


# Comment L-13

LUCERNE VALLEY ECONOMIC DEVELOPMENT ASSOCIATION (LVEDA)

To: Ronald J. Kosinski,   
Division of Env. Planning - Project #80  
Caltrans, District 7  
100 S. Main St. MS-16A  
Los Angeles, CA 90012

From: Chuck Bell, Pres. [chuckb@sisp.net](mailto:chuckb@sisp.net) 760 964 3118  
P. O. Box 193  
Lucerne Valley, CA 92356



Date: 12/1/14

RE: HIGH DESERT CORRIDOR – Draft EIS/EIR

## Impact of “High Desert Corridor Project” on Lucerne/Johnson/Moronogo Valleys.

Under the current project description – which includes the Apple Valley link between I-15 and Hwy. 18 – the Corridor’s eastern terminus with its 4 to 6 lanes dumps traffic on 2 lane Hwy 18 (with a significant ADT increase in both directions due to the Corridor’s link between I-14 and the I-10) – which will create significant congestion and safety hazards on Hwys. 18, 247 and 62 along the route to the I-10. This is a current ‘trade corridor’ with increasing truck traffic that will be significantly increased due to this project - that has to be addressed in its entirety. CEQA requires that a project’s impacts - even outside a project’s boundaries – must be assessed and mitigated. This draft EIR doesn’t even reference said obvious impacts – which will make it vulnerable to litigation. The solution would be to incorporate improvements to these eastern segments in the HDC’s planning and financing (ie: a minimum of 4 lanes – wider lanes – turn pockets – shoulder improvements – etc.). Without said planning and a financing link to the project, the Corridor EIR’s “off-site” analysis for these eastern segments will have to show a “significant adverse environmental impact” that will be impossible to ignore with “findings of overriding consideration”.

L-13-1

The only good solution is to ELIMINATE THE APPLE VALLEY LINK BETWEEN I-15 AND HWY. 18 – not realistic anyway due to cost of bridging the Mojave River, etc, etc. Many agency and AV Town representatives don’t even know why it is still included. But as long as it remains – the project is vulnerable to litigation.


L-13-2

## Response to Comment L-13

Comment Code (Topic)	Response
L-13-1 (Traffic)	<p>The "Route Concept Fact Sheet" for SR-18, prepared by Caltrans District 8, dated March 2002, outlines the route concept requirements for year 2020, operational improvements, and the ultimate transportation corridor. A widened SR-18 is identified as part of the ultimate transportation corridor when traffic volumes and other conditions warrant. The existing level of traffic between Lucerne Valley and the Bear Valley cutoff is 9,400 vehicles per day over the course of the year (Annual Average Daily Traffic). This volume of traffic does not warrant widening of the facility in this segment, other than for passing lanes and/or intersection improvements which may be deemed appropriate upon further investigation. Forecast traffic volumes for 2040, the design year of the HDC freeway/expressway, indicate that daily traffic volumes will more than double compared to existing use. This will occur with or without construction of the HDC. A four lane conventional highway or 4-lane expressway would be an appropriately sized facility to accommodate that level of traffic volume. As highway widening projects take years to develop and finance, requests to consider such a project should be coordinated through SANBAG and Caltrans District 8. Please also see also Response to Comment B-2-1.</p>
L-13-2 (Traffic)	<p>The Mojave River is west of I-15 and will have to be bridged whether the connection to SR-18 is built or not. This connection is included in the Town of Apple Valley's 2009 General Plan, which was adopted by the Town Council in August of that year. In addition, the Town is a member of the HDC Joint Powers Authority and representatives from the Town have been involved in numerous planning discussions concerning the project over the past several years.</p>

# Comment L-25



To: Ronald J. Kosinski,   
Division of Env. Planning - Project #80  
Caltrans, District 7  
100 S. Main St. MS-16A  
Los Angeles, CA 90012

From: Marina D. West, Sec. [wells.out.west@gmail.com](mailto:wells.out.west@gmail.com) 760 910-3264  
P.O.Box 24  
Joshua Tree, CA 92252

Date: 12/1/14

RE: HIGH DESERT CORRIDOR – Draft EIS/EIR

## Impact of "High Desert Corridor Project" on Lucerne/Johnson/Morongo Valleys

Mr. Kosinski,

The Project as described includes the Variation E: "between US 395 and east of Federal Prison. This east side of the project terminates the project onto a 2 lane Hwy 247 which leads through the Lucerne Valley, Johnson Valley, Homestead Valley, Yucca Valley and Morongo Valley rural communities prior to linking with the I-10 near Palm Springs.

L-25-1


The project has an obvious industrial trade-corridor transportation link between its western beginning at the I-14 and the eastern end within miles of the Hwy 18 Junction with Hwy 247. This will create significantly increased congestion and safety hazards which must be addressed in its entirety through the EIR/EIS process.

CEQA requires that a project's impacts - even outside a project's boundaries - must be assessed and mitigated.

L-25-2

This draft EIR doesn't even reference said obvious impacts - which will make it vulnerable to litigation. The solution would be to incorporate improvements to these eastern segments in the HDC's planning and financing (ie: a minimum of 4 lanes - wider lanes - turn pockets - shoulder improvements - etc.). Without said planning and a financing link to the project, the Corridor EIR's "off-site" analysis for these eastern segments will have to show a "significant adverse environmental impact" that will be impossible to ignore with "findings of overriding consideration".

Sincerely,

  
Marina D. West, PG  
Secretary MBCA

## Response to Comment L-25

Comment Code (Topic)	Response
L-25-1 (Traffic)	The easterly end of the project is located near the Bear Valley Road cutoff, approximately 10 miles west of the SR-18/Old Woman Springs Road intersection, which connects to SR-247.
L-25-2 (Design)	The HDC Project was proposed based upon detailed traffic studies that indicated a long-term need for substantially increased east-west motor vehicle capacity in the Antelope and Victor Valleys. When and if future traffic studies identify a substantial need for increased capacity or other improvements to SR-247, those improvements will be considered by regional and state transportation agencies.