~ The settlement agreement prevents the export of groundwater from the Basin.

Imported Water Sources

State Water Project Supplies. The State Water Project (SWP) water is the third water source for the Yucca Valley area. The HDWD obtains its SWP supplies from the Mojave Water Agency (MWA). MWA is a special act district to help meet the

water needs within its territory. The MWA's maximum annual water supply through the SWP system is 75,800 acre feet per year (AFY). The HDWD is located within Division 2 (Improvement District M) of the MWA, which is currently entitled to 7,257 AFY. ~~has an entitlement of 75,800 AFY through the SWP system. Division 2 (Improvement District M) has entitlement to 7,257 acre feet per year (AFY) of water from the SWP~~. Of the four purveyors within Division 2, the ~~The~~ HDWD has a contractual entitlement of 4,282 AFY, which HDWD is able to take full advantage of due to water recharge to the Warren Valley Basin. HDWD recharges the SWP water it receives through the Morongo Basin Pipeline into the Warren Valley Groundwater Basin through a series of percolation ponds owned and operated by HDWD. An additional recharge facility (Site 3) was recently constructed east of Pioneertown Road that increased the District's total recharge capacity to approximately 11,000 acre-ft/yr.

Contractual deliveries of up to 4,282 acre-feet in wet years allow the HDWD to include in its total projected water supplies a long-term average of 3,297[1] acre-ft/yr of SWP water from MWA. ~~The HDWD estimates a long-term average of 4,920 AFY from the SWP.~~

Additional SWP Supplies. Under the 1991 Agreement, the HDWD has the first option to take delivery of contractual amount that is not utilized by the three other purveyors in District 2. Since completion of the Morongo Basin Pipeline, none of the other purveyors have requested or received any portion of their SWP supplies. This creates an opportunity for HDWD to purchase up to an additional 2,011 acre-ft/yr. This long-term annual average may also be stored in the Warren Valley Basin.

Additional SWP Table A Supplies Available to the HDWD. In addition to the HDWD's contractual rights to SWP water, the HDWD is able to acquire such additional surplus SWP supplies from MWA's "Table A" by purchase under MWA's Ordinance No. 9 (refer to Appendix C in Appendix 15.5b). This allows HDWD to purchase annual amounts of SWP water from MWA for domestic, industrial, municipal, agricultural, recreational, and/or groundwater replenishment purposes. Such water may be placed in a storage account under the Rules and Regulations of the Warren Valley Basin. As a conservative estimate for purposes of this WSA, the HDWD may purchase between 5,000 and 10,000 acre-feet of unused SWP supplies from MWA over the next 10-year period, either as a one-time purchase or as incremental purchases. Those deliveries will be made to the HDWD via the Morongo Basin Pipeline.

Interruptible SWP Supplies Available to the HDWD. The HDWD also has an opportunity to purchase "interruptible" or "Article 21" water from MWA. Article 21 water is typically available only in wet months, such as December through March, and is only available to SWP Contractors who can use the water directly or store it in their own system, such as in a groundwater basin. It is has estimated that an average of at least 120,000 acre-ft/yr of interruptible water will be available for purchase by the Contractors in years 2005 through 2025. Similarly, because of the HDWD's ability to store water in the Warren Valley Basin, it is appropriate for HDWD to incorporate future purchases of Article 21 water from MWA into the HDWD's

[1] 3,297 is derived using a 77 percent reliability rate of total water deliveries, refer to Appendix 15.5 for additional information.

projected water supply portfolio. As a conservative estimate for purposes of this WSA, the HDWD projects it may purchase between 5,000 and 10,000 acre-feet of interruptible SWP supplies from MWA over the next 10 to 20-year period, either as a one-time purchase or in annual increments.

~~In 1994, the HDWD carried out a conjunctive use agreement with the MWA, which provided the HDWD with the opportunity to import additional SWP water through the Morongo Basin Pipeline for recharge into the WVB. Under the agreement, MWA delivers and recharges SWP water at recharge facilities, and the HDWD extracts and purchases this water directly. The HDWD has purchased nearly 1,500 acre-feet of conjunctive use water from MWA.~~

Water Supply

Historical water supply represents the measured and estimated inflows to the WVB and imported water from the Ames/Means Valley Basin and other sources. The sources of the WVB recharge include precipitation on the Basin, runoff from its limited watershed (80 AFY), return flows from irrigation, septic, and wastewater systems, conjunctive use water from Mojave Water Agency, and SWP water imported from the MWA through the Morongo Basin Pipeline. Table 5.4-~~8~~9, *Historical Water Supply*, summarizes the total historical water supplies the HDWD received from 1995 through 2005.

Table 5.4-~~8~~9
Historical Water Supply

Reliability of Water Supply

Several important factors contribute to the reliability of the HDWD's existing and future water supplies. First, the HDWD is fortunate to have a diversified set of water rights, including adjudicated groundwater rights, contractual groundwater rights, and contractual rights to SWP supplies. Second, the HDWD is advantaged by having the Warren Valley Basin to use as a regulating reservoir.

Groundwater

As discussed throughout the HDWD WSA, the District utilizes the WVB to coordinate its groundwater and SWP rights, storing water in excess of demand during wet cycles and producing stored reserves during dry cycles. This utilization of the WVB allows the HDWD to plan for and serve the water demands of its existing and future customers throughout wet, normal, and dry water years. Other key factors in the HDWD's water supply reliability are the significant amounts of local return flows to the Basin and conservation and demand management measures implemented by the HDWD.~~Water provided to customers within the HDWD's service area is groundwater that is replenished with State Water Project (SWP) water from the Morongo Basin Pipeline (MBP).~~ During dry years when SWP deliveries are reduced, SWP water previously stored in the Basin is extracted. As of June 2006, the Warren Valley Basin Watermaster has estimated that recharge in excess of extraction totaled 21,910 acre-feet, a 7.1 year reserve based on current production levels (WVBWM, 2006). Consequently, the groundwater supply is reliable to the extent that adequate SWP water is available for recharge and to maintain an adequate ~~Basin~~ reserve.

Table 5.4-~~9~~10, *Groundwater Storage by Year – Warren Valley Basin*, indicates the banked groundwater storage by year for the WVB (data for the MVB was not available).

Table 5.4-~~9~~10
Groundwater Storage by Year – Warren Valley Basin

Return flows play a key role in maintaining the health and reliability of the Warren Valley Basin. Currently, return flows to the WVB from precipitation and natural recharge, irrigation returns, septic returns, and stormwater runoff are approximately 900 AFY. A large majority is attributed to irrigation and septic system returns. The HDWD estimates that approximately 32 percent of the water used within the portion of the HDWD overlying the WVB returns to the Basin. That calculation is based on dividing the estimated average return flows by the Warren Valley groundwater pumping over the past 18 years (refer to Table 5.4-7). Based on the projected annual water use increase within the HDWD over the next 20 years, return flows to the Basin in the year 2028 are estimated to be 1,747 AFY without the Old Town Specific Plan Project.

In December 2003, ~~the court overseeing the WVB judgment approved a proposal for allocating water meters. The court-approved method establishes~~ a direct method of establishing the relationship between groundwater reserves and actual growth was approved. Groundwater reserves are based on the amount of water recharged into the WVB. This method removes all restrictions on growth unless water reserves in the groundwater Basin reach a pre-determined level.

The effect of this policy is to maintain minimum groundwater reserves that are adequate to meet current and approved demands during dry years without causing overdraft. If an extended dry period occurs that draws the reserves below the established levels, limitations on approval of additional growth would be implemented. No changes to this policy are anticipated.

Imported Water

Current imported supplies are available to the HDWD from MWA through the Morongo Basin Pipeline. While the HDWD's current entitlement to SWP is 4,282 AFY, actual deliveries vary depending on seasonal climate changes. Table 5.4-11, *HDWD SWP Purchases (1995-2005)* summarizes the amount of SWP deliveries received by the HDWD between 1995 and 2005. Since the execution of the Morongo Basin Pipeline agreement in 1995, reductions to the HDWD have not been necessary due to low overall demand for SWP supplies within the MWA service area. However, as demand for SWP water within the MWA service area increases, reductions in SWP deliveries may become more frequent in dry years. Consequently, the value of 3,297 AFY is considered to be a conservative estimate of the amount of SWP water available to HDWD.

Table 5.4-11
HDWD SWP Purchases (1995-2005)

Year	HDWD
1995	1,608
1996	3,919
1997	4,848
1998	2,895
1999	1,918
2000	3,631
2001	3,831
2002	2,566
2003	2,681
2004	3,700
2005	3,460
Average	3,187

Source: Hi-Desert Water District, Water Supply Assessment for Old Town Yucca Valley Specific Plan, May 2007.

Water Demand

The SPA area currently consists of existing land uses that generate a water demand, including residential, commercial, industrial, and civic. Water Demand Factors are necessary in order to estimate existing and ultimate water demands. According to the UWMP (2005), the HDWD assumes a typical household uses 0.28 AFY (250 gallons/day). The UWMP does not specifically state water demand factors for land uses other than residential. The ~~District's~~ HDWD's Draft Water Master Plan (DWMP) has estimated that a typical household uses 0.39 AFY (350 gallons/day). The DWMP also provides water demand factors for selected land use types. Refer to Appendix 15.5b for a summary of the water demand factors pertinent to the Old Town Yucca Valley Specific Plan area.

Existing water demand within the SPA is estimated to be 159.4 AFY (42,268 gallons per day)~~144,551 gallons per day (161.9 AFY)~~ (refer to Appendix 15.5b of this EIR for detailed water demand calculations). Table 5.4-~~10~~12, *Water Demand – Existing*, categorizes the existing water demands based on the proposed planning districts and shows the domestic water demand for existing conditions according to land use types.

Table 5.4-~~10~~12
Water Demand – Existing

Section 5.4, Pages 5.4-13 through 5.4-14

Table 5.4-~~11~~13, *Wastewater Generation - Existing*, outlines the wastewater generation and indicates that an estimated 92,045 gpd of wastewater are currently generated within the SPA.

Table 5.4-~~11~~13
Wastewater Generation – Existing

Section 5.4, Page 5.4-15

Table 5.4-~~12~~14, *Solid Waste Generation - Existing*, outlines the estimated solid waste generation and indicates that an estimated 3,448 tons per year of solid waste are currently generated within the SPA.

Table 5.4-~~12~~14
Solid Waste Generation – Existing

Section 5.4, Pags 5.4-20 through 5.4-21

Table 5.4-~~13~~15, *Law Enforcement - Projections*, provides law enforcement projections and indicates that the proposed Specific Plan would generate a demand for three patrol officers, or two officers more than the demand generated by existing conditions.

Table 5.4-~~13~~15
Law Enforcement – Projections

Section 5.4, Page 5.4-22

Comparatively, buildout of the SPA would generate approximately 762 students more than the student population projection, based on *General Plan* buildout; refer to Table 5.4-~~14~~16.

Table 5.4-~~14~~16
Student Population – Projections

Section 5.4, Page 5.4-23

Impact Analysis: Table 5.4-~~15~~17, *Library Resources - Projections*, provides the library facility projections and indicates that Project implementation would generate a demand for 1,122 SF of facility space and 2,806 books/materials, or 1,095 SF of facility space and 2,738 books/materials more than the demand generated by existing conditions, respectively.

Comparatively, the Specific Plan would result in more population growth than the existing General Plan, thus, the demand for library space and books/materials would be proportionately greater; refer to Table 5.4-~~15~~17.

Table 5.4-~~15~~17
Library Resources – Projections

Section 5.4, Page 5.4-25

Impact Analysis: Table 5.4-~~16~~18, *Parkland Demand – Projections*, provides the projected demand for parkland and indicates buildout of the SPA would generate a demand for 14 acres of developed parkland, or 9.9 acres more than the demand generated by existing conditions. Comparatively, buildout of the SPA would generate a demand for 13.7 acres of developed parkland more than the parkland demand, based on *General Plan* buildout; refer to Table 5.4-~~16~~18.

Table 5.4-~~16~~18
Parkland Demand – Projections

Section 5.4, Pages 5.4-26 through 5.4-28

WATER

- **PROJECT IMPLEMENTATION WOULD INCREASE THE DEMAND FOR WATER BEYOND CURRENT CONDITIONS REQUIRING AN INCREASE IN FUTURE WATER SUPPLY.**

Impact Analysis:

Water Supply. ~~As previously stated, a~~ Water Supply Assessments (WSA) ~~(December 2006) was~~ were prepared by RBF Consulting and by the HDWD for the proposed Project, in accordance with Water Code Section 10910 and Senate Bill 610. The analysis and calculations by the HDWD (May 2007) supersede the Town's Assessment presented in the December 2006 WSA which was incorporated into the Draft EIR. At buildout, the Specific Plan area ~~will~~ would consist of residential, commercial/retail, industrial, office, and civic land uses. Table 5.4-~~17~~19, *Water Demand – Project* provides the detailed domestic water demand for the proposed Specific Plan, according to planning district and land use type. Water demand for the Project was calculated by the HDWD using water demand factors from Appendix 15.5 of this EIR. The ultimate average day water demands at full build-out are estimated to be approximately 526.7 AFY ~~474,005 gpd (531.0 AFY)~~ for the proposed SPA.

The net change in water demand from existing to ultimate represents the impact the Project will have on HDWD's supply system. The proposed Specific Plan would result in an increase in water demand of 367 AFY ~~329,454 gpd (369.1 AFY) for an average day.~~

Table 5.4-~~17~~19
Water Demand – Project

District/Land Use Type	Density (du/ac)	Gross Area (ac)	Units (du)	Building Area (SF)	Water Demand Factor[1] (gpd/ac)	Average Day Demand (AFY)
Commercial/Retail		17.428		759,317	1,000	19.5
Residential	40	11.625	465		11,730	152.8
Total		**29.053**	**465**	**759,317**	**-**	**172.3**
Commercial/Retail		58.355		889,684	1,000	65.4
Total		**58.355**		**889,684**	**-**	**65.4**
Commercial/Retail		40.165		699,769	1,000	45.0
Residential	24	17.208	413		7,040	135.7
Total		**57.373**	**413**	**699,769**	**-**	**166.4**
Industrial		31.66		551,834	850	30.1
Residential	30	7.933	238		8,800	78.2
Total		**39.589**	**238**	**551,834**	**-**	**108.3**
Total Proposed Water Demand		**184.370**	**1,116**	**2,900,604**	**-**	**526.7**
Less Existing Demand			**129**			**159.4**
Total Projected Water Demand		**184.370**	**1,115**			**367.3**

~~District/Land Use Type~~	~~Density (du/ac)~~	~~Gross Area (ac)~~	~~Units (du)~~	~~Building Area (SF)~~	~~Water Demand Factor[1]~~	~~Average Day Demand~~	
						~~(gpd)~~	~~(AFY)~~
~~Commercial/Retail~~		~~17.428~~		~~759,317~~	~~1,000 gpd/ac~~	~~17,428~~	~~19.5~~
~~Residential~~	~~40~~	~~11.625~~	~~465~~		~~12,950 gpd/du~~	~~150,544~~	~~168.6~~
~~**TOTAL**~~		~~**29.053**~~	~~**465**~~	~~**759,317**~~	~~**-**~~	~~**167,972**~~	~~**188.2**~~

~~District/Land Use Type~~	~~Density (du/ac)~~	~~Gross Area (ac)~~	~~Units (du)~~	~~Building Area (SF)~~	~~Water Demand Factor[1]~~	~~Average Day Demand~~	
						~~(gpd)~~	~~(AFY)~~
~~**Old Town Highway Commercial**~~							
~~Commercial/Retail~~		~~58.355~~		~~889,684~~	~~1,000 gpd/ac~~	~~58,355~~	~~65.4~~
~~**TOTAL**~~		~~**58.355**~~		~~**889,684**~~	~~**-**~~	~~**58,355**~~	~~**65.4**~~
~~**Old Town Commercial/Residential**~~							
~~Commercial/Retail~~		~~40.165~~		~~699,769~~	~~1,000 gpd/ac~~	~~40,165~~	~~45.0~~
~~Residential~~	~~24~~	~~17.208~~	~~413~~		~~6,300 gpd/du~~	~~108,413~~	~~121.4~~
~~**TOTAL**~~		~~**57.373**~~	~~**413**~~	~~**699,769**~~	~~**-**~~	~~**148,577**~~	~~**166.4**~~
~~**Old Town Industrial**~~							
~~Industrial~~		~~31.66~~		~~551,834~~	~~2,000 gpd/ac~~	~~26,907~~	~~30.1~~
~~Residential~~	~~30~~	~~7.933~~	~~238~~		~~9,100 gpd/ac~~	~~72,193~~	~~80.9~~
~~**TOTAL**~~		~~**39.589**~~	~~**238**~~	~~**551,834**~~	~~**-**~~	~~**99,101**~~	~~**111.0**~~
~~**TOTAL PROPOSED WATER DEMAND**~~		~~**184.370**~~	~~**1116**~~	~~**2,900,604**~~	~~**-**~~	~~**474,005**~~	~~**531.0**~~

~~Notes:~~
~~ac = acre, du = dwelling unit, sf = square feet, gpd = gallons per day, AFY = acre feet per year~~
~~1 Water demand factors based on District's Draft Water Master Plan.~~

Growth within the project area is expected to occur linearly over a 50-year period starting in 2008 and ending in 2057. This results in an annual growth in demand of 7.3 acre-ft/yr. Beyond 2057, the Project's additional water demand remains constant at 367 AFY.

Projected Water Demand

The HDWD needs to take into account all additional water demands in deciding whether there is sufficient water supply for the proposed Specific Plan. As of ~~August 2006~~May 2007, there are ~~54~~ 62 development projects under some stage of consideration by the Town in addition to this Specific Plan. ~~active development projects in the Town of Yucca Valley~~ (refer to *Appendix ~~E~~ G* in Appendix 15.5b of this EIR). These projects are incorporated in the base demand forecasts, which uses a linear growth rate of 2.3 percent to estimate future population and water demand. Table 5.4-20, *Projected Water Demand (2.3 Percent Growth Rate),* displays projected HDWD water demand totals up to the year 2028. The table also displays the HDWD future water demand with anticipated future projects, and anticipated demand from the Old Town Specific Plan Area. ~~Table 5.4-18, *Projected Water Demand-Excluding Project Demands* shows the projected future demand increase for the HDWD.~~

~~**Table 5.4-18**~~
~~**Projected Water Demand – Excluding Project Demands**~~
~~**(2.3 percent Growth Rate)**~~

~~User~~	~~2010~~	~~2015~~	~~2020~~	~~2025~~	~~2030~~
~~Blue Skies Country Club~~	~~585~~	~~585~~	~~585~~	~~585~~	~~585~~
~~Institute of Mental Physics~~	~~14~~	~~14~~	~~14~~	~~14~~	~~14~~
~~Minimal Producers~~	~~16~~	~~16~~	~~16~~	~~16~~	~~16~~
~~HDWD~~	~~3,320~~	~~3,665~~	~~4,101~~	~~4,286~~	~~4,700~~
~~**Total Demand**~~	~~3,935~~	~~4,280~~	~~4,625~~	~~4,901~~	~~5,315~~

Table 5.4-20
Project Water Demand (2.3 percent Growth Rate)

User	2008	2013	2018	2023	2028
HDWD – Warren Valley[1]	2,744	3,338	3,748	4,037	4,325
Old Town SP Project (net increase)	7	44	81	118	154
Total Demand	2,751	3,382	3,829	4,155	4,479

1. HDWD – Warren Valley demand includes existing customers, an annual increase of 58 acre-/yr (2.3 percent of existing demand) and projected demand for the Mountain Vista development.
2. The net demand increase is used because the existing demand of the Old Town area is included in the existing demand projection.

Based on ~~these~~ the calculations in Table 5.4-20, the projected demands to the HDWD for a normal year are estimated to increase by approximately ~~5,315~~4,479 acre-feet by the year ~~2030~~2028. ~~In addition, t~~The Old Town Yucca Valley Specific Plan is anticipated to create an additional water demand of ~~369~~154 acre-feet by 2028 ~~at buildout~~, which is assumed to be ~~complete by the year 2025~~ only partially built out. This amount would represent approximately ~~7.5~~3.4 percent of the HDWD's water ~~2030~~2028demands ~~and seven percent of the HDWD's water 2030 demands~~.

According to the HDWD's WSA for the Old Town Yucca Valley Specific Plan Area, water supplies are adequate to meet demands in normal, single dry and multiple dry years both without and with the proposed Project through 2028 while maintaining DHWD supply reserves in the Warren Valley Basin exceeding five years. Beyond the 20-year analysis period (2028), the District will need to acquire additional supplies above its current contracted SWP supply to meet the future demand in the SPA.

To meet the future demands of ~~2030~~2028 and beyond, the HDWD would have to plan on obtaining additional sources of water such as increased imported water from MWA, recycled water or desalinated water. HDWD could purchase additional SWP water in early years to buildup a larger groundwater reserve. However, it should ensure that it does not violate its water reserve policies.

Based on existing water supply and demand conditions and future assumptions, the WSA has concluded the following regarding the proposed Project:

- Hi-Desert Water District has been identified as the public water purveyor for the Old Town Yucca Valley Specific Plan.

- Water demand for the proposed Specific Plan ~~is not specifically identified as a future demand in the District's 2005 UWMP; however, growth in the area was anticipated and~~ is planned to be met through groundwater extraction and imported sources from the SWP. ~~supplemented by recharge at the District's percolation ponds.~~

- Reliability to the groundwater system is provided by natural recharge and recharge in the percolation ponds, which is supplied by MWA and the SWP along with management and conservation measures taken by the HDWD.

- The calculated water demand for the proposed Specific Plan is approximately ~~531~~526.7 AFY at buildout (2057), and it has been estimated that approximately ~~162~~159.4 AFY of water is currently used within the SPA.

  ~~The net change in water demand to the Project site is 369 AFY. The net change would represent approximately seven percent of the District's estimated long-term average of 5,684 AFY from the SWP, Warren Valley Basin, and Ames/Means Valley Basin.~~

- The Hi-Desert Water District proposes to deliver water to the Old Town Yucca Valley Specific Plan project from groundwater extracted from Warren Valley Basin, and SWP. ~~Ames/Means Valley Basin.~~

~~The HDWD plans to meet the proposed water demands of the Old Town Yucca Valley Specific Plan with groundwater from the Warren Valley and Means Valley Basins. The District plans to recharge water yearly into the WVB from the SWP, natural recharge, return flows, and conjunctive use water. The reserve groundwater will be available during dry periods when the District will not be able to recharge the Basin due to a reduction in supply from the SWP. The ongoing groundwater storage in the Warren Valley Basin provides the District with reliable source of domestic water. It is further noted that the HDWD is in the process of evaluating the construction of a new wastewater treatment facility, which could be a viable source of future groundwater recharge upon completion.~~

Section 5.4, Pages 5.4-29, Paragraph 1 and 2

During the 1995-96 Pipeline Improvement Project, the HDWD completed several miles of pipeline upgrades to replace old and undersized pipelines; refer to Table 5.4-~~19~~21, *Water Pipeline Replacements Completed*. The pipeline upgrades included the construction of 22,300 linear feet of replacement pipeline in the District's west side, which would directly benefit the 3495W Pressure Zone and the SPA. This study assumes that all replacement projects completed to date are incorporated into the 2002 Water System Atlas.

Table 5.4-~~19~~21
Water Pipeline Replacements Completed

Fire-flow criteria (as provided in the 2001 Water Master Plan Update) and appropriate system pipeline diameters are indicated in Table 5.4-~~20~~22, *Fire-Flow Pipe Dimensions*.

Table 5.4-~~20~~22
Fire Flow Pipe Dimensions

Section 5.4, Pages 5.4-31 through 5.4-32

Impact Analysis: According to the HDWD, the generation rates for domestic contribution to the wastewater system is assumed to be 90 gallons per capita per day (gpcd), while specific generation rates are applied to the other types of land uses. Table 5.4-~~21~~23, *Wastewater Generation - Project*, provides an estimate of the amount of wastewater that would be generated by implementation of the Specific Plan. As indicated in Table 5.4-~~21~~23, an estimated 328,521 gpd of wastewater would be generated by the proposed Project, or 236,476 gpd more than the wastewater generated by existing conditions. Comparatively, buildout of the SPA would generate approximately 238,320 gpd more than the wastewater generation, based on General Plan buildout; refer to Table 5.4-~~21~~23.

Table 5.4-~~21~~23
Wastewater Generation – Project

Section 5.4, Pages 5.4-33 through 5.4-34

Table 5.4-~~22~~24, *Solid Waste Generation – Project*, outlines the estimated solid waste generation for the proposed Specific Plan and indicates post-development operations would generate approximately 12,902 tons of solid waste per year (prior to recycling), or 9,454 tons per year more than existing conditions. Comparatively, buildout of the SPA would generate 2,482 tons of solid waste per year less than the solid waste generation based on *General Plan* buildout; refer to Table 5.4-~~22~~24.

Table 5.4-~~22~~24
Solid Waste Generation – Project

Section 8.0, Page 8-5, Mitigation Measure HYD-3

HYD-3 A Water Quality Management Plan shall be prepared for each future development project and shall include Nonstructural/Source Control and Structural/Treatment Best Management Practices to conform to the Town's Storm Water ~~Management Plan~~ standards and National Pollution Discharge Elimination System requirements ~~Permit~~.