**LUCERNE VALLEY ECONOMIC DEVELOPMENT ASSOCATION (LVEDA)**

COMMENTS RE: 2007 PLAN TRANSITIONS TO THE NEW “PLAN”

9/3/18

We appreciate the inclusion of our 2007 Plan’s goals/policies on the link. When we dealt with the first draft of our “Action Plan” - basically rejecting it as ‘not a real plan and impossible for communities to achieve’ – we and other communities were dead serious in our request to just update our 2007 Plan with a Renewable Energy section – some updates - and be done with it. Obviously it didn’t happen and we spent countless hours writing very specific comments. Looks like it didn’t do any good – waste of time. When we saw the link to the old plans we were hopeful that ‘carryovers/transfers’ from the Lucerne Valley 2007 Plan to the current draft Plan (and all the parts that constitute it) would clearly match and include the 2007 verbiage and intent. Some sort of do – some are not clear, masked in generic, non-specific jargon – some just shined on. Many of you weren’t around in 2007 – but we spent countless hours working on that Plan – with pride and appreciation that most if not all what we asked for was included. Looks like we are losing most of it now – the good stuff – or so diluted we won’t recognize most of it in the new Plan. And so we probably will waste more time with more comments - trying to fix something that seems to be in concrete (without a good foundation) – but we have no choice to deal with it – the good, bad and ugly. Based on what transpired since the last draft – more than likely – a major waste of time and more distrust of this process – likely led by consultants.

Most of the following comments relate to the lack of specificity of how and where our original 2007 Plan’s policies/goals would be incorporated into the new Plan – whatever and wherever that really is (General Plan/Policy Plan/Action Plans/separate maps/etc. – parts of it hither and yon all over the web page). This process – while maybe in sinc with the typical ‘Planning 101’ college course – dilutes the very essence of ‘local planning’ – what real community Plans are supposed to be. If you want each community to come up with all their local wants and wishes via the “Action Plans” – good luck. We know the County can’t and won’t do everything we want for our communities and our Plans – and it is up to we citizens to force the issues and promote them – but at the very least – our local issues, goals and policies need to be in OUR “Community Plan” whether part of the “Action Plan” or not – so collectively we all know what we expect for the future.

COMMENTS: (Our comments in BLUE CAPS. “LU” is the 2007 Plan.)

LU 1.3 Encourage new development to provide a mix of lot sizes but discourage parcel sizes less than 2.5 acres. In the event that a future development project proposes a subdivision covering 40 acres or more of lots 2.5 acres in size or less, require the project to be reviewed through a Planned Development application process. NOT ADDRESSED IN THE TRANSITION.

LU 1.6 Develop standards for outdoor storage to ensure compatibility with surrounding development. This can be accomplished by:

A. Prohibiting the use of truck semi-trailers as storage containers in commercial districts without appropriate screening.

B. Limit the height, size and volume of outdoor storage containers by land use district

C. Require adequate screening of outdoor storage in commercial and industrial districts. Adequate screening may vary by zoning and land use type. THIS ALSO IS MEANT FOR EXISTING DEVELOPMENT REQUIRING CODE ENF. DOESN’T LOOK LIKE IT IS CARRIED OVER TO THE EXTENT THE 2007 PLAN DICTATED.

LU 1.8 Prohibit commercial Off-Highway-Vehicle tracks/facilities on private parcels less than 160 acres. Off-Highway-Vehicles tracks/facilities shall only be allowed within the RC District. NEW PLAN PHRASING IS TOO GENERIC AND DOESN’T GET TO THE POINT RE: PARCEL SIZE AND ZONING..

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| LU 2.3 Support the designation of Neighborhood Commercial (CN) districts on Highways 18 and 247 near major intersections commensurate with the needs of residents in the area. NOT WELL ADDRESSED IN THE TEXT – UNLES DEALT WITH ELSEWHERE? |  |

LU 3.3 Direct future commercial development to locate within the Rural Commercial (CR) land use district, as delineated by the Land Use Policy Map at the time of adoption of this plan, between Custer Road east to Allen Way. As this Rural Commercial district reaches development capacity, proposed expansions of the Rural Commercial land use district shall be located adjacent to the current district and expanded initially south to Furst Street, and ultimately, to be extended to the north side of Clark Street. SPECIFICALLY FOCUSED IN OUR 2007 PLAN – SEEMINGLY NOT IN THE NEW PLAN. OR WHERE WILL IT BE?

LU 3.4 Support the expansion of the Regional Industrial (IR) land use district up to ½ mile wide on each side of the rail spur from Crystal Creek east to Highway 18, to create an industrial corridor along the existing rail line. Support future projects within this corridor that ……IT LOOKS LIKE THIS GETS INCORPORATED INTO THE NEW PLAN – BUT NOT CLEAR?

LU 3.5 Upon completion of land exchanges with the BLM that are adjacent to industrial and mining uses, convert those new private lands to a designation of Regional Industrial (IR).

SO IS THIS STILL IN OUR PLAN - TO CHANGE ZONING TO INDUSTRIAL IF AND WHEN CONVERTED TO PRIVATE? THIS IS A SPECIFIC ACTION AND NOT CLEAR WHETHER IT IS TRANSFERRED OR NOT.

LU 3.6 Heavy, industrial-type agricultural uses should be located within the Agricultural (AG) land use district, as delineated by the Land Use Policy Map at the time of adoption of this plan, in the north/northeast portion of the community plan area where adverse impacts on residential uses, groundwater, and downwind air quality will be minimized. NOT CLEAR IF THIS IS CARRIED FORWARD AS STATED – ESPECIALLY SINCE THE NEW RLM DISTRICT THAT INCLUDES AG. DOESN’T DIFFERENTIATE BETWEEN HEAVY AG. (DAIRIES/FEED LOTS/ETC.) VS. TYPICAL AG. (FIELD AND TREE CROPS).

CI 1.4 Coordinate with SANBAG and Caltrans on planning efforts, including the High Desert Corridor Plan. The County shall support expansion of the High Desert Corridor Plan **beyond the current Apple Valley boundary**, eastward to Camp Rock Road, in order to facilitate funding for future improvements. THE TRANSITION DOESN’T REFLECT OUR ABSOLUTE MANDATE THAT THE COUNTY HELP US GET THE HDC BOUNDARY EXTENDED EASTWARDE IN ORDER TO FUND AND GET IMPROVEMENTS ON HWYS 18 and 247 TO ACCOMMODATE THE INCREASED LOCAL AND LONG-HAUL TRAFFIC CREATED BY THE HDC – THE WESTERN BOUNDARY OF WHICH CURRENTLY ENDS IN EASTERN APPLE VALLEY. INCREASED TRAFFIC WILL REQUIRE MAJOR IMPROVEMENTS TO HWYS 18 AND 247 EAST TO AND THROUGH LUCERNE VALLEY.

CI 1.5 Do the following relative to SR-18:

A. Reclassify SR-18 within the plan area as a four-lane major highway.

B. Work with Caltrans to plan center lane/turn pockets on SR-18, between Custer Road, or High Road, on the west to Crystal Creek Road, in order to provide improved access to the commercial corridor.

C. Work with Caltrans to plan center lane/turn pockets on SR-247 from the current 4-way stop east to Camp Rock Road. THIS IS SPECIFIC TO LV – ABSOLUTELY REQUIRED – AND SEEMINGLY NOT INCLUDED IN THE NEW PLAN – NOT EVEN HINTED TO IN ALL THE JARGON WHICH DOESN’T RELATE TO SPECIFIC IMPROVEMENTS.

Action Statement C3. Continue efforts to designate California State Highway 247/Old Woman Springs Road declared a Scenic Highway. NOT JUST OW SPRINGS RD. – BUT ALSO THE BARSTOW ROAD SECTION – THE TOTAL OF HWY 247.

CI 1.7 Identify Furst Street, between Custer Road and SR-18 to the east, as a future paved street. HUH? PAVING **NO**T COMPLETED. NOT ALL OF IT COUNTY R/W.

CI 1.8 Classify Clark Road as a future two-lane collector between Buena Vista on the west to SR-18 on the east. BEING OUTSIDE THE COUNTY MAINTAINED SYSTEM IS NOT THE POINT. THIS WAS FOR A SPECIFIC LONG-TERM DESIGNATION AND PROJECT TO ALLEVIATE TRAFFIC ON HWY 18 THROUGH TOWN.

Policy Map TM 1C Roadway Network | North Desert Region, Victor Valley & Barstow. The proposed roadway designations are shown for Lucerne Valley based on a traffic model analysis conducted for the Countywide Plan. THIS MAP SEEMS TO ONLY INCLUDE THE MAJOR ROUTES. IS THERE A SEPARATE ONE FOR “ROADWAYS”?

(County notes): The following list provides an update of road conditions and improvements:

A. Foothill Road from Custer Avenue to Highway 18 – Only portions of this road are in the CMRS, still unpaved

B. Ladera Road from Highway 18 to Rabbit Springs Road – Only a small portion in a housing development adjacent to SH 18 is paved and in the CMRS, the rest is not in the CMRS and unpaved. No right-of-way exists for this road north of SH 247 (Old Woman Springs Road)

C. Midway Road from Highway 247 to Highway 18 – Unpaved and this portion is not in the CMRS

D. Buena Vista Road from Highway 18 to Buenos Aires Road - Unpaved and with only intermittent portions in the CMRS

E. Exeter Road from end of current pavement to Ivanhoe Road. - Unpaved and only a portion in the CMRS

F. Furst Street from Custer Avenue to Highway 18. – Unpaved, not in the CMRS, and would require substantial right-of-way acquisition. WE APPRECIATE THIS DETAILED RESPONSE TO THIS 2007 ROADS REQUEST – BUT THE SPECIFICS LOOK LIKE THEY GET LOST IN THE GENERIC TEXT. WE FULLY UNDERSTAND THAT THESE PROJECTS CAN’T BE DONE UNDER THEIR CURRENT STATUS. THE INTENT IS FOR OUR 10 YEAR PLANS TO LIST THESE PROJECTS THAT WILL BE REQUIRED FOR FUTURE GROWTH – SOME ARE NEEDED NOW. MAYBE THEY WILL BE LISTED – BUT WHERE?

CI 2.1 Use rights-of-way and easements not needed for road construction for bicycle, pedestrian and equestrian paths and require trails concurrent with road widening and improvements. THE FOCUS HERE IS MAINTAINING/SETTING-ASIDE EXISTING EASEMENTS – A SPECIFIC FUNCTION OF OUR OLD PLAN..

CI 2.2 Where feasible separate equestrian/pedestrian traffic from vehicular traffic on major roadways to protect the safety of trail users. OUR FOCUS WAS ALSO EQUESTRIAN TRAILS – WHICH NEED TO BE INCLUDED. WE ARE A RURAL COMMUNITY – NOT URBAN (AT LEAST YET). THERE IS TOO MUCH URBAN ORIENTATION (PLANNING 101) IN THIS NEW PLAN.

CI 2.3 Where safe traffic conditions permit, bicycle paths should be paved shoulders on paved County-maintained roads, with a network that provides sufficient circulation through the community. WHY NOT SPECIFY ‘PAVED SHOULDERS ON PAVED COUNTY ROADS” AS ONE OPTION FOR BIKE PATHS?

Priority shall be given to the development of a pedestrian bridge and/or widening of the SR-18 Bridge over the flood channel to facilitate safe pedestrian and bicycle crossings. THIS WAS A CRITICAL SPECIFIC PROJECT THAT NEEDS TO BE INCLUDED IN THE PLAN – AS IT WAS IN THE 2007 PLAN – NOT SOMETHING WE NEED TO PLAN ALL OVER AGAIN AND REGURGITATE VIA OUR SO-CALLED ‘ACTION’ PLAN.

Policy IU-1.1 Water supply. We require that new development be connected to a public water system or a County-approved well to ensure a clean and resilient supply of potable water, even during cases of prolonged drought. DOES THIS ONLY REFER TO DEVELOPMENT CONNECTED TO AN IE: A MUTAL WATER SYSTEM? WE ASSUME IT DOESN’T INCLUDE MORE REMOTE LOW DENSITY RESIDENTIAL DEVELOPMENT WITHIN RURAL LIVING’S 2.5 ACRES THAT CANNOT BE CONNECTED TO A CENTRALIZED WATER SYSTEM? AND WHAT CONSTITUTES ‘NEW DEVELOPMENT’ – NEW SUBDIVISIONS ONLY – OR ALSO A SINGLE FAMILY HOME?

Action Statement D3. Coordinate with County Flood Control to improve flood mitigation measures throughout the community and advocate for a stormwater retention basin to effectively capture stormwater runoff. NEED TO ADD RECHARGE BASINS TO PERCOLATE STATE WATER VIA THE MORONGO PIPELINE.

CO 1.3 Reduce disturbances to fragile desert soils as much as practicable in order to reduce fugitive dust. The County shall consider the following in the development of provisions to limit clearing.

A. Parcels of one acre or larger shall not be disturbed or cleared of native vegetation unless for the installation of building pads, driveways, landscaping, agriculture or other reasonable uses associated with the primary use of the land.

B. Fire abatement or local clean-up efforts shall be accomplished by mowing or means other than land scraping whenever possible to minimize fugitive dust and windblown sand. When de-brushing or blading is considered the most feasible alternative, additional methods shall be required for erosion control.

C. The County Office of Building and Safety may issue permits for further grading or clearance of vegetation subject to Land Use Review. THESE ARE SPECIFIC MEASURES – SOME ALREADY IN THE EXISTING DEV. CODE THAT WE NEED IN OUR PLAN. THE ‘CARRYOVER’ IS TOO GENERIC TO DO ANY GOOD.

CO 1.4 Support implementation of the Carbonate Habitat Management Strategy to the greatest extent practicable. THIS IS A SPECIFIC FOCUS FOR LUCERNE VALLEY AND NEEDS TO BE INCLUDED IN THE NEW PLAN.

Goal CO 2 Protect agricultural lands from the effects of non-agricultural development. THE CARRYOVER IS NOT SPECIFIC AND TOO MUSHY.

*The minimal parcel size in the Agriculture zone is 10 ac. Increasing the minimum lot size may be considered in the Development Code update that will follow adoption of the Countywide Plan.* WILL THIS BE A PUBLIC PROCESS?

Policy NR-3.3 Management of designated areas. We coordinate with public and nongovernmental agencies to sustainably manage and conserve land within or adjacent to locally-, state-, or federally-designated open space or resource conservation areas. NEED TO INCLUDE PROTECTING ‘PUBLIC ACCESS’ TO SAID LANDS THAT WE HAD IN OUR 2007 PLAN.

Policy NR-3.4 Land exchange. We coordinate with state and federal agencies to exchange publicly owned lands in order to provide additional areas for open space, recreation, and resource protection. We also request the right of first refusal on publicly owned lands made available for purchase to the public. DOES THIS MEAN THE COUNTY WANTS FIRST SHOT AT ANY SUCH PURCHASE? BLM’S PUBLIC PURPOSE ACT ALSO ALLOWS FOR TRANSFERS OF BLM PARCELS TO THE COUNTY FOR PARKS, FLOOD CONTROL, ETC. USES.

OS 1.3 Where possible, require that open space areas set aside within individual developments be contiguous to natural areas adjacent to the site. Isolated open space areas within development shall be specifically discouraged, but may be accepted if no adjacent open space areas are available. “CONTIGUOUS TO NATURAL AREAS” IS MORE SPECIFIC THAN THE CARRYOVER.

OS 1.5 The foothills of the San Bernardino Mountains are recognized as an important open space area that provides for wildlife movement and other important linkage values. Projects shall be designed to minimize impacts to wildlife movement in this area. FOCUS HERE IS ON COUNTY REQUIREMENTS FOR PROJECT DESIGN – NOT JUST ALL THE NICE WORDS ABOUT COORDINATION AND GENERIC COMPLIANCE IN THE NEW PLAN.

OS 3.2 Establish a plan for the development of a local trail system. The plan shall incorporate the following recommendations:

A. Designate separate trails for non-motorized trail use (pedestrian, bicycle, and equestrian trails) and motorized vehicle trails (off-road vehicles).

B. Provide trail heads that link regional trails, recreational areas, residential areas, neighborhood trail systems, schools and commercial nodes.

C. Explore methods for providing designated routes for off-highway vehicles to reach the BLM Johnson Valley OHV recreational area within Lucerne Valley. Discourage unauthorized motorized use of the trail network by posting signage, providing barriers where appropriate and enforcing violations. THESE ARE MORE SPECIFIC THAN THE GENERIC TEXT IN THE NEW PLAN – IMPORTANT TO KEEP IN OUR NEW PLAN. NOTE: THIS IS ANOTHER EXAMPLE AMONG MANY OF THIS NEW GENERAL PLAN/POLICY PLAN/ACTION PLANS/SEPARATE MAPS/ETC. ETC. BEING HITHER AND YON ALL OVER THE PLACE – DILUTING THE VERY CONCEPT OF “LOCAL PLANNING’ – WHAT REAL COMMUNITY PLANS ARE SUPPOSED TO BE.

OS 3.3 When an approved trails plan is developed require dedication of a pedestrian/bicycle/equestrian trail easement as a condition of approval for all new subdivisions of land if adjacent to the approved trail system. The trail easement shall allow unobstructed trail access and provide connections to off site trails. THIS IS SPECIFIC TO OUR AND OTHER COMMUNITIES AND AT THE VERY LEAST NEEDS TO BE IN THE DEV. CODE.

OS 3.4 Promote safe and attractive trail crossings at logical points on roads and where feasible pursue opportunities to separate equestrian, pedestrian and bicycle traffic from vehicular traffic particularly along SR-18 and SR-247. AGAIN – YOUR CARRYOVER IS FOCUSED ON PEDESTRIAN AND BIKE TRAILS – NOT ALSO EQUESTRIAN. THE POLICY PLAN HAS SOME NEAT STUFF IN IT RE: ‘RURAL COMMUNITIES AND LIFESTYLES – BUT WHEN YOU GET TO THE DETAILS – THIS THING IS MOSTLY URBAN ORIENTED.

OS 4.1 Strictly enforce Off-Road Vehicle laws. WE KNOW THE SHERIFF’S DEPT. CAN’T DEAL WITH THESE ISSUES ON AN ON-GOINB BASIS – BUT THE CARRYOVER OF THIS TO THE NEW PLAN IS SO GENERIC TO BE USELESS. ENFORCEMENT NEEDS TO BE MORE INCORPORATED INTO THE NEW PLAN.

Policy LU-4.1 Context-sensitive design in the Mountain/Desert regions. We require new development to employ site and building design techniques and use building materials that reflect the natural mountain or desert environment and preserve scenic resources.

Policy LU-4.5 Community identity. We require that new development be consistent with and reinforce the physical and historical character and identity of our unincorporated communities. AFTER WE FINALLY FOUND ABOUT THE DOLLAR GENERAL STORE FILING IN LUCERNE VALLEY - RICHARD SELBY HAD TO WORK DIRECTLY WITH THE APPLICANT TO SCALE DOWN THE BUILDING SIZE AND ALTER ITS FRONTAGE DESIGN TO MAKE IT LESS OBTRUSIVE (STILL AN EYE-SORE). PLUS WITH IT WE GOT A SIDEWALK TO NOWHERE. HOW CAN WE TRUST PLANNERS TO IMPLEMENT ALL THE WONDERFUL IDEALS IN OUR NEW ‘GENERIC’ PLAN?

ED 1.2 Promote the expansion of home based businesses within the plan area. This may be accomplished by the following:

A. Explore alternative provisions for home based businesses that are compatible with the rural nature of the plan area. This may allow for relief from certain requirements in the event that the business will provide an overall benefit or needed service to the community and that the use is compatible and/or adequately buffered from adjacent uses; and

B. Establish performance standards to minimize off-site impacts and nuisances.

C. Reevaluate the current permit process, development code standards and permit fees applicable to home-based businesses to ensure that the process is clear, reasonable and is not cost prohibitive. THIS IS EXTREMELY IMPORTANT FOR LUCERNE VALLEY AND OUR ECONOMICS. ACCORDING TO THE CHART - ‘WHERE IT WILL BE ADDRESSED’ JUST MENTIONS THE DEVELOPMENT CODE AND REGULATIONS. WHY CAN’T OUR PLAN FLAT OUT SAY IT LIKE OUR 2007 PLAN DID? WE SUPPOSE YOU JUST FIGURE WE WILL COME UP WITH IT IN OUR ‘ACTION PLAN’ – WHICH WE ALONE CAN’T AFFECT AND CAN’T RELY ON THE COUNTY TO IMPLEMENT. JUST MORE MEANINGLESS RESPONSES.

ED 1.4 Enhance the rail spur’s economic attributes by:

A. Encouraging industrial development along the rail spur in the southern portion of the community plan area and to ship local products by rail. B. Promoting land exchanges from the Bureau of Land Management to private ownership along the rail corridor through mechanisms to be established in the West Mojave Plan. AGAIN – A VERY FOCUSED GOAL AND POLICY FROM OUR 2007 PLAN – LOOKS LIKE IT’S GETTING SHINED ON VIA THE GENERIC RESPONSE REPEATED TIME AND TIME AGAIN.

Focus Statement B3. Advocate for limiting industrial development to only those areas adjacent to the existing railroad tracks in southeastern Lucerne Valley. WELL AND GOOD – BUT IT DOESN’T DEAL WITH THE ORIGINAL ISSUE OF THE COUNTY PARTICIPATING AND HELPING US WITH THIS LAND EXCHANGE. THE 2007 PLAN STIPULATED THAT INDUSTRIAL ZONING WOULD BE IN EFFECT UPON TRANSFER OF SAID BLM LANDS TO PRIVATE. DOES OUR NEW ‘PLAN’ STIPULATE TO THAT? IT JUST LOOKS LIKE IT REFERS TO ‘NODES’ SOMEWHERE.