



April 20, 2022

Jim Morrissey, Contract Planner
County of San Bernardino
Via email to Jim.Morrissey@lus.sbcounty.gov

Re: PROJ-2020-00191 Draft Initial Study/ Mitigated Negative Declaration Flamingo 640
Assessor Parcel Number: 0629-181-01

Dear Mr. Morrissey:

The Morongo Basin Conservation Association (MBCA) respectfully rejects the findings of the Draft Initial Study/ Mitigated Negative Declaration. We contend, given the potential for serious environmental impacts, this project warrants the preparation of a complete Environmental Impact Report (EIR).

The Draft Initial Study/ Mitigated Negative Declaration is wholly inadequate in addressing these and other issues:

1. **The potential adverse effect on wildlife and habitat fragmentation due to human presence in the proximity of wildlife corridors.** Given the transient nature of many desert animals an extended study would be required to provide an adequate analysis.
2. **The destruction on Joshua tree woodland habitat.** Joshua trees are currently a state protected species being considered for listing as Threatened under the California Endangered Species Act. Relocation of Joshua Trees almost always ends with the death of the transplanted tree. The large undisturbed creosote and Joshua Tree area is actively sequestering carbon. The underground caliche is storing carbon from the Ice Ages which will be released when disturbed. Any potential destruction of habitat should be carefully studied and weighed and evaluated with the ongoing, cumulative loss of habitat.
3. **Destruction of creosote clonal rings more than 4,000 years old on the proposed site.** Clonal rings are irreplaceable environmental treasures and deserve complete protection. The proposal to relocate creosotes by its very nature destroys the clonal rings. The root system of creosote bush consists of a shallow taproot and several 10-foot secondary roots. This extended root structure makes successful relocation difficult if not impossible.
4. **The creation of adverse noise sources within an otherwise quiet area.** The desert environment is exceedingly quiet; ambient noise levels of less than 20 dB are typical. Noise, particularly during nighttime hours, travels great distances in

the desert. Without a scientific analysis of onsite conditions any consideration of noise impacts for this project is incomplete.

5. **The impact of additional traffic on Highway 247 (SR 247).** SR-247 is already a dangerous highway. The additional traffic created by this project would potentially add to existing vehicle safety concerns, demand for public services (fire, ambulance, law enforcement etc.) and hasten current pavement deterioration. Given other development proposals within the Morongo Basin area, the cumulative impacts of this development must be evaluated.
6. **Significant impacts on scenic vistas.** After many years of study, documentation, and the application process SR 247, is currently pending a designation as a Scenic Highway by the State of California. Under California Department of Transportation rules while a highway is undergoing this process it is protected as if it is already a designated a State Scenic Route. A full study of the potential impact is required.
7. **The introduction of artificial light sources within a relatively dark area.** MBCA and others have recently worked with the County of San Bernardino to codify the "Dark Skies Ordinance." A lack of a detailed analysis of the potential light trespass of this project in the Mitigated Negative Declaration leaves addressing this concern incomplete.
8. **Air quality issues** related to, vehicle traffic, helicopter traffic, use of campfires, and the potential for wildfires initiated from the site are not fully addressed (or addressed at all) in the Mitigated Negative Declaration.
9. **The carbon footprint of energy use of tents** that are provided with heating and cooling should be addressed in the Environmental Impact Report.
10. **The potential for adverse effects on water wells within the area.** Due to over-pumping, groundwater levels have historically declined in this region. This has required the importation of State Water Project water via the Morongo Basin Pipeline. The proposed project may impinge upon natural drainage. An Environmental Impact Report is required to analyze the water demands and potential impacts of the proposed site on the health of the region's groundwater supplies and potential adverse effects on drainages and blue-line watercourses.
11. **Impacts on local affordable housing stocks.** Staff for the proposed site will require housing, probably local housing. There is significant documentation by MBCA and others of an acute affordable housing shortage in the region due to recent housing conversion to short term rentals. This issue should be addressed within an Environmental Impact Report.

In addition to the above, MBCA seriously questions the compatibility of this project with the stated goals of the Homestead Valley Community Action Guide.

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MBCA is a 501(c)3 non-profit, community based, all volunteer organization

A complete well-prepared Environmental Impact Report is required to fully address these significant concerns. (Note, there are additional issues not listed here that also deserve complete study) Short of preparation of this requested EIR, it is impossible to fully weigh the potential impacts to the region.

In conclusion, MBCA requests that the Mitigated Negative Declaration for PROJ-2020-00191 be rejected as inadequate to address the concerns above. We respectfully request that the applicant be instructed to perform a thorough and complete Environmental Impact Report.

Sincerely,

A handwritten signature in black ink that reads "Steve Bardwell". The signature is fluid and cursive, with a long horizontal stroke at the end.

Steve Bardwell, president
Morongo Basin Conservation Association
www.mbconservation.org