From: Stop The Wonder Inn Project
To: info@stopwonderinn.org
Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Tuesday, February 21, 2023 6:04:12 PM

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- Write your own comments and send them in yourself.See how here.

Name

Michael Burakoff

Email

burakoff@gmail.com

Address

1342 Calumet Avenue
Apt. 8
Los Angeles, CA
90026
US

I am a:

Visitor

Comment On Wonder Inn IS/MSD

To: Azhar Khan, Planner, County of San Bernardino (via email)

cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District
Steve Reyes, Field Representative 3rd District

Re: Wonder Inn Hotel/Resort (Twentynine Palms), PROJ-2021-00163

Thank you for the opportunity to comment on the Initial Study/Mitigated Negative Declaration ("IS/MND") for the proposed Wonder Inn Hotel/Resort ("Project").

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The following concerns, among others, have been either not addressed or not adequately addressed in the IS/MND:

- **Aesthetics:** Significant impacts on scenic vistas; numerous new sources of lighting cumulatively significantly impacting Dark Night Skies, a community designated valued asset.
- **Air Quality:** Significant increase in traffic-related air pollution, including PM10 and PM2.5 related to traffic on dirt roads, not fully analyzed.
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- **Energy:** Failure to adequately evaluate potential for overload of already strained power grid.
- **Geology/Soils:** Assessment needed of potential for damage from near-by active East and West Valley Faults and disturbance of trace faults extending from these Faults and the impact of soil erosion from the clearing of 24 acres of the native creosote galleta plant.
- **Greenhouse Gas Emissions:** No solar power included in project plans.

Hazards and Hazardous Materials: Inadequate evaluation of potential soil contamination with PCBs and mining waste products, and of potential for asbestos and lead in pre-1970 building.

- **Hydrology/Water Quality:** Unsupported claims of potability of water,
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- **Public Services:** Inadequate evaluation of increased burden on already insufficient services including Fire, Paramedic and Sheriff, with potential increased demand of roughly 20%.
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  and guest "exploration" of neighborhood, impacts to Gammel Road between
  Amboy Road and Highway 62, hazardous road condition created by rise on Amboy Road in front of property, and inadequate details on road modifications.

A complete well-prepared EIR 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.

Therefore, I request that the Mitigated Negative Declaration for PROJ-2021-00163 be rejected as inadequate to address the concerns above and that a thorough and complete, certified Environmental Impact Report per the requirements of CEQA to fully address significant adverse environmental impacts be performed.

Thank you.

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Name

Chris Newsom

Email

itkeepsmewarm@gmail.com

Address

3388 paradise view road
Yucca valley , CA
92284
US

I am a:

Resident

Comment On Wonder Inn IS/MSD

To: Azhar Khan, Planner, County of San Bernardino (via email)

cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District
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Name

Alicia Pike

Email

wanderinglily@gmail.com

Address

3227 Los Olivos Avenue
Twentynine Palms, CA
92277
US

I am a:

Resident

Comment On Wonder Inn IS/MSD

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Thank you.

Additional Comments

The Stop Wonder Inn Working Group has done a tremendous job compiling the major points that need to be evaluated by the county in regards to the proposal for the Wonder Inn. After doing plenty of my own thorough research (Check out this episode of a podcast I produced that covers the topic in depth. - https://omny.fm/shows/90-miles-from-needles-with-chris-clarke-and-alic-1/s2e4-protecting-wonder-valley) I found myself repeatedly wondering what these developers must be thinking. I have been a newbie to the desert, I know how that goes, maybe they honestly feel like there is "nothing out there", that the desert is just a "wasteland" waiting to be improved by man. The fact is, with climate change and mass extinctions happening around the globe and in our own backyard, we need to carefully consider where and how we develop the last intact ecosystem of the lower 48. That being said we cannot deny that an increase in tourism has come to the Morongo Basin, the need for housing of transients is necessary and there are plenty of already disturbed lots that do not have endangered species living on them that make sense. I advocate for considerate development, I have a background in design and architecture, with special interest in desert vernacular architecture, there is plenty of opportunity in the basin and I welcome thoughtful and considerate projects. When developers are looking for a parcel to build a place for tourists to stay they are naturally drawn to the beautiful areas in our basin. After talking with community members we all resoundingly feel that those wide open spaces in our precious desert must be protected and defended against reckless development. There are tortoises out there and they are reason enough to deny this project. What strikes me the most, is that I firmly believe this project would irreversibly change Wonder Valley, and not for the better, it is a wild place, not a resort destination. I have spoken with many residents and community members and we all agree this project needs to do a thorough EIR. I read the proposal and the Mitigated Negative Declaration they submitted and it is simply untrue that in all the categories they listed the proposal would have "Less Than Significant Impact - No Impact". We demand a full and thorough EIR.

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Name

Darcy Phillips

Email

dwpbelmont@aol.com

Address

73755 Siesta Drive
Twentynine Palms, CA
92277
US

I am a:

Resident

Comment On Wonder Inn IS/MSD

To: Azhar Khan, Planner, County of San Bernardino (via email)

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Name

Tara Terry

Email

sonesta7777@yahoo.com

Address

3696 Laver Court
Redding, CA
96002
US

I am a:

Visitor

Comment On Wonder Inn IS/MSD

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Michael Stoffel, Planning Commission 3rd District

Steve Reyes, Field Representative 3rd District

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I am a third generation native of the Coachella Valley. I visit the desert several times each year from Northern California to spend time with my family. I also have family and friends that reside in the Morongo Basin in Yucca Valley. They have young children that attend local public schools. Additionally, I am a supporter of the Mojave Desert Land Trust. Aside from the last 12 years I have lived my entire live in the Coachella Valley, and I am 46 years old.

I feel strongly that desert areas need to be protected from large developments to preserve and protect native reptiles, especially the Mojave desert tortoise. I have witnessed the vast growth that has occurred in the Coachella Valley throughout my life. While it's understandable that development is desirable for the economy, I believe there are certain restrictions and limits that should be in place. It is such a shame to see the vast open areas of the low-desert that have slowly disappeared over the years. The Coachella Valley has changed so much that at times it saddens me. It would be disappointing to see this type of over-development in the Morongo Basin. The high-desert has gained a lot of attention over the past few years and tourism has boomed. The area is inundated with people visiting on weekends. I was in Yucca Valley this past October and it was shocking the amount of tourists and cars in town and the line of cars waiting to enter Joshua Tree National Park. I suspect the majority of locals that live in the Morongo Basin aren't keen on this new project for a host of reasons.

Allowing this development in Wonder Valley will be detrimental to the Mojave desert tortoise along with other native reptiles, fauna, and flora. The desert tortoise digs its burrow and stays underground during winter brumation. In the warmer months the desert tortoise will stay in its burrow unless it's foraging for food. We must strive to protect its natural habitat. The desert tortoise has many obstacles to overcome before it reaches

adulthood and humans shouldn't be one of those obstacles. This development will displace desert tortoises from their native habitat. Another wonderful aspect of the high-desert the amazing Dark Night Sky. In the Coachella Valley it's quite difficult to find a place dark enough to properly view the night sky due to the overwhelming amount of light pollution. A resort of this magnitude will certainly create light pollution in Wonder Valley which is at the heart of the Dark Night Sky.

Please preserve the raw beauty and grandeur of the high desert. Further inspection needs to be conducted by way of an Environmental Impact Report. It is so deeply important for a project of this size. Future generations of all species will benefit from the careful consideration made now to preserve this beautiful desert area that is virtually untouched. Please do not allow development to proceed on the Wonder Valley Inn/Resort project.

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Name

Utaw Cuseo-White

Email

utaw.politics@gmail.com

Address

1170 Pacific Beach Dr.
San Diego , CA
92109
US

I am a:

Visitor

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Thank you.

Additional Comments

I've visited wonder valley many times to visit friends and enjoy the area's quiet and vastness. I don't see how a large resort would benefit the area and would cause a lot of environmental damage to the area. And this would be a start to much more development, traffic, and environmental disturbances. Please consider keeping development in the already developed areas.

Sent from Stop The Wonder Inn Project

From: Stop The Wonder Inn Project
To: info@stopwonderinn.org
Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Tuesday, February 21, 2023 1:55:52 PM

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- Write your own comments and send them in yourself.See how here.

Name

Sid Robertson

Email

sidisafox@gmail.com

Address

12710 Algonquin rd
Apple valley , CA
92308
US

I am a:

Resident

Comment On Wonder Inn IS/MSD

To: Azhar Khan, Planner, County of San Bernardino (via email)

cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District
Steve Reyes, Field Representative 3rd District

Re: Wonder Inn Hotel/Resort (Twentynine Palms), PROJ-2021-00163

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- **Energy:** Failure to adequately evaluate potential for overload of already strained power grid.
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of potential soil contamination with PCBs and mining waste products, and of potential for asbestos and lead in pre-1970 building.

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  potential pollution of groundwater supplies from contaminated soils, insufficient assessment of water table and projected water use, compliance with regulations on hauled water, well improvement permits, and Drought Emergency Proclamations; and appropriateness of transient non-community water system classification.

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Thank you.

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From: Stop The Wonder Inn Project
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Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Tuesday, February 21, 2023 1:04:23 PM

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- Write your own comments and send them in yourself.See how here.

Name

Allie Beazell

Email

allie@alliewrites.co

Address

72692 Two Mile Road
Twentynine Palms, CA
92277
US

I am a:

Resident

Comment On Wonder Inn IS/MSD

To: Azhar Khan, Planner, County of San Bernardino (via email)

cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District
Steve Reyes, Field Representative 3rd District

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From: Stop The Wonder Inn Project
To: info@stopwonderinn.org
Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Tuesday, February 21, 2023 12:39:07 PM

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- Write your own comments and send them in yourself.See how here.

Name

Diane Williamson

Email

dianececile@yahoo.com

Address

36990 Woodview Rd.
Anza, CA
92539
US

I am a:

Visitor

Comment On Wonder Inn IS/MSD

To: Azhar Khan, Planner, County of San Bernardino (via email)

cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District
Steve Reyes, Field Representative 3rd District

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Thank you.

Additional Comments

Like Wonder Valley, Anza has an electric cooperative dating from the 1950's. Back then, the co-op sold bright yard lights on tall poles in order to sell more electricity, to help the cooperative stay in business.
Times have changed and AEC no longer offers brite lites on tall poles to homeowners, due to many complaints from Anza residents, who want to enjoy dark skies.
I have neighbors on either side of me who do have tall yard lights and it's a big disappointment to me. If I want to enjoy the stars, I need to visit someplace like Wonder Valley.
As a former resident of Cadiz, CA I have visited the Joshua Tree area many times. I would gladly pay to stay in an Elder Hostel or any small establishment with limited lighting and responsible water use. I believe many International visitors share these values and would contribute to the local economy given the chance to care for the ecology of Wonder Valley.

Sent from Stop The Wonder Inn Project

From: Stop The Wonder Inn Project
To: info@stopwonderinn.org
Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Tuesday, February 21, 2023 12:29:39 PM

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- Write your own comments and send them in yourself.See how here.

Name

Michael Bizon Bizon

Email

mbizon3000@gmail.com

Address

5701 Monte Vista St
Los Angeles, CA
90042
US

I am a:

Resident

Comment On Wonder Inn IS/MSD

To: Azhar Khan, Planner, County of San Bernardino (via email)

cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District
Steve Reyes, Field Representative 3rd District

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Thank you.

Additional Comments

I live there half time and highly oppose this development

Sent from Stop The Wonder Inn Project

From: Stop The Wonder Inn Project
To: info@stopwonderinn.org
Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Tuesday, February 21, 2023 12:27:17 PM

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Name

Linda Wolter

Email

ukbirdie49@hotmail.com

Address

5450 Paisano Lane
Yucca Valley, CA
92284
US

I am a:

Resident

Comment On Wonder Inn IS/MSD

To: Azhar Khan, Planner, County of San Bernardino (via email)

cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District
Steve Reyes, Field Representative 3rd District

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From: Stop The Wonder Inn Project
To: info@stopwonderinn.org
Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Tuesday, February 21, 2023 12:02:45 PM

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Name

Olive Toscani

Email

wv.olive@gmail.com

Address

PO Box 665
78925 Indian Trail
Twentynine Palms, CA
92277
US

I am a:

Resident

Comment On Wonder Inn IS/MSD

To: Azhar Khan, Planner, County of San Bernardino (via email)

cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District
Steve Reyes, Field Representative 3rd District

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Thank you.

Additional Comments

The reason I live here and many others is because we appreciate the environment; the cleanish air, the starry nights and the peace and quiet, the tortoises and the community of like minded neighbors. We don't want our community turned into LA. You need to look into fully addressing all of the above concerns. Thank you.

Sent from Stop The Wonder Inn Project

From: Stop The Wonder Inn Project
To: info@stopwonderinn.org
Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Tuesday, February 21, 2023 11:53:56 AM

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Name

Bibiana Oseguera

Email

bibioseguera8@gmail.com

Address

15408 Halinor St
Hesperia, CA
92345
US

I am a:

Resident

Comment On Wonder Inn IS/MSD

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of potential soil contamination with PCBs and mining waste products, and of potential for asbestos and lead in pre-1970 building.

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Thank you.

Sent from Stop The Wonder Inn Project

From: Stop The Wonder Inn Project
To: info@stopwonderinn.org
Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Tuesday, February 21, 2023 11:49:35 AM

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- Write your own comments and send them in yourself.See how here.

Name

John Fisher

Email

hijuan@gmail.com

Address

152 Sunnyside Ave
Santa Cruz, CA
95062
US

I am a:

Visitor

Comment On Wonder Inn IS/MSD

To: Azhar Khan, Planner, County of San Bernardino (via email)

cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District
Steve Reyes, Field Representative 3rd District

Re: Wonder Inn Hotel/Resort (Twentynine Palms), PROJ-2021-00163

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Thank you.

Additional Comments

Hi, As an annual visitor to Wonder Valley I DO NOT feel Wonder Valley is the appropriate space for a hotel projects such as Wonder Inn Hotel/Resort. This hotel will change the character of the homestead desert environment.

- John Fisher - Santa Cruz, CA

Sent from Stop The Wonder Inn Project

From: Stop The Wonder Inn Project
To: info@stopwonderinn.org
Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Tuesday, February 21, 2023 10:46:42 AM

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Name

Ashley Carter

Email

ashleycarterstudio@gmail.com

Address

83878 Mesa drive
Wonder valley
29 palms , CA
92277
US

I am a:

Resident

Comment On Wonder Inn IS/MSD

To: Azhar Khan, Planner, County of San Bernardino (via email)

cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District
Steve Reyes, Field Representative 3rd District

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Thank you.

Additional Comments

Preposterous use of land and resources and downright illegal and deceptive approach in integrating into the “community”

Sent from Stop The Wonder Inn Project

From: Stop The Wonder Inn Project
To: info@stopwonderinn.org
Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Tuesday, February 21, 2023 9:43:25 AM

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Name

DAVID LAKOMSKI

Email

davidlakomski1@gmail.com

Address

3209 Ladoga Ave
Long Beach, CA
90808
US

I am a:

Visitor

Comment On Wonder Inn IS/MSD

To: Azhar Khan, Planner, County of San Bernardino (via email)

cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District
Steve Reyes, Field Representative 3rd District

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Thank you.

Additional Comments

I have been visiting the Morongo Basin for more than 40 years. The main reason is the solitude and unspoiled nature. This project will be a blight on a primarily untouched area. I strongly oppose it.

Sent from Stop The Wonder Inn Project

From: Stop The Wonder Inn Project
To: info@stopwonderinn.org
Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Tuesday, February 21, 2023 9:24:03 AM

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Name

Miri Hunter

Email

eizorakdanit@yahoo.com

Address

PO Box 1080
Joshua Tree, CA
92252
US

I am a:

Resident

Comment On Wonder Inn IS/MSD

To: Azhar Khan, Planner, County of San Bernardino (via email)

cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District
Steve Reyes, Field Representative 3rd District

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Thank you.

Additional Comments

I moved to Wonder Valley eight years ago. I moved for the desert beauty, the quiet and the opportunity to steward a small portion of the land, which included animals and vegetation. In addition, Wonder Valley offered me the opportunity to continue my work as a creative professional. I am a musician and playwright and burgeoning visual artist, as well as a Professor at Copper Mountain College. The rural quiet has been a driving force in my development as an artist and community member.

Human beings need not only food and water and shelter, but in a world such as we live in today, it is vital that we have the opportunity to nurture our spirits. This is what Wonder Valley offers to many of its residents. This new development threatens all of that. The increase in population threatens safety. We have no law enforcement, and no fire department and very few public services. The increase in recreational activities that this development has mentioned in their brochure (off roading, for example) promises to threaten the very core of the reasons that many of us chose to live here.

In addition, the development will increase health risks for those of us that are vulnerable. After experiencing major health concerns last year, I am hesitant, to say the least, to affirm any project, such as this, which will no doubt increase noise pollution and air pollution. Health of the community is important.

Where will the displaced wildlife go? Animals that have lived here for centuries, some endangered, are at risk of losing their homes.

Members of this community, some have nurtured the land for generations as well as newer members, are requesting a full environmental impact report. And with these additional comments I affirm the following:

….. I request that the Mitigated Negative Declaration for PROJ-2021-00163 be rejected as inadequate to address the concerns above and that a thorough and complete, certified Environmental Impact Report per the requirements of CEQA to fully address significant adverse environmental impacts be performed.

Sincerely,

Miri Hunter, Ph.D., Wonder Valley Resident

Sent from Stop The Wonder Inn Project

From: Stop The Wonder Inn Project
To: info@stopwonderinn.org
Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Tuesday, February 21, 2023 9:17:15 AM

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Name

Beth LaKomski

Email

bethyc1@gmail.com

Address

3209 Ladoga Ave
Long Beach, CA
90808
US

I am a:

Visitor

Comment On Wonder Inn IS/MSD

To: Azhar Khan, Planner, County of San Bernardino (via email)

cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District
Steve Reyes, Field Representative 3rd District

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From: Stop The Wonder Inn Project
To: info@stopwonderinn.org
Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Tuesday, February 21, 2023 8:59:37 AM

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Name

Lorna Vetters

Email

lornavetters@gmail.com

Address

1820 mulberry st
Chico, CA
95928
US

I am a:

Visitor

Comment On Wonder Inn IS/MSD

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cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District
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Therefore, I request that the Mitigated Negative Declaration for PROJ-2021-00163 be rejected as inadequate to address the concerns above and that a thorough and complete, certified Environmental Impact Report per the requirements of CEQA to fully address significant adverse environmental impacts be performed.

Thank you.

Sent from Stop The Wonder Inn Project

From: Stop The Wonder Inn Project
To: info@stopwonderinn.org
Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Tuesday, February 21, 2023 8:22:06 AM

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How to make this comment:

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- Write your own comments and send them in yourself.See how here.

Name

Jessica Graybill

Email

jagraybill@gmail.com

Address

56445 Anaconda Drive
Yucca Valley , CA
92284
US

I am a:

Resident

Comment On Wonder Inn IS/MSD

To: Azhar Khan, Planner, County of San Bernardino (via email)

cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District
Steve Reyes, Field Representative 3rd District

Re: Wonder Inn Hotel/Resort (Twentynine Palms), PROJ-2021-00163

Thank you for the opportunity to comment on the Initial Study/Mitigated Negative Declaration ("IS/MND") for the proposed Wonder Inn Hotel/Resort ("Project").

Review of the IS/MND reveals numerous deficiencies, indicating further study is needed to adequately evaluate potential significant impacts on the Wonder Valley community, environment, and resources. Substantial evidence demonstrates that impacts from the Project are individually and cumulatively significant. Accordingly, the County must prepare a complete, certified Environmental Impact Report (EIR) addressing these impacts, in full compliance with CEQA, before it can approve the Project.

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- **Greenhouse Gas Emissions:** No solar power included in project plans.
- **Hazards and Hazardous Materials:** Inadequate evaluation

of potential soil contamination with PCBs and mining waste products, and of potential for asbestos and lead in pre-1970 building.

- **Hydrology/Water Quality:** Unsupported claims of potability of water,
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Thank you.

Additional Comments

People come to this desert because of what it is now - vast, inspiring, and one of the last wild frontiers in California. Please stop ruining what makes this place so unique.

Sent from Stop The Wonder Inn Project

From: Stop The Wonder Inn Project
To: info@stopwonderinn.org
Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Tuesday, February 21, 2023 8:07:49 AM

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Name

Email

Address

I am a:

Visitor

Comment On Wonder Inn IS/MSD

To: Azhar Khan, Planner, County of San Bernardino (via email)

cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District
Steve Reyes, Field Representative 3rd District

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Thank you.

Additional Comments

Allowing this development would be a devastating mistake. Please reject the IS/MND for the proposed Wonder Inn!

Sent from Stop The Wonder Inn Project

From: Stop The Wonder Inn Project
To: info@stopwonderinn.org
Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Tuesday, February 21, 2023 7:50:02 AM

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- Write your own comments and send them in yourself.See how here.

Name

Sebastian Egurvide

Email

segurvide18@gmail.com

Address

130 west angeleno ave
San Gabriel , CA
91776
US

I am a:

Visitor

Comment On Wonder Inn IS/MSD

To: Azhar Khan, Planner, County of San Bernardino (via email)

cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District
Steve Reyes, Field Representative 3rd District

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Thank you.

Additional Comments

Keep the community natural, don’t destroy the eco system!!

Sent from Stop The Wonder Inn Project

From: Stop The Wonder Inn Project
To: info@stopwonderinn.org
Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Tuesday, February 21, 2023 7:36:40 AM

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- Write your own comments and send them in yourself.See how here.

Name

Irina Signayevsky

Email

irina.sign@gmail.com

Address

2806 6th
San Diego , CA
92103
US

I am a:

Visitor

Comment On Wonder Inn IS/MSD

To: Azhar Khan, Planner, County of San Bernardino (via email)

cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District
Steve Reyes, Field Representative 3rd District

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From: Stop The Wonder Inn Project
To: info@stopwonderinn.org
Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Tuesday, February 21, 2023 7:19:14 AM

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Name

Diana Rozendaal

Email

dianarozendaal@gmail.com

Address

7013 N Star Ave
Twentynine Palms, CA
92277
US

I am a:

Resident

Comment On Wonder Inn IS/MSD

To: Azhar Khan, Planner, County of San Bernardino (via email)

cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District
Steve Reyes, Field Representative 3rd District

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Thank you.

Additional Comments

keep wonder valley for the locals and tourists who enjoy and appreciate it for what it currently is. There are plenty of upscale places where tourists can go in Joshua Tree and Palm Springs. Please protect the water if wonder valley and deny the permit for this resort.

Sent from Stop The Wonder Inn Project

From: Stop The Wonder Inn Project
To: info@stopwonderinn.org
Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Tuesday, February 21, 2023 7:15:55 AM

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Name

Karen Tracy

Email

oktracy@mac.com

Address

62350 Cummins Way
Joshua Tree, CA
92252
US

I am a:

Resident

Comment On Wonder Inn IS/MSD

To: Azhar Khan, Planner, County of San Bernardino (via email)

cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District
Steve Reyes, Field Representative 3rd District

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Thank you.

Additional Comments

Mitigated Negative Declaration for PROJ-2021-00163 is completely inadequate for this proposal. Quiet and desert tortoise are my 2 concerns. I have lived here for 36 years. Military exercises to do not occur all the time. When they are not bombing, the silence speaks to the aware. It is deep and penetrating.

Desert tortoise are a threatened species. There are tortoise in the area of the "pink building." I know this for a fact. An EIR must be completed.

Sent from Stop The Wonder Inn Project

From: Stop The Wonder Inn Project
To: info@stopwonderinn.org
Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Tuesday, February 21, 2023 6:07:44 AM

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Name

Val Geyvandov

Email

vgeyvandov@gmail.com

Address

115 Lombard St #B
Philadelphia , PA
19147
US

I am a:

Visitor

Comment On Wonder Inn IS/MSD

To: Azhar Khan, Planner, County of San Bernardino (via email)

cc: Dawn Rowe, Supervisor 3rd District
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Thank you.

Sent from Stop The Wonder Inn Project

From: Stop The Wonder Inn Project
To: info@stopwonderinn.org
Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Tuesday, February 21, 2023 5:53:05 AM

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- Write your own comments and send them in yourself.See how here.

Name

Tanya Brassie

Email

tanya.brassie@gmail.com

Address

115 Lombard St
Unit B
Philadelphia, PA
19147
US

I am a:

Visitor

Comment On Wonder Inn IS/MSD

To: Azhar Khan, Planner, County of San Bernardino (via email)

cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District
Steve Reyes, Field Representative 3rd District

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Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Monday, February 20, 2023 11:50:53 PM

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Name

Bree Rosas

Email

vansbree@gmail.com

Address

37116 Lombardy
Barstow , CA
92321
US

I am a:

Visitor

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Name

Sarah Applebaum

Email

applebaumsarah@gmail.com

Address

2200 Adeline Street
Oakland, CA
94607
US

I am a:

Visitor

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cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District
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Subject: Comments on Wonder Inn IS/MND
Date: Monday, February 20, 2023 10:02:25 PM

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Name

Jennifer Mirich

Email

jennifermirich12@gmail.com

Address

2845 Idlewild Dr Apt 315
Reno, NV
89509
US

I am a:

Visitor

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Additional Comments

I am a concerned visitor of Wonder Valley and have close friends who live there. So many places in our remote desert regions are being bulldozed down for industry whether it's mining, ranching, cheap housing, or tourism. Ecosystems are at stake along with the beauty of the surroundings and the quiet life of the area. I live in the high desert of Northern Nevada, and I know the consequences of fast tourism and the capitalistic land grabbing ways that cause urban and suburban sprawling without adequate studies or imput from citizens in the area. This hotel resort will further anger residents, as well as visitors who come to witness the valley for the beauty of it's current state. Thank you

Sent from Stop The Wonder Inn Project

From: Stop The Wonder Inn Project
To: info@stopwonderinn.org
Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Monday, February 20, 2023 9:29:33 PM

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Name

Sabrina Fox

Email

sabrinastreavel@gmail.com

Address

8149 Rubidoux Ave.
Yucca Valley, CA
92284
US

I am a:

Resident

Comment On Wonder Inn IS/MSD

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Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
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Name

Ben Vaughn

Email

manymoods@earthlink.net

Address

83070 Mesa View Lane
Twentynine Palms, CA
92277
US

I am a:

Resident

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Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Monday, February 20, 2023 8:36:12 PM

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- Write your own comments and send them in yourself.See how here.

Name

Anita Carraher

Email

ascarraher@ucsb.edu

Address

79414 Ward Lane
Twentynine Palms , CA
92277
US

I am a:

Resident

Comment On Wonder Inn IS/MSD

To: Azhar Khan, Planner, County of San Bernardino (via email)

cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District
Steve Reyes, Field Representative 3rd District

Re: Wonder Inn Hotel/Resort (Twentynine Palms), PROJ-2021-00163

Thank you for the opportunity to comment on the Initial Study/Mitigated Negative Declaration ("IS/MND") for the proposed Wonder Inn Hotel/Resort ("Project").

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Thank you.

Additional Comments

In Section 8.2, "Operational Energy Demand" (pg 66 of Appendices) the writers determine that the project's operational energy demand creates an insignificant impact by comparing CalEEMod modeling estimates of the project's annual energy consumption to the annual consumption of the county of San Bernardino. It would be inaccurate to determine the project's impact only on this annual energy consumption measurement because the voltage and the coincident peak load created by the Inn also impact the area's electricity service. It's also inaccurate to compare it to the annual energy consumption of the county of San Bernadino - energy service is determined by districts set by the utility, not county.

In the 2020 San Bernardino Countywide Zero-Emission Bus Study Master Plan (https://www.gosbcta.com/wp-content/uploads/2020/08/SBCTA-ZEB-Final-Master-Plan_04.24.20.pdf) the San Bernardino County Transportation Authority SBCTA notes that the electrical utility Southern California Edison's Yucca Valley district, which includes this project location, has "one of the worst reliability metrics in the state of California", referring to the district's scoring in metrics of frequency and duration of power outages experienced by customers.

To recap, a sufficient analysis of the project's energy use would include dimensions such as the expected coincident peak load and voltage of the service request. This information has not been included thus far, and needs to be known in order to perform a sufficient analysis of the project's energy use. Finally, given that the project description also includes a back-up electrical generator, the likelihood and frequency of utilizing this generator - based on SCE's reliability and outage data - should be accounted for in calculating the propane use and GHG emissions from the inn in the respective sections of the environmental impact report.

Sent from Stop The Wonder Inn Project

From: Stop The Wonder Inn Project
To: info@stopwonderinn.org
Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Monday, February 20, 2023 8:32:29 PM

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Name

Hilary Dell

Email

dell.hilary@gmail.com

Address

9160 Cowan Rd
Twentynine Palms, CA
92277
US

I am a:

Resident

Comment On Wonder Inn IS/MSD

To: Azhar Khan, Planner, County of San Bernardino (via email)

cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District
Steve Reyes, Field Representative 3rd District

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From: Stop The Wonder Inn Project
To: info@stopwonderinn.org
Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Monday, February 20, 2023 8:17:22 PM

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Name

Heather Sprague

Email

litlwing13@gmail.com

Address

81667 Amboy Road
Twentynine Palms, CA
92277
US

I am a:

Resident

Comment On Wonder Inn IS/MSD

To: Azhar Khan, Planner, County of San Bernardino (via email)

cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District

Steve Reyes, Field Representative 3rd District

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Thank you.

Additional Comments

This company is flat out lying to their investors, to residents, and to the County about their plan.

https://www.modly.com/community/joshua-tree?fbclid=IwAR3M7tkXoUilFkrH5GXyBk7FI2mbh1pNpI1sverbCzpH8Nn2GazBdW5Xczg

In addition to the completely gratuitous and unsustainable “Inn”, now they are seeking to subdivide the 160 acres into 24, 5 acres parcels with equally unsustainable 4 bedroom, 3 bath villas, all with their own swimming pools and hot tubs at the outrageous 6 figure price range, way above the median home price for Wonder Valley, disenfranchising all those who already call Wonder Valley their home. These developers will destroy this area, go bankrupt or bankrupt others, and then walk away, AFTER they have destroyed it for everyone else. They lie when they say the development is in the heart of Joshua Tree. It is NOT. And the difference between Joshua Tree and Wonder Valley is like night and day when it comes to resources and severe environment. This place is not for everyone, but for those of us that love it, and call it home, we are sick to death of seeing developers who have no clue, or inclination except greed, trying to come in and devastate it.

The wildlife, the night sky, the land, the water table, the residents, everything that makes this place beautiful can be ruined in an instant with one bad decision to let something like this less than honest plan move forward. Please say NO, because once it is gone, it will be gone. There is no coming back from it.

Sent from Stop The Wonder Inn Project

From: Stop The Wonder Inn Project
To: info@stopwonderinn.org
Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Monday, February 20, 2023 8:04:53 PM

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Name

Domonique Mitchell

Email

dom_777@icloud.com

Address

820 Armory Ave
Barstow, CA
92311
US

I am a:

Visitor

Comment On Wonder Inn IS/MSD

To: Azhar Khan, Planner, County of San Bernardino (via email)

cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District
Steve Reyes, Field Representative 3rd District

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Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
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Name

Damon Huss

Email

damonhuss@gmail.com

Address

2600 Virginia Ave, Apt 17
Santa Monica , CA
90404
US

I am a:

Visitor

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To: Azhar Khan, Planner, County of San Bernardino (via email)

cc: Dawn Rowe, Supervisor 3rd District
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Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
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Name

Aimee Groener

Email

aimgroe@gmail.com

Address

2600 Virginia Ave Apt 17
Santa Monica, CA
90404
US

I am a:

Visitor

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Thank you.

Additional Comments

I think some development could benefit Wonder Valley but the Inn/resort is out of scale and net destructive in every category

Sent from Stop The Wonder Inn Project

From: Stop The Wonder Inn Project
To: info@stopwonderinn.org
Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
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Name

Patricia Grogan

Email

pgrogan754@gmail.com

Address

3082 Sunset Avenue
#15
Marina, CA
93933
US

I am a:

Visitor

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To: Azhar Khan, Planner, County of San Bernardino (via email)

cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District
Steve Reyes, Field Representative 3rd District

Re: Wonder Inn Hotel/Resort (Twentynine Palms), PROJ-2021-00163

Thank you for the opportunity to comment on the Initial Study/Mitigated Negative Declaration ("IS/MND") for the proposed Wonder Inn Hotel/Resort ("Project").

Review of the IS/MND reveals numerous deficiencies, indicating further study is needed to adequately evaluate potential significant impacts on the Wonder Valley community, environment, and resources. Substantial evidence demonstrates that impacts from the Project are individually and cumulatively significant. Accordingly, the County must prepare a complete, certified Environmental Impact Report (EIR) addressing these impacts, in full compliance with CEQA, before it can approve the Project.

The following concerns, among others, have been either not addressed or not adequately addressed in the IS/MND:

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- **Air Quality:** Significant increase in traffic-related air pollution, including PM10 and PM2.5 related to traffic on dirt roads, not fully analyzed.
- **Biological Resources:** Serious issues with extremely opposing data and the lack of a valid focused survey of the threatened desert tortoise.
- **Cultural Resources:** Failure to properly evaluate property and district historical resources.
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- **Geology/Soils:** Assessment needed of potential for damage from near-by active East and West Valley Faults and disturbance of trace faults extending from these Faults and the impact of soil erosion from the clearing of 24 acres of the native creosote galleta plant.
- **Greenhouse Gas Emissions:** No solar power included in project plans.

Hazards and Hazardous Materials: Inadequate evaluation of potential soil contamination with PCBs and mining waste products, and of potential for asbestos and lead in pre-1970 building.

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  potential pollution of groundwater supplies from contaminated soils, insufficient assessment of water table and projected water use, compliance with regulations on hauled water, well improvement permits, and Drought Emergency Proclamations; and appropriateness of transient non-community water system classification.
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- **Public Services:** Inadequate evaluation of increased burden on already insufficient services including Fire, Paramedic and Sheriff, with potential increased demand of roughly 20%.
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Thank you.

Sent from Stop The Wonder Inn Project

From: Stop The Wonder Inn Project
To: info@stopwonderinn.org
Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Monday, February 20, 2023 5:26:52 PM

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- Write your own comments and send them in yourself.See how here.

Name

Margaret Oostendorp

Email

mp@allwomencount.net

Address

PO Box 1192
Twentynine Palms, CA
02277
US

I am a:

Resident

Comment On Wonder Inn IS/MSD

To: Azhar Khan, Planner, County of San Bernardino (via email)

cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District
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Thank you.

Additional Comments

Monday, February 20, 2023

Dear Mr. Khan,

My name is Margaret Oostendorp, I am a resident of Wonder Valley and I want to express my deep opposition to the proposed Wonder Inn Project. I hope you and other decision makers will hear what residents like us have to say. We also invite all the decision makers to visit WV, to meet with us to ensure that you have a feeling, a sense of the community that your decision may very well change forever.

Although my husband and I had been frequent visitors to the area for more than two decades, we are new to WV, we relocated here two years ago due to my respiratory problems. I have compromised lungs which among other things led to me developing asthma as an adult. Living in the city, exposure to air and chemical pollution, especially to 2.5 particles was adversely impacting my health and I was getting worse as time went on. As you know 2.5 particles get into one's lungs and blood stream, and lung issues put pressure on the heart. I am one of the "sensitive" receptors, which is how us vulnerable residents are referred to in the report prepared on the WI project. And lungs issues feed into heart issues. Wonder Valley residents like me, will pay with ill health and likely a few years shaved off our lives if this project moves forward. For residents like me, a development such as this can shave a few years off our lives.

People with health issues move to WV like the homesteaders before us for the healing qualities of open clean air, open space, closeness to nature, lack of traffic noise and pollution. Much of what WI promises to offer is exactly what we left behind to move to this quiet rural community. We love the business that is embedded here, like the Palms. We love to gather at the historic Tower Homestead to share time with our neighbors.

We appreciate the County taking steps to limit the numbers of short-term rentals in our community. The last thing we need is a hotel in our pristine desert, a threat not only to the health and well-being of those who love WV as it is, but also threatens the endangered desert tortoise and all the critters who will be negatively impacted.

In reading the report prepared for the County by those hired by the owners, they say no desert tortoises were found on the property. This contradicts a report on the property a year earlier that did find tortoise, and more recently a baby tortoise was found close to the perimeter of the property. I was not at all surprised by this finding. As since living here we have seen five desert tortoises right on or close to our property. One can draw a straight line from our property to the Pink Building, the proposed project site. When I look out my back porch, I look directly at the Pink Building, it is only 1 mile away from us. I never believed for one moment that a number of desert tortoises can be found on or close to our property, but none on the proposed site. The desert tortoise has lived here for tens of thousands of years and are now facing extinction. Our community is where they still obviously live and breed and every effort must be made to protect them. This project is a threat to the desert tortoise.

While I am alarmed at vehicles that drive across pristine desert, not even on the roads, potentially smashing burrows of our precious tortoise population, destroying berms, driving across private property, I am told by old timers here that the situation used to be much worse. We are grateful annoying as these drivers are that it is better. But it is worrying that the WI project promises to make these off-road vehicles available to their guests, we know that will be in uptick in people driving across the desert with no thought or care to the damage they are causing. And we also know that in ATVs or in regular vehicles, curious WI guests will want to explore the neighborhood, and when they do, they will increase traffic on dirt roads. WV has 168 dirt roads. We are proud of the upkeep of our roads thanks to our wonderful WV grader. This is a cost to taxpayers here that we are glad to pay. But when our dirt roads are torn up by wear and tear and berms destroyed, it is those of us who live here who pay the highest price.

Furthermore, there is the issue of the increase in dust as a result of the WI project. Disturbing the desert crust causes more dust which includes polluting particles to be churned up. More traffic on dirt roads and across pristine desert also creates more dust. All of us who live here know the issues with and impact of dust. We are glad to have the creosote which helps to protect the land, while storing polluting carbon under the ground. While the owners of the WI Project claim to be only developing 25 acres, they have bought up surrounding property with further plans to develop it by building over two dozen luxury homes one home per five-acre lot. This will cause further disruption to the desert crust, mean clearance in the area of our precious creosote and further stress the desert tortoise population.

It will mean even more noise and traffic on top of what the 106-room hotel will bring. And noise travels far in the desert.

Many come to this community to live or as visitors also because of our dark skies. The project claims they will not add to light pollution, which is nonsense. It is ridiculous to claim as the project owners report states that only those of us that live 1,700 feet southwest of the project will potentially be impacted. We all know how far dust travels (all the way from the Sahara to some places) as well as noise.

Then there is the question of water. We realize that given the likely impact on our wells, that some might see dollar signs for us residents having to dig deeper wells, but not everything must be secondary to or sacrificed for the dollar. Water is life and must be protected. This project will negatively impact our water supply and it is unclear how they will make water safe for their guests.

It is insulting and shocking that residents are barely mentioned in the report. WV is an impoverished community that must be considered under CEQA Environmental Justice. Impacts on people's health and wellbeing, physical and mental, must be part of the consideration when projects like this are considered. How will those who have ill health, and/or elders in the community be protected from the impacts of this project? How will opening this rural community to commercial licensing change our community? No disrespect to our closest towns of Twentynine Palms, Joshua Tree and Yucca Valley, but we live in WV for a reason. If we want to go out to eat, we go to the Palms, to the historic 29 Palms Inn (is WI trying to appropriate the name of the 29 Palms Inn?), the other restaurants close by, or venture further to other of our surrounding towns. We love our local towns, but to visit and then come home to the calm of Wonder Valley.

We don't need to make WV into a town. It is an historic homestead community that should be preserved and protected. Visitors come to WV because of how it is now, to turn it into something else, the area will lose its cultural root and will be less attractive to visitors who now can stay in family-owned small business operations. They will be driven away, with a negative impact on our community and the County. The owners claim they want to bring the desert experience to their guests, but as I expressed in the meeting at our community center last year, how can you bring guests the desert experience when you are destroying the desert experience.

Many of us have left town and city life behind and all the amenities associated with them, spas (for those who could afford them), large pools, restaurants and music late into the night, movie theaters as well as problems associated with city living and chose to live in WV because we love it as it is. It is why we are drawn here. We are not interested in the growing income inequality that will result from owners/residents of luxury homes promised by WI owners, of taking away income from local residents who live here and who get some extra income from small scale rentals; WV is not an enclave for the wealthy. Development must not come at all costs but be integral and fits with the community; and not something that the community overwhelmingly opposes. We are not Rancho Mirage, nor do we want to be. The cumulative effect of the second largest hotel in the Morongo Valley placed here and not only that but additionally the 24 luxury homes built on the surrounding land, will forever change the nature of WV. This must not happen, and those of us opposed to this project and who live here are determined that must not.

At the very least a full EIR must be done before the Board of Supervisors vote on this project.

And finally returning to the question of the desert tortoise and its value to WV and to all of nature, please enjoy and consider the importance of the poem below. I am not claiming to know the poet or how she would feel about the WI project, but I wanted to share it with you as she in many ways captures the importance of tortoise:

Ancient Ones

By Grace S. McLaughlin

You —

who we name

tortoise —

Ancient ones,

you carry the weight of the world

on your backs.

From your burrows,
you watched
the mountains rise
and the seas recede,
the giant mammals disappear
and the condors soar less,
the two-legged ones arrive.

For 10,000 years
they named you sacred —
honored your presence,
your strength,
your persistence.

Then, the two-leggeds changed.
The new two-leggeds
no longer named you
sacred
but killed
for no reason
and did not honor
tortoise.

They brought new four-leggeds
in great numbers
who ate your food
and trampled your burrows and nests.

Machines came

that tore the land

crushed your families and homes.

From your burrows,

you watched.

Some two-leggeds grew in wisdom

And began to watch

And to care.

They learned about your lives

And protected your homes

They moved the four-leggeds

And kept machines away.

Once again,

they name you sacred

and honor

tortoise.

And you, ancient ones,

Who carry the weight of the world

on your backs

From your burrows,

You watch.

Thank you in advance for your consideration.

Margaret Oostendorp,

78225 Mesa Drive, Wonder Valley. PO Box 1192 Twentynine Palms, CA

92277

AG_ Env. Justice Fact Sheet -5-712[2].pdf

Sent from Stop The Wonder Inn Project

From: Stop The Wonder Inn Project
To: info@stopwonderinn.org
Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Monday, February 20, 2023 4:59:43 PM

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- Write your own comments and send them in yourself.See how here.

Name

Rudolph Mena

Email

menarudolphgabriel@gmail.com

Address

151 Vista Dr
Sugarloaf , CA
92386
US

I am a:

Resident

Comment On Wonder Inn IS/MSD

To: Azhar Khan, Planner, County of San Bernardino (via email)

cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District
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From: Stop The Wonder Inn Project
To: info@stopwonderinn.org
Cc: Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject: Comments on Wonder Inn IS/MND
Date: Monday, February 20, 2023 4:35:09 PM

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Name

Belem Sanchez

Email

belemss23@yahoo.com

Address

P. O. BOX 5624
Sugarloaf, CA
92386
US

I am a:

Visitor

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cc: Dawn Rowe, Supervisor 3rd District
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From:	Io"smoon
To:	Khan, Azhar; Supervisor Rowe; Planning Commission Comments
Subject:	Re: Wonder Inn Hotel/Resort (Twentynine Palms), PROJ-2021-00163
Date:	Monday, February 20, 2023 10:30:02 AM
Attachments:	Wonder Inn Study response doc..docx

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Mr Khan,
Please review the attached comments regarding the Wonder Inn project. There are many troubling omissions and inconsistencies in the initial study submitted for the project. In the attached document I have outlined some of the most prominent elements that seem well worth reviewing.
This project is worthy of a full Environmental Impact Review as I hope I have shown with this submission.
Thank You for your time and attention to this matter,
Adrian Field

REF.
'Initial Study/Mitigated Negative Declaration'
SB. PROJ-2021-00163.

Thank you for your attention to these matters.
The ease at which multiple significant and troubling factors have been glossed over in this document is astounding and very troubling. Additionally this is the largest project ever planned for the area to date. The Wonder Valley area is a valuable, historical, and irreplaceable desert biome, this fact alone should require a very thorough and informed review. I will list below some of my major concerns with this project that require review and further study. The issues enumerated in this document are shared concerns for all residents of Wonder Valley.

We are to gather from the applicant that there are absolutely no 'Potentially significant impacts' on the environment out of a total 75 possible 'issues' listed by the San Bernardino County checklist. This assertion is wildly inaccurate and the following examination of the 'Issues' or 'environmental factors potentially affected' together with the applicant's responses will show that there are multiple 'significant impacts' to the environment. It can be shown that many of the mitigations suggested are answers to the wrong questions, Dust pollution being a clear case of looking in the wrong place and finding nothing but more on that later. Aside from actual instances where data is misleading, incorrect or misrepresented; the project's size, scope and location is clearly wrong for this community. There are so many inconsistencies in data and responses, that the entire Initial study Document for SB. PROJ-2021-00163 is called into question. The following deeper review will demonstrate that a full environmental review (EIR.) is required.

Figure below on Page. 14 of the signed Initial Study show the environmental factors considered in the Study and the finding by San Bernardino County.

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below will be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☐ Biological Resources	☐ Cultural Resources	☐ Energy
☐ Geology/Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology/Water Quality	☐ Land Use/Planning	☐ Mineral Resources
☐ Noise	☐ Population/Housing	☐ Public Services
☐ Recreation	☐ Transportation	☐ Tribal Cultural Resources
☐ Utilities/Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

DETERMINATION: Based on this initial evaluation, the following finding is made:

☐	The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION shall be prepared.
☒	Although the proposed project could have a significant effect on the environment, there shall not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION shall be prepared.
☐	The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
☐	The proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
☐	Although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

The 'SAN BERNARDINO COUNTY
INITIAL STUDY/MITIGATED NEGATIVE DECLARATION
ENVIRONMENTAL CHECKLIST FORM' (excerpt on the previous page) prepared by the applicant (The Wonder Inn LLC.) for San Bernardino County.

In this checklist there are nineteen areas of concern or 'Environmental Factors potentially affected' by the Wonder Inn project. Pertaining to these nineteen areas of concern there are seventy-five related questions posed to the owner of the project by San Bernardino County. There is one of four possible answers to each of the seventy-five questions describing possible impacts on the environment. The categories of answers are:

1. Potentially Significant Impact
2. Less Than Significant Impact With Mitigation incorporated.
3. Less Than Significant
4. No Impact

The answers supplied by the applicant (The wonder Inn LLC.) to these questions, choosing between these four answers, break down in the following percentages for each category:

1) Potentially Significant Impact = 0 % (of answers given)
2) Less Than Significant Impact With Mitigation incorporated = 2.6 %
3) Less Than Significant = 74.6 %
4) No Impact = 22.6 %

According to this document out of all these areas of concern and related questions there are no areas of 'Potentially Significant Impact'? I will show that this is far from the case.

I will look at some of the more concerning of the nineteen major environmental factors potentially affected by this project: Aesthetics, Hydrology and Water quality, Noise, Air Quality, Hazardous Materials and Mandatory findings of significance.

- **Aesthetics**

Figure on page 14 of the Signed Initial Study.

This figure shows less than significant impact in answer to all questions

	Issues	*Potentially Significant Impact*	*Less than Significant with Mitigation Incorporated*	*Less than Significant*	*No Impact*
I.	***AESTHETICS*** – Except as provided in Public Resources Code Section 21099, would the project:				
a)	Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b)	Substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c)	In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d)	Create a new source of substantial light or glare, which will adversely affect day or nighttime views in the area?	☐	☐	☒	☐

- **Aesthetics** (continued).

a) *Would the project have a substantial adverse effect on a scenic vista?*

Before enumerating all the ways that this project will have a substantial adverse effect on a scenic vista, I will use an answer given by the respondent (The wonder Valley Inn LLC.) to a later question in this group. The respondent states:

The Project Site is located in a non-urbanized area within the East Desert Region of San Bernardino County. The site would be visible from Amboy Road, which is a County Scenic Route.

Therefore, the project is located on a scenic route according to the applicant.
The project's size, scope, and location make it inappropriate for our desert community (Wonder Valley). This answer will be repeated, as it is fundamental to all the issues explored in this review.
The respondent (The wonder Valley Inn LLC.) also describes the area in reply to this question as follows:

'The Project vicinity is primarily an unincorporated, undeveloped area, approximately 4.5 miles east of the City of Twentynine Palms and approximately 9 miles south of the Bullion Mountains. The Project Site is located within an area that is primarily vacant'

Well, that description says a lot about the respondent's view of the area and signals a lack of understanding of the desert biome, desert living, and our community.
The project's elements and buildings are located on a rise in the center of the valley. The project will be seen from 360 degrees around the Valley.

- **Aesthetics** (continued).

Some of the projects elements so far include:

- A Potable Water Storage water tank (dimensions **36 feet wide by 35 feet high)**
- **106** pre-manufactured modular structures **20ft high** for guest residences.
- A **210 vehicle** stall parking lot with aerial lighting.
- Astronomy pergola
- Administration– 6,310 sq. ft. pre-manufactured modular building
- A 3,300 SF multi-purpose tent for gatherings with a 1,700 SF building and restroom area.
- Wellness Area with arrival center (a building), shade structure treatment rooms, restroom, and a shade structure fitness room (total 3,985 SF).
- A **6,300 SF** swimming pool
- Propane Gas: 6,500 gallon propane tank and propane generator within fenced area.

This is an impossibly large and imposing project even in these early stages. The project is out of sync with its surroundings.
Additionally this project will serve as a gateway project for other developers and as such should be rigorously reviewed.
Therefore,

a) *Would the project have a substantial adverse effect on a scenic vista?*
The answer obviously should be that is has a 'Potentially Significant Impact'.

- **Aesthetics** (continued).

b) ***Would the project substantially damage scenic resources, including but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?***

There is a potentially historically important building located on the grounds of the project. This building was funded and erected by the local residents to supply electric power to the community.
The appropriate category answer to this question should be a, 'Potentially Significant Impact'.

c) ***Would the project in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point).***

(listed on Page. 3 of the study 'Amenities') Some of the previously listed elements of the project are:

1. A Potable Water Storage water tank (dimensions 36 feet wide by 35 feet high)
2. 106 pre-manufactured modular structures 20ft high for guest residences.
3. 210 vehicle stall parking lot with aerial lighting.
4. Astronomy pergola
5. Administration– 6,310 sq. ft. pre-manufactured modular building
6. A 3,300 SF multi-purpose tent for gatherings with a 1,700 SF building and restroom area.
7. Wellness Area with arrival center (a building), shade structure treatment rooms, restroom, and a shade structure fitness room (total 3,985 SF).
8. A **6,300 SF** swimming pool
9. Propane Gas: 6,500 gallon propane tank and propane generator within fenced area.

- **Aesthetics** (continued).

  The project contains a collection of structures and elements that will dominate the skyline.
  The view shed will be impacted from side to side and end-to-end of Wonder Valley. The project location in the middle of the valley ensures that it will be seen from all angles.
  In early promotional literature, a 30ft tall sculpture is placed on the grounds.
  The established building type and size for this area consists of small, (early pioneer) 'Jackrabbit' cabins and single story, ranch style houses. The size of the Wonder Inn project is out of proportion with the character and requirements of its surroundings. It should also be noted that the current proposal concerns only perhaps a quarter of the entire land owned by Wonder Inn LLC. at this location. I am sure much more infrastructure is planned for the Wonder Inn project. In short, the Wonder Inn project initial study could be a segmentation of possible future projects at this site.
  Clearly, this project's size, scope, and location make it inappropriate for this desert community (Wonder Valley).

The answer then to the question ***Would the project in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a*** *publicly accessible vantage point).* Surely should be a, 'Potentially Significant impact

- **Aesthetics** (continued).

d) ***Would the project*** ***Create a new source of substantial light or glare, which will adversely affect day or nighttime views in the area?***

Inevitably, guests and facility insurance requirements will require a plethora of different lighting throughout this oversize design. Examples of elements within the design that will require significant lighting are:

- Car parking, (pole lights)
- Many walkways throughout the project,
- Accommodation lighting,
- Landscape lighting, (up-lighting?)
- Proposed business and entertainment events

Lighting may be mitigated to some extent as noted in the 'substantiation' but it cannot be mitigated enough to prevent significant light 'bloom' from a project of this scope in a desert environment. The Wonder Inn project will create an unavoidable light 'bloom' that will significantly negatively impact the dark skies for residents and visitors to the area. The project's size, scope and location make it inappropriate for this desert community especially it's treasured night sky. Much tougher standards should apply.

d) Would the project ***Create a new source of substantial light or glare, which will adversely affect day or nighttime views in the area?***

Clearly the answer should be, a 'Potentially Significant Impact.'

- **Hydrology/Water Quality**

Figure from Page 56 (Initial study)
Figure shows 'Less than Significant Impact' in all categories?

	Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
X.	**HYDROLOGY AND WATER QUALITY -** Would the project:				
a)	Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?	☐	☐	☒	☐
b)	Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c)	Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
	i. result in substantial erosion or siltation on- or off-site;	☐	☐	☒	☐
	ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on or offsite;	☐	☐	☒	☐
	iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of runoff; or	☐	☐	☒	☐
	iv. impede or redirect flood flows?	☐	☐	☒	☐
d)	In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e)	Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

[9] San Bernardino Countywide Policy Plan Draft EIR. Hazards and Hazardous Materials. Figure 5.8-6 "Fire Severity and Growth Areas in the East Desert Regions."

Hydrology/Water Quality (continued).

- **Hydrology/Water Quality** (continued)

In answer to the second question in this segment:

b) Would the project Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

There has been no significant study of the water table in this area for decades. The fact is that without a thorough study of the aquifer supplying Wonder Valley's wells, nothing can be assumed. Old rumors based on studies perhaps done before any significant habitation in the area are not proof enough to substantiate a major draw (or future draws) from the aquifer without a detailed study.. See Page 59 of the Signed Initial Study, wherein the applicant acknowledges

'Little work has been done on the hydrogeology of the Dale Basin, as it is not a host to significant population, nor does it contain many wells.'

Where is the data? What is the hydrology of the Dale basin? What is its capacity and actual number of the well owners in Wonder Valley? This data nowhere to be seen in this initial study and is critically important in drought stricken California. A study of the water table must be undertaken before this project is initiated.

b) Would the project Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

The answer to this question is; yes, there is definitely a 'Potentially Significant Impact.'

Hydrology/water quality (continued).

Total occupancy of The Wonder Inn project (not including unregistered guests attending functions) is 282 people (PGE. 3 Wonder Inn Hydrology report)
The graphic below is the estimated water demand for the project listed on Page. 58 of the Initial study. I believe it considers a 75% occupancy.

Table 7 – Estimated Water Demand

Hotel Component	Average Annual Demand (gallons per year)	Average Daily Demand (gallons per day)
Guest Rooms	2,177,000	6,000
Public Restrooms	66,100	200
Guest Ice and Laundry	1,104,000	3,000
Commercial Kitchen	2,844,000	7,800
Dishwashing	145,000	400
Pool & Spa	435,700	1,200
Total (gallons per year)	**6,771,800**	
Total Average Day Demand (ADD) (gpd)		**18,600**
Total Max Day Demand (ADD x 2) (gpd)		**37,200**

- **Hydrology/water quality** (continued).

1. Well water in this location is not potable.
See Appendix F-2 Page 735
2.4 Proposed Water System Operation and Facilities
States
As the water has high total dissolved solids (TDS), a reverse osmosis system may also be installed
in the future.

This statement by the applicant and 'possible' plan should be considered as part of the current study. TDS. Is not the only worrying contaminant in the well water supply as indicated in a study prepared for the applicant and listed in the Appendices (more on this later).
If a reverse osmosis system is required (and it will be required!), the water draw (from well #2) will rise exponentially and numbers given (in table-7 Estimated Water Demand Pge.58 of the initial study) will be incredibly low and totally inaccurate. This refutes the listed answer of **' Less than significant impact '**

2. (NB) The draw from (Well #1) is not included in Table 7 'Estimated Water Demand'. Water from this well is to be used for the large-scale landscape planting for the project. This additional water use should be added to the total draw for an accurate picture of projected water use. Water used for cleaning facility elements such as pathways decks et. are also unaccounted for in this plan

- **Hydrology/water quality** (continued).

Reviewing 'item b).' on Page 80 'The project should':

b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?

The response by the applicant:

The analysis in Appendix F-2 identified that the Proposed Project is estimated to utilize 20.7 acre feet annually (approximately 6.7 million gallons).

In fact

Page. 58 of the Initial study Table 7 'Estimated water demand' lists only the minimum estimated demand. The study should also list the maximum water demand and that is **41.669297138** acre. Ft. given in the respondent's own study not 20.7. As noted previously there are discrepancies in computing the 'Water Demand', which make even this number low compared to actual projected use. This refutes the listed answer of **' Less than significant impact '**

The project should receive a 'Potentially Significant Impact' for this question.

Additionally in answer to these Hydrology and water quality questions the applicant (The Wonder Inn LLC.) states that the project should be termed as a TNC. (Transient Non-Community) supply system for water system description. This description allows the project to 'sidestep' oversight that is more rigorous.

Hydrology/water quality (continued).

Here is how the applicant substantiates their claim to designate TNC.. It does not hold up to scrutiny or the facts.

'The Project Site has two existing wells, one of which will serve as the source of domestic, irrigation, and fire suppression water for the Proposed Project. Because the well will be providing water for human consumption to at least 15 service connections or to at least 25 people for at least 60 days per year, the water system proposed for the Project meets the classification as a public water system, more specifically, a 'transient non-community' water system (TNC), which limits the number of employees to less than 25 and limiting guest stays to less than 60 days.'

I submit that the project does not meet the criteria for 'Transient non-community' (TNC) system but rather meets the standards for a Non-community non-transient Water System as explained below. The California Water Boards describes *'places like schools and businesses that provide their own water'* should be termed a **'Non Community Non Transient Water Systems'.**

See here:
https://www.waterboards.ca.gov/drinking_water/certlic/drinkingwater/documents/waterpartnerships/what_is_a_public_water_sys.pdf

	Community Water Systems are city, county, regulated utilities, regional water systems and even small water companies and districts where people live.
	Non-community non-transient water systems are places like schools and businesses that provide their own water. The same people have a regular opportunity to consume the water, but they do not reside there.
	Transient water systems include entities like rural gas stations, restaurants and State and National parks that provide their own potable water source. Most people that consume the water neither reside nor regularly spend time there.

- **Hydrology/water quality** (continued).

  Another response (by The Wonder Inn LLC.) to the grouping of questions in this category states the following:
  Response (by The Wonder Inn LLC.) Page 59 of the Initial Study. Doc.

The analysis in Appendix F-2 identified that the Proposed Project is estimated to utilize 20.7 acre feet annually (approximately 6.7 million gallons) (NB) This is only the lowest estimated use figure and is not proven. *Therefore, the Proposed*
Project is anticipated to consume approximately 14.29 acre feet less annually than the jojoba farm had previously for decades. Additionally, the hotel would be equipped with modern low-flow fixtures, and the Proposed Project includes a grey water reclamation system that would return approximately 65 percent of the hotel's consumption to the aquifer. Therefore, the Project would not substantially decrease groundwater supplies

The amount of water drawn by any previous owners is conjecture and in no way verifies or validates any current proposed water use. This is a totally inadequate response. The previous sections regarding the poorly classified designation of 'Transient non-community use' together the issues around confusing water use calculations and non-potable water cannot justify the listed answer of **' Less than significant impact '** to all these concerns.
'Potentially Significant Impact' is the correct answer

- **Hydrology/water quality** (continued).

'The Wonder Inn Conditional Use Permit PROJ-2021-00163
Initial Study/Mitigated Negative Declaration'
Pages 741, 742, 785 and 786.

A short review of the submitted water testing shows irregularities, missing / confused data and some alarmingly high levels of contaminants such as:

Arsenic
Chromium
Chromium Hexavalent
Fluoride
Nitrate
Boron
Zinc
Vanadium
Sulfate
Very High Conductance levels

More thorough and updated water testing is required for this project.
How can a project of this proportion and significance move forward without an in depth review of the impact on the available water source relied upon by so many residents. This project alone will draw more water than anyone involved with the project (knowingly or not) will admit to. The quality of the water in the Wonder Valley area is not potable therefore; significant water treatment will be required.

- **Noise**

	Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
XIII.	**NOISE** - Would the project result in:				
a)	Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐

[11] San Bernardino Countywide Policy Plan Draft EIR. Figure 5.11-2 Mineral Resource Zones 2 & 3 in the Eastern Half of County.

b)	Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☐	☒
c)	For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

- **Noise** (continued)

b) Would the project result in excessive ground borne vibration or ground born noise levels?

We have to look beyond the construction phase of the project and look at the possible impacts beyond the construction event.
A fact known to all residents in desert areas, noise travels much further than you would think. Tires on a gravel road can be heard a mile away or more! The effect is doubled at night when the air is cooler and thinner. Loud music and base lines can be heard for literally miles at night. Cars, car alarms, service vehicles, guests, music venues, and events will have an enormous effect on the quiet of our desert biome. The effect of noise on wildlife and residents will be devastating.
Desert communities treasure the quiet of their surroundings perhaps more than many other elements. As with light, water and dust; noise presents a clear call for more in depth study.
The project's size, scope, and location make it inappropriate for our desert community (Wonder Valley).
A full EIR. Is required.

- **Air Quality**

Page 22 Initial Study Doc.

	Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
III.	**AIR QUALITY** - Where available, the significance criteria established by the applicable air quality management district or air pollution control district might be relied upon to make the following determinations. Would the project:				
a)	Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b)	Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c)	Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d)	Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	☐	☐	☒	☐

Page 52 of the Initial study doc.

Hazards and Hazardous materials

	Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
IX.	**HAZARDS AND HAZARDOUS MATERIALS** – Would the project:				
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐

- **Air Quality &**

Hazards and Hazardous materials (continued)
Pages 22 & 52 Initial Study Doc.

Would the project
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?
d) Result in other emissions adversely affecting a substantial number of people?

The applicant in their 'substantiation' for the answer to these questions Page 22. States:

1) According to the MDAQMD, a project is non-conforming if it conflicts with or delays implementation of any applicable attainment or maintenance plan.

Further

An example of a non-conforming project would be one that increases the gross number of dwelling units, increases the number of trips, and/or increases the overall vehicle miles traveled in an affected area.

On Page 23 the applicant also states:

2) Operational Conditions
For purposes of analyzing mobile source emissions, per the traffic assessment, the Project would generate approximately ***604 trips per day***

- **Air Quality &**

Hazards and Hazardous materials (continued)

Given the applicants substantiations listed above (1, 2,), in their own words the applicants have cited conditions that have a 'Potentially Significant Impact' on the area and the surrounding community when the following is taken into consideration.

In the applicant's 'Substantiation' much is made of actual construction and work site emissions which may be mitigated to some extent and may or may not produce concerning levels of pollution/contaminants (See Water Quality Page 17).
Nothing has been produced that shows what the impact of this increased vehicle use (trips) would have on the surrounding area.

Wonder Valley was historically designated by San Bernardino County as a DUST **CONTROL ZONE****. These signs have been 'lost' in recent times. These Dust Control signs pointed to a significant fact about the area (also known by residents of Wonder Valley). Wonder Valley is not just a valley but also a dry lake bed. The floor of the valley consists of minerals and contaminants (including PM 2.5) that once airborne create a significant hazard to anyone in the area. This hazard was noted on the 'Dust Control Area' signs erected by SB. County. *(Insert here actual ordinance number and verbiage)* Historically, designated 5-acre lots of land limited soil disturbance and kept traffic to a minimum.

** **'Dust Control Zone' ordinance # 810.0410**

- **Air Quality &**

Hazards and Hazardous materials (continued)

The Wonder Inn project (in early literature) encouraged prospective guests to bring recreational vehicles etc. to the Inn for use in the area and its surrounds.

Regardless of possible recreational vehicle use, the amount of actual vehicles and guests projected will have significant effects on the local environment. The majority of roads in the area are unpaved 'residential access' roads. These unpaved roads are the source of significant PM 2.5 airborne contaminants (remember the dry lake bed). The surrounding unpaved roads will be subject to exponential increases in traffic from inquisitive and adventurous guests of the inn unaware of the dangers and how to navigate these byways.

Vehicles traveling on these roads necessarily 'kick up' fine particulate matter (including PM. 2.5) into the environment. A significant increase in traffic will have a very deleterious effect on the community. A baseline study is required to fully understand the impact of the additional dust/contaminant pollution on local residents and travelers to the area. All this is beyond the mitigation attempts proposed for actual construction at the site but pose a significant and very real danger, affecting residents. The dangers outlined here will be as a direct result of the proposed Wonder Inn project.

So the answer to Air quality Page 22

b) Would the project- Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?

and

d) Would the project-Result in other emissions adversely affecting a substantial number of people?

The answer given by the applicant to b) and c) (IX Air Quality) was **'Less than Significant'** when the correct answer should be a 'Potentially Significant Impact'.

- **WILDLIFE CONSIDERATIONS AND FACTS (Wonder Valley)**

  Wildlife in Wonder Valley will be considerably impacted by the increase in traffic, noise, dust and light pollution. The increased number of vehicles (605 additional trips daily to and from the Wonder Inn project) will use not only the two main paved access arteries of Amboy Road and Route 62 but also all the surrounding unpaved roads in the area. These unpaved roads are significant crossing points, nesting places and thoroughfares for varieties of snakes, desert tortoises, burrowing owls, desert tarantulas, many types of lizard, coyotes, bobcats, and mountain lions. All these species and more are found in and around the location of the Wonder Inn site. Several migratory birds use Wonder Valley as their flyway between destinations, as do many species of butterfly.
  To say that significant light pollution, noise and increased activity on roads will not disrupt the migratory, resident and protected wildlife is clearly willful ignorance of the facts.
  I have to say at this point the documentation of the wildlife (or lack of it) presented by the Wonder in proponents and their Biologist is scant, borrowed from other sources, and
  unbelievably dismissive of the rich diversity of wildlife in Wonder Valley. A full 'Environmental Impact Review' is necessary.

  In conclusion, the Wonder Inn project is incompatible with everything that residents and visitors to the area desire. Those elements are: abundant and curious flora and fauna, dark skies, wild lands, quiet, solitude and safety from avoidable harm.
  Thank you for your time and attention to these critical factors,

Adrian Field (resident Wonder Valley)

From:	Russ K
To:	Planning Commission Comments
Subject:	ATTN: Michael Stoffel
Date:	Monday, February 20, 2023 1:42:10 PM
Attachments:	MStoffelCommentLetter.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hello Mr. Stoffel,
Attached are my comments in opposition of the proposed Wonder Inn, PROJ-2021-00163.
Thank you for your time in reviewing my comments,
Russell Kohn

Russell Kohn
71212 El Paseo Drive
Twentynine Palms, CA 92277

February 17, 2023

Michael Stoffel
Planning Commissioner – 3rd District
385 N. Arrowhead Ave.
1st Floor
San Bernardino, CA 92415
planningcommissioncomments@lus.sbcounty.gov

Dear Mr. Stoffel,

Firstly, I am writing you today within the COMMENT period in relation to the proposed Wonder Inn Hotel/Resort, San Bernardino County Initial Study/Mitigated Negative Declaration Environmental Checklist Form, PROJ-2021-00163. There are many reasons why I am personally OPPOSED to this project, but when I began to read through the Initial Study and the County's documents, I noticed some of my personal reasons were also reasons given in the San Bernardino Countywide Plan, Policy Plan, and Wonder Valley Community Action Guide why this proposed development should also be OPPOSED by the County.

But before I show you the similarities between my personal views and the County's docs, I wanted to read through and compare the "meat" of what's at stake, by carefully reading through the Initial Study in comparison to the requirements of CEQA and related County Plans.

To be upfront and transparent, I'd like to let you know that I was Registered Deputy Building Inspector, or Deputy Building Inspector for 30 years before taking an early retirement and moving to Twentynine Palms. I was licensed and certified for the inspection of Structural Steel Welding and High Strength Bolting, Reinforced Concrete and Drilled-In Anchors, by the I.C.C., AWS-CWI, L.A. City, among other jurisdictions and licensing authorities. I've worked as Lead Inspector on numerous OSHPD and DSA projects, worked on high profile projects (Getty Center, Disney's California Adventure, and more), one of the few who were qualified to inspect earthquake repair work after the Northridge earthquake, and finished my inspection career as Lead Inspector for the Wilshire Grand in downtown Los Angeles, the tallest building west of the Mississippi.

The reason why I'm including my inspection career in relation to this proposed project is because each jurisdiction has its own codes, standards, Policy Plan, governing

documents, and it was my job to incorporate the jurisdiction's codes and standards with any other applicable codes such as the CBC, AWS, CSI, OSHPD, DSA, Research Reports, etc.

Whenever reading through the various codes and reference materials, a few words carried weight that couldn't be refuted by a contractor or subcontractor, and those words were "required," "shall" or "shall be," "absolute," "must." Anytime there was a conflict between plans or drawings or codes, these words held firm, and there could be no argument as to their meaning or interpretation. And each time I've had to bring one of these words as part of a code or standard to the attention of a contractor, subcontractor, owner's representative, or Building Official, the word *always* held up. No argument could prevent its use, and no legal reply could overturn this language. All parties presented with this absolute verbiage would back up these terms, for they knew to challenge "*required"* in court would be a losing cause.

And I do want to stress that much of what I will bring up in this comment letter has been written by the County. I will be referring to the Countywide Plan, Land Use Elements, the County Policy Plan and the Wonder Valley Community Action Guide, as well as other referenced documents.

-Is it you, as Planning Commissioner, who is supposed to adhere to and follow the guidelines of the Land Use Elements and County Policy Plan when approving new development?

I would hope the answer to this question is "yes." ***-If "no" then why don't you follow these County guidelines?***

Many comments have already been submitted to the County, and many have dealt with the details of each CEQA category, including the Stop Wonder Inn working group. This personal comment letter will only deal with some of the CEQA categories, from which I will ask:

-Why is the proposed Wonder Inn even being considered for construction when the rural community of Wonder Valley does NOT have the resources for this project?

From the County Policy Plan, Policy LU-1.2 Infill development:

"We prefer new development to take place on existing vacant and underutilized lots where public services and infrastructure are available."

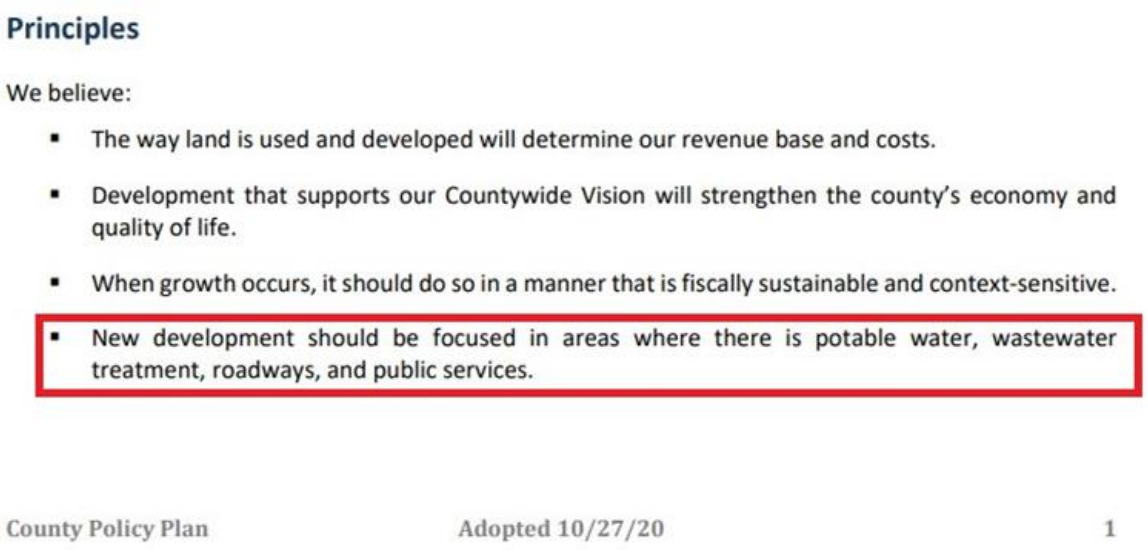
Comment: **NO** infrastructure and **NO** public services are available in Wonder Valley.

-Why would this project be considered for approval when there are NO public services and NO infrastructure available in Wonder Valley?

-Wouldn't the County want new development to have infrastructure available?

-How could a hotel/resort of this size be built without public services and infrastructure available?

In the Countywide Policy Plan, Land Use Element, Principles states:



Principles

We believe:

- The way land is used and developed will determine our revenue base and costs.
- Development that supports our Countywide Vision will strengthen the county's economy and quality of life.
- When growth occurs, it should do so in a manner that is fiscally sustainable and context-sensitive.
- New development should be focused in areas where there is potable water, wastewater treatment, roadways, and public services.

County Policy Plan Adopted 10/27/20 1

Comment: Wonder Valley, in its entirety, has NO potable water, NO septic systems, NO wastewater treatment, mostly dirt and INNSUFFICIANT roadways, and NO public services.

-Why is Wonder Valley even considered for this proposed large-scale project when there is NO potable water, NO septic systems, NO wastewater treatment, and NO public services.

-Shouldn't Land Use Services have asked the developers for alternative sites due to the lack of infrastructure and public services available in Wonder Valley?

Comment: The developers plan to use the existing wells on site to provide water for the proposed project. All water from the aquifers in Wonder Valley is NOT potable. All water for use in a hotel is required to be potable. Per Land Use Services:

"Hauled water is defined as transporting potable water from one source to a property via truck or bottle to be used on-site for human consumption." And:

"Due to the state laws that took effect in January 2017, the County can no longer permit hauled water as a source of drinking water for any new construction."

Comment: If the County upholds its ban on hauled water for this proposed hotel/resort as it should per its own documents, the only way to obtain potable water would be by filtration of the aquifers, the well water. The developers have NOT submitted the filtering system in the Initial Study that they plan to use, or the potable water/waste water ratio due to the filtration process. To filter this well water with high levels of dissolved solids and naturally occurring contaminants, a high amount of water would be wasted to make this water potable.
We in the southwestern states are already experiencing a severe water shortage. The central valley aquifers are going dry, the water levels in Lake Mead and the Colorado River are at historic lows, and the western states are all fighting for whatever water is remaining.

Comment: The Wonder Inn proposed project and submitted IS/MND violates Order 9.b of EXECUTIVE DEPARTMENT. STATE OF CALIFORNIA EXECUTIVE ORDER N-7-22 (Gavin Newsom) which states the following:

"WHEREAS on April 12, 202l, May l0, 2021, July 8, 202l, and October 19, 2021, I proclaimed states of emergency that continue today and exist across all the counties of California, due to extreme and expanding drought conditions;

9. To protect health, safety, and the environment during this drought emergency, a county, city, or other public agency shall not:
b. Issue a permit for a new groundwater well or for alteration of an existing well without first determining that extraction of groundwater from the proposed well is (1) not likely to interfere with the production and functioning of existing nearby wells, and (2) not likely to cause subsidence that would adversely impact or damage nearby infrastructure."

-Why is this project even being considered when the State of California has proclaimed a state of emergency in response to extreme and expanding drought conditions?

Comment: The developers have failed to provide an accurate accountability of the actual amount of water they will be using for this proposed project. Because we are currently in a severe drought, it is unknown how much water actually resides in the aquifers beneath Wonder Valley, but with the illegal marijuana grows that were taking place throughout all of Wonder Valley the previous number of years, there is definitely less water now than there was before.

-What about the residences of Wonder Valley that rely on their well water to survive?

-Is the County willing to sacrifice the water supply of the community and residences of Wonder Valley for a hotel/resort that serves the wealthy and privileged?

Comment: The main pool size is 6,300 square feet and exposed to the sun. It is the center of the proposed complex and has a large surface area. The amount of

evaporation loss will be significant, and the developers failed to address this in the Initial Study.

Comment: The amount of water needed to service this would-be largest resort in the entire Morongo Basin with 106 hotel rooms, a restaurant, wellness center, spa, event center, as well as having "weddings and other events" would be excessive. It would siphon whatever water is available from the community for a high-end luxury resort that would NOT benefit the community, only hurt it. We are in a water shortage and this hotel/resort is NOT something that should be built where there is NO potable water available at all, where the resources of the community will be sacrificed for the desires of the well-to-do.

-Why is the County even considering this proposed project in Wonder Valley when the aquifers across the state are drying up, we are in a severe drought, and the County's own Principles state that "new development should be focused in areas where there is potable water" when there is NONE in Wonder Valley?

Comment: **Per the California State Executive Order stating that we are in an extreme drought, and the San Bernardino County Policy Plan Principles for new development, as well as the residential community that relies on the aquifers to survive that has NO potable water available, the proposed Wonder Inn should NOT be approved for construction at all in Wonder Valley and ALL permit applications should be withdrawn.**

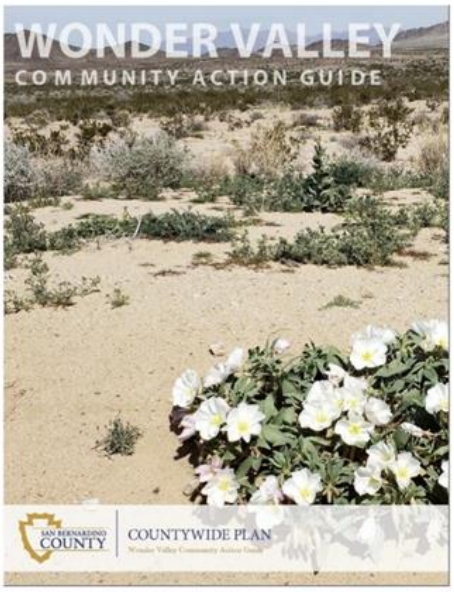
This CEQA question is asked in the Initial Study, p.62:

b) (Would the project) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Here is one of the developers' answers (in red) to this question:

"The Project Site is located within an unincorporated area of the County and has a zoning designation of Rural Living and is not subject to a Community Plan. The Project vicinity is primarily an unincorporated, undeveloped area, approximately 4.5 miles east of the City of Twentynine Palms and approximately 9 miles south of the Bullion Mountains. The Project Site is located within an area that is primarily vacant for approximately 1 mile on the north, south, east and west. Large-lot rural residential land uses exist primarily on Goodwin Road to the east and Mojave Road to the west."

Comment: The community is subject to and has a Community Plan. The Wonder Valley Community Action Guide already existed before the developers purchased the property. It has been available to them, but they chose to ignore the existence of our community and the Wonder Valley Community Action Guide as part of the San Bernardino Countywide Plan.



As shown below, the Countywide Plan "*requires* that new development be consistent with and reinforce the physical and historical character and identity of our unincorporated communities, as described in Table LU-3 and in the values section of Community Action Guides. In addition, we consider the aspirations section of Community Action Guides in review of new development."

Land Use & Planning

Countywide Plan

- Goal LU-2: Land Use Mix and Compatibility
  - Policy LU-2.1 Compatibility with existing uses: We require that new development is located, scaled, buffered, and designed to minimize negative impacts on existing conforming uses and adjacent neighborhoods. We also require that new residential developments are located, scaled, buffered, and designed so as to not hinder the viability and continuity of existing conforming nonresidential development.
  - Policy LU-2.3 Compatibility with natural environment: We require that new development is located, scaled, buffered, and designed for compatibility with the surrounding natural environment and biodiversity.
  - Policy LU-2.4 Land Use Map consistency: We consider proposed development that is consistent with the Land Use Map (i.e., it does not require a change in Land Use Category), to be generally compatible and consistent with surrounding land uses and a community's identity. Additional site, building, and landscape design treatment, per other policies in the Policy Plan and development standards in the Development Code, may be required to maximize compatibility with surrounding land uses and community identity.
- 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, as described in Table LU-3 and in the values section of Community Action Guides. In addition, we consider the aspirations section of Community Action Guides in our review of new development.

Table LU-3. Community Character

Community Category	Key Characteristics and Features
Valley Communities Bloomington, Mentone, Muscoy, San Antonio Heights	▪ A suburban lifestyle characterized by a mix of lot sizes and/or land uses in proximity to urban services and facilities. ▪ Views of canyons and hills within the community planning area (Mentone and San Antonio Heights). ▪ Economic activity that benefits local residents and/or serves the local economy.
Mountain Communities Angelus Oaks, Bear Valley [1], Crest Forest [2], Hilltop [3], Lake Arrowhead [4], Lytle Creek, Mt Baldy, Oak Glen, Wrightwood	▪ A rural lifestyle characterized by low density neighborhoods oriented around commercial or recreational nodes, and the prevalence of the forest and mountain landscapes and natural resources. ▪ Abundant views of open spaces, natural features, and dark skies. ▪ Scenic, natural, and recreational features that serve as the foundation of the community's local economy and attract tourists. ▪ Small businesses that serve local residents and visitors, compatible with the natural environment and surrounding uses.
Rural Desert Communities Baker, El Mirage, Homestead Valley [5], Lucerne Valley, Morongo Valley, Newberry Springs, Oak Hills, Pioneertown [6], Phelan/Pinon Hills	▪ A rural lifestyle characterized by the predominance of large lots, limited commercial development, and the prevalence of the desert landscape and natural resources. ▪ Abundant views of open spaces, natural features, and dark skies. ▪ Scenic, natural, and/or recreational features that serve as the foundation of the community's local economy and attract tourists. ▪ Small businesses that serve local residents and visitors, compatible with the natural environment and surrounding uses. ▪ Mining of mineral resources with minimal negative impacts on local residents.
Desert Village Communities Daggett, Helendale, Joshua Tree, Oro Grande, Yermo	▪ A rural context with clusters of housing in proximity to commercial development and public facilities, and larger lots farther from the commercial core. ▪ Abundant views of open spaces, natural features, and dark skies especially outside of clustered development. ▪ Scenic, natural, and/or recreational features that serve as the foundation of the community's local economy and attract tourists. ▪ Small businesses that serve local residents and visitors, compatible with the natural environment and surrounding uses. ▪ Mining of mineral resources with minimal negative impacts on local residents (Oro Grande and Yermo).

Notes:

1. Bear Valley includes: Baldwin Lake, Big Bear City, Erwin Lake, Fawnskin/Northshore, Lake Williams, Moonridge, Sugarloaf.
2. Crest Forest includes: Cedarpines Park, Crestline, Lake Gregory, Valley of Enchantment.
3. Hilltop includes: Arrowbear, Green Valley Lake, Running Springs.
4. Lake Arrowhead includes: Agua Fria, Blue Jay, Cedar Glen, Crest Park, Deer Lodge Park, Lake Arrowhead, Rimforest, Skyforest, Twin Peaks.
5. Homestead Valley includes: Flamingo Heights, Johnson Valley, Landers, Yucca Mesa.
6. Pioneertown includes: Gamma Gulch, Pioneertown, Pipes Canyon, Rimrock.

Values Statement

The Values are those shared assets, principles, standards, mores, and in the judgement of the community, what is important in the lives of its residents and businesses. A community's values are an important consideration in shaping its aspirations, focus and actions.

As a community, Wonder Valley values:

Rural Atmosphere. The large lots and space between properties give residents room to breathe. Wide open spaces allow residents to appreciate and maintain the solitary, laid-back lifestyle of this area.

Natural Desert Beauty. Residents value the beautiful sunrises and sunsets, the dark and starry night skies and the desert views and wildlife.

Community Spirit. Wonder Valley is a tight-knit community whose residents value self-reliance and neighborly support. The people have a respect for nature, freedom, privacy, and each other. Here, residents work together but also enjoy their independence and being left alone in solitude.

Aspirations Statement

The Aspirations Statement is a written narrative illustrating how the community desires to look and function once the Community Focus Statements and Action Statements are accomplished. This is a long term view of 10 to 20 years. The Aspirations Statement serves as a foundation for developing Community Focus Statements and Action Statements.

As a community, Wonder Valley aspires to:

Better Communication and Services.

The community offers family-oriented activities, community health services including mental health services, services for the disadvantaged, improved public transportation, a local fire station and locally based Sheriff's response.

Maintain the Rural Atmosphere.

Wonder Valley provides residents with a rural lifestyle on large lots with dark night skies.

Again, b) (Would this development) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? (p.62)

Here's the answer by the developers: "Project would neither physically divide an established community nor cause a significant environmental impact due to conflict with any land use plans or policies. No significant impacts are identified or anticipated, and no mitigation measures are required."

-Have the developers looked at the County's land use plan, policy plan or any County regulations?

As per Land Use Policy LU-4.5 and its referenced documents, here as some of its requirements:

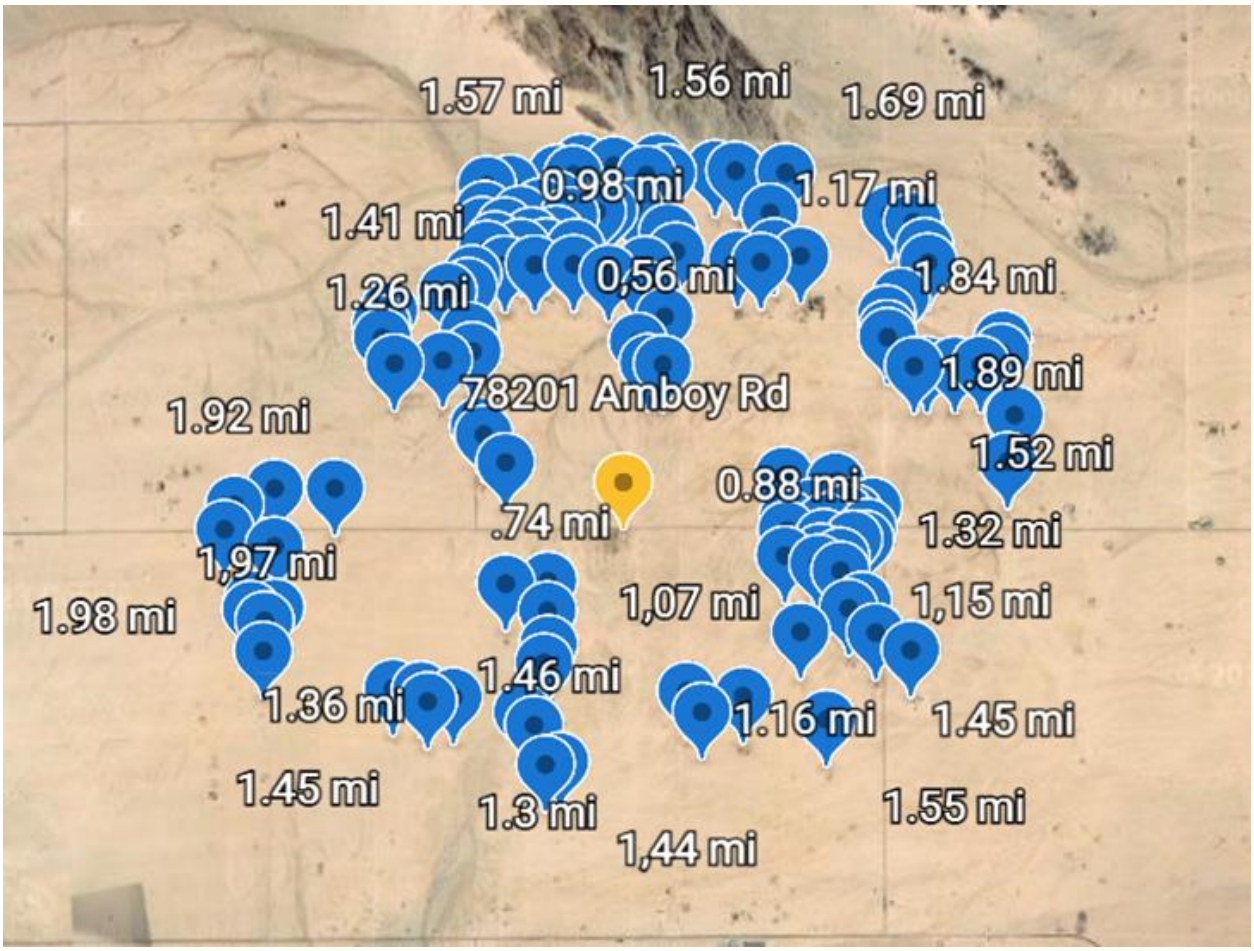
“Abundant views of open spaces, natural features, and dark skies”

Comment: This large hotel/resort will take away abundant views of open spaces, will have NO natural features, and excessively, artificially lighten the current dark skies and would NOT meet this Policy requirement.

“Small businesses that serve local residents and visitors, compatible with the natural environment and surrounding uses.”

Comment: The proposed Wonder Inn would be the largest resort in the entire Morongo Basin, is NOT a small business, would NOT serve local residents and is NOT compatible with the natural environment and surrounding uses. There is nothing like this in Wonder Valley and the proposed project would NOT meet this Policy requirement.

“The large lots and space between properties give residences room to breathe. Wide open spaces allow residences to maintain and appreciate the solitary, laid-back lifestyle of this area.”



Yellow pin = Wonder Inn site, Blue pins = residences (Map courtesy Google Earth)

Here’s what the developers state on page 16 of the Initial Study:

“Because of the open design concept, it is anticipated that when viewed from a distance, the Proposed Project would blend into the surrounding area similar to the scattered large-lot residences.”

Comment: As shown in above map, the proposed Wonder Inn would eliminate much of the space between residences and take away much of the room to breathe, would NOT maintain the solitary, laid-back lifestyle of the area, and would NOT “blend into the surrounding area similar to the scattered large-lot residences” as they claim, and would NOT meet this Policy requirement.

-Do the developers and the County actually believe that this proposed project could “blend into the surrounding area similar to the scattered large-lot residences?”

“Residences value the beautiful sunrises and sunsets, the dark and starry night skies and the desert views and wildlife.”

Comment: If any resident is within the large viewshed of this proposed hotel/resort, it will affect these values, brighten the darkened night skies, diminish the desert views, and disturb and interfere with the habitat of the desert tortoise, a designated threatened species, and therefore would NOT meet this Policy requirement.

The *“quotes”* noted above are only some of the requirements referenced per Land Use Policy 4.5. As defined in the Policy Plan Glossary of Terms:

“Require. To absolutely impose an obligation or standard.”

Just a reminder:

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, as described in Table LU-3 and in the values section of Community Action Guides. In addition, we consider the aspirations section of Community Action Guides in our review of new development.”

Comment: The proposed Wonder Inn is not consistent with and meets NONE of these above quoted requirements of Table LU-3 and the Wonder Valley Community Action Guide per the County Policy Plan under CEQA, therefore the County should withdraw all permit applications and NOT approve this project for construction.

-How can this new development be consistent with and reinforce the physical and historical character and identity of Wonder Valley per the requirements of Land Use Policies and the Community Action Guide when the developers fail to acknowledge the existence of these CEQA and San Bernardino County related documents?

Policy LU-2.3 Compatibility with natural environment:

"*We require that new development is located, scaled, buffered, and designed for compatibility with the surrounding natural environment and biodiversity*."

Comment: The developers don't state in the Initial Study *anything* related to this Land Use requirement. Based on size, location, design and compatibility with the environment, and in accordance with the requirements of Land Use Services and the Countywide Plan, this proposed project is *huge* in comparison with the surroundings, the sheer number and size of proposed additional structures does NOT fit with the surroundings, and definitely is NOT "located, scaled, buffered, and designed for compatibility with the surrounding natural environment and biodiversity" as required, and should NOT be allowed to be built in Wonder Valley.

Other reasons for stopping this project NOW:

Biological Resources

Comment: The desert tortoise is a designated a threatened species by the United States Fish & Wildlife Service, and the desert tortoise *does* currently reside on the proposed Wonder Inn project site. An independent experienced desert tortoise surveyor discovered a subadult desert tortoise on the property this week as well as large scat from other tortoises. You may already have received comment letters from organizations such as the Morongo Basin Conservation Association, the Desert Tortoise Council, the Center for Biological Diversity, the National Parks Conservation Association, among others who are better versed at describing the fragility of this beloved reptile and the importance of its environment, so I will leave the details to them as concerned organizations.

However, I must bring to question the honesty, sincerity and transparency of the Wonder Inn developers.

In short, the developers commissioned two habitat surveys, the first by Circle Mountain Biological Consultants, Inc. and the second by ELMT Consulting. CMBC discovered a subadult tortoise, a carapace, numerous fresh and older scat, and a burrow. ELMT Consulting found NO evidence of any tortoise, scat, or burrow. The developers chose to only use the ELMT survey that showed no evidence of tortoises.

-Why didn't the Wonder Inn developers use the Circle Mountain Biological Consultants survey when they were the ones who commissioned it?

-Why is there such a discrepancy between these two surveys done in the same area?

-Why didn't ELMT Consulting find any evidence at all of any tortoise, tortoise scat or tortoise burrows during their survey?

-Did the developers intentionally NOT disclose the survey done by CMBC?

-If this project gets approved, how could we trust the developers to follow through with any Mitigation Measures (BIO-3) when they've shown blatant disregard for available desert tortoise surveys that show proof of their existence on the project site?

The above questions must be asked and answered, and based on how the proposed Wonder Inn developers handled these surveys, and with the existence of desert tortoises on the site, the County should strongly consider NOT approving this project for construction for the sole reason of protecting this threatened species per the requirements of the California Department of Fish and Wildlife and the U.S. Fish and Wildlife Service.

Transportation

Comment: The proposed developers only state that they will add a 40 foot approach and right turn lane into the facility from the west. That's all they mention. They have not stated how they will handle visitors from the east, making a left into the site, or if paving Gammel Road to the east of the site would be a necessity. The number of extra vehicles driving on Amboy would be significant, and dangerous, especially on weekends when there are more tourists, more diners, and more visitors to the "weddings and other events" they plan to have. More traffic on Amboy Road will only cause more accidents on Amboy Road, an already dangerous two-lane highway with a history of deadly traffic accidents. One fatality due to the existence of the proposed Wonder Inn is one fatality too many.

-How many extra visitors will be travelling to the proposed development for the "weddings and other events?"

-What is the road plan for visitors arriving from the east?

Public Services

Comment: Currently the Fire Station in Wonder Valley sits vacant since 2017. Currently there is NO San Bernardino County Sheriff substation. Any emergency call will take 15 minutes or longer for an on-site response which is already too long for an emergency situation. Wonder Valley is deemed a Disadvantaged Community, is already stressed by the lack of these public services, and with the addition of this proposed project, County Fire and Sheriff Departments will be further overloaded. As a hotel/resort/restaurant/weddings/event center and more, with drinking, partying, guests wandering the desert, with this and many, many more people, there will be many, many more incidents that WILL require the services of police and fire departments that Wonder Valley DOES NOT have.

-Why was this project even considered for Wonder Valley when there are no Public Services available for the community and Wonder Valley as a whole?

If the County adheres to its own Countywide Plan, Policy Plan and Community Action Guide under CEQA, there are numerous requirements that have NOT been met. And given the design, scope, and excessive size of the proposed Wonder Inn, this development CANNOT meet these requirements at all, therefore San Bernardino County Land Use and Planning should follow their own Plans, Policy's and Guidelines and STOP this extraordinarily outlandish resort from ever getting built in Wonder Valley and withdraw ALL permit and permit applications for the proposed Wonder Inn.

-Per CEQA, have the developers submitted alternative sites for their project?

Comment: Please reference "JT105 ALLIANCE, a community group vs. COUNTY OF SAN BERNARDINO and SAN BERNARDINO COUNTY BOARD of SUPERVISORS, and DOES 1-25, inclusive"

This was a Petition that was filed with the Superior Court of the State of California by the JT105 Alliance, a community group that opposed the development of the Altamira Project residential community, Project No. P200700997, in unincorporated Joshua Tree. In short, the project was approved by the San Bernardino County Planning Commission, an appeal was brought by the JT105, and next the Board of Supervisors rejected the appeal and approved the project for construction. The approvals by the County forced the JT105 to file a Petition in State Superior Court, which stated the complainant violated the CEQA guidelines, failed to file an Environmental Impact Report, and *"that the County's approval of the Project was inconsistent with the County's General Plan and the Joshua Tree Community Plan, in violation of the County Development Code and without the proper findings required for approval of a Tentative Tract Map and Conditional Use Permit."*

The original permit application from the Altamira developers was submitted in 2007, and the Petition was filed in 2016. The County decided NOT to challenge the Petition and they did NOT take this to trial. After numerous meetings, a settlement was reached in 2019 and the County finally rescinded the permit applications, expired all approvals and the Altamira development was ceased. This lasted 13 years and the developers were NOT able to build this residential housing tract due to the community members PROVING that the requirements of THEIR OWN Countywide Plan, Policy Plan, Community Action Guide, Development Code, and CEQA guidelines were NOT met, and the new proposed development was NOT approved for construction. Please look at this Altamira proposed project and confirm the reasons why the County chose NOT to challenge this Petition.

Comment: Precedence was established with this Petition as per the reasons why the County chose NOT to challenge the JT105 Alliance and the State of California in Superior Court. These same reasons parallel the proposed Wonder Inn and the many reasons that have been laid-out, shown, referenced and explained by the community of

Wonder Valley in the many comment letters you will read, including this one, as to why this proposed Wonder Inn DOES NOT belong in Wonder Valley.

-Why didn't the County challenge the Petition filed by the JT105 Alliance?

-Why didn't the Altamira project receive approval for construction from the County?

Comment: IF the County DOES adhere to and abide by its own Plans, Policy's, Codes, standards and Principles, this proposed Wonder Inn project CANNOT be approved for construction based on the requirements of its own guidelines and CEQA.

Comment: IF the County DOES NOT adhere to and abide by its own Plans, Policy's, Codes, standards and Principles, this proposed Wonder Inn project CANNOT be approved for construction based on the County's inability to follow the requirements of its own guidelines and CEQA.

Per CEQA and County guidelines, the proposed Wonder Inn should NOT be given ANY permits for construction in Wonder Valley, and any current permit applications for the proposed Wonder Inn should be withdrawn.

Many of those who have or will comment will be asking for a certified Environmental Impact Report. After reading through the Wonder Inn Initial Study I should ask:

-How could this Initial Study, which doesn't answer many of the CEQA questions or reference the Countywide Plan, receive a Mitigated Negative Declaration?

Comment: Yes, based on the lack of information, the redundances and repetition, the intentional or unintentional lack of substantive answers to the CEQA questions in this Initial Study, I do understand that a full, certified EIR be required for the proposed Wonder Inn. But I will give valid reasons why the County, Land Use Services and the Planning Commission should seriously consider withdrawing all permit applications for the proposed Wonder Inn RIGHT NOW.

Reasons why it is RIGHT for Land Use Services to STOP this proposed project development in Wonder Valley NOW:

- Save the County, the County Supervisors, the Planning Commission and their staffs valuable time and resources, which could linger for years with various appeals, lawsuits, meetings, document reviews, comments, etc…
- Save the County the additional costs which would be applied to all of the staff time, document reviews, legal fees, certifications, extra services and more.
- Save the Project Developers additional costs for: a certified Environmental Impact Report, compliance documents, document reviews, other certifications, legal fees, Supervisor donations, contract representative fees, site rendering fees, and more.

- Save the community of Wonder Valley and those against this project the time, legal fees, and effort to use all legal means necessary to keep the proposed Wonder Inn from being built.
- Gain respect from the residents of San Bernardino County for making the correct decision.
- Gain respect from future developers who will understand that they can't bully San Bernardino Land Use Services and ignore the Countywide Plan.
- Gain respect from other jurisdictions that may have been aware of the proposed Wonder Inn and the reasons why many are opposed to it.
- Gain respect from the residences and Conservation groups concerned about the desert tortoise, a threatened species. There are desert tortoises on the project site right now, and if this proposed project gets approved for construction it will be the wrong decision for the environment and the desert tortoise.
- There is NO potable water, NO sewage system, NO wastewater treatment in Wonder Valley.
- There are NO public services in Wonder Valley
- There are NO substantial roadways to handle the increased traffic.
- There is NO infrastructure in Wonder Valley.
- The proposed project does NOT meet the requirements of Policy LU-4.5, Table LU-3, Policy LU-2.3, the Wonder Valley Community Action Guide and CEQA.
- Good press. The County did the right thing by governing in accordance with its own documents and requirements.

Reasons why it is WRONG for Land Use Services to approve this proposed project OR CONTINUE AT ALL from this point forward:

- It will cost the County much time and resources from many on its staff. This proposed project could linger for years if the County chooses it to do so, and the labor force, time and resources could be used for new development and respectable developers that follow the guidelines of the Countywide Policy Plan.
- It will cost the County money. The cost for staff, documents, legal fees, extra services, reviews, and more will add up if the County does not cease this proposed project now. (Are these extra costs paid by the County or the residences of the County? The Developers? Are taxpayers covering the extra costs?)
- It will cost the Project Developers more money and time. The cost for all related services, contract representatives, an Environmental Impact Report, certification fees, Supervisor donations, legal fees, and the unknown. It may be a best-case-scenario for the developers if the proposed project was stopped now. They have already invested a lot of money. Those against the proposed Wonder Inn are willing and will continue to oppose and fight the building of this hotel/resort for as long as it takes, which could be years if the County lets it. If the County decides

to let this proposed project continue it WILL cost the developers a lot more money, and they still may not ever receive a permit to build.

- It will cost the community of Wonder Valley more money and time. Our time will be utilized whenever and however long it is necessary to stop this proposed project. It will cost money for legal fees and representation. If needed, we will use a Go Fund Me page to raise money for our cause and find any pro-bono legal aid available.
- The Land Use Service and the Planning Commission will lose respect from the residences of San Bernardino County. If the County fails to follow its own Countywide Plan and Policy plan, how could you expect others to follow them?
- Lose respect from new developers. The impression will be given by the County that if they don't follow their own Plans and Policy's why would any new developer have to? New developers could just pay any fees, submit any docs that look okay, donate to the Supervisors and expect their project to get approved. If the County questions a new development Initial Study, we could only expect a new developer to say, "You approved the Wonder Inn's Initial Study, how could you *not* approve mine, no matter how poor it is."
- Lose respect from other governing agencies that are aware of the proposed project.
- Lose respect from conservation groups and the population concerned about the desert tortoise. The Wonder Inn developers made themselves known how they don't care about this sensitive threatened species when they intentionally did NOT utilize a desert tortoise survey that found a live tortoise on site, as well as fresh scat and a carapace. This is blatant disregard for a U.S. Fish and Wildlife listed threatened species, and all should be concerned about the developers and their mishandling of the desert tortoise.
- Harm the threatened desert tortoises that exist on the proposed Wonder Inn site.
- There is NO potable water, NO sewage system, NO wastewater treatment in Wonder Valley.
- The State of California is in an extreme drought. If the County approves the proposed project for construction, there is a REAL possibility that this large hotel/resort could dry the aquifers in Wonder Valley due to the water they would need to run this huge facility- all for the well-to-do. This would be a monumental disaster. Is the proposed Wonder Inn worth it?
- There are NO public services in Wonder Valley
- There are NO substantial roadways to handle the increased traffic.
- There is NO infrastructure in Wonder Valley.
- Bad press. If this large hotel/resort/restaurant/event center/spa/wellness center and more gets approval at any level, the press will know that the County approved a project where there is NO potable water and aquifers are to be used by the Wonder Inn, there is NO wastewater treatment or sewage system, roadways are INNSUFFICIANT, there are mostly dirt roads, and there are NO

public services available for the community right now. The Supervisors and the Planning Commission will be called out by the community members opposed to this project, the public, and any news agency that has a right to know that the County's own Policy's, Plans and Principles are NOT being adhered to by the County that developed them, as well as the requirements of CEQA.

As I mentioned in the beginning of this letter, the similarities between my personal reasons why I am opposed to this project are also given by the County. I enjoy the peace and quiet, the dark night skies, fresh air, unobstructed scenic views of the mountains and sky and wide-open spaces, just as the County of San Bernardino intended Wonder Valley to be. The County set the standards for each community to reflect how *they* wanted to be represented, and for us, how Wonder Valley wanted to be represented. Per the Countywide Plan, the community of Wonder Valley implemented the *Values Statement* and *Aspirations Statement*, just as we wanted our community to be represented.

-Does the County follow it own guidelines and Community Action Guide implementation?

This is from the County Policy Plan, **Community Character,** page 8:

"In the evaluation of proposed development, the County will use standards and guidance in the Development Code and goals and policies from the Policy Plan to determine whether a proposed development would positively reinforce or negatively affect the desired community character and identity of an unincorporated community. Although the goals and policies throughout the entire Policy Plan may apply, those contained in the Land Use Element will commonly be the initial reference points. In particular, Policy LU-4.5 directs the County to ensure that new development is consistent with the physical and historical character and identity of an unincorporated community planning area. This policy also directs the County to ensure consistency with the values and aspirations as defined by each community in their Community Action Guides. To further assist the County in determining the consistency of new development with a community's character, Table LU-3 identifies key characteristics and features that new development should reinforce and/or not detract from in order to maintain and protect the identity and character of the community planning areas."

Comment: Please note that "the County ***will*** use…"

I sincerely hope the County WILL use its own Countywide Plan, Policy Plan, Community Action Guide, Development Code and applicable goals and standards to determine that the proposed Wonder Inn should NOT be approved for construction, NOT be given a Conditional Use Permit for change from RL-5 to CS, NOT be issued ANY permit for construction on the proposed project site, and ALL permit applications be withdrawn.

I believe I have presented a strong, valid case why the proposed Wonder Inn should NOT be built at all in Wonder Valley. In review:

1) **Principles**. County Policy Plan page 1:

"New development should be focused in areas where there is potable water, wastewater treatment, roadways, and public services."

Comment: Wonder Valley has NO potable water, NO sewage system or wastewater treatment, NO sufficient roadways to handle this proposed project, and NO public services.

-If the County does not value its own Principles why should any other new developer?"

2) **Water.** From the State of California Executive Order in regard to extreme drought conditions:

"*To protect health, safety, and the environment during this drought emergency, a county, city, or other public agency shall not:*
b. Issue a permit for a new groundwater well or for alteration of an existing well without first determining that extraction of groundwater from the proposed well is (1) not likely to interfere with the production and functioning of existing nearby wells, and (2) not likely to cause subsidence that would adversely impact or damage nearby infrastructure."

Comment: The state of California is currently in a severe drought and the water usage from this proposed largest resort in the entire Morongo Basin would be extremely excessive, and would surely adversely affect and severely impact the current aquifers in Wonder Valley and the community that relies on well water to survive.

-Does the County understand that an Executive Order was proclaimed by the State of California that we are in an extreme drought and that this proclamation is applicable to all counties?

-Does the County care about its citizens and the possibility that this proposed project threatens the aquifers and highly increases the probability that the wells of the residences of Wonder Valley could run dry much sooner than anticipated?

-Is the water usage of this proposed project more important than maintaining the aquifers for water usage by the residences of Wonder Valley?

3) **Applicable Plans, Policy's, Codes.** From the County Policy Plan Glossary of Terms:

-Principle. An assumption, fundamental rule, or doctrine that guides Policy Plan policies, proposals, standards, and implementation measures.

-Require. To absolutely impose an obligation or standard.

-Shall. Will always be carried out or required; no exceptions.

-Should. Will be carried out or required most of the time, unless a very good reason is identified why an exception is acceptable.

-Policy Plan. A compendium of long-term goals and policies intended to guide decision making regarding the improvement and planning of the county unincorporated areas, as well as the provision of regional and local services and facilities. The Policy Plan also provides the high-level direction for implementing programs and ordinances, such as the County Development Code. The Policy Plan legally functions as the County's general plan. A general plan is a legal document required of each local agency by the State of California (see Government Code Section 65300 et seq.). In California, a general plan must address at least eight mandatory topics (land use, circulation, housing, conservation, noise, open space, safety, and environmental justice), and may include any number of optional topics (such as air quality, economic development, and health and wellness).

Comment: These definitions of terms are all applicable to the documents presented in this letter and are all applicable to confirm that many of the requirements of noted documents are NOT met by the developers in the Initial Study, and do NOT MEET the requirements and intent of the Countywide Plan, the County Policy Plan, the Wonder Valley Community Action Guide and CEQA.

- Based on all the information I've presented and provided in this comment letter, it is IMPERATIVE that the County of San Bernardino Planning Commission REJECT or WITHDRAW all issuance of permits and Conditional Use Permits for the proposed Wonder Inn Hotel/Resort.
- Based on the information provided by the developers in the Initial Study and based on the requirements of CEQA and the County of San Bernardino, the proposed Wonder Inn Hotel/Resort should NOT be built in Wonder Valley.
- Based on the excessive aquifer/well water usage that would be necessary for this large-scale Hotel/Resort while we are in a severe drought, this proposed project SHOULD NOT be built.
- Based on the existing precedence of the JT105 ALLIANCE, a community group vs. COUNTY OF SAN BERNARDINO and SAN BERNARDINO COUNTY BOARD of SUPERVISORS, the proposed Wonder Inn Hotel/Resort should NOT be approved by the County for construction in Wonder Valley and should NOT waste any of those involved any more time and money.

Wonder Valley is a place that changed the lives of my wife, our children, and myself since we've been coming to our Homestead Cabin in 2005. It was a respite from the city, a place where we could enjoy peace and quiet, solitude, fresh air, mountain views all around, with a great dark, night sky that enabled us to see stars that we couldn't see in the city. We've also discovered at least five different desert tortoises on our property through the years, with many others around that we haven't seen.

Wonder Valley has no amenities and no infrastructure. It's just a sleepy, small community that resides in a big, beautifully scenic valley. This proposed project would impede on the scenic views, bring excessive traffic, excessive emissions, noise, artificial light pollution, destroy desert tortoise habitat, and certainly dry up whatever resources we do have.

THE PROPOSED WONDER INN IS VISUALLY, FUNCTIONALLY, VIABLY, LEGALLY AND SIGNIFICANTLY OUT OF PLACE IN, AND DOES NOT BELONG IN WONDER VALLEY for all the reasons and requirements noted AND MORE.

I beg you please, PLEASE do the correct thing and follow the guidelines and requirements of YOUR own documents which will stop this ridiculously HUGE proposed project from being built. I also ask you to do what is RIGHT for the community and the people of Wonder Valley as per the Community Action Guide and STOP this out-of-place project from being built at all in an area where it doesn't belong.

I respectfully look forward to your decision on the proposed Wonder Inn.

Sincerely,

Russell Kohn

From: Gina Kohn
To: Planning Commission Comments
Subject: Attn: Michael Stoffel Wonder Inn Hotel/Resort (Twentynine Palms) (PROJ-2021-00163)
Date: Tuesday, February 21, 2023 7:07:58 PM
Attachments: StoffelCommentletterGina.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Mr. Stoffel,
Attached is my Comment Letter regarding the proposed Wonder Inn Hotel/Resort (Twentynine Palms) (Proj-2021-00163)
Thank you for your time and consideration,
Gina Kohn

Sent from Mail for Windows

Virus-free.www.avast.com

Gina Kohn
71212 El Paseo Drive
Twentynine Palms, CA 92277

February 21, 2023

Attn: Michael Stoffel
Planning Commissioner – 3rd District
385 N. Arrowhead Ave.
1st Floor
San Bernardino, CA 92415
planningcommissioncomments@lus.sbcounty.gov
RE: Wonder Inn Hotel/Resort (Twentynine Palms) (PROJ-2021-00163)

Eighteen years ago, in 2005, my husband and I were introduced to Wonder Valley, a rural community about 10 miles east of the City of Twentynine Palms. We instantly fell in love with the vast expansive views, picturesque horizons, tranquility, quiet and beauty of the natural desert. We appreciated the space between the old historical homestead cabins and modest desert homes and the fact that very few had fences dividing the properties. It made for a unique and pleasing neighborhood aesthetic with an observable relationship between the residences, the land and sky. The encompassing biologically diverse desert wilderness was a stark contrast to our home in the city which was in a neighborhood with 7 feet tall cinderblock fences dividing and separating each tract home on small parcels.

That same year we became the owners of a small 396 sq ft jackrabbit homestead cabin on 5 acres in need of some serious TLC located at 78426 Raymond Drive. This dilapidated cabin in the desert became our refuge, an essential and beloved retreat for our family. A respite from the noise and intensity of city living in Long Beach, we became official “weekenders” (a hi desert local term for city folks coming out for a weekend) and would drive the 2 ½ hours, or longer with traffic, as often as we could.

A half a mile South from our modest cabin is the Pink Building, the site of the proposed luxury Wonder Inn Hotel/Resort. Our cabin is one of the closest in proximity to this proposed development and we have a clear unobstructed view of the historic Pink Building from our front yard, our porch and from inside looking out of our windows. In Wonder Valley, where neighbors appreciate wide open spaces between residences, if you consider the people's perspective in Wonder Valley measurements and terms, this proposed development is across the road from our cabin and will have a significant negative impact not only on our scenic views, but our serenity, dark night sky and enjoyment that we, our neighbors, new and returning visitors appreciate and are used to.

We rehabilitated this cabin, pulled the required permits, brought it up to San Bernardino County Code per the County requirements. We worked passionately for years, devoting time, blood, sweat, tears, hard earned money to bring this ram-shackled cabin back to its intended original charm and in turn brought some curb appeal to the neighborhood. When Inspector Sergio came for final inspection, we were ecstatic that all was done per requirements and code and we could now enjoy the cabin and the beautiful scenic vistas all around it rather than work on it, and this final inspection enabled us to hook up to electricity which was a big deal! What a dream come true for our family.

Eventually we sold our home in Long Beach because we wanted to be here 24/7, so we purchased a home in Twentynine Palms in 2016 and appreciated that our little Wonder Valley cabin is only 15 miles away, a 15-minute drive but it feels like a world away.

Being that I am a homeowner in Twentynine Palms and Wonder Valley I have a unique vantage point and experience that I'd like to share with you.

The contrast of the City of Twentynine Palms and unincorporated San Bernardino County to Wonder Valley are significant, although they are close in proximity to each other. The night sky is noticeably darker in Wonder Valley than in Twentynine Palms even though Twentynine Palms is considered a Dark

Sky community. Artificial lights from the Twentynine Palms Marine Corps Air Ground Combat Center, Knotts Sky Park, Lucky Park, Tortoise Rock Casino, streetlights, porch lights, traffic lights, commercial business lighting, hotel and parking lot lights, etc. cast a sky glow above this city and it continues to expand due to growth, development and demand from increased tourism and recreation to the area. Even with mitigation requirements, the artificial lights at these developments shine bright as seen in this map indicating the spread of light pollution from Twentynine Palms into the adjacent rural community of Wonder Valley.

We've noticed that even since moving here over 6 years ago, the artificial light glow has grown exponentially in a short period of time. Many new businesses and developments are being built, which is understandable for a city such as Twentynine Palms. Growth is inevitable in the city because it has supporting infrastructure, potable city water and public services, such as a local fire department available to us. These are things Wonder Valley does not have.

Two new high occupancy hotels have been approved by the Twentynine Palms planning department and I'd like to share these proposed Hotels with you to show the contrasts between smart development in a sustainable city and a ridiculous huge sprawling development in an unsustainable rural community.

Home to Suites by Hilton Hotel 6579 Tamarisk Twentynine Palms CUP-22-000003. This proposed three story, **95-room hotel** has a total of **92 proposed parking spaces** on-site and has an additional 11 spaces

available for use on Tamarisk. Amenities for hotel guests include, but is not limited to an exercise room, bicycle accommodations, guest laundry, a business center, an outdoor pool, and patio with fire pit.

This proposed hotel is 8.1 miles, an 11-minute drive (using Amboy Rd) from the proposed Wonder Inn Hotel/Resort. Adjacent to this proposed hotel in Downtown Twentynine Palms has infrastructure to support it. The Joshua Tree Cultural Center at Freedom Plaza, Chamber of Commerce, as well as gas stations, grocery stores, restaurants, a fire station, and a bustling downtown area.

The Wander Inn Hotel at Split Rock Ave and Hastings St. (Tentative Parcel Map No. 20360) Twentynine Palms, the 9.36 acre project site proposes a hotel consisting of one-story shipping container structures and private patios, and associated development, including a central clubhouse to include a pool, office and gift shop, an on-site sewage treatment facility, driveways, parking lots and landscaping. Phase 1 will include a total of 65 container rooms (21 big rooms, 4 ADA rooms, and 40 small rooms), a laundry/break room, a clubhouse, unconditioned storage containers, as well as the sewage treatment facility, parking lot and landscaping. A total of 65 parking stalls will be provided for Phase 1, including 6 ADA stalls and 4 electric City of Twentynine Palms Wander Hotel Initial Study Page 2 of 88 vehicle stalls**. At buildout, the project will include a total of 93 rooms**.

The proposed Wander Inn in Twentynine Palms is 9.0 miles, a 12-minute drive from the proposed Wonder Inn Hotel/Resort. Like the Home to Suites by Hilton, there is infrastructure in the City of Twentynine Palms to support a development of this size, which is on a considerably smaller footprint than the 24-28 acres and planned expansion onto their 134 acres.

Twentynine Palms is already home to numerous hotels, motels and Short Term Rentals (STR) with available occupancy. According to the Retail Market Study, the average occupancy of hotels in the Twentynine Palms Area peaks at approximately 78 percent during March and has a low of approximately 50 percent during December and January and even less during the summer.

Motel 6 is the largest in the Morongo Basin (in occupancy) but the proposed hotel resort Wonder Inn, with 106 rooms and a 210 parking lot in a rural residential community sprawled upon 160 acres would in fact become the largest hotel/resort in the Morongo Basin, if you consider the 20 to 24 luxury villas they are advertising that are not included in the Initial Study - The Wonder Inn - Joshua Tree, CA — BAIN (bainhospitality.com) Note: They would each be privately owned on a 5 acre parcel with their own swimming pool and jacuzzi and the owner will have the option to STR them.

Would these new hotels mentioned above that have infrastructure, access to public services, public transportation and potable water be a viable substitute for the proposed unsustainable Wonder Inn Hotel/Resort that has no potable water, no public services, no public transportation, no wastewater treatment?

Is there a need for this proposed luxury Wonder Inn Hotel/Resort in an unicorporated, rural Disadvantaged Community with no infrastructure, no public transportation, not centrally located where the average Wonder Valley resident's income is $16,000 a year?

Soon after we moved to Twentynine Palms, I was diagnosed with an aggressive breast cancer. Retired and living on a fixed income and in order to help pay the medical bills and gas needed for numerous trips up and back to Palm Springs for surgeries, hospital stays and chemo treatments, we decided to permit our little cabin to a STR to help us survive and keep our head above water. We are a legally

permitted (CESTRP-2021-00013) and operating as a legally permitted STR in Wonder Valley since January 2020 allowing one or two people maximum occupancy.

The proposed Wonder Inn would not be competition for our humble little homestead cabin, it would crush us.

Our guests come to Wonder Valley from all across the globe, specifically for its unique landscape, to escape the noise, light pollution and fast paced hustle and bustle of the cities. They come to disconnect from their devices and enjoy the breathtaking scenic vistas, absorb the splendor of the natural desert, stargaze into the dark night sky and appreciate wildlife.

The focus, environment, views and experiences for our guests will dramatically change if this proposed development is built and it will significantly negatively affect our livelihood.

I have spent more than 3 years building my small business, gaining super-host status as well as an impressive 5-star rating from over 222 guests. I truly love being a host, making guests feel special and sharing our cabin with kind folks who appreciate it. I use it as an opportunity to educate my guests about the threats facing the desert and have a small library of interesting desert books regarding the history of the Chemehuevi and Serrano People whose land our cabin sits upon, homestead cabins and the small tract act, geology, soil, wildflower reference books and info on the beloved threatened tortoises. This is our small business and as retired folks on a fixed income we depend on this for our survival here.

I'm sharing some of recent reviews here so you can see what the guests appreciate about Wonder Valley, i.e., respite from the city, stargazing, tranquility, solitude, quiet, expansive views, etc.

November 2021

Gina's place was exactly what we needed. It's a perfect place to get away. There was so much thought put into this little home. We had everything we needed and more. This stay was nothing like we experienced before. It was so nice to disconnect from the busyness of every day. It was so quiet and peaceful. At night we would sit outside and look at the sky that was covered in stars which was great after a full day of hiking. The shower is a work of art. Actually, there are so many amazing touches throughout. We will most definitely be back! read less

Cecilia, Fresno, CA
Joined in 2018

November 2021

I've stayed in more than 50 Airbnb properties over the past 10 years and Gina's place in Wonder Valley ranks right near the top. The cabin is roomy, comfortable, and well stocked. It's far enough away from town for excellent stargazing at night, yet close enough to Joshua Tree NP and Twentynine Palms for quick and easy access to the park and town. There is no wifi, but I had a reasonably good cellular connection with AT&T. Would definitely stay here again. read less

Duane, Monterey, CA
Joined in 2011

Claudia, Portland, OR
Joined in 2012

March 2022

Stayed here 2 nights with my husband while visiting Joshua Tree national Park. Great location as far as getting to the park goes but also for enjoying the peace and quiet. Enjoyed playing some old tunes while laying outside and stargazing, the light pollution is so minimal it's amazing what you can see. Cabin had everything we needed. thanks for a great stay! read less

Jen, Salt Lake City, UT
Joined in 2017

March 2022

Gina has created a perfect getaway cabin...her attention to detail is wonderful. We loved sitting outside on the chaise lounges stargazing at night and welcoming the sunrise in the morning. We spent our days exploring Joshua Tree National Park. It was a rejuvenating trip. The cabin is incredibly special. read less

Taylor, California, United States
Joined in 2017

December 2022

Absolutely adored our getaway at this incredibly quaint cabin. The owners put a lot of love into this place and every detail has been attended to. It couldn't have been a more peaceful location, away from people, completely quiet with lovely desert views. Great location for stargazing and beautiful sunsets and sunrises. Thank you so much for sharing your home with us. read less

Vivian, Las Vegas, NV
Joined in 2018

December 2022

Cute, clean cabin in a secluded part of the desert. Gina's house was so comfortable and had so much soul. The surrounding landscape was gorgeous with amazing view of the stars. Gina was incredibly fun and responsive—even immediately responding when we needed help at 6am. One of the best Airbnb's we have ever been to. read less

As an STR host in unincorporated San Bernardino County, I respectfully comply and follow the County's codes and regulations. I hope that San Bernardino County Land Use Services and the San Bernardino County Planning Commission will show the same respect for the small business owners and residents of this disadvantaged unincorporated rural community by referring to the Wonder Valley Community Action Guide, by following your own principals and regulations in your Policy Plan and Countywide Plan in making your decision about this proposed development.

Throughout these 18 years of being part of this unique and special community, we have seen numerous Mojave desert tortoises *Gopherus Agassizii* at and around our cabin and other properties we own all within a ½ mile to 1 mile proximity North of this proposed high occupancy development which if built will include a 210 space paved parking lot. At least 3 different times, we've had 3 different tortoises seek shade under our vehicles in Wonder Valley. One should always check under their vehicle before driving off in this desert tortoise habitat area during their active season.

July 2015 Photo taken by me (Gina Kohn) of adult desert tortoise seeking shade under my truck at our cabin at 78426 Raymond in Wonder Valley only ½ mi North from the proposed Wonder Inn Hotel Resort

We had the remarkable experience of seeing a tiny hatchling meandering in our wash!

March 2019 our daughter, Halle Kohn, with tears of joy at the discovery of a desert tortoise hatchling (about 2 ½ inches in diameter) on our property that is 1 mile North of the proposed development.

March 2019 Photo taken by me (Gina Kohn) of the above discovered desert tortoise hatchling found on our property that is 1 mile North from the proposed Wonder Inn Hotel Resort

We squealed with delight and cried tears of joy but the joy soon turned to tears of hopelessness because we knew this tiny little hatchling with it's thin, vulnerable soft new born shell, only had a 10 percent chance of becoming an adult. The top threats these threatened/soon to be listed endangered species face is loss of habitat from development, raven predation (people's trash brings them here) and vehicles running over them. Please disclose how the developers intend to make sure no tortoises will be killed by this proposed Hotel Resort by any of the above threats. The only way to ensure no harm to any tortoise is by NOT BUILDING IT AT ALL.

There is proof that there is at least one desert tortoise on the property by a study done by renowned tortoise biologist Ed LaRue of Circle Mountain Biological Consultants, Inc. Being that the developers and/or their agent intentionally left out this critical information is very concerning and should be a huge red flag as to their trustworthiness and integrity moving forward.

During the past 18 years, we've seen a hatchling, numerous subadult and adult tortoises in their burrows, seeking shade, chomping on native flora, napping under a creosote (and a vehicle), meandering over rocky mounds and in the washes in and around our properties during their active season. We've seen empty, broken tortoise eggshells, scat tracks and unfortunately the tiny pecked and empty carapaces of two hatchlings left by scavenging ravens.

We feel so incredibly lucky that this area, Wonder Valley, is still habitat to this critically threatened/soon to be listed endangered species and my family and I are dedicated and committed to ensure their survival and save their habitat from destructive developments such as the proposed Wonder Inn Hotel/Resort.

In January 2021 we had another wonderful experience of finding a Western Burrowing Owl *Athene cunicularia ssp. Hypugaea* on our property.

Photo by me (Gina Kohn) of a threatened Western Burrowing Owl Jan 2021 at our property 78426 Raymond Drive Wonder Valley ½ mile North from the proposed Wonder Valley Hotel Resort.

In your Mitigated Negative Declaration, you state that the elements I have mentioned in my comment letter will not have a significant impact. This issuance of an MND rather than an EIR has been an insult to the community of Wonder Valley and the citizens of San Bernardino County. This development will have a significant negative impact on my family, neighbors, community and the threatened desert tortoises and western burrowing owls. You cannot pretend they don't exist here, nor can you deny the fact that PEOPLE and COMMUNITY LIVE here, when you ignored the Wonder Valley Community Action Guide. Show the Wonder Valley Community and greater San Bernardino County Community the respect they deserve by following your own County Plans, Principals and requirements that your Agency established. An EIR is the least, last due diligence you must fulfill to safeguard this beautiful, scenic, expansive place, home of the desert tortoise, burrowing owl and people who love it, who live and breathe to protect it and I hope you will consider my comments in your evaluation for this proposed development.

Respectfully,

Gina Kohn

Gina Kohn
71212 El Paseo Drive
Twentynine Palms, CA 92277
ginasuz@gmail.com

From:	stopwonderinn info
To:	Khan, Azhar
Cc:	Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject:	Our Response to the PROJ-2021-00163 IS/MND
Date:	Wednesday, February 22, 2023 7:17:50 AM
Attachments:	Stop Wonder Inn IS-MND Comments on PROJ-2021-00163.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Mr. Khan,

Attached you will find the Stop The Wonder Inn Working Group's response to the IS/MND re PROJ-2021-00163. We will also be sending a hard copy of this document via USPS, postmarked before the 4:30 PM deadline, today.

Please confirm that upon receipt you can open and review this document.

Thank you again for the opportunity to comment.

Sincerely,

Eric Hamburg
Member of the Stop The Wonder Inn Project Working Group
323.632.5542

Stop Wonder Inn Project

PO Box 1722, Twentynine Palms, CA 92277

info@stopwonderinn.org

February 22, 2023

Attn: Azhar Khan, Planner
County of San Bernardino
Land Use Services Department, Planning Division
385 N. Arrowhead Ave 1st Floor
San Bernardino, CA 92415
azhar.khan@lus.sbcounty.gov

Sent via email and US Postal Service

Re: Wonder Inn Hotel/Resort (Twentynine Palms), PROJ-2021-00163

Dear Mr. Khan,

Thank you for the opportunity to comment on the Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed Wonder Inn Hotel/Resort (Project).

The undersigned comprise a mix of residents, homeowners, property owners, and small-business owners in Wonder Valley, with residency going back as long as 30 years. We are profoundly interested in the well-being and future of Wonder Valley. As such, we have been working together to exercise our rights and duties as citizens to understand the implications of the Project and to use the tools of education and advocacy to make our findings known to our neighbors and to decision-makers in San Bernardino County.

Our review of the IS/MND reveals numerous deficiencies, indicating further study is needed to adequately evaluate potential significant impacts on the Wonder Valley community, environment, and resources. Substantial evidence demonstrates that impacts from the Project are individually and cumulatively significant.

Accordingly, the County must prepare a complete, certified Environmental Impact Report (EIR) addressing these impacts, in full compliance with the California Environmental Quality Act (CEQA), before it can approve the Project.

Further, while we are following the County's process and commenting in credible detail, **we request that the rezoning applied for in the Conditional Use Permit and the amendment to the General Plan should be denied.**

In addition to responding to the IS/MND, we want to clearly state here that we and many members of our community, as reflected by the many comments that have been sent to Land Use Services (LUS) regarding this project over the past year since we learned of the Conditional Use Permit (CUP) application, and most recently in specific objection to it, are completely opposed to this project being built. Even taking account all of the developer's studies as laid out in the Appendices and the Substantiations and Mitigations documented in the IS/MND, and which we are providing our comments to in credible and extensive detail, we strongly believe that, given the existing rural/residential environment, the Project's conflict with the Goals stated in the Land Use Elements of the Countywide Plan that apply to Wonder Valley, and the fact there is *nothing* of this type of major development in existence in Wonder Valley, a hotel/resort of this type is anomalous, inappropriate and undesired. It would establish an unacceptable precedent in the Wonder Valley area that would likely open the door to further highly undesired development.

We present our detailed comments ("Response Comments") divided into two parts.

Part One is "General Areas of Concern", addressing issues that apply across the entire IS/MND.

1. **Description of the Setting Is Inadequate**. The built and cultural environment is not included in the IS/MND, failing to establish the baseline physical conditions and to comply with County Policy as required by CEQA and preventing a proper evaluation of the potential for significant environmental impacts.
2. **Environmental Justice**. Wonder Valley is a Disadvantaged Unincorporated Legacy Community, but Environmental Justice is not addressed at all in the IS/MND as required by CEQA.
3. **Size, Scope, and Piecemealing**. Inconsistencies throughout the IS/MND prevent a full understanding of the actual size of the Project, and the discovery of an undisclosed plan for a luxury housing development on adjacent acreage owned by the developers *already in promotion* but not included in the Project description raise serious questions of piecemealing which is prohibited by CEQA.

Part Two includes response to the individual environmental factors in the CEQA checklist. Some issues of particular concern include:

- **I: Aesthetics**. Significant impacts on scenic vistas and County scenic route; numerous new sources of lighting cumulatively significantly impacting Dark Night Skies, a community designated valued asset.
- **II: Air Quality**. Significant increase in traffic-related air pollution, including PM10 and PM2.5 related to traffic on dirt roads, not fully analyzed.
- **IV: Biological Resources**. Omission of evidence of presence of the threatened desert tortoise, serious issues with extremely opposed data, and lack of a valid focused survey.
- **V: Cultural Resources**. Failure to properly evaluate property and district historical resources.
- **VI: Energy**. Failure to adequately evaluate potential for overload of already strained power grid.

- **VII: Geology/Soils**. No evidence of completion of percolation test for septic system; assessment needed of potential for damage from near-by active faults.
- **VIII: Greenhouse Gas Emissions**. No solar power included in project plans.
- **IX: Hazards and Hazardous Materials**. Inadequate evaluation of potential soil contamination with PCBs and mining waste products, and of potential for asbestos and lead in pre-1970 building.
- **X: Hydrology/Water Quality**. Unsupported claims of water potability; potential pollution of groundwater supplies from contaminated soils; insufficient assessment of water table and projected water use; questions of compliance with regulations on hauled water, well improvement permits, and Drought Emergency Proclamations; and appropriateness of transient non-community water system classification.
- **XI: Land Use/Planning**. Failure to adequately evaluate Project's use of land in accordance with the Principles and requirements of the San Bernardino Countywide Plan, the Wonder Valley Community Action Guide, and CEQA.
- **XIII: Noise**. Failure to fully evaluate noise impacts from special events, from increased traffic including off-road vehicle use, and from increased air traffic. Inadequate noise study.
- **XIV: Population and Housing**. Unplanned and unsupported population growth; gentrification and displacement in a disadvantaged community.
- **XV: Public Services**. Inadequate evaluation of increased burden on already insufficient services including Fire, Paramedic and Sheriff, with potential increased demand over 20%.
- **XVII: Transportation**. Failure to fully evaluate increased traffic including from special events, impacts from advertised off-highway vehicle tours and guest exploration of neighborhood, impacts to Gammel Road between Amboy Road and Highway 62, hazardous road condition created by rise on Amboy Road in front of property, and inadequate details on road modifications.

We appreciate Land Use Services taking the following comments into consideration, as well as the many other substantive comments that have been submitted from other members of the community.

A note on style: These comments were generated by a grassroots group of concerned neighbors, not experts. There are a variety of styles, including different ways each person may have expressed their concerns and/or highlighted their questions.

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PART 1:

General Areas of Concern

DESCRIPTION OF THE SETTING IS INADEQUATE

INTRODUCTION

In order for the potential for significant environmental impacts from a Project to be assessed, the existing environmental setting must be described so as to determine the baseline physical conditions. The Initial Study/Mitigated Negative Declaration (IS/MND) has failed to adequately describe the setting throughout the volumes, specifically not acknowledging the built and cultural environment beyond the single, recurring, and misleading word *undeveloped*. There is essentially no mention of the existence of a community anywhere in the volumes, or that the Project would be centrally located in that community. This does not meet the requirements of the California Environmental Quality Act (CEQA) or the Countywide Plan and interferes with the adequate assessment of potential significant environmental impacts as discussed throughout these Response Comments. That assessment cannot be made without a full study of the environment including the setting, and therefore a complete, certified Environmental Impact Report (EIR) is essential.

PROJECT SETTING NEEDS TO BE DESCRIBED

CEQA requires the setting of the Project to be described:

> 15063. INITIAL STUDY (d): Contents. An Initial Study shall contain in brief form:
>
> (1) A description of the project including the location of the project;
> (2) An identification of the environmental setting

Also to meet the requirements of CEQA, the IS/MND must note potential impacts due to any conflict with land use policy:

> *b) [Would the project] cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?* (p.62)

However, the IS/MND fails to do either. The San Bernardino Countywide Plan Land Use Element requires that new development "be consistent with and reinforce the physical and historical character and identity of our unincorporated communities."

> **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, as described in Table LU-3 and in the values section of Community Action Guides. In addition, we consider the aspirations section of Community Action Guides in our review of new development. Refer to Aspirations statement above and the Table below as it relates to Rural Desert Communities.

In order to have consistency with and reinforcement of the "physical and historical character and identity of "the unincorporated communities, that character and identity must be known and described. The IS/MND does NOT discuss compliance or conflict with Policy LU-4.5 or even mention the existence of the Wonder Valley Community Action Guide, *where the setting for the Project in terms of the physical and historical character and identity of the unincorporated community of Wonder Valley is described.*

WONDER VALLEY AS PART OF THE SETTING IS NOT DESCRIBED

The IS/MND contains essentially no description of the setting that includes the physical and historical community character and identity.

Page 7 of the Cultural Resources Assessment does include some older history of the greater Twentynine Palms area but utterly fails to mention or address the Small-Tract Act of 1938, the single greatest influence on the historical and modern face of Wonder Valley as community and as built, cultural, natural, and regulated environment. (See section "V. Cultural Resources", "Small-Tract Act Homestead District", in these Response Comments for discussion of the history, the importance, and the historical significance of the Small Tract Act in Wonder Valley.)

Throughout the IS/MND the recurring description of the setting is as follows:

> The Project Site is located within an unincorporated area of the County and has a zoning designation of Rural Living and is not subject to a Community Plan. The Project vicinity is primarily an unincorporated, undeveloped area, approximately 4.5 miles east of the City of Twentynine Palms and approximately 9 miles south of the Bullion Mountains. The Project Site is located within an area that is primarily vacant for approximately 1 mile on the north, south, east and west. Large-lot rural residential land uses exist primarily on Goodwin Road to the east and Mojave Road to the west.

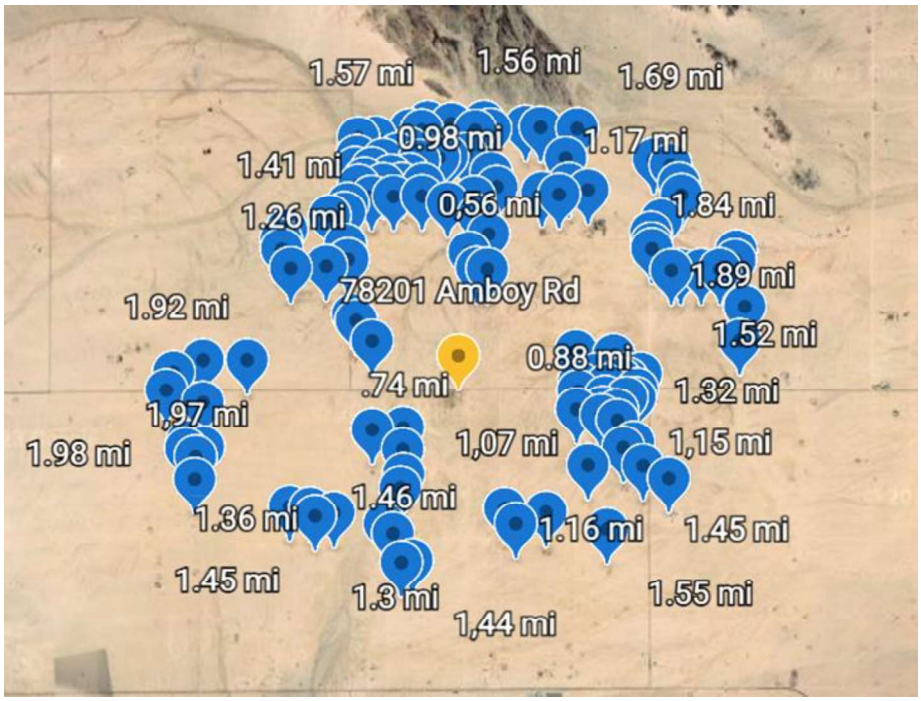
This description, or any other appearing in the IS/MND, is not adequate to establish the environmental setting constituting the "baseline physical conditions by which a lead agency determines whether an impact is significant" as required by CEQA 15125. ENVIRONMENTAL SETTING (a). Therefore, in order to determine the potential for significant impacts on the environment from the Project, a full study in the form of a complete, certified EIR is necessary.

WONDER VALLEY AS SETTING

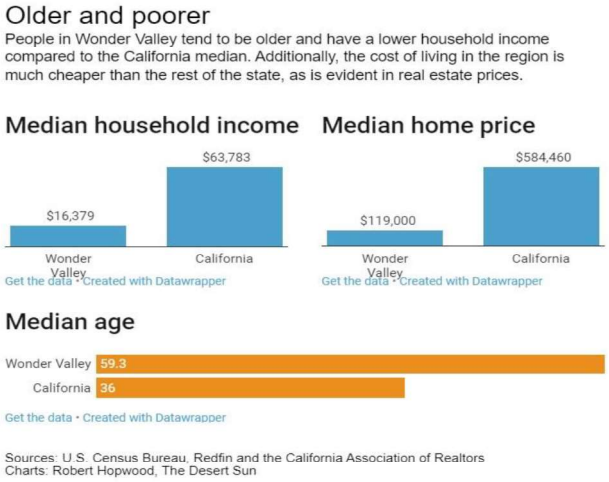
So, let's give Wonder Valley a face, and the Project a setting. What *is* the physical and historical character and identity of Wonder Valley?

Despite the recurring description as "undeveloped", Wonder Valley is not "undeveloped" but rather is developed in an idiosyncratic manner consistent with its historical origins in the Small Tract Act of 1938. (S*ee* section "V. Cultural Resources".) Residences are scattered irregularly and sparsely across a broad, open desert basin, interspersed with tracts of public lands and tending to blend into the landscape. But, though almost invisible in this immense natural environment, the residents ARE there, and they add up to a community.

The map below pins residences (blue) in Wonder Valley within a two-mile radius of proposed Wonder Inn (yellow pin). (Courtesy Google Earth)



The 1019 residents (2020 Census) of Wonder Valley are spread across 147 square miles. Residents are mostly older (average age 59.3) and poorer, with a median income of $16,379 *(Source below).*



Source: Desert Sun 2018 desertsun.com

The physical and historical character and identity of Wonder Valley may best be described by the residents themselves in the Wonder Valley Community Action Guide (WVCAG), part of the

Countywide Plan. https://countywideplan.com/wp-content/uploads/sites/68/2020/07/34_Wonder-Valley_CAG_2020.pdf Quotes following are from the WVCAG.

Physically, "Wonder Valley consists of single-family residential dwellings, primarily single story, located on 5-acre parcels. Many of the old homestead cabins have been updated for use as first or second homes. The main thoroughfare in Wonder Valley is Highway 62 (Twentynine Palms Highway), a paved two-lane highway with one lane of travel in each direction. Amboy road is located parallel to the north of Highway 62, and is another main road through the community. Local roads are mainly dirt. There are no pedestrian or bicycle facilities in the area. The closest commercial uses are located within the city limits of Twentynine Palms."

What do the residents value? From the WVCAG, the following word cloud was created during a community survey done in 2018 and highlights the values of this community. The size of the words are indicators of how often that word was mentioned in the survey
.

Per the WVCAG, "As a community, Wonder Valley values:

- **Rural Atmosphere.** The large lots and space between properties give residents room to breathe. Wide open spaces allow residents to appreciate and maintain the solitary, laid-back lifestyle of this area.
- **Natural Desert Beauty**. Residents value the beautiful sunrises and sunsets, the dark and starry night skies and the desert views and wildlife.
- **Community Spirit**. Wonder Valley is a tight-knit community whose residents value self-reliance and neighborly support. The people have a respect for nature, freedom, privacy, and each other. Here, residents work together but also enjoy their independence and being left alone in solitude.

Finally, "As a community, Wonder Valley aspires to maintain the Rural Atmosphere: Wonder Valley provides residents with a rural lifestyle on large lots with dark night skies."

Wonder Valley residents originally came here with these values and aspirations, and for 80 years they have maintained them.

And they make sacrifices to live here. The community has challenges, including a harsh environment and especially lack of public services. (See "XV: Public Services" in these Response Comments.) A current challenge the community is facing, due mostly to larger social and economic trends, is the accelerating growth of short-term rentals (STR), which, on the one

hand, bring money and opportunity into the community, but, on the other hand, can put pressure on housing stock, already stressed public services, and the cost of living, and can introduce other disruptions and nuisances.

This, taken together, is the setting for the proposed Wonder Inn Project - a setting whose description was available and *required by the Countywide Plan to be considered* in the IS/MND, yet was ignored.

CONCLUSION

Essentially, the Wonder Inn Project would create a shiny Castle on the Hill, dense, vertical, and dominant above a broad, flat, wild desert basin scattered with the small, dusty cottages of a disregarded community that is invisible in the IS/MND.

Issues related to the particular setting of Wonder Valley are found throughout these Response Comments, coming up again and again. The lack of description or even acknowledgement of the specifics and peculiarities of the setting – *the baseline physical conditions* - render much of the evaluation in the IS/MND inadequate and its determinations unreliable. An evaluation of the potential for significant environmental impacts cannot be made without a full study of the environment *including the setting*, and therefore a complete, certified EIR is essential.

ENVIRONMENTAL JUSTICE IS NOT ADDRESSED

What is environmental justice, and how does it apply to this Project?

> "Low-income communities and communities of color often bear a disproportionate burden of pollution and associated health risks when compared to their more affluent neighbors. This inequity can be addressed through environmental justice, which is defined by California law as "the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies." (Gov. Code, § 65040.12, subd. (e).)" *from Comments by Attorney General Xavier Becerra on the San Bernardino Countywide Plan Draft EIR, August 2019*

Per the office of current Attorney General Rob Bonta, State of California Department of Justice,

> "CEQA requires government agencies in California to consider potentially significant environmental impacts on communities already burdened with pollution when reviewing and permitting new projects. The Attorney General is particularly concerned that land use planning and permitting decisions consider and address any additional burdens on environmental justice communities." (*https://oag.ca.gov/environment/justice*)

Yet there is no mention of environmental justice or the Wonder Valley community, or any description whatsoever of the community, in the Initial Study/Mitigated Negative Declaration (IS/MND) and the 895 pages of analysis, reports, and information included in the Appendices. (*See* section "Description of Setting Is Inadequate" in these Response Comments.) This reflects poorly upon the project applicants. One might conclude that they have neither interest in, nor concern about our Wonder Valley community - or their impact upon it.

The California Environmental Quality Act (CEQA) requires Environmental Justice be included in the CEQA studies, which it appears may not have been done for this project. Therefore, a complete Environmental Impact Report (EIR) must be done to include this vital area of study.

Per former California Attorney General Kamala Harris,

> Human beings are an integral part of the 'environment.' An agency is required to find that a 'project may have a 'significant effect on the environment' if, among other things, 'the environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly. (*https://oag.ca.gov*)

Indeed, people are part of the environment and this project will have significant impacts upon our rural and underserved community, especially for the people who live here full time. At minimum, the character of our community will be significantly impacted and devalued by the addition of this large, luxury hotel and event space. Our quality of life will be dramatically changed. And, at worst, our safety will be at risk, and lives and property may be lost due to the increasing demand upon Public Services in this already underserved community.

What are some of the environmental justice requirements of the County of San Bernardino?

From the San Bernardino County Policy Plan 2020: Safety & Security Section, Hazards Element

Principles: We believe:

- A safe environment is necessary to build and maintain a sustainable and prosperous county.
- The County is proactive in lessening risks from natural and human-generated hazards.
- Reduction in the loss of life, injury, private property damage, infrastructure damage, economic losses, and social dislocation can be achieved through planning and preparedness.
- Emergency response and recovery efforts contribute to a resilient county, given unavoidable emergencies and natural disasters.
- Those who live in unincorporated disadvantaged communities should not be burdened with elevated exposure to pollution risks and reduced access to public facilities and services.

COMMENT: As discussed in Section "XV: Public Services", these goals have not been met.

From the San Bernardino County Policy Plan 2020: Safety and Security Section | Hazards Element September 2022 - County Policy Plan Adopted 9/27/22:

> Policy HZ-3.17 **Community stakeholders.** We identify and coordinate with key community stakeholders through advisory committees or other methods to increase public awareness and obtain timely community input concerning potential funding opportunities, conditional use permits, changes in zoning, and amendments to the Policy Plan in or adjacent to environmental justice focus areas.

COMMENT: Who, in our community of Wonder Valley, has been involved in the zoning and conditional use applications for this Project as a 'stakeholder'? Who, in our community, has been identified as a 'stakeholder'? As residents and community members, we are unaware of any such effort and therefore have had no 'voice' in participating in community input on this Project, other than responding to this CEQA IS/MND.

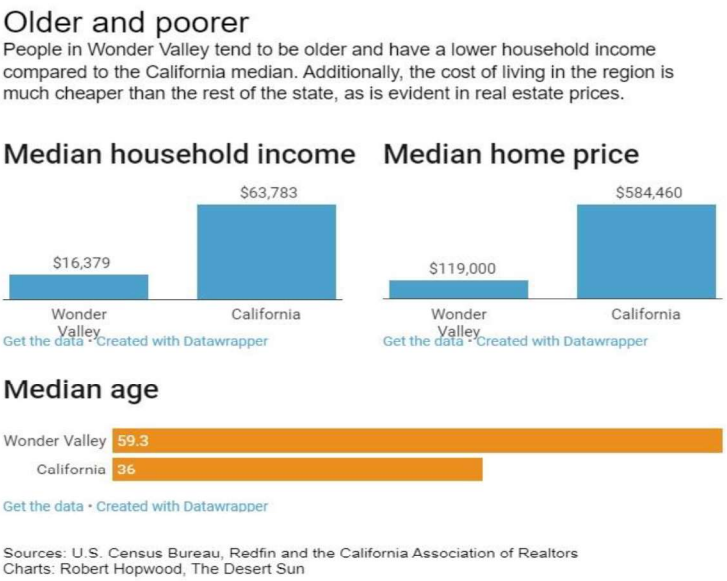
Also from the San Bernardino County Policy Plan 2020: Safety and Security Section | Hazards Element:

> Policy HZ-3.18 **Application requirements.** In order for a Planning Project Application (excluding Minor Use Permits) to be deemed complete, we require applicants to indicate whether the project is within, adjacent to, or nearby an unincorporated environmental justice focus area and, if so, to:
>
> - document to the County's satisfaction how an applicant will address environmental justice concerns potentially created by the project; and
> - present a plan to conduct at least two public meetings for nearby residents, businesses, and property owners to obtain public input for applications involving a change in zoning

or the Policy Plan. The County will require additional public outreach if the proposed project changes substantively in use, scale, or intensity from the proposed project presented at previous public outreach meeting(s).

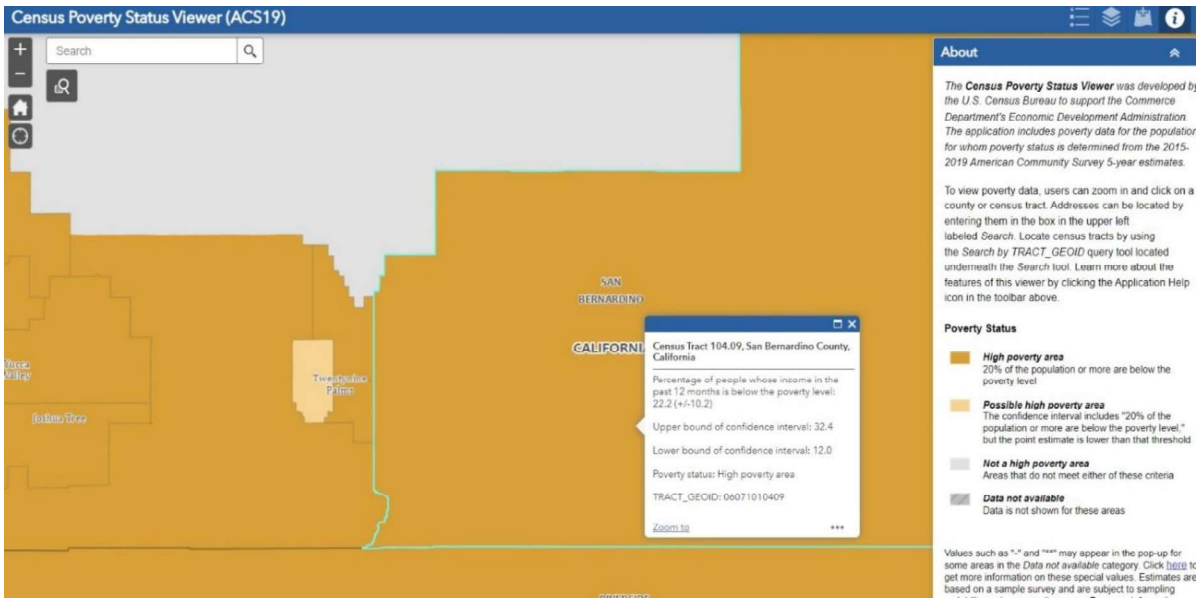
Have the requirements of Policy HZ-3.18 been met? Let's see:

Wonder Valley is a poor unincorporated area:



Source: Desert Sun 2018 desertsun.com

Wonder Valley is in a High Poverty area:



Wonder Valley was included in the Legacy Community Study Areas as a Disadvantaged Unincorporated Legacy Community in the Final EIR for the Countywide Plan:

Table 1-2 Legacy Community Study Areas

Valley Region	
There are no unincorporated communities that match the criteria set forth in California Government Code Section 65302.10.	
Mountain Region	
Bear Valley area: Big Bear City, Fawnskin (Northshore), Moonridge, and Sugarloaf	Lake Arrowhead area: Twin Peaks
Crest Forest area: Cedarpines Park, Crestline (Lake Gregory), and Valley of Enchantment	Additional communities with areas that match the criteria: Agua Fria, Blue Jay, Crest Park, Lake Arrowhead, Rimforest, and Skyforest
Forest Falls	Wrightwood
Hilltop area: Arrowbear and Running Springs	
Desert Region	
Baker	Phelan
El Mirage	Pinon Hills
Havasu Lake*	Pioneertown area: Gamma Gulch, Pioneertown, Pipes Canyon, and Rimrock
Homestead Valley area: Flamingo Heights, Johnson Valley, Landers, Yucca Mesa	Red Mountain
Joshua Tree	Ridgecrest area*
Lucerne Valley	Searles Valley
Morongo Valley	Trona
Newberry Springs*	Wonder Valley
Oro Grande	Yermo

* The entire community does not match the criteria set forth in state law as a disadvantaged unincorporated legacy community, but portions of the community area do match the criteria.

COMMENT:

- When can we expect the County to share this information with us, the community?
- This project proposes to change zoning on 24 acres, and includes a CUP. To date, the applicants have not conducted a public meeting.
- NO official or properly noticed public meetings have been held or scheduled, and this Initial Study is the FIRST opportunity that the public has had to comment on or offer any input on.

Again, the San Bernardino County Policy Plan 2020: Safety and Security Section | Hazards Element:

Goal HZ-3 Environmental Justice

Policy HZ-3.2 **Studying and monitoring.** We coordinate with state and regional regulatory entities to monitor pollution exposure, publicize pollution data, and identify solutions in unincorporated environmental justice focus areas. We work with state and regional regulatory entities to pursue grant funding to study cumulative health risks affecting such areas.

Policy HZ-3.7 **Well water testing.** In unincorporated environmental justice focus areas that are not served by public water systems, we periodically test well water for contamination, identify potential funding sources, and, where feasible, provide technical assistance to implement necessary improvements, with particular emphasis in addressing the types of contamination identified in the Hazard Element tables.

COMMENT: To our knowledge, no studies have been done of our community. IF any studies have been done, kindly tell us where we can access these reports.

These are a few of the many reasons why we are requesting that a complete, certified Environmental Impact Report per the requirements of CEQA be done to fully address the significant numerous adverse impacts upon this Disadvantaged Unincorporated Legacy Community. It is our belief that this full study will reveal the many reasons why this project is not suitable for this area.

References

https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej_fact_sheet.pdf

https://www.desertsun.com/story/news/2018/05/24/wonder-valley-life-threatened-nature-authorities-and-tourists/612176002/

SIZE, SCOPE, AND PIECEMEALING

The size and scope of the Project are not clear, and we have serious concerns that the Project applicant may be involved in "piecemealing," or segmenting, which is prohibited by the California Environmental Quality Act (CEQA).

What is piecemealing, or segmenting?

Per CEQA Portal (Association of Environmental Professionals https://ceqaportal.org/tp/CEQA%20Project%20Description%202020%20Update.pdf):

> The CEQA Guidelines define a project under CEQA as "the whole of the action" that may result either directly or indirectly in physical changes to the environment. This broad definition is intended to provide the maximum protection of the environment.
>
> Piecemealing or segmenting means dividing a project into two or more pieces and evaluating each piece in a separate environmental document, rather than evaluating the whole of the project in one environmental document. This is explicitly forbidden by CEQA, because dividing a project into a number of pieces would allow a Lead Agency to minimize the apparent environmental impacts of a project by evaluating individual pieces separately, each of which may have a less than-significant impact on the environment, but which together may result in a significant impact. Segmenting a project may also hinder developing comprehensive mitigation strategies.

CEQA prohibits piecemealing. Again, per CEQA Portal:

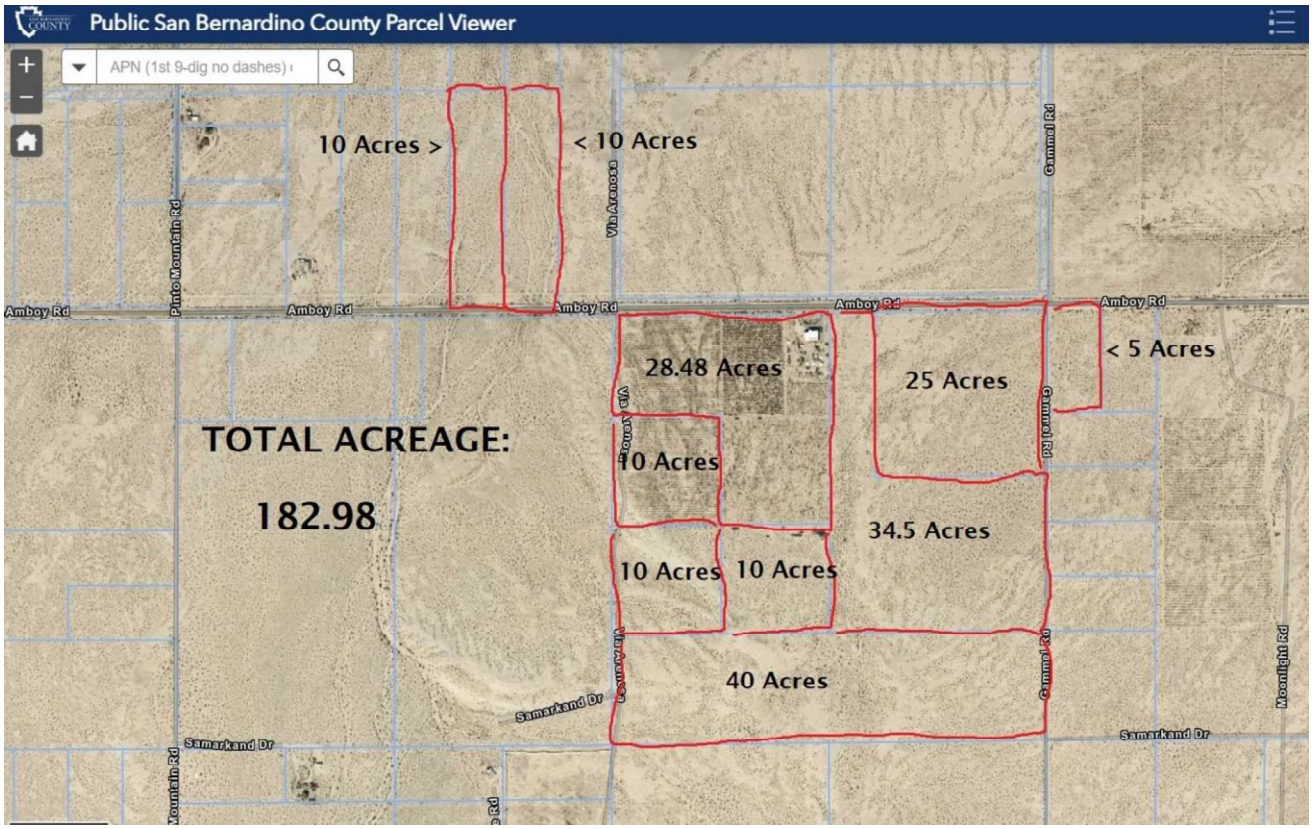
> CEQA case law has established the following general principles on project segmentation for different project types:
>
> - For a phased development project, even if details about future phases are not known, future phases must be included in the project description if they are a reasonably foreseeable consequence of the initial phase and will significantly change the initial project or its impacts. *Laurel Heights Improvement Association v Regents of University of California* (1988) 47 Cal. 3d 376.

CONCERN: SIZE AND SCOPE

The Project size and scope is not clear. The Wonder Inn Project applicants have given us a broad stroke view of their project, but there is much information missing. We have many questions regarding the total acreage of the multiple parcels currently owned by the Project applicants and how this land will be used.

There are gross inconsistencies in descriptions of the size and scope of the Project. Full discussion of these inconsistencies is contained in section "XI: Land Use and Planning" of these Response Comments and is hereby incorporated into the concerns in this section.

Further, the proposed Wonder Inn Project is to be situated on **24.4** acres of the 132.98 acres mentioned in the Proposal. It is unclear what is planned for the remaining 130.58 acres mentioned in the proposal. In 2021 the proponents of the Project purchased an additional 50 acres, for a total of **182.98** acres. It is also unclear what is planned for these additional acres. (Please see map below.)



QUESTION: Why were 4 of these parcels, purchased in 2021, not included in the project description?

QUESTION: What future development or land use is planned for the remaining 158.58 acres owned by the project developers?

CONCERN: POSSIBLE INTENTION TO EXPAND PROJECT ONTO ADDITIONAL ACREAGE WITH LUXURY HOUSING

A simple Google search for Wonder Inn / Wonder Valley Inn reveals two links which are of great concern.

First: **Modly – Joshua Tree** *(modly.com/community/joshua-tree)* promoting "Wonder Valley Villas". Note the similar description of "106 bungalow suites, restaurant and bar…". This description mentions 24 private homes on 5 acres each, on a 160-acre site. (Note that various areas of the

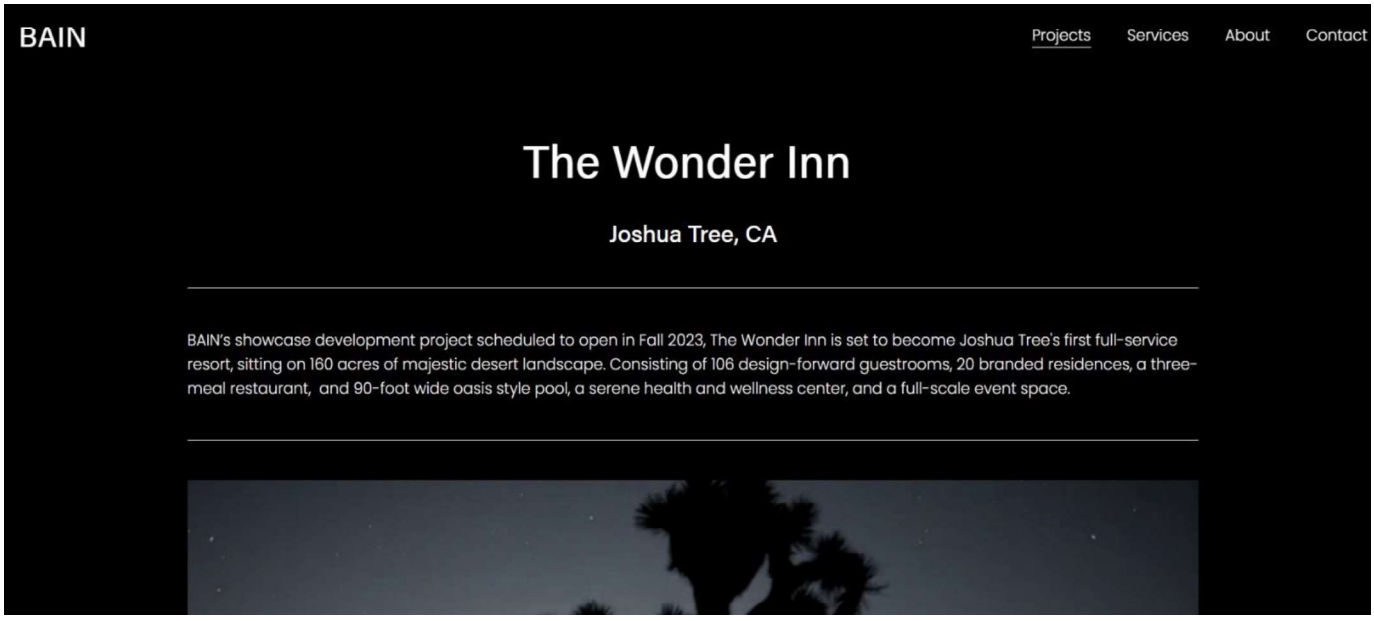
Morongo Basin, including Wonder Valley, are sometimes referred to by the catch-all “Joshua Tree” in promotional literature. In fact, Joshua Tree is a different unincorporated community located around 20 miles to the west.)

Homes developed within Joshua Tree's newest luxury resort

A truly one-of-a-kind resort named Wonder Valley Inn is in development in the heart of Joshua Tree, California just 10-minutes away from the North entrance of the National Park. The resort will feature 106 bungalow suites, a spa with fitness facilities, an expansive oasis swimming pool with adjacent hot tubs and a full-service restaurant & bar. On the 160 acre site, we will be constructing 24 private villa homes, each sitting on a private 5-acres site. Each contemporary home will consist of 4 bedrooms and 3 bathrooms with all the amenities you'd expect including a swimming pool, hot tub, outdoor showers, fire pits, solar panels and an electric car charger. Homeowners can occupy the homes year-round or they can opt-in to have the hotel manage the homes for guests to rent them out at $1,000 Average Daily Rate. This is a fantastic opportunity to own a second home which pays for itself. Residents can move into their Wonder Valley Villas by Q4, 2024.

Lot prices will be starting at approximately $150,000.

Second: **Bain Hospitality** *(bainhospitality/thewonderinn),* which includes this description: “The Wonder Inn is set to become Joshua Tree's first full-service resort, sitting on 160 acres of majestic desert landscape. Consisting of 106 design-forward guestrooms, **20 branded residences**, a three-meal restaurant, and 90-foot wide oasis style pool, a serene health and wellness center, and a full-scale event space.”



Based on review of the websites listed above, it appears that the next phase(s) of the Wonder Inn Project may indeed be already known.

One is obligated to question if the Project developers' plan to begin with this hotel/resort with the many amenities mentioned, then expand into a luxury home development of 20-24 homes, each on 5 acres, each with swimming pool, hot tub, outdoor showers and fire features – each requiring a well, and each home adding to the already over-stressed Public Services.

In light of these promotions and the additional acreage belonging to the applicants adjoining the Project, the possibility of piecemealing is clearly a concern and must be addressed before further consideration of this Project.

Further, the lack of full disclosure of these plans in the currently submitted Project application seems deceptive. It is already being advertised as available, but the first application for the core of the project has not yet been approved and there is no evidence of application for permits yet on the second phase. (Is it legal to sell homes / properties and solicit deposits to reserve them for which there have been no Land Use Services permits filed?)

It is unfair to the community who have extensively examined and responded to the IS/MND in detail to not have access to the developers' complete intent for development, as applied for, fully disclosed so that both the County and the community have the opportunity to respond to the impacts that would be entailed. This is contrary to the intent of CEQA.

Again, it is not possible to effectively evaluate the impact this project would have upon the Wonder Valley environment and community resources without a complete description of the Project. There are environmental factors addressed throughout the IS/MND and these Response Comments where the potential for impacts could change considerably depending on what the size and scope of the Project *actually is*. The possibility for cumulative impacts is clearly significant and must be fully considered. We must have a full Environmental Impact Report to assess this, and any question of piecemealing must be fully examined.

PART 2:

Environmental Factors I - XXII

I. AESTHETICS

The California Environmental Quality Act (CEQA) asks:

a) (Would the project) Have a substantial adverse effect on a scenic vista?

From the developer:

> "The CEQA Guidelines do not provide a definition of what constitutes a "scenic vista" or "scenic resource" or a reference as to from what vantage point(s) the scenic vista and/or resource, if any, should be observed. Scenic resources are typically landscape patterns and features that are visually or aesthetically pleasing and that contribute affirmatively to the definition of a distinct community or region such as trees, rock outcroppings, and historic buildings. A scenic vista is generally identified as a public vantage viewpoint that

> provides expansive views of a highly valued landscape for the benefit of the general public. Common examples may include a public vantage point that provides expansive views of undeveloped hillsides, ridgelines, and open space areas that provide a unifying visual backdrop to a developed area." (p.15 of Initial Study/Mitigated Negative Declaration)

Comment: Regarding the highlighted area above: The developers are describing in detail just what Wonder Valley is – a scenic vista and scenic resource.

The developers continue by describing the proximity to various landmarks, measurements to geological locations and describe physical attributes of their development, which has nothing to do with the CEQA question.

Comment: The developers did NOT answer this question.

Here's also what the developers give for the answer to question a):

"The hotel rooms consist of pre-manufactured structures, two-stories high, (approximately 20 feet high), and are generally placed in groups of two (four rooms total) in various areas of the Project Site, primarily centering around the approximately 6,300 SF circular swimming pool. The existing commercial building is 18 feet high, and most other structures are approximately 20 feet high. The tallest structures on site include the existing geodesic domes, which are approximately 22 feet high, and the proposed water tower, which would be approximately 31 feet high. The planned support structures would be 12 feet high, stucco buildings."

Photo of proposed Wonder Inn from Atelier Eyster Architecture

"Because of the open design concept, it is anticipated that when viewed from a distance, the Proposed Project would blend into the surrounding area similar to the scattered large-lot residences. Therefore, the impact to scenic areas would be less than significant, and no mitigation measures are required."

-How can this new commercial development spread upon 28 acres, with all described above and more, "blend into the surrounding area similar to the scattered large-lot residences?"

-How can this two story, high occupancy proposed hotel/resort blend in or even be compared to be in relation aesthetically to the residences?

-How does a resort of this size, sprawled upon 25-28 acres with a 210-space paved parking lot, compare in relation to and be seen as similar to a 400 square foot home on 5 acres?

a) (Would the project) Have a substantial adverse effect on a scenic vista?

Comment: Based on their own description of the project, with numerous tall structures, the stacked hotel rooms, the amount of site acreage used, the proposed Wonder Inn would have an adverse effect on the scenic vista of Wonder Valley, and would NOT "blend into the surrounding area similar to the scattered large-lot residences."

The landscape of an area defines its cultural, natural, and historic heritage. Scenic routes, special landscape features and vistas of all kinds contribute to a community's character and aesthetic quality. They can also provide tourism-related economic opportunities for our local owned small businesses. Poorly planned development, such as the Wonder Inn Development, will impact and undermine these resources.

Consequently, growth-related problems can have negative effects on communities by threatening their scenic areas and setting a precedent. Preserving the integrity of scenic vistas requires consideration of both the area being viewed (the vista) and the point(s) from which it is seen (the viewing area). This development will alter and degrade the integrity of the scenic vista that is Wonder Valley.

b) (Would the project) Substantially damage scenic resources including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?

Comment: Amboy Road is a County scenic route, but is not a designated State scenic route; however, the existing commercial building (the "Pink Building") does hold historical value to the community. See section "V: Cultural Resources" in these Response Comments for more information in regards to the historical value of the Pink Building.

Comment: This project would substantially damage scenic resources. Visual character and scenic resources have direct economic impacts. Property values, individual well-being, use of recreation areas and small businesses are harmed by degradation of visual quality.

From the American Society of Landscape Architects:

> "'Visual character' refers to characteristics and elements that make a specific environment distinctive and cohesive. 'Scenic quality' is often used to refer primarily to natural features; however, many definitions include cultural elements, as well as experiences and perceptions of both the individual and the larger community. At the turn of the 20th century, John Muir, Theodore Roosevelt, and others campaigned for scenic beauty as part of the growing conservation movement. While they first fought for protection of untouched wilderness and sites of unique scientific conditions, 'scenic

resources' soon grew to encompass agricultural lands, transportation corridors, cultural landscapes, viewsheds, and many other landscapes, both rural and urban.

"The National Environmental Quality Act of 1969 mandated consideration of visual as well as ecological impacts, thus proposed federal projects had to assess potential impacts to historic and scenic properties--and to the experiences of people who view those environments. In the 1994 amendment, this was made clearer, stating the act's purpose was to "assure for all Americans safe, healthful, productive, and aesthetically and culturally pleasing surroundings" (National Environmental Policy Act 1994). This federal mandate spurred systematic assessment of landscape visual quality in the latter half of 20th century and was instrumental in development of numerous planning, design, and management strategies at federal, state and local levels, such as Context Sensitive Design for transportation, Bureau of Land Management Visual Resource Management System, scenic easements, scenic highway programs, signage and landscape ordinances, and building codes to protect and enhance visual character." (ASLA, "Visual Character and Scenic Resources")

Would the project:

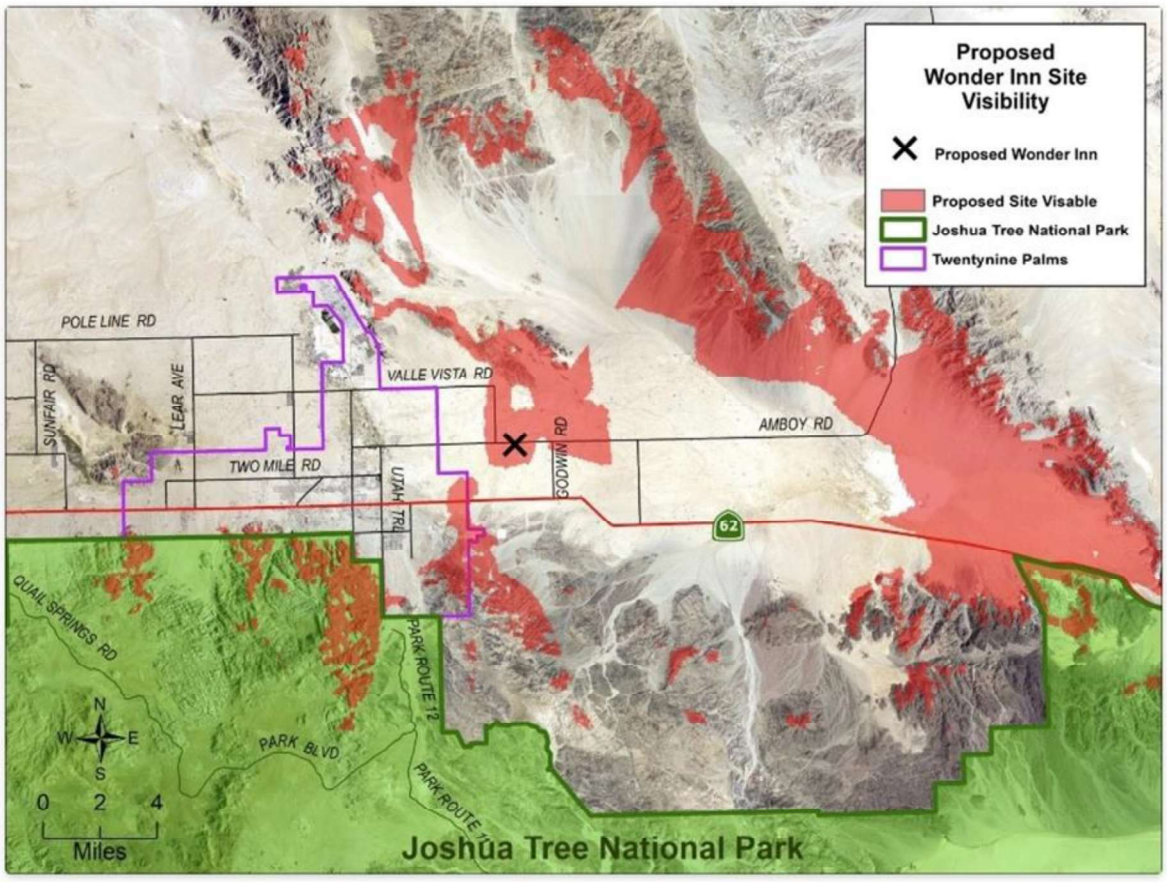
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from a publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

From the Developers:

"The Project Site is located in a non-urbanized area within the East Desert Region of San Bernardino County. The site would be visible from Amboy Road, which is a County Scenic Route. The Proposed Project is the development of a destination resort hotel with an open concept over 28 acres, and it would therefore change the existing visual character of the site. Under the Rural Living Zone, all structures proposed for development of the Proposed Project cannot exceed 35 feet. Compliance with this height limit would minimize potential obstruction of views of the surrounding mountains and other public views. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

Maps Showing Impact Of The Proposed Wonder Inn Project

(via Morongo Basin Conservation Association)



Visibility of Wonder Inn To Surrounding Areas – Light Shed At Night Will Be Visible To An Even Larger Area

COMMENT: (Criterion "c")

Again, reading the developers response, they do not answer the question.

However, when the developers conclude that the impact to the scenic areas would be less than significant, this is in contradiction to their own explanation that *it would in fact* change the existing visual character of the site (see yellow highlighted area above). This large occupancy Hotel/Resort would not only change and degrade the existing visual character of the specific site, but also significantly change and degrade the existing and visual character of the surrounding areas and beyond as this development would be seen for miles, including from vantage points in Joshua Tree National Park.

Valued for the expansive scenic mountain and valley views, extensive open space and absence of urban infrastructure, the community values the scenic qualities; Rural Atmosphere, Natural Desert Beauty and Community Spirit as stated in the San Bernardino Countywide Plan and

Wonder Valley Community Action Guide. The Community Action Guide must be considered in relation to this development and the effect it will have on the visual character and qualities impacting the areas surrounding this proposed development in Wonder Valley.

-Why are the developers ignoring the San Bernardino Countywide Plan and the Wonder Valley Community Action Guide?

SAN BERNARDINO COUNTY | COUNTYWIDE PLAN
Wonder Valley Community Action Guide

Values and Aspirations

Values Statement

The Values are those shared assets, principles, standards, mores, and in the judgement of the community, what is important in the lives of its residents and businesses. A community's values are an important consideration in shaping its aspirations, focus and actions.

As a community, Wonder Valley values:

Rural Atmosphere. The large lots and space between properties give residents room to breathe. Wide open spaces allow residents to appreciate and maintain the solitary, laid-back lifestyle of this area.

Natural Desert Beauty. Residents value the beautiful sunrises and sunsets, the dark and starry night skies and the desert views and wildlife.

Community Spirit. Wonder Valley is a tight-knit community whose residents value self-reliance and neighborly support. The people have a respect for nature, freedom, privacy, and each other. Here, residents work together but also enjoy their independence and being left alone in solitude.

Aspirations Statement

The Aspirations Statement is a written narrative illustrating how the community desires to look and function once the Community Focus Statements and Action Statements are accomplished. This is a long term view of 10 to 20 years. The Aspirations Statement serves as a foundation for developing Community Focus Statements and Action Statements.

As a community, Wonder Valley aspires to:

Better Communication and Services.

The community offers family-oriented activities, community health services including mental health services, services for the disadvantaged, improved public transportation, a local fire station and locally based Sheriff's response.

Maintain the Rural Atmosphere.

Wonder Valley provides residents with a rural lifestyle on large lots with dark night skies.

Comment: The developers conclude the area surrounding the proposed development is primarily "vacant". Wonder Valley residents, homeowners and visitors define areas such as these as "wide open spaces and "room to breathe." A thriving community, residents, homeowners, and small businesses that depend on these valued assets, surround this prospective site.

From the San Bernardino County, CA Code of Resources, Development Code

§ 82.19.040 **Development Criteria within Scenic Areas.**

(a) Applicability. The criteria below shall be used to evaluate a land use proposed within a scenic area in an Open Space Overlay and shall apply to:

(1) Areas with unique views of the County's desert, mountain and valley areas or any other aesthetic natural land formations.

Comment: One of the attractions of Wonder Valley is its wide-open spaces, scenic views of mountains all around, expansive desert landscape and natural land formations. The proposed development would only detract from the open space.

(2) An area extending 200 feet on both sides of the ultimate road right-of-way of State and County designated Scenic Highways as identified in the General Plan. The area covered may vary to reflect the changing topography and vegetation along the right-of-way.

Comment: Amboy Road is a designated Scenic Route and is identified as such in the Countywide Policy Plan.

-Will the proposed project follow this criterion (2) noted above?

(b) Report. A special viewshed analysis shall be required if it is determined through the preparation of an Initial Study pursuant to the California Environmental Quality Act (CEQA) that the proposed project may have a significant negative impact on the scenic values of the subject parcel. This analysis shall identify mitigation measures designed to reduce or eliminate potentially significant impacts to the viewshed.

Comment: Based on the Development Criteria within Scenic Areas, (b) Report, a special viewshed analysis IS required based on CEQA and that this proposed project WILL have a significant negative impact on the scenic values in Wonder Valley as described by this Development Criteria.

I am formally requesting a special viewshed analysis for the proposed Wonder Inn as required by the San Bernardino County Development Code.

(c) Building and Structure Placement. Structure placement and style shall be compatible with and shall not detract from the visual setting or obstruct significant views.

Comment: As previously noted, there are numerous structures over 20 feet high and above, up to 35 feet high, including a water tank, geodesic domes, parking light poles, event center, statues, hotel rooms and more, all spread upon 25 acres. This proposed project WILL detract from the visual setting AND obstruct significant views.

-Why is this resort/hotel being considered for construction when it is NOT compatible with the environment and Wonder Valley?

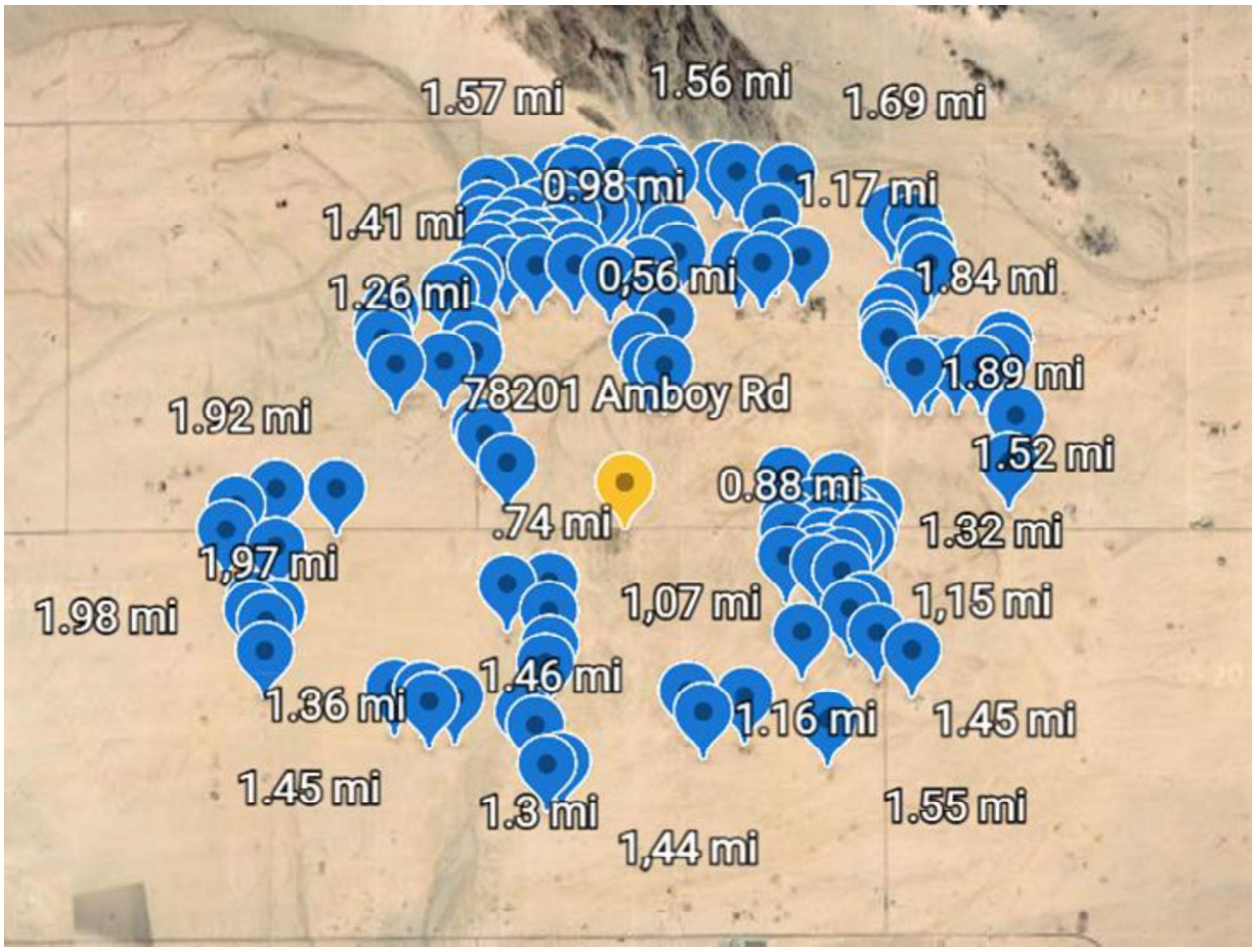
(d) Review Area. Land development proposals, including but not limited to residential facilities, commercial activities and mobile home parks/manufactured home land-lease

communities, shall be designed to blend into the natural landscape and maximize visual attributes of the natural vegetation and terrain. The design of development proposals shall also provide for maintenance of a natural open space parallel to and visible from the right-of-way.

Comment: The proposed project upon 25 acres does NOT blend into the natural landscape. It does NOT maximize visual attributes of the natural vegetation and terrain.

-How can a proposed project of this size and scope blend into the natural desert landscape at all?

-Does the proposed project provide maintenance of a natural open space parallel to and visible from the right-of-way?



Residences surround the proposed project. (Map source: Google Earth)

Comment: As shown on the above map, the proposed Wonder Inn sits in the center of a rural community and would certainly not meet this Countywide Plan Values Statement:

> "*Rural Atmosphere.* The large lots and space between properties give residences room to breathe. Wide open spaces allow residences to appreciate and maintain the solitary, laid-back lifestyle of this area."

-Why are the developers ignoring the existence of a rural residential community here?

Comment: Open space is a valued aesthetic element that connects our homes and land and is part of our community's identity. Although the residencies are spread out, we consider this area to be a tight-knit community, as described in the Values Statement above. This is also a community that values land stewardship and aims to protect the viability of natural resources and open spaces as valuable aesthetic and economic assets. Aesthetics are an economic value for locals who own and operate short term rentals on their property and they depend on the income generated by tourism to this area for economic survival.

-How would this development affect the locally owned Short-Term Rentals (STR) for those residents who depend on this income?

-Would tourists frequent the local owned STR's if a development of this size takes away from the community's aesthetic values?

As stated in the San Bernardino Countywide Plan Goals and Policies - Goal LU-4 Community Design: **"Preservation and enhancement of unique community identities and their relationship with the natural environment"** is followed by this:

> **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, as described in Table LU-3 and in the values section of Community Action Guides. In addition, we consider the aspirations section of Community Action Guides in our review of new development. Refer to Aspirations statement above and the Table below as it relates to Rural Desert Communities."

Table LU-3. Community Character

Community Category	Key Characteristics and Features
Valley Communities Bloomington, Mentone, Muscoy, San Antonio Heights	▪ A suburban lifestyle characterized by a mix of lot sizes and/or land uses in proximity to urban services and facilities. ▪ Views of canyons and hills within the community planning area (Mentone and San Antonio Heights). ▪ Economic activity that benefits local residents and/or serves the local economy.
Mountain Communities Angelus Oaks, Bear Valley [1], Crest Forest [2], Hilltop [3], Lake Arrowhead [4], Lytle Creek, Mt Baldy, Oak Glen, Wrightwood	▪ A rural lifestyle characterized by low density neighborhoods oriented around commercial or recreational nodes, and the prevalence of the forest and mountain landscapes and natural resources. ▪ Abundant views of open spaces, natural features, and dark skies. ▪ Scenic, natural, and recreational features that serve as the foundation of the community's local economy and attract tourists. ▪ Small businesses that serve local residents and visitors, compatible with the natural environment and surrounding uses.
Rural Desert Communities Baker, El Mirage, Homestead Valley [5], Lucerne Valley, Morongo Valley, Newberry Springs, Oak Hills, Pioneertown [6], Phelan/Pinon Hills	▪ A rural lifestyle characterized by the predominance of large lots, limited commercial development, and the prevalence of the desert landscape and natural resources. ▪ Abundant views of open spaces, natural features, and dark skies. ▪ Scenic, natural, and/or recreational features that serve as the foundation of the community's local economy and attract tourists. ▪ Small businesses that serve local residents and visitors, compatible with the natural environment and surrounding uses. ▪ Mining of mineral resources with minimal negative impacts on local residents.
Desert Village Communities Daggett, Helendale, Joshua Tree, Oro Grande, Yermo	▪ A rural context with clusters of housing in proximity to commercial development and public facilities, and larger lots farther from the commercial core. ▪ Abundant views of open spaces, natural features, and dark skies especially outside of clustered development. ▪ Scenic, natural, and/or recreational features that serve as the foundation of the community's local economy and attract tourists. ▪ Small businesses that serve local residents and visitors, compatible with the natural environment and surrounding uses. ▪ Mining of mineral resources with minimal negative impacts on local residents (Oro Grande and Yermo).

Notes:

1. Bear Valley includes: Baldwin Lake, Big Bear City, Erwin Lake, Fawnskin/Northshore, Lake Williams, Moonridge, Sugarloaf.
2. Crest Forest includes: Cedarpines Park, Crestline, Lake Gregory, Valley of Enchantment.
3. Hilltop includes: Arrowbear, Green Valley Lake, Running Springs.
4. Lake Arrowhead includes: Agua Fria, Blue Jay, Cedar Glen, Crest Park, Deer Lodge Park, Lake Arrowhead, Rimforest, Skyforest, Twin Peaks.
5. Homestead Valley includes: Flamingo Heights, Johnson Valley, Landers, Yucca Mesa.
6. Pioneertown includes: Gamma Gulch, Pioneertown, Pipes Canyon, Rimrock.

Policy LU-4.7 Dark Skies:

> We minimize light pollution and glare to preserve views of the night sky, particularly in the Mountain and Desert regions where dark skies are fundamentally connected to community identities and local economies. We also promote the preservation of dark skies to assist the military in testing, training, and operations.

Questions for the Developers Regarding Aesthetics (c):

-Why did the developer fail to engage with or take into consideration the Wonder Valley Community, homeowners, and residents for input on how this high occupancy Commercial Hotel/Resort may potentially change the valued visual characteristics of the rural desert neighborhood?

-Why are the developers ignoring the existence of a vibrant rural residential community here?

-Why are the developers ignoring Table LU-3 in relation to Rural Desert Communities?

Would the project:

> d) Create a new source of substantial light or glare, which will adversely affect day or nighttime views in the area?

The developers answer:

In their statement to meet the Dark Sky Ordinance, the developers only address the type of bulbs used and the shielding requirements. There is no mention how the overall artificial illumination of the resort and the light viewshed of the expansive area will affect the dark night sky in Wonder Valley.

They mention “all outdoor lighting will be extinguished by 11:00p.m.”

Here are some questions for the developers and the County:

-Will there be lights on the 35-foot-tall water tower?

-Will there be lights on the tents, the domes, the signage?

-Will there be light emanating from the pool? How many pool lights will they have?

-How many parking light poles will there be?

-How tall are the parking lot poles?

-How much more additional artificial lighting will there be for the weddings and other events they plan to have?

-Will there be artificial lighting on any of the additional RL-5 parcels that are noted in the Initial Study?

-How much additional artificial lighting will there be from the increased traffic with regular and high beam headlights during the darkened hours?

-How much additional artificial lighting will there be from the increased traffic going to and from the weddings and other events?

-Do any applicable codes allow for parking lot lights to be extinguished at all for a 24-hour business operation? Are motion sensors allowed on all parking lot lights?

These are just some of the questions the developers failed to answer in the Initial Study.

Comment: All these additional lights add up. They will be high and low and all over the site. Pathway lights, signage lights, pool lights, hotel room lights, landscaping lights, parking lot lights. All of this does not add up to a desert dark night sky.

And here’s their answer to CEQA question d):

> “The Proposed Project would be designed to adhere to these lighting standards, to ensure that the Project does not create a new source of substantial light or glare, which will adversely affect day or nighttime views in the area. Demonstration of compliance

> would be required prior to issuance of a building permit. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required." (p.19)

We disagree with this assumption. If the Wonder Inn gets built it will significantly cause a new source of substantial artificial light, skyglow or glare and would definitely affect the day and nighttime views in Wonder Valley.

Comment: Question **d)** is in relation to the Dark Night Sky. Dark Night Sky is mentioned often in the Countywide Plan, Land Use Services, and our own Wonder Valley Community Action Guide in relation to **Zoned Rural Living**. A designated valued asset by our community, **Dark Night Sky** is listed in both the "Values Statement" and "Aspirations Statement" in the Community Action Guide.

Comment: Currently, at night while driving home from the west along Amboy there is only an exterior light and an interior light that shines from the old pink building. If this resort were to be built, the amount of additional light pollution is extreme and would be highly significant and adversely affect the daytime and nighttime views of Wonder Valley.

Comment: 29 Palms Astronomy Club is adjacent to this proposed development. Dark night sky is an economic value for this local small business who depends on the dark sky and tourism to this area for economic survival. There are small businesses that would be negatively impacted by this proposed development.

Many questions are left unanswered in AESTHETICS, and in order to make an adequate determination of significant impacts this must be addressed with further study, and I request that a full, certified Environmental Impact Report per CEQA requirements should be completed for the project and project site of the proposed Wonder Inn.

III. AIR QUALITY

The criteria characterized in the Initial Study/Mitigated Negative Declaration (IS/MND) are not consistent with the criteria required to characterize according to the California Environmental Quality Act (CEQA).

Initial Study	CEQA Checklist
a) Conflict with or obstruct implementation of the applicable air quality plan?	a) Conflict with or obstruct implementation of the applicable air quality plan?
	b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the Project region is non-attainment under an applicable federal or state ambient air quality standard?	c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?
c) Expose sensitive receptors to substantial pollutant concentrations?	d) Expose sensitive receptors to substantial pollutant concentrations?
d) Result in other emissions (such as those leading to odors adversely affecting a substantial number of people?	e) Create objectionable odors affecting a substantial number of people?

Criterion b) from the actual CEQA checklist is not addressed in the IS/MND. Not adhering to the CEQA criteria as such is a procedural omission that by itself must lead to further evaluation and an Environmental Impact Report. The elements left out are indicative of the project's disregard for the wellbeing and aspirations of the Wonder Valley residents.

REVIEW AND COMMENTS ON THE ACTUAL CEQA CRITERIA

Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations.

Would the project:

a) *Conflict with or obstruct implementation of the applicable air quality plan?*

Windy dusty days have increased in the desert; they are also longer. Windblown dust, also called fugitive dust and Particulate Matter, is hazardous to human health and the environment. PM 2.5 can enter the lungs and bloodstream. Sources of particulate matter include unpaved roads, construction sites, disturbed soil areas, and vehicle pollution.

The Mojave Desert is in nonattainment for PM10 under both federal and state standards. The Mojave Desert Air Quality Management District (MDAQMD, the District) monitors air pollutants. They have an air monitoring station in 29 Palms. But for monitoring construction sites County planners use the Victorville station's readings. This is not useful for the PM10 baseline for the Morongo Basin. Fugitive dust control plans are regulated by the District's Rule 403.2 adopted in 1996. Guidance on suggested mitigation methods are not provided with the rule. They rely on neighbor alerts in rural areas, but this is not a proven, effective strategy for monitoring and enforcement of fugitive dust violations.

Per the Mojave Desert Air Quality District, the Morongo Basin is not in compliance with Federal EPA or State Standards. Every project has to follow how to mitigate dust standards; the suggestion is to use water to mitigate dust. But these mitigation standards have never worked in the desert.

The Mojave Desert Air Quality Management District uses data related to construction in Victorville. The Victorville monitor is on concrete. The basic wind direction in Wonder Valley is from the west not from the east.

Traffic is another source of particulate pollution. The IS/MND on page 23, paragraph 2, line 8 states: "An example of a non-conforming project would be one that …. increases the number of trips, and/or increases the overall vehicle miles traveled in an affected area (relative to the applicable land use plan)." The Project is estimated to generate 604 trips per day. That is an increase already and likely underestimated, especially given the events that are planned to take place and the driving around in the Wonder Valley area, on and off-road, legal and illegal, that will result from the project. <u>None of this has been addressed or analyzed.</u>

Comment on the statements in the IS/MND: Are the values listed in "Table 2 Regional Significance - Construction Emissions (pounds/day)" accurate with the actual emissions they will be emitting? Are these accurate numbers given all the vehicles, work trucks, waste disposal trucks, deliveries (i.e., food delivery, laundry- which will be done offsite, supplies, etc.), guests, restaurateurs, employees, visitors, etc.? How do we verify the accuracy of the numbers they provide? The air quality, dust, topsoil disturbed during construction while digging the pond, the paths, the footings, the sunken garden, land scraping, etc…

PROPOSAL: Environmental Impact Report is needed.

Would the project:

b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?

This criterion is not fully addressed and researched in the IS/MND.

From Appendix to the IS/MND:

2.0 Air Quality Regulatory Setting

Air pollutants are regulated at the national, state, and air basin level; each agency has a different level of regulatory responsibility. The United States Environmental Protection Agency (EPA) regulates at the national level. The California Air Resources Board (ARB) regulates at the state level. The Mojave Desert Air Quality Management District (MDAQMD) regulates at the air basin level.

2.0.1 National and State

The EPA is responsible for global, international, and interstate air pollution issues and policies. The EPA sets national vehicle and stationary source emission standards, oversees approval of all State Implementation Plans, provides research and guidance for air pollution programs, and sets National Air Quality Standards, also known as federal standards. There are six common air pollutants, called criteria pollutants, which were identified from the provisions of the Clean Air Act of 1970.

- Ozone
- Nitrogen Dioxide
- Lead
- Particulate Matter (PM10 and PM2.5)
- Carbon Monoxide
- Particulate Matter
- Sulfur Dioxide

The federal standards were set to protect public health, including that of sensitive individuals; thus, the standards continue to change as more medical research is available regarding the health effects of the criteria pollutants. Primary federal standards are the levels of air quality necessary, with an adequate margin of safety, to project the public health."

And:

"In accordance with the CEQA requirements, the County does not, however, have the expertise to develop plans, programs, procedures, and methodologies to ensure that air quality within the County and region will meet federal and state standards. Instead, the County relies on the expertise of the SCAQMD and MDAQMD and utilizes the SCAQMD CEQA Handbook and MDAQMD California Environmental Quality Act (CEQA) And Federal Conformity Guidelines (depending on the location/jurisdiction of the project) as guidance documents for

> the environmental review of plans and development proposals within its jurisdiction."

The EPA announced on January 6, 2023, its proposed decision to revise the primary health-based) annual PM2.5 standard from its current level of 12.0 µg/m3 to within the range of 9.0 to 10.0 µg/m3. This decision must be considered in relation to how it impacts the Proposed Project on the Wonder Valley community.

As it stands now, per the Mojave Desert Air Quality District (known as "The District"), the Morongo Basin is not in compliance with Federal EPA or State Standards. Every project has to follow how to mitigate dust standards, the Project's suggestion is to use water to mitigate dust. But these mitigation standards have never worked in the desert.

The Appendix refers to these two rules from The District

> **"Rule 402 (Nuisance)**. This rule specifies that a person may not discharge from any source whatsoever such quantities of air contaminants or other material which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or to the public, or which endanger the comfort, repose, health, or safety of any such persons or the public, or which cause, or have a natural tendency to cause, injury or damage to business or property.
>
> **Rule 403.2 (Fugitive Dust Control for the Mojave Desert Planning Area).** This rule requires owners or operators of a construction or demolition fugitive dust source to implement the fugitive dust control measures listed in Rule 403.2. These measures include periodic watering for short-term stabilization of disturbed surface area to minimize visible dust emissions, stabilization of graded surfaces if no development is planned within 30 days, reducing non-essential earth moving activity under high wind conditions, and more. In addition, for sites over 100 acres such as the proposed project, the control measures in Rule 403.2 must also be implemented. The additional control measures include preparing and submitting a dust control plan to the MDAQMD prior to commencing earth-moving activities. The dust control plan must describe all applicable dust control measures that will be implemented at the project site. Other additional control measures to minimize visible fugitive dust for sites over 100 acres include stabilizing access routes, maintaining natural topography to the extent possible, and constructing paved roads and parking lots first where feasible."

Please note in the Appendices the Project is said to be over 100 acres.

The project will likely increase PM10 and PM2.5 particles (or dust). This increase will no doubt result from hotel vendors and/or guests driving on dirt roads. There are 178 dirt roads in Wonder Valley. Guests will be driving around on nearby dirt roads, neighborhood "exploring" including using off-road vehicles, which the Project advertises will be available for guest use. Wonder Valley residents know the impact of these vehicles not staying on dirt roads but driving across pristine desert.

Not mentioned or commented upon is the increased PM2.5, PM10.5 exposure from disturbing the desert crust, scraped land/exposed soil when winds blow. Research has shown the building

to be used in the Project formerly was used for industry that included hazardous materials including PCBs.

Here are some highlights of what EPA has to say about PCBs:

- PCBs have been demonstrated to cause a variety of adverse health effects.
- PCBs were domestically manufactured from 1929 until manufacturing was banned in 1979.
- Commercial uses of PCBs (some listed here but not all):
    - Transformers and capacitors
    - Electrical equipment including voltage regulators, switches, re-closers, bushings, and electromagnets
    - Cable insulation
- Release and Exposure of PCBs (some listed here but not all):
    - Leaks or releases from electrical transformers containing PCBs
    - Illegal or improper dumping of PCB wastes
- PCBs do not readily break down once in the environment.
- PCBs can accumulate in the leaves and above-ground parts of plants and food crops. They are also taken up into the bodies of small organisms
- They can remain for long periods cycling between air, water, and soil.

The existing commercial building to be part of the Project was used by the Desert Electric Cooperative. A reasonable conclusion is that any former (or current) electrical company storage yard is presumed contaminated with PCBs until a site survey with multiple PCB tests using scientifically based sampling protocols proves otherwise. Indications are that Desert Electric Cooperative stored both vehicles and equipment onsite and the potential of PCBs at the proposed site demands a full Environmental Impact Report! Disturbing and scraping the soil runs the risk of releasing PCBs.

PROPOSAL: an Environmental Impact Report is needed.

Would the project:

> ***c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?***

No mention of likely increased PM10 and PM2.5 resulting from hotel guests and possibly hotel vendors driving on dirt roads (like Gammel, south of Amboy, which is a north-south pathway to Hwy 62 and could be used as a “shortcut” to Joshua Tree National Park, or vendors coming from town), or guests driving around nearby dirt road neighborhoods “exploring.”

Additionally, what is planned for the remaining 130 acres of this project? Is there a possibility of guest ORV activity on the 130 acres or nearby? Was the impact of such activity studied?

There will be increased PM10 and PM2.5 exposure resulting from scraped land / exposed soil when winds blow. There is no mention of this in IS/MND report.

Dust blowing in Wonder Valley

- Top left: Gammel and Amboy as viewed from 1 mile north
- Top right: Sunfair Dry Lake, west of Copper Mountain College
- Bottom: dust blowing from OHVs in Wonder Valley

- *On fugitive dust:* *https://desertreport.org/scraped-earth-and-desert-winds/*
- *On fugitive dust and Sand Transport paths: "Where the topography inhibits the sand flow, such as at the* ***Bullion*** *and Sheep Hole Mountains, sand ramps form against the mountain slopes…This Sand Transport Path, like others in the east Mojave, is stabilized by the omnipresent creosote bush-galleta grass plant community.2 When its tangle of stabilizing roots is removed, the sand and dust become fugitive with the wind." Source: https://desertreport.org/the-perfect-dust-storm-fugitive-dust-and-the-morongo-basin-community-of-desert-heights/*
- On how PM10's are measured and reported by developers: "*When estimating dust emissions for construction projects,* ***county planners rely on the District's directive to use the Victorville station's readings*** *and meteorological data for long term ambient baseline measurements. Calculated emission estimates guide the mitigation plans designed to protect the affected population from fugitive dust. The Victorville station is located on asphalt and is 300 feet from a road with an average annual daily traffic count of 1000 vehicles. The station monitors a 0.3 to 3.5 square mile area with a relatively uniform land use. Victorville's monitoring records show zero (0.0) days above the 24-hour federal and state PM10 standards.* ***Emission readings, for an area 72 miles north of the Sand Transport Path, with different wind speeds and directions, is not a valid long term PM10 baseline for the Morongo Basin****…..The District's approved monitoring station for substitute records is in Victorville.* ***Without monitoring stations in the Sand Transport Path, it is impossible to establish accurate emission estimates14 that support responsible planning****." Source: https://desertreport.org/the-perfect-dust-storm-fugitive-dust-and-the-morongo-basin-community-of-desert-heights/*

The IS/MND, on page 23 paragraph 3, line 9 states: “therefore, as the Project is a residential use, the Proposed Project is not anticipated to exceed the Attainment Plan assumptions for the Project Site.” That is contradicted by the fact that a non-conforming project is defined as one that “increases the gross number of dwelling units, increases the number of trips, and/or increases the overall vehicle miles traveled in an affected area all of which this Project will do.

Would the project:

d) Expose sensitive receptors to substantial pollutant concentrations?

Sensitive Receptors in the report are defined as land uses or other types of population groups that are more sensitive to air pollution than others. Sensitive Receptors are defined as: children, the elderly, the acutely and chronically ill, those with cardio-respiratory diseases. Residences could be a sensitive receptor location. In the IS/MND they say a sensitive receptor would be a location where a sensitive individual could remain for 24-hours or longer. Most residents who will be impacted by this Project stay in their homes for longer than 24-hours.

In the IS/MND, the statement is made that the Project would be a major receptor, but this would not be a problem, as “the project is not near a major transportation route.” It is claimed that only residences 1,700 feet northwest across Amboy Road are existing sensitive receptors. Of course, there are residents East of the project and the wind is Westward primarily. Wonder Valley has 178 dirt roads, why would the impact be limited 1,700 feet northwest from the Project Site? Ask the residents who have medical issues and live close by. Additionally, increased traffic means increased pollution from vehicles and those of the residents that are Sensitive Receptors, including ones with respiratory issues, know that will negatively impact our health, in particular by the 2.5 particulate pollution. It seems the only mention of residents in the report is by reference to the “sensitive receptors”. All residents of WV could be vulnerable to developing respiratory or heart problems etc. from pollution resulting from this project.

According to an article in the *Desert Report* on Fugitive Dust by Pat Flanagan the following is the case: windy dusty days have increased in the desert; they are also longer. Windblown dust, also called fugitive dust and Particulate Matter is hazardous to human health and the environment. Sources include unpaved roads, construction sites, disturbed areas. Maps of sand transport paths are available (see immediately below). The Mojave Desert Air Quality Management District (MDAQMD) monitors air pollutants, fugitive dust control plans are regulated by the District’s Rule 403.2 adopted in 1996 and since updated but guidance on suggested mitigation methods, are not provided with the rule. They rely on the Victorville monitoring station or phone calls.

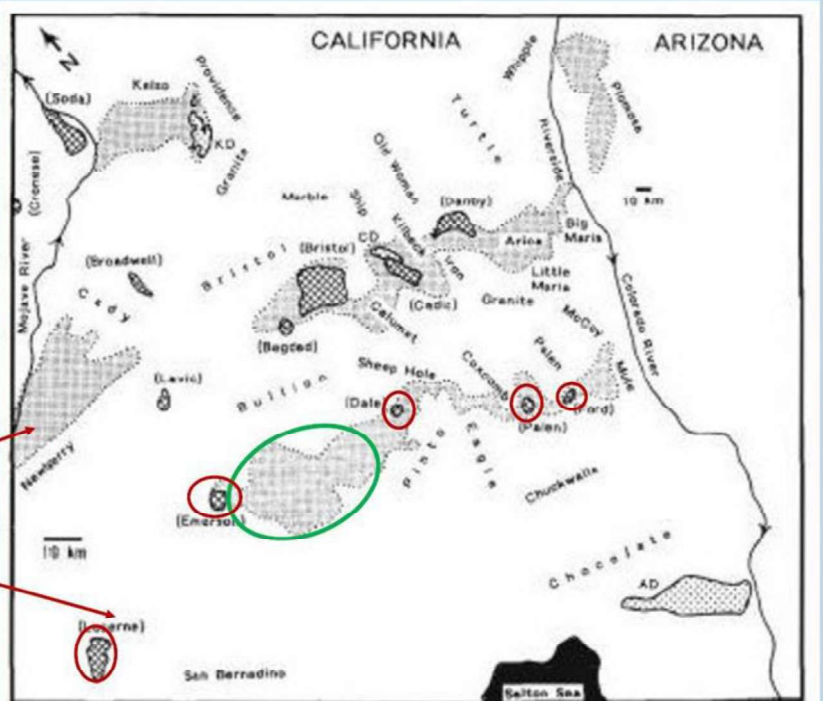
WITHIN the Green Circle
Dust sources include **3 solar facilities** (350 acres), **Copper Mountain College, Coyote Dry Lake, dirt roads** and **where vegetation has been removed**.

Active Sand Sources – red circles
Emerson Dry Lake
Lucerne Dry Lake

OUTSIDE the green circle

Newberry Springs, Daggett Triangle is targeted with 2 Solar PV projects on 5,333 acres of private lands.

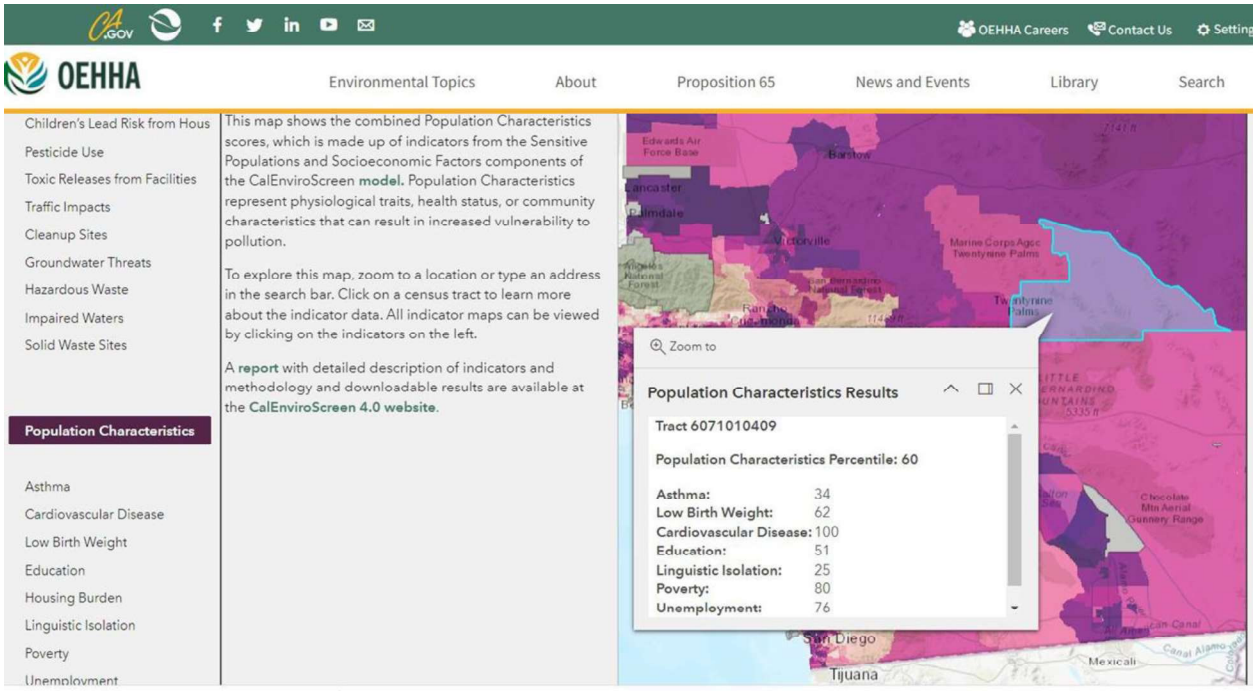
Dust flows through the pass from **Lucerne Valley** and **Johnson Valley OHV** area, also active sources.



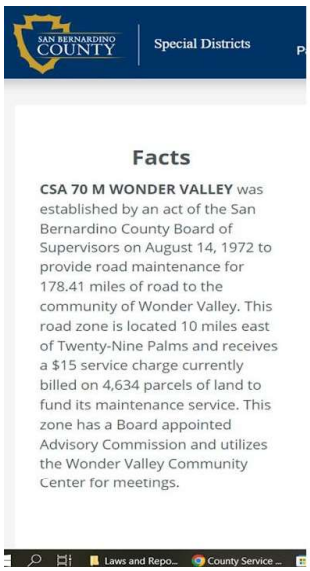
Sand Transport Paths in the Mojave Desert, Southwestern United States. J.R. Zimbelman, S.H. Williams, V.P. Tchakerian. In ***Desert Aeolian Processes.*** Edited by J.R. Tchakerian. 1995.

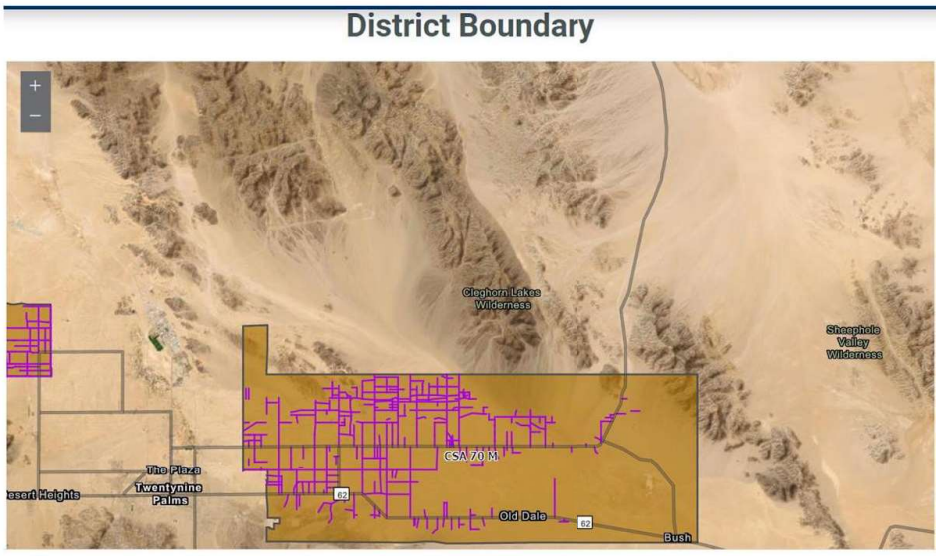
The Initial Study does not address any Environmental Justice elements.

On May 8, 2012, the California Attorney General's office released a report entitled "Environmental Justice at the Local and Regional Level – Legal Background" which interprets existing law to impose environmental justice obligations that local governments must consider when approving specific projects and planning for future development. "Environmental justice" is defined in the Government Code as "the fair treatment of people of all races, cultures, and incomes with respect to the development, adoption, implementation, and enforcement of environmental laws, regulations, and policies." "Fairness" means that "the benefits of a healthy environment should be available to everyone, and the burdens of pollution should not be focused on sensitive populations or on communities that already are experiencing its adverse effects."



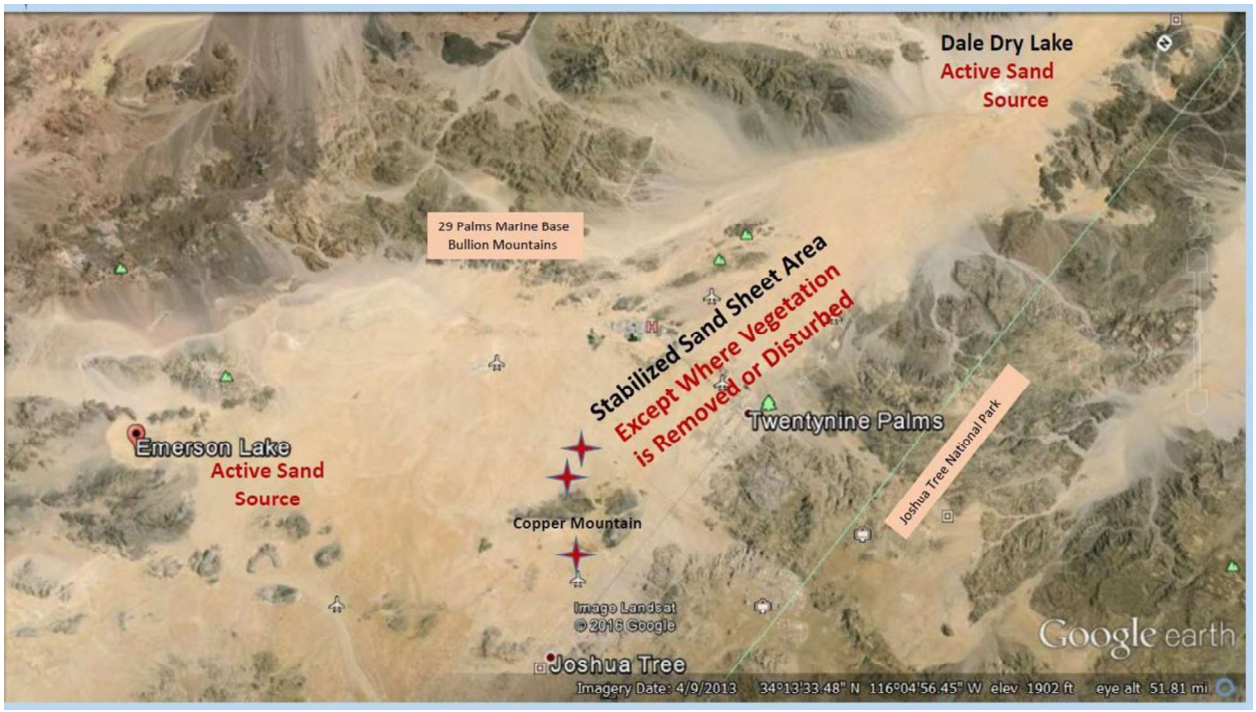
Wonder Valley CSA 70M maintains, for a $50 service fee on 4,634 parcels, 178 miles of dirt roads, very attractive to adventure seeking tourists.





Major dust and road problems come from adventure seeking tourists. 4WD is not required to get up close to the beckoning mountains.

Residents with asthma and cardiovascular conditions suffer from dust. The regulated speed to keep the dust down and preserve the road grading is 15 to 25 mph.



The Proposed Project involves the construction of 106 hotel rooms and would be considered to be a sensitive receptor. However, the Project is not considered a major transportation project and is greater than 10,000 feet north of the nearest major road, State Route 62, which has 18,900 average daily vehicle trips. The closest existing sensitive receptors (to the Project Site) is the residential land use located approximately 1,700 feet northwest across Amboy Road."

- There are several elderly residents near this proposed site, including people with health issues. Was this considered at all?
- Amboy Road has a very similar volume of traffic as Hwy 62. Why is the comparison not done for Amboy?
- What is northwest, 1,700 feet? Do they mean west? Or, north? (In looking at the map, a residence to the northwest is not visible.)
- On sensitive receptors: *"It is time that I, my neighbors, and in fact all residents (including students, asthmatics, and the elderly living east of Joshua Tree Basin) start thinking of ourselves in a new way. We are "sensitive receptors."* Source: "https://desertreport.org/the-perfect-dust-storm-fugitive-dust-and-the-morongo-basin-community-of-desert-heights/

Would the project:

e) Create objectionable odors affecting a substantial number of people?

The IS/MND states:

"Potential sources that may emit odors during the on-going operations of the Proposed

> Project would include odor emissions from vehicular emission trash storage areas. As the Project is a destination hotel rather than an industrial use which would be associated with odors, the Project would be designed to the latest County standards with respect to trash enclosures, and the nearest sensitive receptors are located approximately 1,700 feet from the Project boundaries, no significant impact related to odors would occur during the on-going operations of the Proposed Project. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required."

Trash and odors will not be limited to "on-site;" visitors and guests to the Project will wander off-site and leave trash.

Why would the impact from odors be limited to 1.700 feet from the Project's boundaries and is that distance by itself even validated?

In conclusion:

Given all above, an environmental impact report is urgent, must be prepared and made available to the community for comment before the BOS takes any vote on the project.

Air Quality Additional from Appendices (Page 15 of PDF)

Table 2: Ambient Air Quality Standards

Pollutant	Averaging Time	California Standards[1]		National Standards[2]		
		Concentrations[3]	Method[4]	Primary[3,5]	Secondary[3,6]	Method[7]
Ozone (O3)	1-Hour	0.09 ppm	Ultraviolet Photometry	--	Same as Primary Standard	Ultraviolet Photometry
	8-Hour	0.070 ppm		0.070 ppm (147 µg/m³)		
Respirable Particulate Matter (PM10)[8]	24-Hour	50 µg/m³	Gravimetric or Beta Attenuation	150 µ/m³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	20 µg/m³		--		
Fine Particulate Matter (PM2.5)[8]	24-Hour	--	--	35 µg/m³	Same as Primary Standard	Inertial Separation and Gravimetric Analysis
	Annual Arithmetic Mean	12 µg/m³	Gravimetric or Beta Attenuation	12 µg/m³	15 µg/m³	
Carbon Monoxide (CO)	1-Hour	20 ppm (23 µg/m³)	Non-Dispersive Infrared Photometry (NDIR)	35 ppm (40 µg/m³)	--	Non-Dispersive Infrared Photometry (NDIR)
	8-Hour	9.0 ppm (10 µg/m³)		9 ppm (10 µg/m³)	--	
	8-Hour (Lake Tahoe)	6 ppm (7 µg/m³)		--	--	
Nitrogen Dioxide (NO_2)[9]	1-Hour	0.18 ppm (339 µg/m³)	Gas Phase Chemiluminescence	100 ppb (188 µg/m³)	--	Gas Phase Chemiluminescence
	Annual Arithmetic Mean	0.030 ppm (357 µg/m³)		0.053 ppm (100 µg/m³)	Same as Primary Standard	
Sulfur Dioxide (SO_2)[10]	1-Hour	0.25 ppm (655 µg/m³)	Ultraviolet Fluorescence	75 ppb (196 µg/m³)	--	Ultraviolet Fluorescence; Spectrophotometry (Pararosaniline Method)
	3-Hour	--		--	0.5 ppm (1300 mg/m³)	
	24-Hour	0.04 ppm (105 µg/m³)		0.14 ppm (for certain areas)[10]	--	
	Annual Arithmetic Mean	--		0.130ppm (for certain areas)[10]	--	
Lead[11,12]	30 Day Average	1.5 µg/m³	Atomic Absorption	--		
	Calendar Qrtr	--		1.5 µg/m³ (for certain areas)[12]	Same as Primary Standard	High Volume Sampler and Atomic Absorption
	Rolling 3-Month Average	--		0.15 µg/m³		
Visibility Reducing Particles[13]	8-Hour	See footnote 13	Beta Attenuation and Transmittance through Filter Tape	No National Standards		
Sulfates	24-Hour	25 µg/m³	Ion Chromatography			
Hydrogen Sulfide	1-Hour	0.03 ppm (42 µg/m³)	Ultraviolet Fluorescence			
Vinyl Chloride[11]	24-Hour	0.01 ppm (26 µg/m³)	Gas Chromatography			

1. California standards for ozone, carbon monoxide (except 8-hour Lake Tahoe), sulfur dioxide (1 and 24 hour), nitrogen dioxide, and particulate matter (PM10, PM2.5, and visibility reducing particles), are values that are not to be exceeded. All others are not to be equaled or exceeded. California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations.

2. National standards (other than ozone, particulate matter, and those based on annual arithmetic mean) are not to be exceeded more than once a year. The ozone standard is attained when the fourth highest 8-hour concentration measured at each site in a year, averaged over three years, is equal to or less than the standard. For PM10, the 24-hour standard is attained when the expected number of days per calendar year with a 24-hour average concentration above 150 $\mu g/m^3$ is equal to or less than one. For PM2.5, the 24-hour standard is attained when 98 percent of the daily concentrations, averaged over three years, are equal to or less than the standard. Contact the U.S. EPA for further clarification and current national policies.

3. Concentration expressed first in units in which it was promulgated. Equivalent units given in parentheses are based upon a reference temperature of 25°C and a reference pressure of 760 torr. Most measurements of air quality are to be corrected to a reference temperature of 25°C and a reference pressure of 760 torr; ppm in this table refers to ppm by volume, or micromoles of pollutant per mole of gas.

4. Any equivalent measurement method which can be shown to the satisfaction of the ARB to give equivalent results at or near the level of the air quality standard may be used.

5. National Primary Standards: The levels of air quality necessary, with an adequate margin of safety to protect the public health.

6. National Secondary Standards: The levels of air quality necessary to protect the public welfare from any known or anticipated adverse effects of a pollutant.

7. Reference method as described by the U.S. EPA. An “equivalent method” of measurement may be used but must have a “consistent relationship to

6.0 Cumulative Regional Air Quality Impacts

Cumulative projects include local development as well as general growth within the project area. However, as with most development, the greatest source of emissions is from mobile sources, which travel well out of the local area. Therefore, from an air quality standpoint, the cumulative analysis would extend beyond any local projects and when wind patterns are considered, would cover an even larger area. Accordingly, the cumulative analysis for the project’s air quality must be generic by nature.

8. On December 14, 2012, the national annual PM2.5 primary standard was lowered from 15 $\mu g/m^3$ to 12.0 $\mu g/m^3$. The existing national 24-hour PM2.5 standards (primary and secondary) were retained at 35 $\mu g/m^3$, as was the annual secondary standard of 15 $\mu g/m^3$. The existing 24-hour PM10 standards (primary and

secondary) of 150 µg/m^3 also were retained. The form of the annual primary and secondary standards is the annual mean, averaged over 3 years.

9. To attain the 1-hour national standard, the 3-year average of the annual 98th percentile of the 1-hour daily maximum concentrations at each site must not exceed 100 ppb. Note that the national 1-hour standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the national 1-hour standard to the California standards the units can be converted from ppb to ppm. In this case, the national standard of 100 ppb is identical to 0.100 ppm.

10. On June 2, 2010, a new 1-hour SO2 standard was established and the existing 24-hour and annual primary standards were revoked. To attain the 1- hour national standard, the 3-year average of the annual 99th percentile of the 1-hour daily maximum concentrations at each site must not exceed 75 ppb. The 1971 SO2 national standards (24-hour and annual) remain in effect until one year after an area is designated for the 2010 standard, except that in areas designated nonattainment for the 1971 standards, the 1971 standards remain in effect until implementation plans to attain or maintain the 2010 standards are approved.

    Note that the 1-hour national standard is in units of parts per billion (ppb). California standards are in units of parts per million (ppm). To directly compare the 1-hour national standard to the California standard the units can be converted to ppm. In this case, the national standard of 75 ppb is identical to 0.075 ppm.

11. The ARB has identified lead and vinyl chloride as 'toxic air contaminants' with no threshold level of exposure for adverse health effects determined. These actions allow for the implementation of control measures at levels below the ambient concentrations specified for these pollutants.

12. The national standard for lead was revised on October 15, 2008 to a rolling 3-month average. The 1978 lead standard (1.5 µg/m^3 as a quarterly average) remains in effect until one year after an area is designated for the 2008 standard, except that in areas designated nonattainment for the 1978 standard, the 1978 standard remains in effect until implementation plans to attain or maintain the 2008 standard are approved.

13. In 1989, the ARB converted both the general statewide 10-mile visibility standard and the Lake Tahoe 30-mile visibility standard to instrumental equivalents, which are "extinction of 0.23 per kilometer" and "extinction of 0.07 per kilometer" for the statewide and Lake Tahoe Air Basin standards, respectively.

IV. BIOLOGICAL RESOURCES

a) *(Would the project) Have substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

Here's what the developers stated on p.32 of the Initial Study/Mitigated Negative Declaration (IS/MND):

Sensitive Wildlife

Desert Tortoise. The Desert Tortoise is a State- and federally listed threatened species. There are no documented Desert Tortoise occurrences on site or directly adjacent to the Project Site. Per the USFWS Desert Tortoise Critical Habitat overlay, the Project Site is not within any USFWS-designated Desert Tortoise Critical Habitat The undeveloped portions of the project site are dominated by creosote bush scrub plant communities that have the potential to provide suitable habitat for desert tortoise. Despite a systematic search of the Project Site, no live tortoises, suitable burrows or signs were observed on the project site during the site investigation. Based on the results of the field investigation and lack of suitable burrows and no observed sign, desert tortoise was determined to have a low potential to occur onsite.

ELMT Consulting, Inc. prepared the Habitat Assessment of 134 acres for Wonder Inn Joshua Tree (?) in July of 2021. The above **Desert Tortoise** paragraph was taken from ELMT Habitat Assessment section 4.7.2, page 21.

Initial Study PROJ-2021-00163
Wonder Inn, 78201 Amboy Road, Twentynine Palms, 92277
APNs: 0625-071-04, -05, -07, -08, -09, -10
January 2023

Table 4
Summary of Sensitive Species and Potential to Occur

Common Name	Scientific Name	Potential To Occur
Burrowing Owl Fed: None State: SSC	*Athene cunicularia*	*Low* The project site provides line-of-site opportu favored by burrowing owls. However, the site not support suitable burrows (>4 inche diameter).
Palid Bat Fed: None State: SSC	*Antrozous pallidus*	*Low* Suitable foraging habitat is present within the Project Site. On-site structures provide marginal roosting opportunities.
Spotted Bat Fed: None State: SSC	*Euderma maculatum*	*Low* Suitable foraging habitat is present within the Project Site. On-site structures provide marginal roosting opportunities.
Le Conte's thrasher Fed: None State: SSC	*Toxostoma lecontei*	*Low* *Marginal habitat is present within the project site*
Prairie Falcon Fed: None State: Watch List	*Falco mexicanus*	*Low* *The open area in the southern portion of the site offers suitable foraging habitat. The Bullion Mountains to the north and Pinto Mountains to the south provide suitable nesting opportunities.*
Loggerhead Shrike State: SSC	*Lanius ludovicianus*	*Moderate* *Suitable habitat is present within the project site.*
Desert tortoise Fed: Threatened State: Threatened	*Gopherus agassizii*	*Low* *The uninterrupted creosote bush scrub in the southern portion of the Project Site provides suitable foraging habitat for this species; however, soils on-site are very rocky and tenc to be unsuitable for burrow construction.. No desert tortoises or sign (i.e. scat, burrows, carapaces) were observed on-site.*

In table 4 of the ELMT Consulting Habitat Assessment, the proposed Project developers also include that no tortoise scat, burrows or carapaces were observed on the site, along with no tortoises.

What the Wonder Inn developers failed to include was a study *they* commissioned to be done on 40 acres of the project site by Circle Mountain Biological Consultants, Inc (CMBA). This study was done in April of 2020.

**Focused Survey for Agassiz's Desert Tortoise,
Habitat Evaluation for Burrowing Owl, and
General Biological Resource Assessment for a
40-acre± Site (APN 0625-071-04 & 09) in the Community of Wonder Valley,
San Bernardino County, California**

(U.S. Geological Survey 7.5' Dale Lake quadrangle, Township 1 North, Range 10 East, a portion of the Northwest ¼ of the Northeast ¼ of Section 20, S.B.B.&M.)

Job#: 20-012

Prepared by:
Circle Mountain Biological Consultants, Inc.
P.O. Box 3197
Wrightwood, California 92397
PH/FAX: (760) 249-4948
Website: www.circlemountainbiological.com
Emails: ed.larue@verizon.net
sharon_dougherty@circlemountainbiological.com
Contacts: Ed LaRue, Sharon Dougherty

Prepared for:
Ecotech Design
6404 Hollywood Blvd., Ste 428
Los Angeles, California 90028
PH: (323) 270-5502
Email: ecotech@sbcglobal.net
Contact: Walter Scott Perry

I hereby certify that the statements furnished herein, including attached exhibits, present the data and information required for this biological evaluation, and that the facts, statements, and information presented are true and correct to the best of my knowledge and belief. Field work conducted for this assessment was performed by me or under my direct supervision. I certify that I have not signed a nondisclosure or consultant confidentiality agreement with the project applicant or applicant's representative and that I have no financial interest in the project.

Circle Mountain Biological Consultants, Inc.
Author and Field Investigator: Edward L. LaRue, Jr.

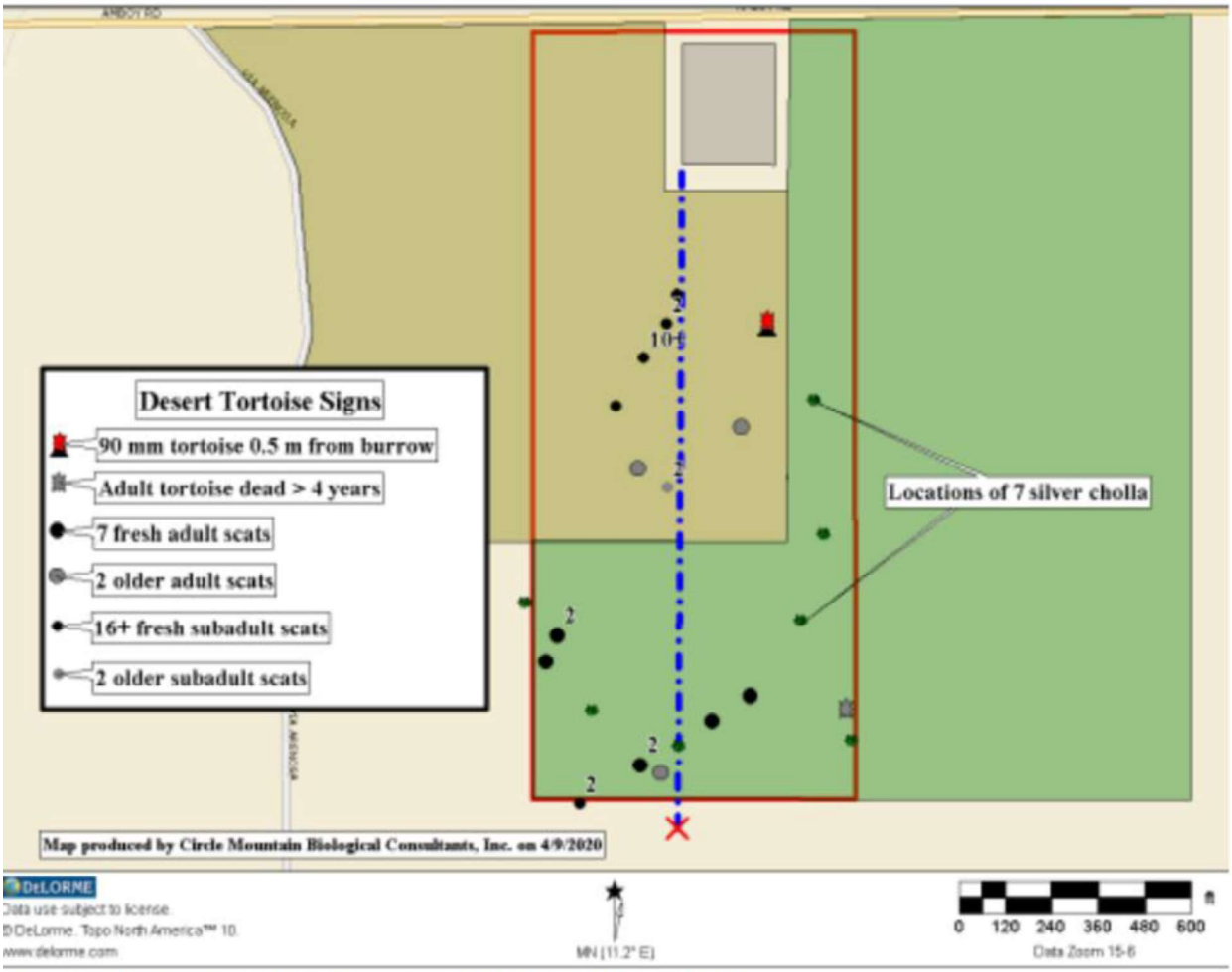
April 2020

Note: The full CMBA survey was sent to Land Use and Planning by Pat Flanagan of the Morongo Basin Conservation Association.

This is from page 13, section 3.2.1 of Circle Mountain Biological Consultants survey:

> "Positive evidence of Agassiz's desert tortoise found during this survey is mapped in Figure 3 and included a 90 mm desert tortoise, the carcass of an adult tortoise that died more than four years ago, 7 fresh scats deposited this year by adult tortoise(s), 2 older scats deposited prior to this year by adult tortoise(s), 16+ fresh scats of subadult tortoise(s), and 2 older scats of subadult tortoise(s)."

Figure 3. Site Map with Desert Tortoise and Cacti Locations



ocused Tortoise Survey & Habitat Assessments (C:/Jobs/WonderInn.2012) iii

This map, Figure 3, is on page 4 of the Circle Mountain Biological Consultants survey. It details the locations on the project site where a young desert tortoise was discovered, where a dead tortoise was discovered, numerous fresh scat from adult and subadult tortoises, as well as the young tortoise burrow. The numerous discoveries of scat show a steady presence and a history of desert tortoises on this proposed project site.

From page 17 of the Circle Mountain Biological Consultants survey:

4.0. Conclusions and Recommendations

"4.1. Impacts to Agassiz's Desert Tortoise and Proposed Mitigation. Based on the presence of tortoise signs found onsite, as depicted in Figure 3, CMBC concludes that Agassiz's desert tortoise occurs onsite, both in undeveloped creosote bush scrub habitats to the south and the adjacent, centrally-located jojoba field. Based on the size and freshness of scats, we conclude that the one subadult tortoise observed near the east central portion of the site is currently resident and an adult tortoise is using scrub areas to the south and the central jojoba field."

Exhibit 8. View of 90 mm subsdult tortoise near the center of the site, in jojoba field.

Exhibit 9. Pieces of adult tortoise carcass that died more than four years ago.

-Why didn't the Wonder Inn developers use the Circle Mountain Biological Consultants survey when they are the ones who commissioned it?

The Circle Mountain Biological Consultants survey was conducted by Ed LaRue, who has been surveying desert tortoises for 33 years, worked as a biologist since 1989, and is Board Member of the Desert Tortoise Council.

The ELMT Consulting survey was conducted by Travis J. McGill, who's title is listed as a Director/Biologist for ELMT since 2018, and previously worked for Michael Baker International as a Project Manager/Biologist.

Comment: EMLT surveyed 134 acres for the proposed Wonder Inn and found NO evidence of any desert tortoise. CMBC surveyed 40 acres and found substantial proof of desert tortoises living in the surveyed area, including living tortoises and fresh scat.

-Why is there such a discrepancy between these two surveys done in the same area?

> *a) (Would the project) Have substantial adverse effects, either directly or through habitat modifications, on any species identified as a candidate, sensitive or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?*

This is the developers' answer to the above question on page 32 of the IS/MND:

> "Despite a systematic search of the Project Site, no live tortoises, suitable burrows or signs were observed on the project site during the site investigation."

Comment: This is in contradiction with the findings of Circle Mountain Biological Consultants. Tortoises, burrows, carapaces and scat were found in the 40-acre habitat survey. Here's what Ed LaRue of CMBC stated:

> *"I've been surveying for tortoises for 33 years, since 1989, and don't see any way, whatsoever, that we would find tortoise signs in 2020 and they not persist there one year later, in 2021, particularly since there was a wealth of juvenile tortoise signs; juveniles are an age class that is less likely to travel long distances as subadults and adults may be prone to do. Even if there had not been any new tortoise scats deposited, the ones we found in 2020 should still be visible, even in 2023, three years later."*

-Why didn't ELMT Consulting find any evidence at all of any tortoise, tortoise scat or tortoise burrows during their survey?

Based on the information available, yes, this project would have a substantial adverse effect on the desert tortoise, a threatened species under the Endangered Species Act.

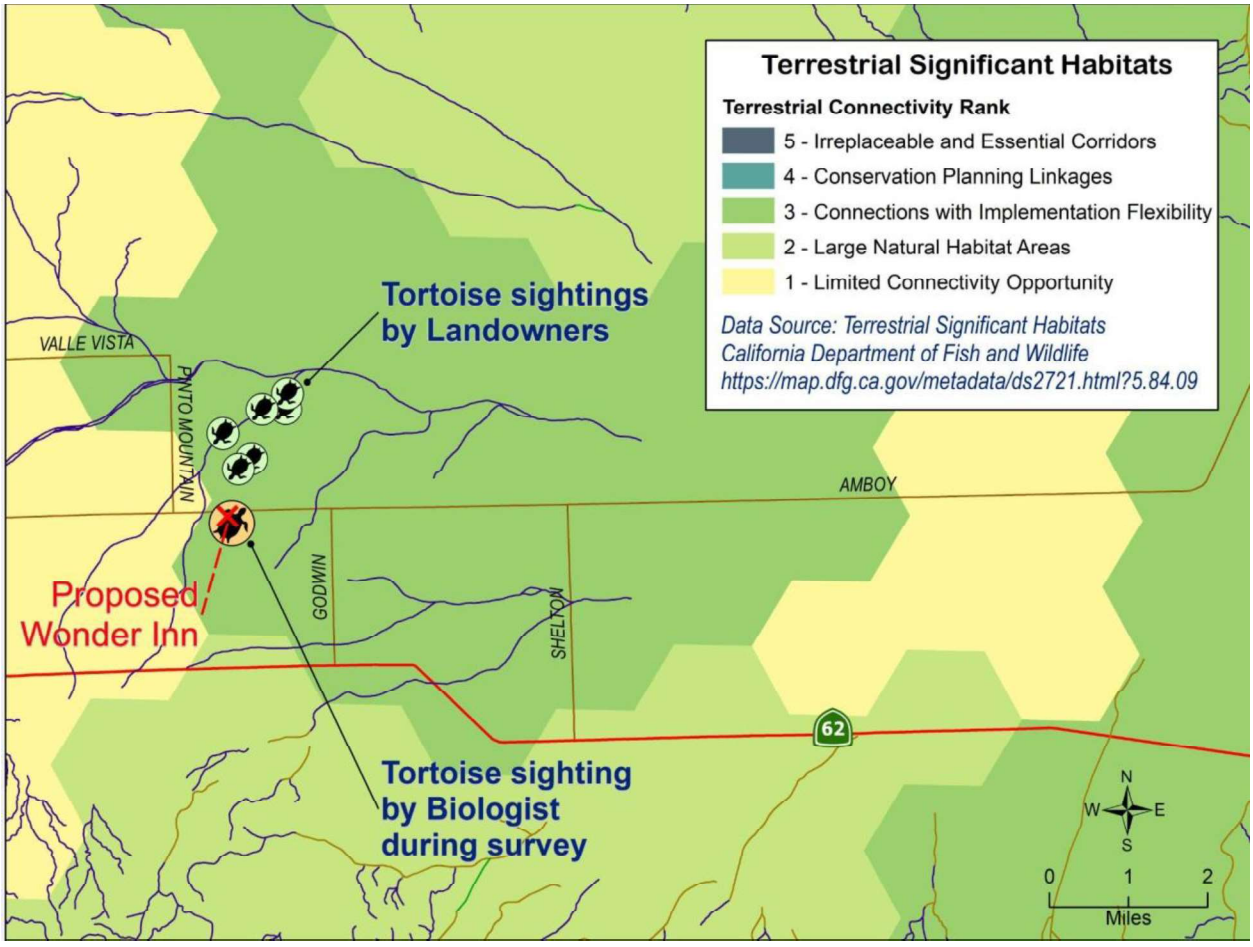
Comment: ELMT Consulting desert tortoise survey was conducted in the month of March. United States Fish and Wildlife (USFW) protocol requires tortoise surveys to be performed in the months of April, May, September or October. This requirement makes the ELMT Consulting survey invalid. Circle Mountain Biological Consultants performed their tortoise survey in April.

-Why didn't ELMT Consulting follow these guideline requirements of the USFW?

Comment: ELMT Consulting tortoise survey was conducted in March of 2021. Circle Mountain Biological Consultants performed their tortoise survey in April of 2020. Focused surveys for desert tortoises are only considered valid by the USFW for one year. Both surveys are now invalid for project consideration. A new tortoise survey is required per the USFW and CEQA.

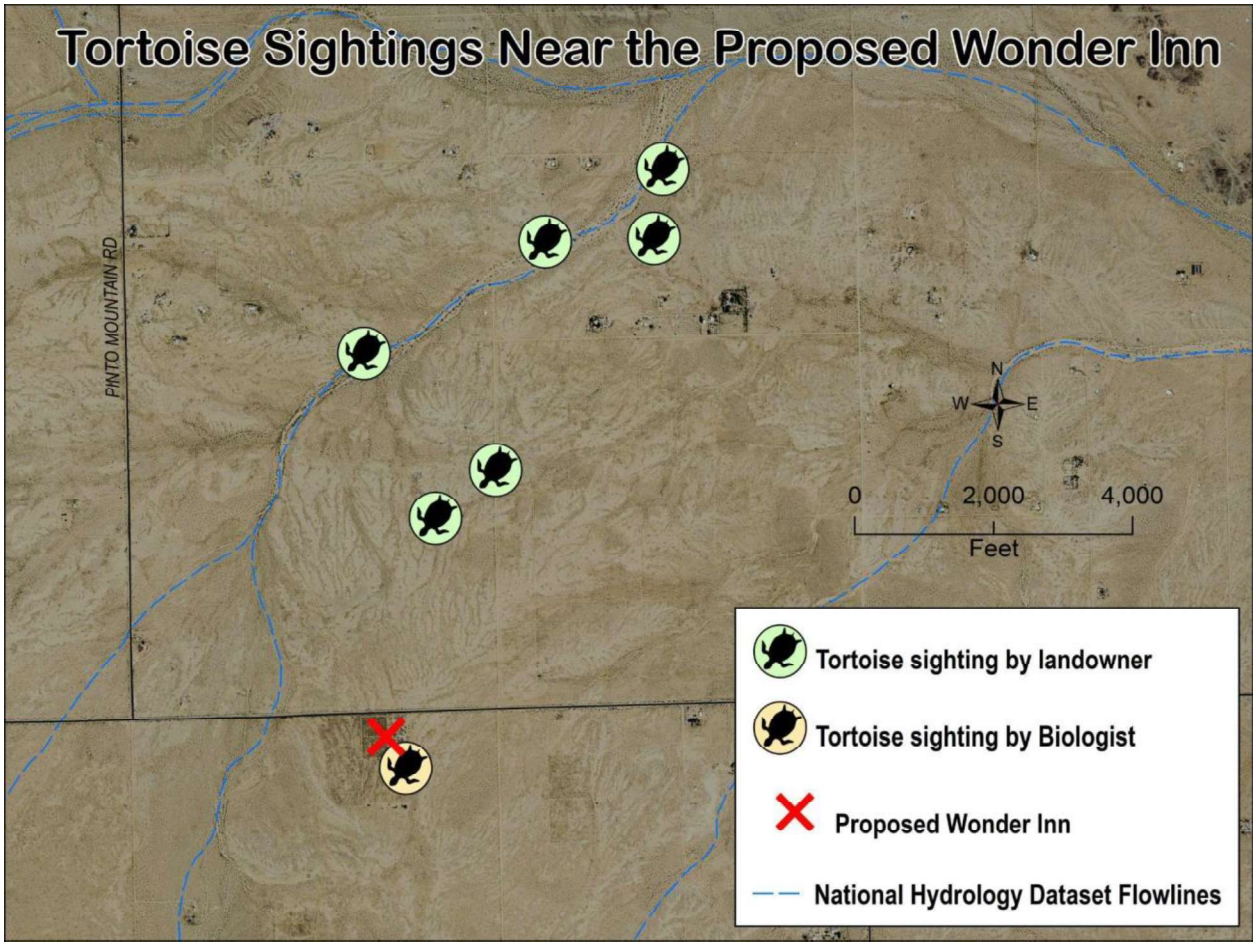
The developers' answer to this CEQA question:

> *d) (Would the project) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*
>
> "Due to the openness of the habitats surrounding the site, it could be expected that the area supports wildlife movement between the Bullion and Pinto Mountains. However, the Project footprint accounts for a minimal portion of the area and does not support riparian corridors or creeks or "stepping-stone" habitats commonly associated with wildlife movement. As such, implementation of the proposed project is not expected to have a significant impact to wildlife movement opportunities or prevent local wildlife movement through the area since there is ample habitat adjacent to the Project Site to support wildlife movement opportunities. No significant impacts are identified or anticipated, and no mitigation measures are required." (p.36)



Map 1: Tortoise sightings on Terrestrial Significant Habitat California/ Department of Fish and Wildlife. https://map.dfg.ca.gov/metadata/ds2721.html?5.84.09

Comment: Map 1 shows the Terrestrial Connectivity habitat corridors and linkages connected to desert tortoises discovered in the area and the connectivity of their pathways. Map 2 shows where tortoise sightings by landowners occurred along Natural Hydrology Flowlines. These first-hand accounts of tortoise discoveries and the connectivity of their movement DOES support a wildlife corridor through the proposed project site and surrounding acres.



Map 2: Tortoise sightings along the National Hydrology Flowlines.

A new, valid desert tortoise survey is required per the USFW, and based on this evidence and the data provided, more studies should be conducted to conclude if this is a wildlife corridor.

This CEQA question is asked in the IS/MND:

> *f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional or state habitat conservation plan?*

Here's the answer given in the IS/MND (p.36):

> "The General Plan does not identify the Project site, nor the vicinity to be within a Habitat Conservation Plan (HCP) and will not conflict with the provisions of an adopted HCP, Natural Community Conservation Plan (NCCP), or other approved local, regional or State HCP since there is no adopted HCP or NCCP in the Project area or local region. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
>
> "No Impact"

Comment: The County Plan does NOT identify ANY site (including this proposed Wonder Inn site) to be within or not be within the vicinity of a Habitat Conservation Plan. This is a false pretense made by the developers.

Comment: Per the United States Fish & Wildlife Service,

> "the potential applicant (Wonder Inn, LLC) develops an HCP that assesses the likely impacts on target species from the proposed project, the steps that will be taken to minimize and mitigate those impacts, and how the steps will be funded. The plan also identifies any alternatives that could avoid the incidental take and the reasons why those alternatives are not being chosen. The applicant then applies to the Service for an incidental take permit."

-Why did the Wonder Inn, LLC group NOT develop an HCP in accordance with the U.S. Fish & Wildlife Service per Section 10 of the ESA and its implementation of the Paperwork Requirement regulations?

Comment: Once again, the developers failed to properly answer and address a CEQA question and the related requirements of the USFW.

This is from the County Policy Plan:

> **Policy NR-5.7**
>
> **Development review, entitlement, and mitigation.**
>
> "We comply with state and federal regulations regarding protected species of animals and vegetation through the development review, entitlement, and environmental clearance processes."

Comment: Although both surveys are invalid per the USFW and CEQA for possible new development consideration, biological studies indicate that the desert tortoise remains within its habitat range for most of its life. Therefore, if desert tortoises were discovered on the proposed Project site in 2020, there is a high probability that desert tortoises remain on the Project site today. Also see quote above from biologist Ed LaRue.

-If this project gets approved, how could we trust the developers to follow through with any Mitigation Measures (BIO-3) when they've shown blatant disregard for available desert tortoise surveys that show proof of their existence on the project site?

Being that Agassiz's Desert Tortoise is a threatened species, and based on the extremely opposing data and the lack of a valid focused desert tortoise survey, in order to make an adequate determination of significant impacts this must be addressed with further study, including a valid Focused Survey for Agassiz's Desert Tortoise, and I request that a full, certified Environmental Impact Report per CEQA requirements should be completed for the Project and Project site of the proposed Wonder Inn.

V. CULTURAL RESOURCES

INTRODUCTION

The determination of Less than Significant Impact under Criterion (a) must be set aside as it is not supported by the Substantiation. Critical information has not been included, improper recommendation has been made, and a major significant historical resource has not been addressed at all.

Specifically:

1. The cultural resource evaluation of the existing commercial building is deficient as critical information has not been included.
2. The recommendation of the existing commercial building as not eligible as a historical resource under the California Environmental Quality Act (CEQA) is invalid as it is based on a deficient evaluation.
3. The setting of the Project within the homestead community of Wonder Valley is not described or analyzed.
4. The potential historical significance of the homestead community/setting of Wonder Valley as a historical district under CEQA is not evaluated.
5. Determination of substantial adverse change in the significance of historical resources caused by the Project cannot be made due to deficient evaluation and invalid recommendation.

Further, the Project is likely to impact two historical resources that have not yet been evaluated:

- Evidence supports the significance of the existing commercial building as a historical resource.
- Evidence supports the significance of the Wonder Valley homestead district as a historical resource.

Due to these deficiencies and the evidence of historically significant resources that will be impacted by the Project, a thorough study must be done to identify potential significant impacts and a full and complete Environmental Impact Report must be prepared.

For more on the modern setting of Wonder Valley, see Section “Description of the Setting Is Inadequate” in these Response Comments.

EXISTING COMMERCIAL BUILDING

a) *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*

Our response to Criterion (a):

The evaluation of the existing commercial building as historical resource is deficient.

The origins of the existing commercial building on-site (locally known as "the pink building") were grossly under-researched, and available and critical historical information was not included.

The Initial Study/Mitigated Negative Declaration (IS/MND) assessment correctly identifies that the building was constructed in 1962. However, it gives no evidence but only speculation as to what use it was built for or how it was used thereafter until 1981, and further states "No contemporaneous newspaper stories…have confirmed its original use...". This statement is grossly inaccurate. A search of contemporaneous editions of the local newspaper of record, *The Desert Trail*, readily accessible in the archives of the local historical association, the Twentynine Palms Historical Society, reveals abundant documentation of the construction and use of the building as the headquarters for the Desert Electrical Cooperative from 1962 to 1966 – within historical timeframe. The study provides no acknowledgement or discussion of this history whatsoever. (*See* Exhibit CR-1, "Power and Lights for Tract Homes…" from *The Desert Trail*, March 31, 1962.)

The existing commercial building is historically significant and eligible for the California Register of Historical Resources.

The existing commercial building as the headquarters of the Desert Electrical Cooperative embodies a unique intersection of the Small Tract Act homestead movement with the Rural Electrification cooperative movement in a remote desert setting, and as such is historically significant and requires evaluation for eligibility as an historical resource under CEQA.

History: The Desert Electrical Cooperative (DEC) was formed in 1950 with help from the Rural Electrification Administration (REA), a federal program formed to help bring electrification to the rural parts of the country. In the 1930s only 3% of farms were electrified, and investor-owned utilities weren't interested in bringing electricity to rural areas. Farmers started forming their own cooperatives to take advantage of loans from the REA. (*See* National Rural Electric Cooperative Association https://www.electric.coop/our-organization/history .)The Desert Electrical Cooperative was part of that movement, formed locally, by local people, and with a desert flavor: serving not farmers but specifically Small-Tract and other homesteader communities from Wonder Valley west across the Morongo Basin.

By 1962 DEC was ready to build itself a new headquarters with REA loans. There was a lot of pride in this building, which had administrative offices, a maintenance yard, a meeting auditorium, and even a demonstration kitchen. The DEC was subsequently bought out by Southern California Edison in 1966. More research remains to be done about the building and the DEC, but clearly the old "pink building" is a key expression of the energy, initiative, and can-do spirit of a unique and historic homestead community --- a history to be proud of.

Eligibility: In light of its history and age, the existing commercial building must be considered historically significant and must be evaluated as a historical resource under CEQA with eligibility for the California Register of Historic Resources under Criteria 1 and 3. The recommendation assessment in the IS/MND is not valid as the history of the building was not provided.

The IS/MND has denied recommendation for eligibility under California Register Criterion 1 because, as stated on p. 38, "Considerable research, however has not revealed important associations between subject property and the history of the region." This statement and recommendation are not supported as the actual history of the building was not provided or considered and the actual history supports a different conclusion.

Contrary to the IS/MND recommendation, the building is very likely eligible and must be evaluated for eligibility as follows:

1. The building was constructed in 1962, making it at least 60 years old and therefore within historical time frame.
2. The building is eligible under California Register of Historical Resources Criterion 1: "Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States". Specifically, the building is associated with:
    a. The Rural Electrification Administration and the national movement of locally formed electrical cooperatives, as detailed above. The building was constructed as the headquarters for the locally formed Desert Electrical Cooperative with REA loans in 1962.
    b. The Small Tract Act of 1938, which reached a maximum expression and fulfillment in Wonder Valley, the setting of the Project and a homestead community eligible for consideration as a historical district.
    c. The Desert Electrical Cooperative and its headquarters building represent a unique intersection of the historic Small Tract Act homesteader movement and the REA and electrical cooperative movement. The building and the community together remain essentially intact as congruent, coherent, and mutually reinforcing living historical artifacts.
3. The building is eligible under California Register of Historical Resources Criterion 3: "Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values". Specifically, the building:
    a. Embodies the distinctive characteristics of a type and period, as described in the Cultural Sources Substantiation (IS/MND, p. 38): "The building is an ordinary example of a mid-century modern commercial/industrial building…" and "…designed during the era with utilitarian and cost-effectiveness as primary goals."
    b. Exhibits architectural and historic integrity. The exterior of the building appears to be essentially unchanged from the time of design and construction, as may be seen by comparing photo P5a on p. 1 of Appendix C of the Cultural Resources Assessment (recorded in 2021) with the original architectural rendering shown in Exhibit CR-1 above. The building is able to convey the significance and authenticity of its historic identity through the survival of physical characteristics and character-defining features that existed during its historical period. It appears to retain the seven aspects of integrity: location, design, setting, materials, workmanship, feeling and association.

Potential for substantial adverse change in the significance of a historical resource pursuant to CEQA Section 10564.5: The determination of Less than Significant Impact cannot be supported by the Substantiation as critical information is missing and the determination is therefore flawed. In light of information provided in these comments the eligibility of the existing commercial building as an historical resource under CEQA is likely and remains to be evaluated after thorough research is conducted. Until that evaluation is completed, the potential for substantial adverse change in the significance of the building as historical resource cannot be determined. Therefore, full study and evaluation with an Environmental Impact Report is mandatory under CEQA and must be completed.

Souvenir Edition THE DESERT TRAIL Twentynine Palms, California

Power and Lights For Tract Homes . . .

Today over 500 miles of DEC distribution lines are supplying more than 2000 Small Tract homes with power and light. Offices and yards, which have been in rented quarters, will move from Twentynine Palms to Amboy Road, where the DEC headquarters building is nearing completion. The co-op owns ten vehicles and employs 14 persons in line and other field and office work.

First formal steps in creating the local DEC were taken at a meeting held here in February 1950, attended by more than 200 persons, from Desert Hot Springs to Twentynine Palms. Articles of incorporation were filed the next month. Action on a loan application was delayed until in June 1952 franchise limits for the DEC and California Electric Power Co. were agreed on.

The service area for DEC extends from Rimrock area north of Yucca Valley to Dale Dry Lake area east of Twentynine Palms, with the exception of Calectric franchise area which includes Morongo Valley and the community areas along Twentynine Palms Hwy. to approximately four miles east of Twentynine Palms. DEC contracts with Calectric for supplying of power from Calectric transmission lines.

A succession of Rural Electrification Administration loans, at low interest, has brought the total to $2,020,661.66, as of March 1962. With part of a 1957 loan a 1500 kva substation was built on Twentynine Palms Hwy. west of town.

Dr. C. F. Lekstrum, local chiropractor, was president during the initial progress and construction under several REA loans. William R. Graham was elected president in March 1959, and soon

A "street lighting" program was approved in April 1959, by which members could have sodium vapor luminaires installed at their property. Late in 1959 a new type of REA loan was approved. This provided funds which the local DEC could reloan to Mutual Water Districts formed within DEC boundaries.

An additional loan, $202,000, was approved in September 1961, to cover cost of a headquarters facilities, increase the substation capacity, convert some service lines from one to three phase, purchase equipment, and other purposes.

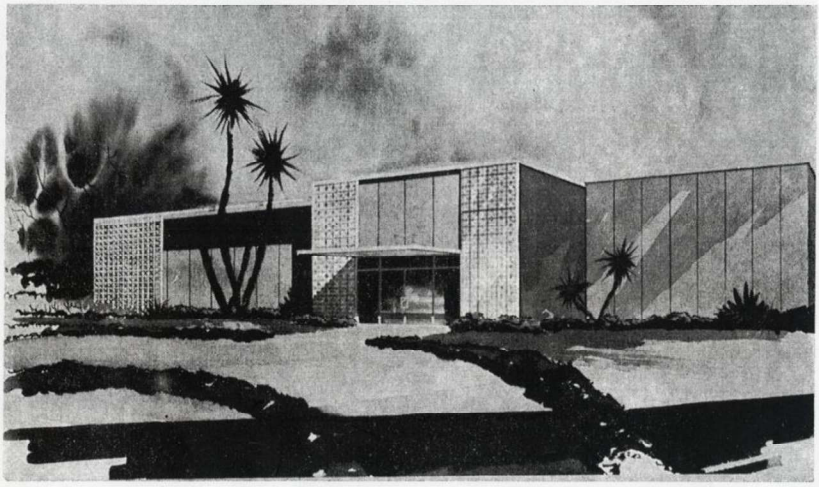
The headquarters building, for which $66,440 contract was awarded, is on a 30 acre site 5½ miles east of Twentynine Palms on the south side of Amboy Road.

By-laws adopted by the DEC at the time of incorporation provide for an annual membership meeting on the second Saturday of March each year (starting 1951) for election of directors, hearing of reports and transacting other business. The directors are elected for three year terms, and officers are chosen from the board of directors.

Present board (March 1962 election was not held) includes: Birger Nelson, president; Leland Rodda, vice president; Ivan Aspaas, secretary-treasurer; William Graham, manager; Irene Fox, John Handley, Clifford Shelton and George Goemans, directors.

There were, as of March 1962, 2258 DEC members who were electricity users, and 47 non-users. There were 506 miles of primary and secondary distribution lines.

The cooperative is one of several such non-profit organizations in California. Locally owned and operated, it has been able with REA funds to provide more than 2,000 Small Tract homes with electricity.



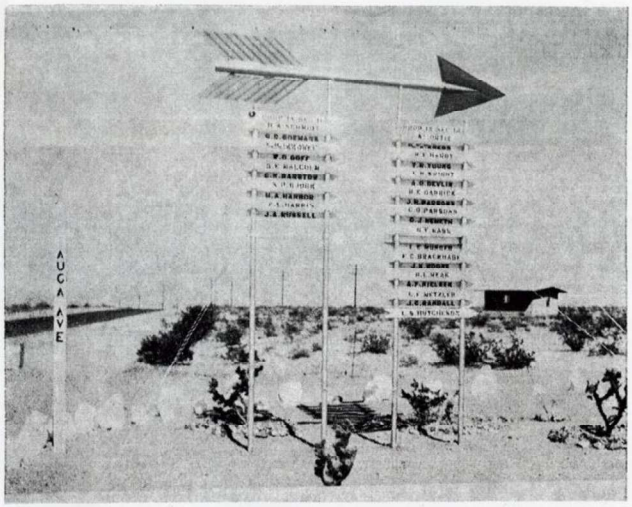
CO-OP HEADQUARTERS—This is architect's drawing of office and headquarters building of Desert Electric Co-operative Inc., now nearing completion on a 30-acre site on Amboy Road 5½ miles east of Twentynine Palms. Yards for DEC vehicles and other equipment will be located here. Bid for constructing the 4530 sq. ft. building was $66,440.

SMALL TRACT HOMES

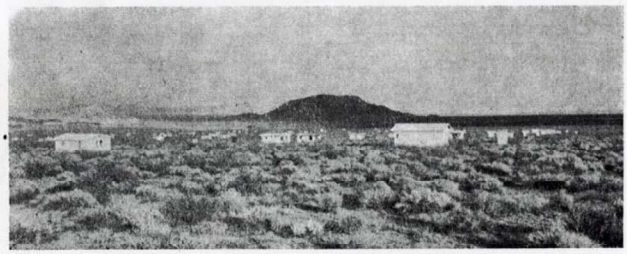
Another phase of housing which has shown phenomenal growth in the Twentynine Palms area is that of the Small Tracts, 2½ and 5 acre parcels which were proved up in homestead fashion under rules of the Small Tract Act, and more recently by the Bureau of Land Management, Department of the Interior. In an area covering 250 sections of land, from Dale Dry Lake 18 miles east of Twentynine Palms, northwest towards Old Women Springs and west to Morongo Valley, there are uncounted thousands of homes on these tracts. The potential number is placed at between 25-50,000.

Through the locally owned and operated Desert Electric Cooperative Inc., aided by loans from the Rural Electrification Administration, many of the small homes formerly used as vacation cabins are now provided with cooling by refrigeration, electric stoves and other accessories and appliances which make for modern living. With water hauled by suppliers, or provided by a cooperative well, Small Tract owners live in a real desert with all the conveniences of town. Grocery stores, gas stations and several other businesses have recently opened, on East 29 Palms Hwy., Amboy Road, Landers, and Flamingo areas.

The first tract homes here were "proved up" in the 1940s. Most of these serve as vacation and week end homes, but with the advent of electricity, more and more people are moving here. Many of the Small Tract people have retired from county, state and city jobs or from their own businesses. They are largely from Southern California city areas, but a number of them are from mid-West and mid-East states. More recently families with children have moved to our outlying desert, with a result that school buses now run as far east as Sheep Hole Pas and many miles to the northwest.



THE WAY HOME—This arrow-topped directory northwest of Twentynine Palms points the way to Small Tract homes. In many sections of the High Desert, owners have banded together to erect neat and systematic signs pointing to their desert homes. In others, individual markers are like thickly planted sticks and make humorous subjects for photographers.



DESERT HOMES—Thousands of vacation and week end homes are scattered throughout the desert arear surrounding Twentynine Palms. They are built on 2½ and 5 acre tracts acquired through provisions of the Small Tract Act, originally by homesteading and more recently by purchase at auction in Bureau of Land Management.

Exhibit CR-1: Article from *The Desert Trail*, 3/31/1962, Twentynine Palms, CA

SMALL TRACT ACT HOMESTEAD DISTRICT

a) *Would the project cause a substantial adverse change in the significance of a historical resource pursuant to §15064.5?*

Response to Criterion (a):

The setting of the Project in the Small Tract Act homesteading community of Wonder Valley is not described in the IS/MND.

The setting of the Project within the physical and cultural environment of the Wonder Valley homestead community is not described. The community of over 1,000 residents and its built and cultural environment is invisible throughout the entire IS/MND. See Sections "Description of the Setting Is Inadequate" and "Environmental Justice" in these Response Comments.

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The IS/MND fails to evaluate the historical significance of the Wonder Valley homestead community, unique as the most intact remaining desert homesteading district of the Small Tract Homestead Act of 1938.

The Project setting of the homestead community of Wonder Valley merits evaluation as a historically significant district and potential eligibility as a historical resource under CEQA as evidence supports its historical significance and there has been very little alteration to its architectural, physical, and historic integrity since its original development as a homestead community.

> "Although the exact etymology of Wonder Valley and the specific beginnings of community consciousness are unclear, it is certain that Wonder Valley and countless other western desert communities came into existence because of the Small Tract Act (STA) of 1938. The STA allowed for the disposal of two-and-a-half to five-acre allotments of federal land in the American West. The greatest concentration of these tracts were released to the public just east of Twentynine Palms in what is now Wonder Valley, and it is only in this area that an extensive "jackrabbit homestead" landscape and a distinct sense of community still exists." - *"Wonder Valley: Place and Paradox" Jacob Sowers, PhD, Assistant Professor of Geography, Minot State University*

History of Wonder Valley as a Small-Tract Homestead Community:

The modern character of Wonder Valley is predominately a result of the Small Tract Homestead Act of 1938, an attempt by the federal government to bring residents into the Mojave Desert in which five-acre parcels of land were given to individuals who agreed to build a small residential structure and meet other minor requirements. Wonder Valley is largely intact as a Small-Tract homestead community. The role of the homestead heritage in shaping the community cannot be overstated, and the cultural and historical significance of this heritage has only more recently been recognized. Little has changed since the following appeared as one of numerous passages on the movement in various issues of *The Desert Magazine*:

> "Passage of the Small Tract Act has opened vast areas of land, not for profit or exploitation, but for folks who like to build with their own hands, and who are thrilled by the challenge of creating a home of their own...These homesteads are for people who delight in watching the moon rise over purpled hills, for those who would call the stars by name, and who love the peace that is found only in remote places." -- *Desert Magazine* 1954

Homesteading on government land is a tradition in the United States, but the typical 160-acre parcels for farming made little sense in the desert. However, recognizing the health and recreation benefits of the high desert, in 1938 Congress passed the Small Tract Homestead Act, making 5-acre parcels available not to would-be farmers so much as weekenders seeking relief from crowded urban conditions. The boom really got going after World War II when thousands of claims were filed in the Morongo Basin, sometimes sight-unseen in unbuildable washes or rock piles. (See Exhibit CR-1, "Power and Lights for Tract Homes…" from *The Desert Trail*, March 31, 1962.) Local companies such as Homestead Supplies grew by serving the "Five Acre People", developing the quick-rising "jackrabbit" cabin models that could be put up almost overnight to help meet the requirements for proving up a claim. The boom petered out and homesteading came to an end by 1976.

> "Jackrabbit homesteads are only for folks who have a bit of pioneering blood in their veins. The land generally is rough, no water is immediately available, more or less road building has to be done. But fortunately, there are many Americans who find infinite pleasure in doing the hard work necessary to provide living accommodations on one of these sites—and cabins are springing up all over the desert country." -- *Desert Magazine* 1950

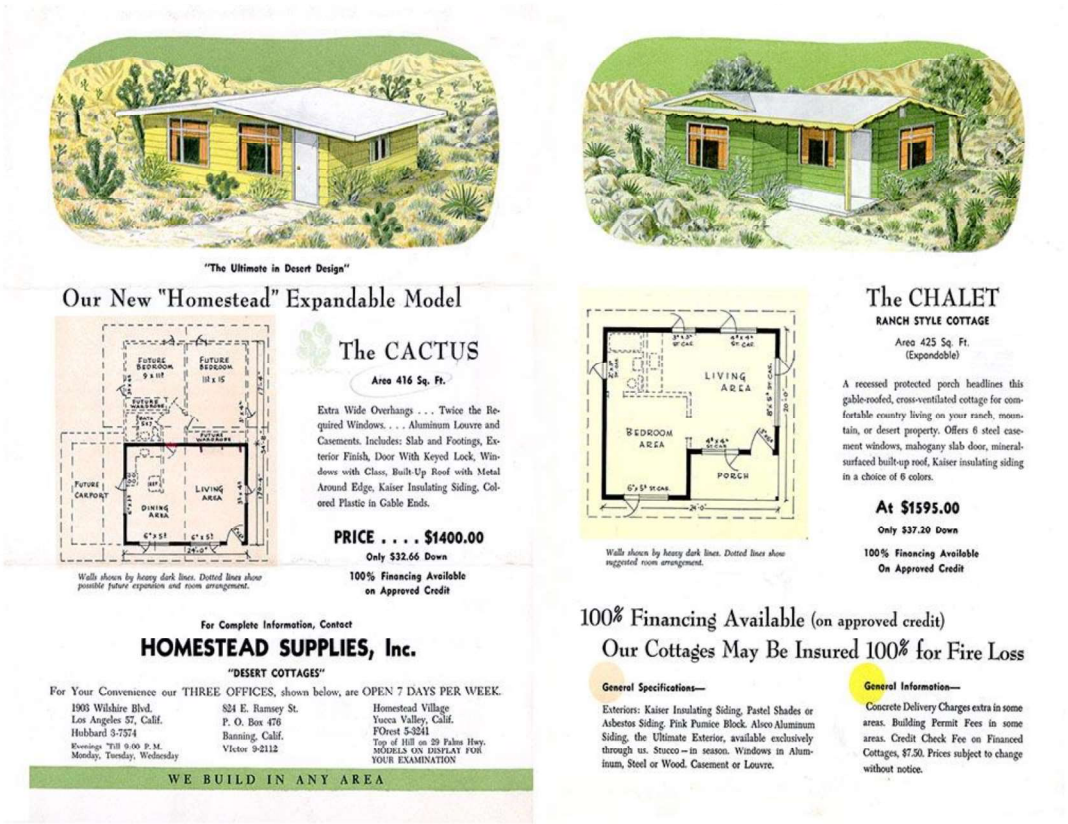


Exhibit CR-2: Sales brochure for "jackrabbit" cabin models, Homestead Supplies, Inc.

A distinctive feature of Wonder Valley remains the now-classic "jackrabbit" homestead cabin – whether a long-loved home, now being refurbished by a new generation, or derelict and abandoned. The original cabins tended to be small – large enough to meet the minimum size dictated by the conditions of the claim process, but often limited by the difficulty of procuring and transporting materials. The term "jackrabbit" referred to the speed by which the inexpensive kit homes went up – seemingly overnight. Kit homes from companies like Homestead Supplies came in a limited number of models with characteristic profiles that have come to characterize the homestead community and the jackrabbit cabin vernacular architecture. Others were designed and built by hand.

Due to geographic remoteness, harsh environment, low property values, lack of public services, and eventually perceived blight due to abandoned or neglected jackrabbit cabins, little changed over the years in the appearance or actuality of Wonder Valley. It remains a very challenging place to live, requiring much sacrifice on the part of residents.

A notable development in the district towards the turn of the century were derelict homestead cabins, which have long lent a striking visual and sensual dimension of erosion, eerie nostalgia, dwindling civilization, and a sense of reclaiming by the desert environment – a unique type of "ruin" that has been compelling to artists and visitors. Over time, the number of the derelicts is decreasing due to environmental conditions and abatement.

Recently, some new interest and investment in Wonder Valley and in the cabins, due in part to larger economic and societal trends, has resulted in increase in the refurbishing of cabins. The refurbishing has been mostly within the historic mode rather than new construction or radical remodeling, and has tended to retain the original design elements of the jackrabbit cabins. Therefore, it can be said that the homestead district is starting to renew itself architecturally in line with its origins. As well, the jackrabbit cabin profile or "type" has become recognized and emulated in new construction and design elsewhere in the Morongo Basin and further become an influential component in a desert trend towards hybridization with classic mid-century modern style.

Eighty-five years since its origin, the Wonder Valley Small Tract Act homestead district and many of its elements remain in use and essentially unchanged. No significant new commercial, institutional, or residential development has occurred in the area for 50 or more years. The district remains characterized by scattered homesteads and dirt roads in 147 square miles of remote and wild desert basin. Contemporary aerial photographs are unlikely to look much different than those from 50 years ago. The historical integrity of the Wonder Valley Small Tract Act homestead district is clear, as it continues to convey its significance and the authenticity of its historical identity through the survival of the character-defining features that existed during its historical period.

For information on the modern setting of Wonder Valley, see Section "Description of the Setting Is Inadequate" in these Response Comments.

See List of References and Resources at the end of this section for more resources on the history of the Small-Tract homestead movement and the jackrabbit cabins.

Eligibility: The Wonder Valley homestead community is historically significant and must be evaluated for eligibility as a historical resource under CEQA as follows:

1. The built and cultural character of the Wonder Valley homestead community was largely determined by the Small Tract Act of 1938 which ended in 1976 with the bulk of settlement activity in the post-war period, meaning the character of the District was formed between 47 and 85 years ago and therefore within historical time frame.
2. The Wonder Valley homestead community is eligible as a district under California Register of Historical Resources Criterion 1: "Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States." Specifically, the Wonder Valley homestead district is intimately associated with:
    a. The Small Tract Act of 1938.
    b. Jackrabbit homestead cabin vernacular architecture.
3. The Wonder Valley homestead community is eligible as a district under California Register of Historical Resources Criterion 3: "Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values." Specifically, the district and its vernacular architecture embody distinctive characteristics of:
    a. Type: Small Tract Act homestead community, with defining features of jackrabbit homestead cabin vernacular architecture on typically 5-acre parcels, widely scattered and interspersed with public lands, and connected by dirt roads in a vaguely grid pattern in a broad natural desert setting.
    b. Period: Largely developed within the context of the Small Tract Act, 1938 to 1976, with the bulk of settlement activity in the post-war period.
    c. Region: Mojave Desert, especially the Morongo Basin.
    d. Method of construction: A defining feature is the "jackrabbit" homestead cabin vernacular architecture, widespread and dominant throughout the district.

Potential for substantial adverse change in the significance of a historical resource pursuant to CEQA Section 10564.5: The determination of Less than Significant Impact cannot be supported by the Substantiation as the Project setting of the homestead community of Wonder Valley was not acknowledged or addressed, nor was its potential as a historically significant district addressed. Its eligibility as a historical resource remains to be evaluated after thorough study is conducted. Until such evaluation is completed, the potential for substantial adverse change in the significance of the community of Wonder Valley homestead district as a historical resource cannot be determined.

However, clearly a Project of this anomalous scale, visual and geographic prominence (elevated and centrally located), relative verticality, relative density and concentration, commerciality, pretension, visual obtrusiveness, and social and economic exclusivity is the antithesis of and would be overwhelmingly in contrast with the horizontal, low-profile, rustic, modest, sparse, homestead-style Disadvantaged Community and wild desert basin in which it is situated --- rather like the shiny Castle on the Hill dominating the small, dusty, homegrown cottages

scattered across the broad plain below. As such, the Project must be expected to create substantial adverse change in the integrity and significance of the district as an historic resource.

Therefore, full study and evaluation with an Environmental Impact Report of the homestead community of Wonder Valley as a historically significant setting and potential historical district is mandatory under CEQA.

CONCLUSION:

Full study and evaluation of the history, significance, and historical eligibility of these two resources, the existing commercial building and the Wonder Valley homestead district, must be conducted. Further, the building and the homestead community together remain essentially intact, congruent, coherent, and mutually reinforcing living historic artifacts and should be evaluated as such, as well. An Environmental Impact Report must be completed to fully evaluate the resources and significant potential impacts upon them from the Project.

REFERENCES AND RESOURCES:

- "Wonder Valley: Place and Paradox" by Jacob Sowers, jackrabbithomestead.com https://jackrabbithomestead.com/wonder-valley-place-and-paradox-sowers/
- "Power and Light for Tract Homes" *The Desert Trail* (3/31/1962)
- National Rural Electric Cooperative Association https://www.electric.coop/our-organization/history
- "History: Jackrabbit homesteading gets its start in the midcentury" by Tracy Conrad, *The Desert Sun* (3/28/2021) https://www.desertsun.com/story/life/2021/03/28/history-jackrabbit-homesteading-california-desert/7030816002/
- "Amboy – California's Gold" with Huell Howser (12/10/1993) https://blogs.chapman.edu/huell-howser-archives/1993/12/10/amboy-californias-gold-410/
- "Desert Jackrabbit Homesteads Inspire Artists" with Maureen Cavanaugh, KPBS Radio (11/30/2010) https://www.kpbs.org/news/arts-culture/2010/11/30/desert-jackrabbit-homesteads-inspire-artists
- "Jackrabbit Homesteads" – History Trove (7/27/2021) https://historytrove.com/2021/07/27/jackrabbit-homesteads/
- Jackrabbit Homestead: Tracing the Small Tract Act in the Southern California Landscape, 1938-2008 by Kim Stringfellow (2010)
- "Homestead where the heart is" by Rebecca Unger, *Hi-Desert Star* (Feb 2008) http://magicgroove.net/Press/HomesteadWhereHeartIsHiDesertStarFeb2008.pdf
- "Shed Reckoning", *Dune Magazine* (Feb-Mar 2008) http://magicgroove.net/Press/Dune%20Magazine%20Feb-Mar%202008.pdf

- "Jackrabbit Homestead: Artists, Off-Roaders, and the American Dream Writ Miniature" KCET *Artbound* (5/7/2012) https://www.kcet.org/shows/artbound/jackrabbit-homestead-artists-off-roaders-and-the-american-dream-writ-miniature
- "The Small Tract Act 1938-1976: Shaping the San Bernardino's High Desert" by Pat Flanagan, *Desert Report* (12/22/2022) https://desertreport.org/the-small-tract-act-1938-1976/
- "The Last Homesteads of Wonder Valley, California" – Laura Bliss, *Bloomberg* (2014) https://www.bloomberg.com/news/articles/2014-12-04/the-last-homesteads-of-wonder-valley-california
- wondervalley.org
- "Experiments in Living 2 : Reclaiming Old Homestead Cabins" - *Someplace Magazine* (2015) http://www.someplacemagazine.com/joshua-tree-features/experiments-in-living-2
- jackrabbithomestead.com
- "In the Desert With Jackrabbits and Clint Eastwood" by Penelope Green, *The New York Times*, (10/3/2019) https://www.nytimes.com/2019/10/01/arts/design/in-the-desert-with-jackrabbits-and-clint-eastwood.html

VI. ENERGY

ENERGY - Would the project:

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

From the Initial Study/Mitigated Negative Declaration (IS/MND):

> "The Project would not result in potentially significant environmental impacts due to wasteful, inefficient, or unnecessary consumption of energy resources, during Project construction or operation… Electricity used for the Project during construction and operations would be provided by Southern California Edison, which serves more than 15 million customers."

Comment: As it currently rests, the electrical grid in Wonder Valley has had many shut-downs and power outages through the years to recently. If the proposed Wonder Inn ever gets built it will put a significant added strain on the already strained power grid in Wonder Valley.

Would the project:

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Comment: The project as designed does not meet/ conflicts with California's New Building Energy Efficiency Standards that require solar and battery storage on all newly constructed commercial buildings and would conflict with the State's plan for renewable energy and energy efficiency.

In 2022 the California Energy Commission published its latest Building Energy Efficiency Standards that require all new commercial buildings (including hotels) to have roof space for solar panels and energy storage capabilities: "Approved last year through a unanimous vote, the order requires all newly constructed commercial buildings to have a solar photovoltaic (PV) array and an energy storage system (ESS) installed."

> "The California Energy Commission (CEC) has published the latest version of the Building Energy Efficiency Standards, which encompasses residential and commercial properties. The Energy Code is modified every three years, containing energy and water efficiency requirements for newly constructed buildings and modifications to existing buildings. The 2022 update provides crucial steps in California's progress towards achieving 100 percent carbon neutrality by 2045. The 2019 standards laid the foundation by requiring all new residential homes to have a solar photovoltaic (PV) system installed, with new commercial buildings having to include roof space for solar panels. California became the first state in the United States to implement such a bold residential solar mandate. With the 2022 Energy Code, California has made history once again as the first state to enact a solar + storage requisite. Approved last year through a unanimous

vote, the order requires all newly constructed commercial buildings to have a solar photovoltaic (PV) array and an energy storage system (ESS) installed. We previously summarized this mandate and the effect it will have in a blog: A. With the 2022 Building Energy Efficiency Standards published and going into effect on January 1, 2023, we have outlined the rules and specifications of the solar + storage mandate to serve as a reference guide for California business owners and project developers. Note: The state standards below are minimum requirements; local jurisdictions may vary."

https://www.energy.ca.gov/sites/default/files/2021-08/CEC_2022_EnergyCodeUpdateSummary_ADA.pdf
https://www.energytoolbase.com/newsroom/blog/californias-new-building-energy-efficiency-standards-mandating-solar-storage#:~:text=With%20the%202022%20Energy%20Code,storage%20system%20(ESS)%20installed.

There is no mention of California's New Building Energy Efficiency Standards in the IS/MND and no solar or energy storage facilities shown on the Wonder Inn's architectural drawings.

Page 67/PDF Appendix A, Air Quality, Greenhouse Gas and Energy Impact Study:

"8.3 Renewable Energy and Energy Efficiency Plan Consistency Regarding federal transportation regulations, the project site is located in an already developed area. Access to/from the project site is from existing roads. These roads are already in place so the project would not interfere with, nor otherwise obstruct intermodal transportation plans or projects that may be proposed pursuant to the ISTEA because SCAG is not planning for intermodal facilities in the project area. 16 California Energy Commission, Electricity Consumption by County. https://ecdms.energy.ca.gov/elecbycounty.aspx 17 California Energy Commission, Gas Consumption by County. http://ecdms.energy.ca.gov/gasbycounty.aspx Wonder Inn Air Quality, Greenhouse Gas, and Energy Impact Study Wonder Valley, CA Energy Analysis 61 Regarding the State's Energy Plan and compliance with Title 24 CCR energy efficiency standards, the applicant is required to comply with the California Green Building Standard Code requirements for energy efficient buildings and appliances as well as utility energy efficiency programs implemented by the SCE and Southern California Gas Company. Regarding the State's Renewable Energy Portfolio Standards, the project would be required to meet or exceed the energy standards established in the California Green Building Standards Code, Title 24, Part 11 (CAL Green). Cal Green Standards require that new buildings reduce water consumption, employ building commissioning to increase building system efficiencies, divert construction waste from landfills, and install low pollutant-emitting finish materials."

Conclusion: An EIR is needed to determine if the Wonder Inn's design complies with California's new Building Energy Efficiency Standards and any other renewable energy mandates that are not being considered in the IS/MND.

Comment: The developers have not coordinated with Southern California Electric to determine the utility upgrades that may be needed to service the Wonder Inn and the impact of those upgrades on the wider community. https://www.sce.com/partners/consulting-services/localplanning

Comment: The Project's high propane usage is in conflict with California's plan to phase out propane/natural gas usage by 2030.

Propane's primary use is for space heating, offering multiple solutions for a business owner. Various restaurants, hotels, resorts, and lodgings use propane to power heating appliances. The California Air Resources Control Board voted in Sept 2022 to ban the sale of these for both residential and commercial use by 2030.
https://www.nytimes.com/2023/01/18/us/gas-stove-debate-california.html

VII. GEOLOGY AND SOILS

GEOLOGY AND SOILS - Would the project:

> *e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*

Comment: This California Environmental Quality Act (CEQA) question cannot be answered in any capacity as the developers of the Wonder Inn have not included any documentation indicating that they conducted studies/percolation tests to determine whether the site conditions including soils can accommodate and support the Large Capacity Septic System and leach field required by a project this size. The Conditional Use Permit (CUP) application process requires that any new project developer include an approved percolation report (approved by San Bernardino EHS) in their application submittals if they plan on/ need to build a new septic system. Without an approved percolation report the Wonder Inn CUP application should not have been even processed and should be withdrawn until completed.

If said approved percolation report has not been completed, the Wonder Inn's application for the CUP should not have been processed until an appropriate percolation report had been reviewed and approved by San Bernardino EHS. In the meantime, their CUP application should be withdrawn. Since approved percolation reports are not made public if such an approved report exists it has not been included in either their Phase 1 ESA, Appendix A or any additional documents made public.

A new septic/ wastewater system would be required and is planned. Below is the Wonder Inn's response:

Page 47/92 Initial Study/Mitigated Negative Declaration (IS/MND):

> *e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?*
>
> "The Project proposes to construct a septic system as its wastewater system. Sewer lines would be gravity fed to a proposed one-half acre leach field located near the parking lot on the west side of the Project Site. In 2021, an infiltration test boring on various portions of the Project Site (Appendix D-2). The test results and soil conditions encountered during the infiltration testing indicated "favorable" conditions. The generally rapid percolation rates determined by testing were consistent with the sandy conditions of the near surface soils throughout the site. The septic system would be certified by a qualified professional (P.E., C.E.G., REHS, C-42 contractor) that the system functions properly, meets code, and has the capacity required for the Proposed Project. No significant adverse impact is identified or anticipated, and no mitigation measures are required."

The above response from the IS/MND does not mention the approval of a percolation test by San Bernardino EHS or address whether the soils could support the new septic system. It should also be noted that a large septic system of the type needed by the Wonder Inn would be governed by the EPA's large-capacity septic systems (LCSSs) regulations. Though the reports

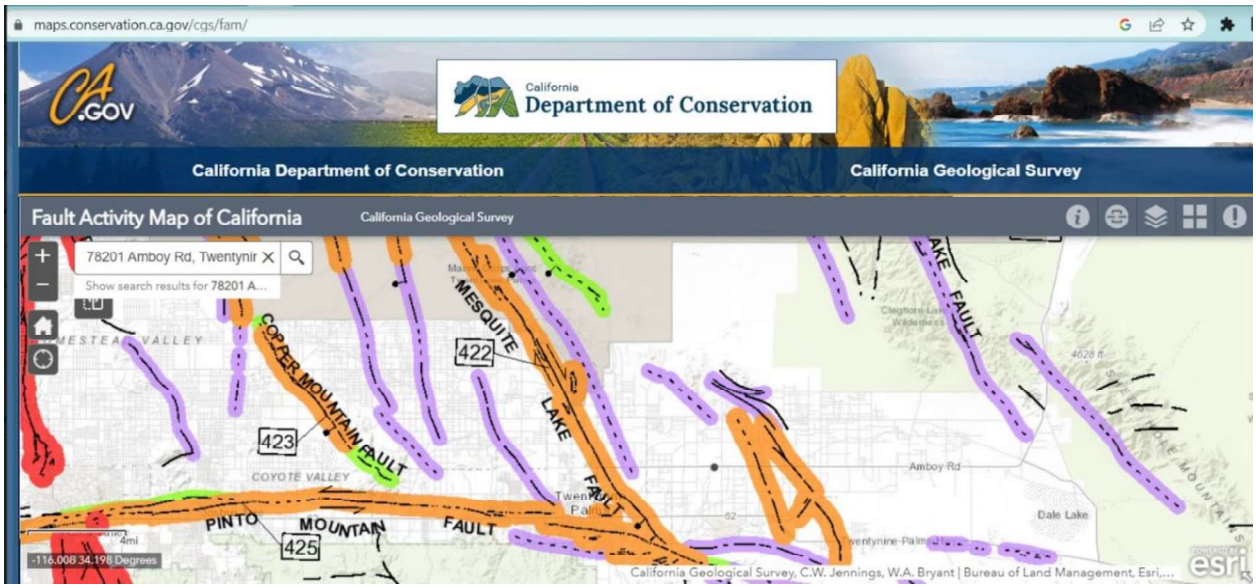
mention a septic system on a few occasions no additional details relating to the size and environmental impact of a large commercial septic system was included in any of the Wonder Inn reports.

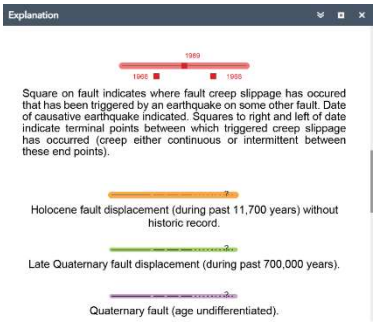
Conclusion: If the Wonder Inn has not submitted an approved percolation test with their application, then the San Bernardino Land Use department is violating their own requirements for CUP applications by continuing to process the Wonder Inn application. If this is the case then Land Use is discriminating against CUP applicants who have met all application requirements lest their CUP applications be withdrawn. As such an Environmental Impact Report (EIR) is needed to investigate whether the soils can adequately support a septic system of the size required by the Wonder Inn as no adequate studies have been currently completed. The EIR is also needed to determine if the septic design meets EPA regulations for a LCSS.

GEOLOGY AND SOILS - Would the project:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:
i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map Issued by the State Geologist for the area.

Comment: The IS/MND states that the project site is located 5 miles from the active Mesquite Fault but does not mention that the site is also located less than 2 miles west of 2 additional active faults, the East Valley Mountain Fault and West Valley Mountain Fault. Conservation.ca.gov states that the most severe earthquake damage is experienced by buildings located within 3 miles of an active fault. "*The US Geological Survey (2018) defines an active fault as a fault that has had surface displacement within Holocene times (about the last 11,000 years) and therefore is considered more likely to generate a future earthquake"*





In 2019 the Ridgecrest earthquake rippled through Southern California and was felt as far as Wonder Valley. In Ridgecrest over 100 buildings were damaged including extensive damage to the Naval Air Weapons Station. The same thing can occur in Wonder Valley. Our low population density means that death and damage may be limited in the event of a localized earthquake. However, with the proposed new high-density construction occurring so close to active fault lines, there needs to be more studies done to evaluate the risk to guests, employees, and visitors to the Wonder Inn.

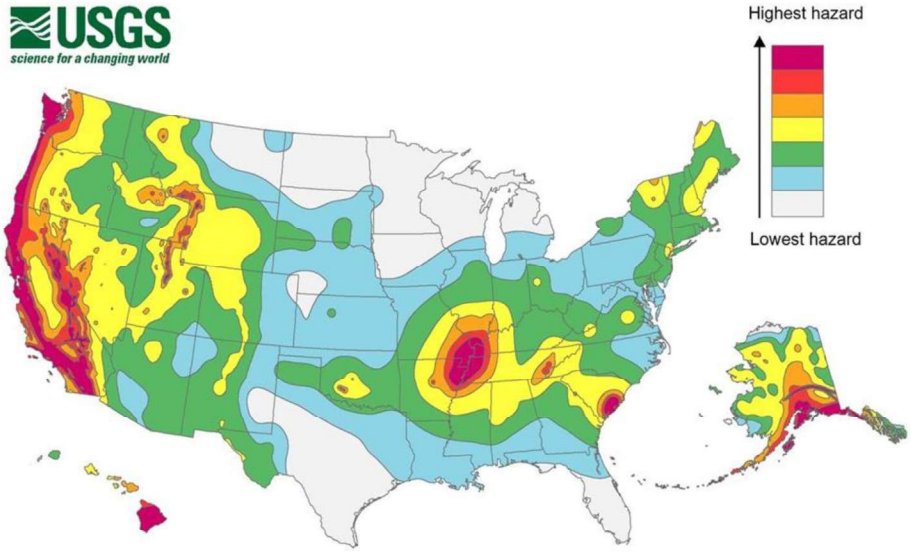
Conclusion: An EIR is needed to determine if this project will result in the disturbance of any trace faults that extend from the East and West Valley Faults.

In addition to the possible rupture of faults/ trace faults, an EIR should be performed to determine whether the current proposed building methods for the Wonder Inn take into consideration additional reinforcements that may be required to safely accommodate guests during a seismic event.

GEOLOGY AND SOILS - Would the project:

*ii) Strong seismic ground shaking***?**

Comment: Wonder Valley is designated within the highest hazard seismic zone, also known as seismic zone 4. See USGS map below. The Wonder Inn and guests could be subject to a large seismic event in an area with extremely limited rescue and ambulatory services. In the event of such an event the population of the Wonder Inn would put undue pressure on the community of Wonder Valley, adding traffic to any emergency escape routes, on the only public hospital Hi-Desert Medical Center hospital in Joshua Tree, and on any public emergency services. There is a strong likelihood that emergency services would be deployed to the well-heeled and concentrated number of guests at the Wonder Inn while neglecting the low income and vulnerable residents of the community.



GEOLOGY AND SOILS - Would the project:

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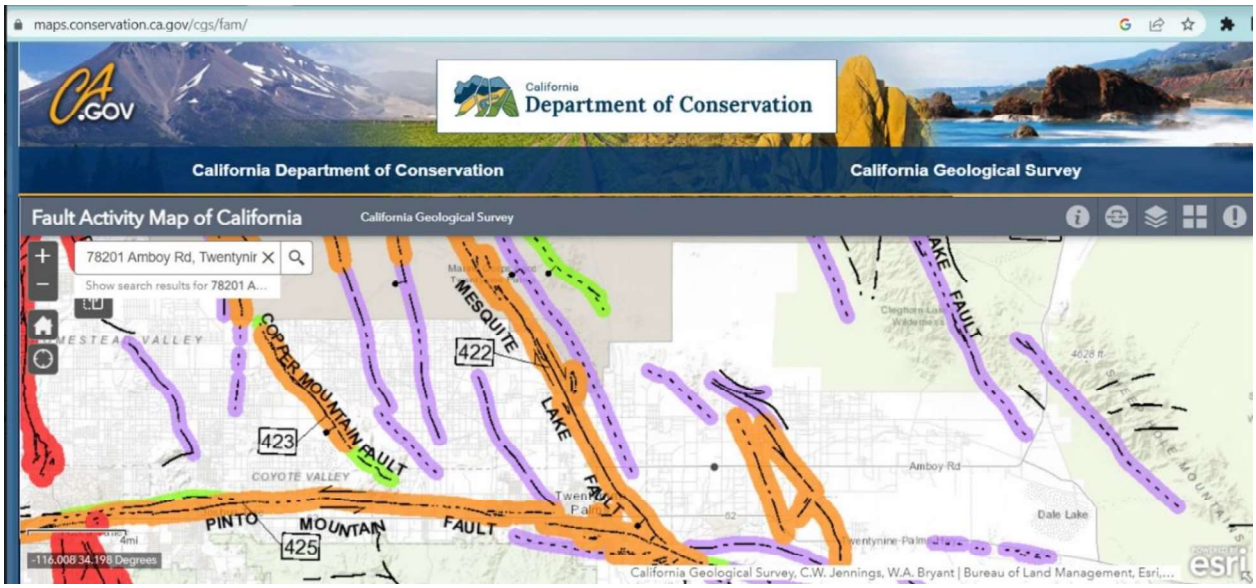

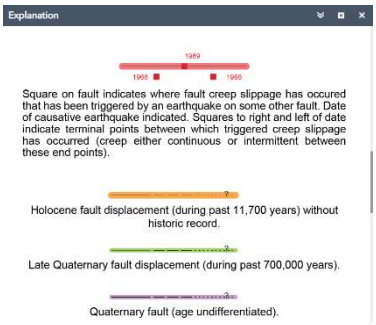

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Conclusion: An EIR is needed to determine:

1. The safety of guests at the Wonder Inn and the impact of the increased population on emergency services during a potential string seismic ground shaking event which is an environmental justice concern.
2. If the construction of the Wonder Inn project will result in the disturbance of any trace faults that extend from the East and West Valley Faults.
3. To determine whether the current proposed building methods for the Wonder Inn take into consideration additional reinforcements that may be required to safely accommodate guests during a seismic event.

GEOLOGY AND SOILS - Would the project:

b) Result in substantial soil erosion or the loss of topsoil?

Comment: The clearing of the roughly 24 acres of native creosote vegetation to accommodate the Wonder Inn construction along with the clearing needed to construct the future planned "luxury villas" will result in significant erosion of the sandy soils at the project site. (*See* section "Size, Scope, and Piecemealing" in these Response Comments.)

Wonder Valley is located within a Sand Transport Path (STP), a geologic feature that is a wind-driven sand deposit over 140 miles long that begins at Emerson Dry Lake in the 29 Palms Marine Base, twenty-three miles north of the Sunfair community in the Joshua Tree basin. At Twentynine Palms Highway the STP turns east, passing through Twentynine Palms and Wonder Valley, plowing over playas, dune fields, and between mountain ranges while crossing the Mojave Desert to the Mule Mountains near Mesa Verde and the Colorado River. The STP is stabilized by the creosote plant and once removed the soil is rapidly eroded and becomes fugitive dust. This soil erosion will result in an increase in dust storms already experienced in this area and will have a negative effect on residents and visitors to this area.

Conclusion: An EIR is needed to assess the impact of the clearing of 24 plus acres of the native creosote-galleta and other desert plants on soil erosion.

VIII. GREENHOUSE GAS EMISSIONS

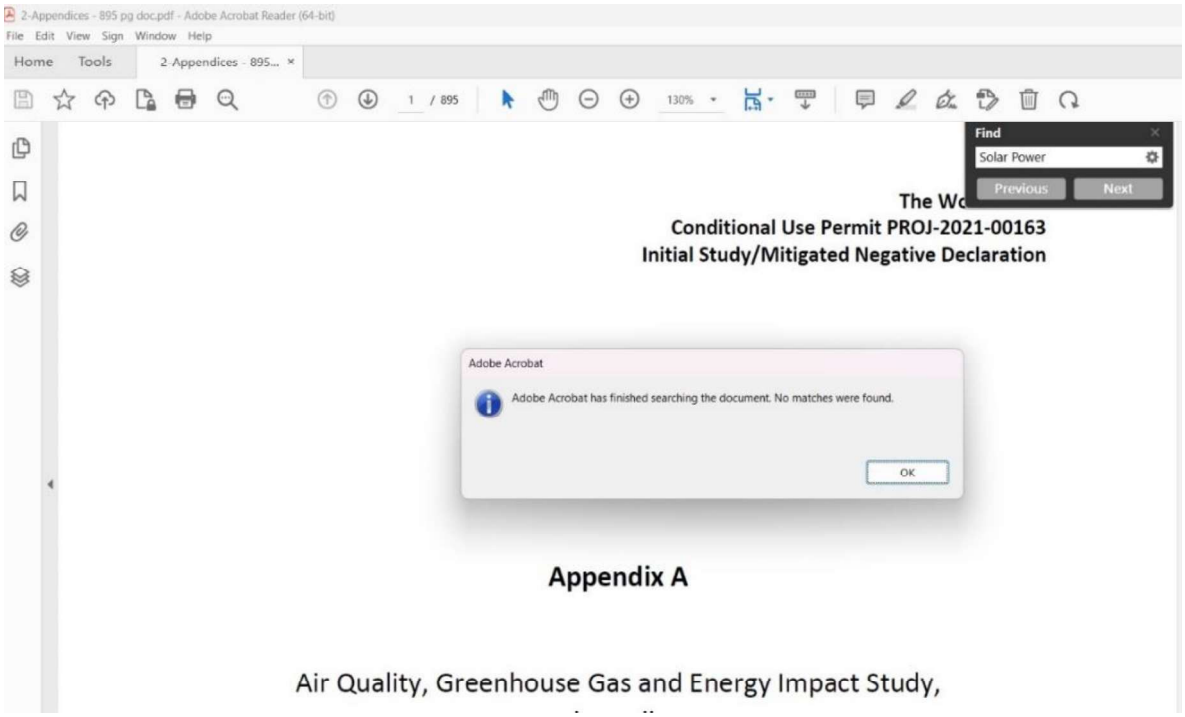
Would the project:

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?
   - *FINDINGS: Less than Significant*

b) Conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases?
   - *FINDINGS: Less than Significant*

CONCERN: for a project of this size, situated in the beautiful and sunny Southern California high desert, it is unfathomable that there are no plans to include solar power in this project.

- Search for SOLAR POWER in Appendices document = No matches found.

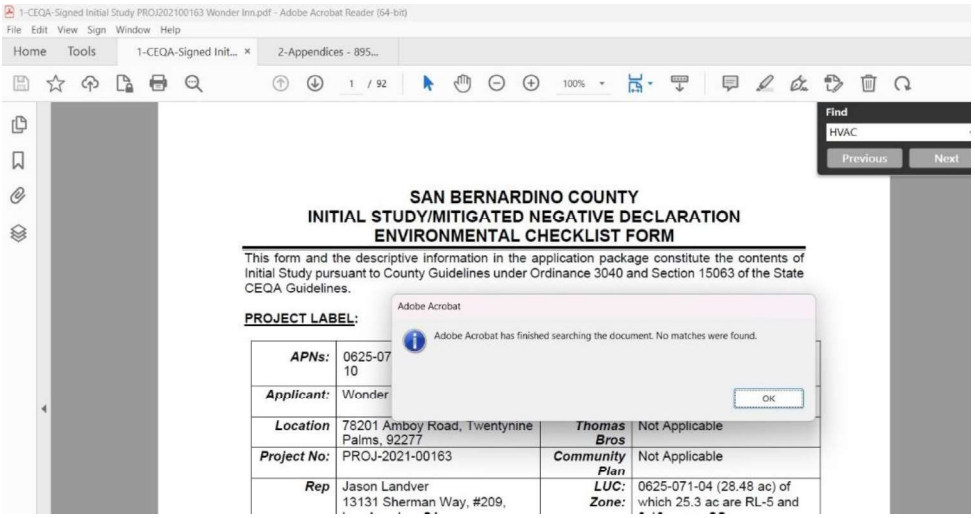


QUESTION: Why is solar power not included in this project?

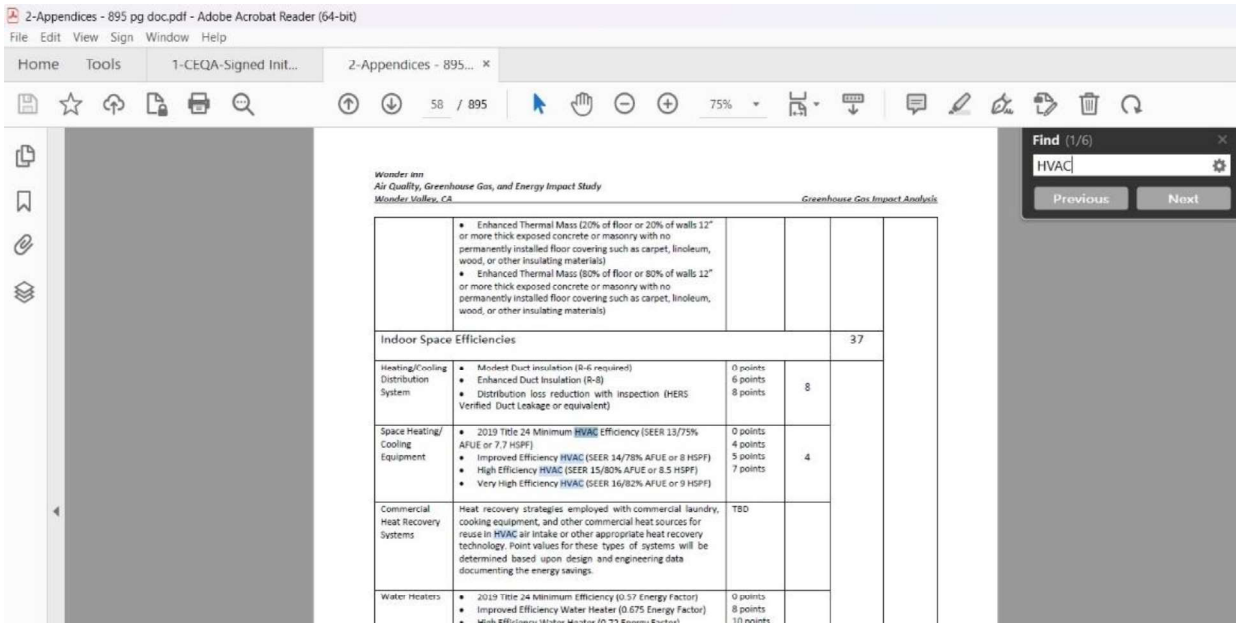
CONCERN: it gets very hot in Wonder Valley in the Summer months, and can get quite cold in the Winter. Summer temps reach triple digits as early as May and peak in July. In July 2022 the monthly average high was 114 degrees. *(Source: wunderground.com)* We were still having triple digit days in September of that year. *(Source: wunderground.com)*

- AIR CONDITIONING: refrigerant produces ozone depleting hydrochlorofluorocarbons (HCFC), which are potent greenhouse gasses. Considering the heat of the desert summers, what is the plan for cooling 106 guest rooms plus the many public spaces for guest comfort? What equipment will be installed for cooling? What is estimated HCFC emissions for a project of this size in the desert?
- HEATING: the desert is cold 3 months of the year. What is heating method for guest rooms and indoor social areas? Will there be Fireplaces in guest rooms? In public areas? Will fireplaces be Woodburning or Gas? What is expected propane usage? Will outdoor propane heaters be used for outdoor dining areas? Other outdoor spaces? Sitting areas around the pool?

CONCERN: Unable to find description of HVAC / heating or cooling systems planned for indoor spaces in Initial Study doc:



CONCERN: Unable to find detailed description of heating or cooling systems planned for indoor spaces in the Appendices doc:



QUESTION: Re HCFC's, how will this resort hotel be cooled or heated (indoor climate control for guest comfort)? What equipment will be used? Will HVAC be installed? How many HVAC units will be needed to cool the over 60,000 sq.ft. of indoor building spaces? What will the 106 guest rooms be cooled with? HVAC? Mini-split / heat pump units? The desert temps are triple digit from June through parts of September *(Source: wunderground.com),* and units will require more AC than in an area that has cooler temps (LA or San Diego, for example.) Was this taken into consideration when estimating the CHFC's for this project?

CONCERN: Per Appendices Pg 362: **2.2.3. Heating and Cooling Systems:** "Heating and cooling systems are powered by electricity provided by utility purveyors. Natural gas is not provided to the site." Note: propane is mentioned on pg. 67 of Appendices.

QUESTION: Were any studies done on the intended uses of propane for this proposed project, and its effects upon the environment? What type of outdoor fires / fire features are planned? How many outdoor fire features will there be? What is source of fuel for the outdoor fire features? Wood? Propane? Will there also be indoor fire features? In the indoor restaurant area? Other indoor social gathering areas? Will the guest rooms also have fireplaces / fire features? What is fuel source for guest rooms? If fire features will be propane, what is the total estimated propane usage expected to be, and what will the impact upon the environment be? Will propane be used for outdoor heating, such as outdoor dining area, or outdoor stargazing areas? Or sitting by the pool? Or guest room outdoor patio areas? Were deliveries of propane gas included in the studies?

QUESTION: Will the outdoor pool be temperature controlled? What is heating method for pool? Will it be heated year-round? Will the pool be covered at all? What is heating method for hot tub? Will the hot tub be covered at all? Were the effects of the pool and hot tub included in the GHG studies?

QUESTION: Will there be a backup generator for power outages? How big and/or how many generators will be needed to supply power to several buildings and 106 guest rooms during an outage? What type of fuel will be used in the generators? Was this included in the greenhouse gas studies? Power outages are not uncommon out here and power can go out for several hours - sometimes as long as 24-30 hours (in 2021.) Is the WI prepared to use generator for this long? Will gasoline be stored onsite? How much fuel will need to be stored? The shelf life of gasoline is short (6 months or so.) How will the aged gas be disposed of? Will the project run the generators to use up the gas as a method of disposal? What effects might that have upon the environment?

QUESTION: Regarding the offsite construction of guest rooms and modular buildings, where will these pods and buildings be created? What is the actual distance between the construction site and the project site? Per CEQA, environmental impacts are cumulative and include offsite environmental concerns.

QUESTION: Will all buildings be "green" buildings? Well insulated? Energy efficient? What efforts will be in place to reduce energy needs, especially AC? (Greenhouse Gas emissions)

CONCERN: Regarding FOOD and TRANSPORTATION of food: When solid waste decomposes in landfills it creates landfill gas, which is primarily composed of CO2 and CH4. When cooking with gas, CO2, CH4 and N2O are created. Cows produce CH4…

QUESTIONS: Will the restaurant be 12 hour or 24 hours? Both are mentioned in Appendices. What food storage equipment is planned? How many refrigerators are needed? Will refrigerators be energy efficient / Energy Star? Were the number of refrigerators included in the GHG studies? What is plan for food waste? Is there a plan for composting onsite? Will food waste be added to trash that will then be moved to landfill? How often will food be delivered to support 3 meals a day plus coffee/tea/snacks? Has the delivery schedule been included in the GHG analysis? Where will be food be delivered from (distance)? Was this included in the GHG studies? What are emission projections from cooking 3 meals a day for a restaurant with 100 seats - plus coffee/tea/snacks? (HFCF's) Will the restaurant serve any specialty coffees that must come from other countries? Will the transportation distance affect GHG emissions? Will baked goods (breads, pastries, etc.) be baked onsite? Or, delivered fresh daily? Was this included in the GHG analysis? What is cooking equipment - gas/propane or electric? How many stoves? How many burners on each stove? Was this factored into the GHG analysis? If cooking will be offsite, where will food be prepared? How often will deliveries be made? Was this considered during analysis of GHG for this project? If restaurant will serve food to-go, what type of food containers will be used? Styrofoam? Plastic? Compostable cardboard? Aluminum foil? What type of utensils? Compostable cornstarch? Plastic? (Decompose differently, affecting CO2 and CH4 levels.) Will the restaurant be vegetarian or will they serve meat? (Animal products, such as red meat, contribute to methane levels.)

CONCERN: WATER: WASTEWATER / DRINKING water account for 2% of energy consumption in the US. Wastewater treatment plants emit CH4 and N2O. Wonder Valley water is not potable and has high levels of contaminates which will require some type of processing.

QUESTIONS: What type of water treatment is planned for this project? Will ALL water be treated, including for toilets? Showers? Pool? Drinking? Will all toilets be low flow? Will all showerheads be low flow? What is plan for maintaining landscaping? How much water will be required? See Ca.Dept. of water resources "Model Water Efficient Landscape Ordinance / MWELO. What is estimated evaporation rate for outdoor pool? What is expected replenishment rate (gallons per day)? Will pool be covered at all? Will pool be heated? Will that increase evaporation rate? Was this considered in GHG studies? What are the expected emissions from the expected water demands? Is there a contingency plan in place if expected water usage is exceeded?

CONCERN: WASTE MANAGEMENT: Solid waste creates carbon dioxide (CO2) and methane (CH4) gasses as it decomposes.

QUESTIONS: How much solid waste will be produced by 200 + people per day? How large is septic tank? Will this volume of daily waste require septic pumping? How often? Were the trips that will be needed for a tanker to come pump the septic system and deliver contents to a waste treatment facility considered? Where is nearest waste treatment facility to the proposed project? Was this distance considered in the GHG evaluations? Will the disposal method minimize CO2 and CH4 release? Is a leech field viable and legal for a project of this size? How will that effect groundwater?

CONCERN: GUEST TRANSPORTATION: Transportation accounts for 41% of GHG's.

QUESTIONS: How far will people travel to reach the Wonder Inn? How often will they likely go into town? How many trips up into the Park? For a luxury resort styled hotel, will some guests arrive by airplane or helicopter to the 29 Palms airport? Was this possibility considered in the evaluations of GHG effects for this project? Will there be any shuttle services available? From Palm Springs Airport? From Twentynine Palms? Are 604 daily trips realistic for 160 daily guests, 40 visitors, 20+ staff, plus vendors, pool maintenance, spa service staff, events, etc.?

CONCERN: LIGHTING: Lighting accounts for nearly 5% of global CO2 emissions.

QUESTONS: What type of lighting will be used? Incandescent? LED? Fluorescent? In guest rooms? In public areas? Outdoor lighting over parking areas? Sidewalks? On buildings?

CONCERN: "When estimating dust emissions for construction projects, **county planners rely on the District's directive to use the Victorville station's readings** and meteorological data for long term ambient baseline measurements. Calculated emission estimates guide the mitigation plans designed to protect the affected population from fugitive dust. The Victorville station is located on asphalt and is 300 feet from a road with an average annual daily traffic

count of 1000 vehicles. The station monitors a 0.3 to 3.5 square mile area with a relatively uniform land use.8 Victorville's monitoring records show zero (0.0) days above the 24-hour federal and state PM10 standards. Emission readings, for **an area 72 miles north of the Sand Transport Path, with different wind speeds and directions, is not a valid long term PM10 baseline for the Morongo Basin.**" - Source: https://desertreport.org/the-perfect-dust-storm-fugitive-dust-and-the-morongo-basin-community-of-desert-heights/

QUESTION: How can the health effects of scraping 25 (or more) acres of sandy desert land be accurately measured when comparing our area with a monitoring station that is over 70 miles away from the Project site, and is stationed on concrete (not sand)?

CONCERN: "Damage to the biotic community when the surface is scraped clean is obvious. A less obvious consequence is **the release of carbon** which has been sequestered in the soil for centuries. Still another consequence that is visible, but which is seldom acknowledged, is the release of dust into the air that results from the construction itself and from the changes in land cover in the succeeding years." - Source: https://desertreport.org/scraped-earth-and-desert-winds/

QUESTION: Have the above referenced carbon releases been considered during the Greenhouse Gas analysis for this project?

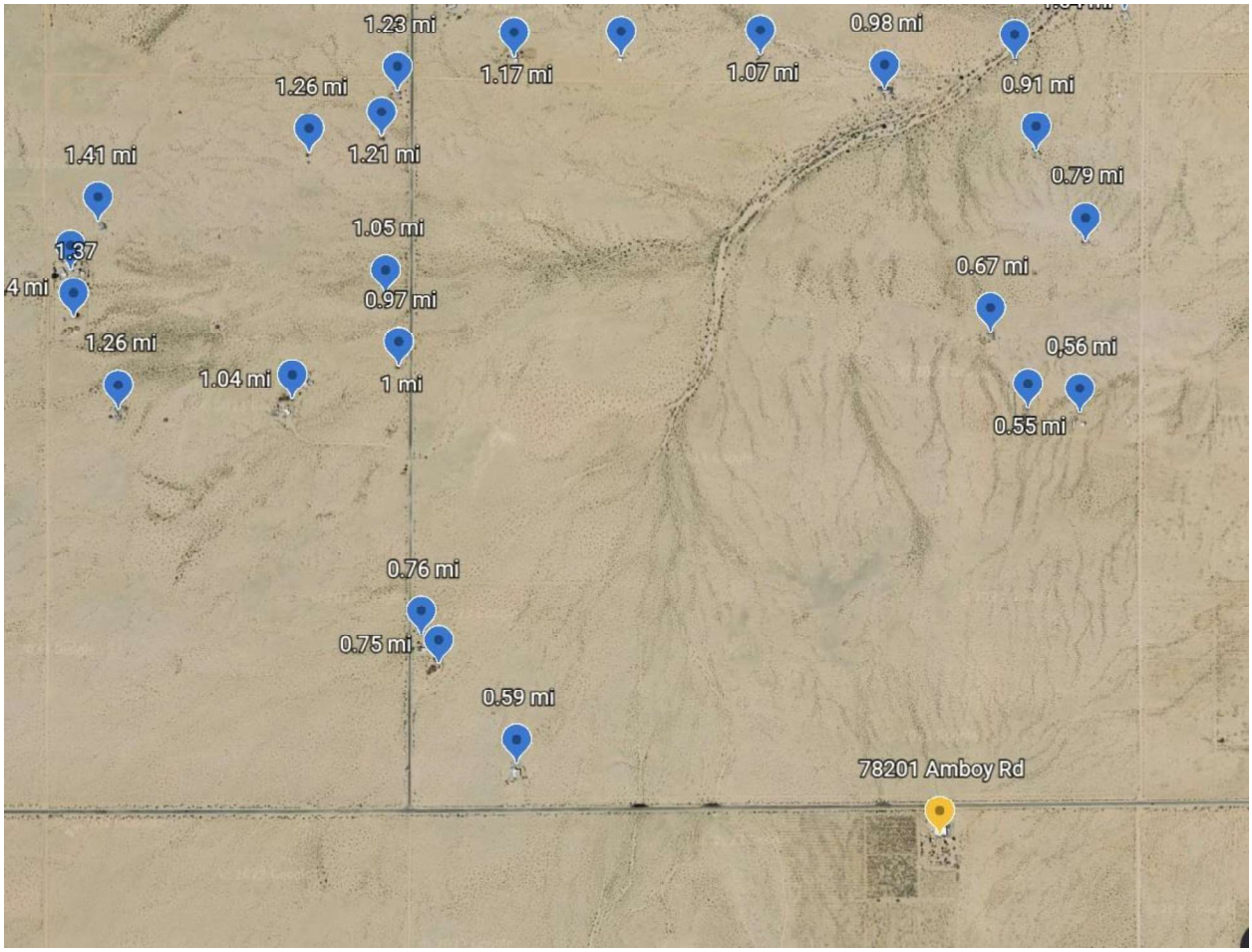
CONCERN: In the Appendices on page 39 of the document:

> "**3.0 Setting 3.1 - Existing Physical Setting** The project site is located approximately two miles north of the unincorporated community of Sunfair in the southern central portion of the County of San Bernardino, which is part of the Mojave Desert Air Basin (MDAB) that includes the desert portion of San Bernardino County and the far eastern end of Riverside County."

QUESTION: Where is this "Sunfair" area mentioned in this study? Is this referring to the area along Sunfair Road in Joshua Tree, which is roughly 20 miles west of the project site? This is not in Wonder Valley, which raises the question of where, exactly, this study was performed? And, where, exactly, does the agent doing the study think this project is located? We question the validity and results of this study.

CONCERN: In the Appendices on page 51, section 6.2.2 of the document: "The closest existing sensitive receptors (to the site area) is the residential land use located approximately 2,300 feet northwest across Amboy Road."

QUESTION: Where is this? Below is a map of the area. There is nothing in the range listed in this study. What is the actual area that was studied? Was this study of the actual site for the proposed Wonder Inn? Again, we question the validity and results of this study.



References:

https://www.wunderground.com/dashboard/pws/KCATWENT10/graph/2022-07-31/2022-07-31/monthly

https://desertreport.org/the-perfect-dust-storm-fugitive-dust-and-the-morongo-basin-community-of-desert-heights/

https://desertreport.org/scraped-earth-and-desert-winds/

IX. HAZARDS AND HAZARDOUS MATERIALS

HAZARDS AND HAZARDOUS MATERIALS - Would the project:

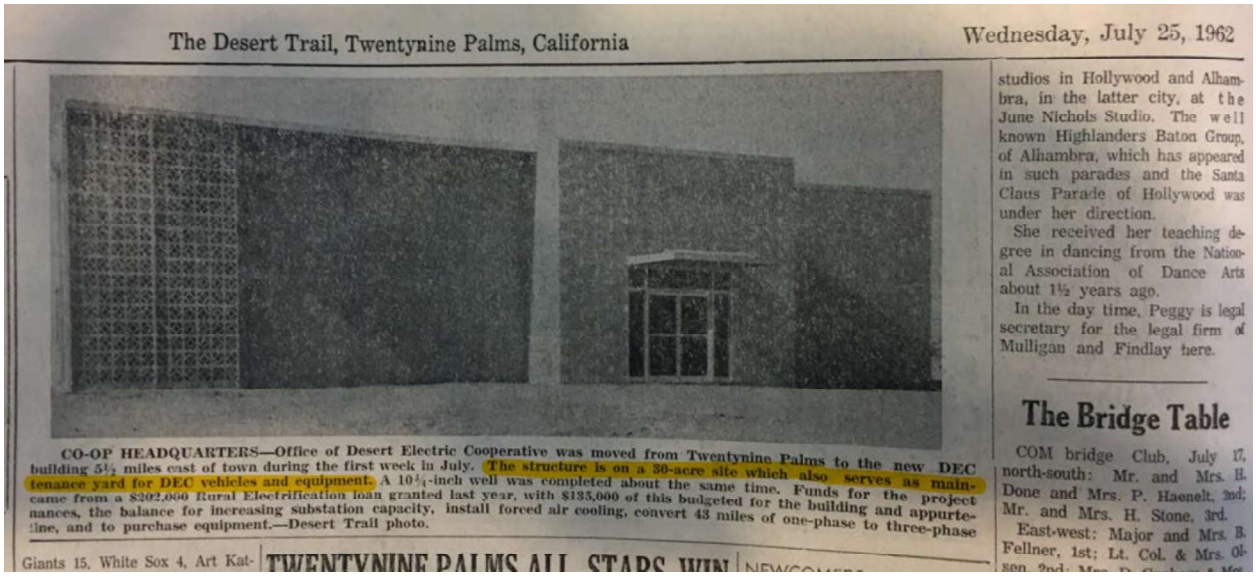
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the Environment?

COMMENT: An accurate ownership history of the existing commercial building (the "Pink Building") and surrounding acreage was not presented in the Initial Study/Mitigated Negative Declaration (IS/MND). Given the building's ownership between 1962-1983 by Desert Electrical Coop and Southern California Electric an Environmental Impact Report (EIR) is absolutely necessary to rule out any PCB (Polychlorinated biphenyls) contamination that is absent in the IS/MND. https://www.epa.gov/pcbs/learn-about-polychlorinated-biphenyls-pcbs

On page 54/92 of the IS/MND the Project developers state the following:

"The ESA identified that from at least 1948 through 1952, the site was vacant land. Sometime before 1970, the existing commercial building was constructed and used for residential purposes through at least 1983. By 1995, the northwestern portion of the site was being used for agricultural purposes, most recently to grow jojoba beans for use in producing jojoba oils. According to regulatory records, the agricultural uses ceased in 2007. At the time of ESA field review, no jojoba production was noted, and the commercial building was vacant."

The history of existing commercial building presented in the IS/MND has a 21-year gap in ownership history from its construction in 1962 till 1983 when it was used for residential purposes. Research has indicated that the building was constructed in 1962 as the headquarters of the Desert Electric Coop while the surrounding 30-acre site was used as the maintenance yard for their vehicles and equipment.



The Desert Trail, Twentynine Palms, California — Wednesday, July 25, 1962

CO-OP HEADQUARTERS—Office of Desert Electric Cooperative was moved from Twentynine Palms to the new DEC building 5½ miles east of town during the first week in July. The structure is on a 30-acre site which also serves as maintenance yard for DEC vehicles and equipment. A 10¼-inch well was completed about the same time. Funds for the project came from a $202,000 Rural Electrification loan granted last year, with $135,000 of this budgeted for the building and appurtenances, the balance for increasing substation capacity, install forced air cooling, convert 43 miles of one-phase to three-phase line, and to purchase equipment.—Desert Trail photo.

studios in Hollywood and Alhambra, in the latter city, at the June Nichols Studio. The well known Highlanders Baton Group, of Alhambra, which has appeared in such parades and the Santa Claus Parade of Hollywood was under her direction.

She received her teaching degree in dancing from the National Association of Dance Arts about 1½ years ago.

In the day time, Peggy is legal secretary for the legal firm of Mulligan and Findlay here.

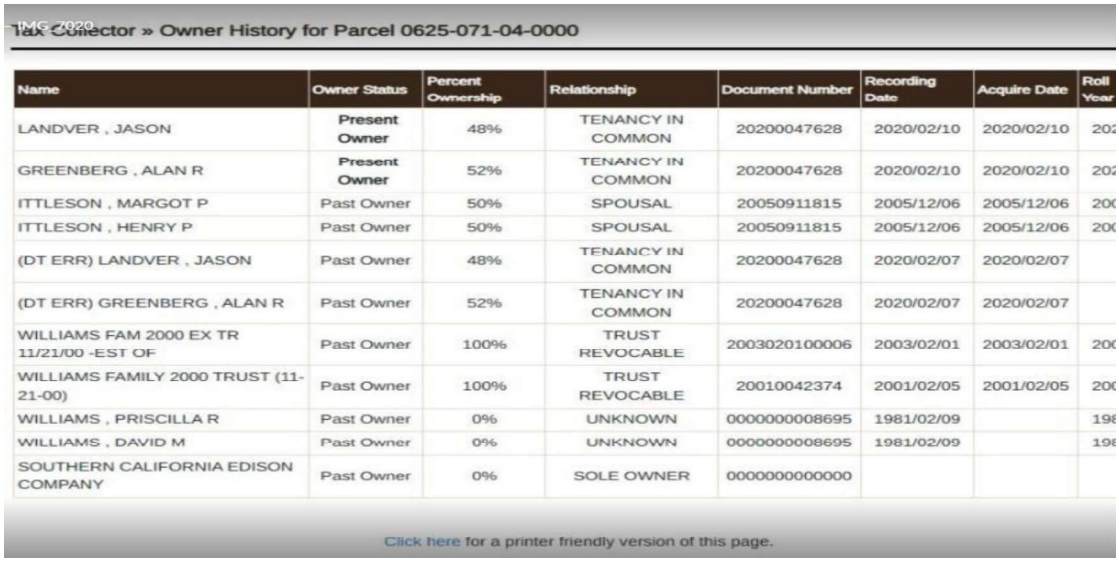
The Bridge Table

COM bridge Club, July 17, north-south: Mr. and Mrs. B. Done and Mrs. P. Haenelt, 2nd; Mr. and Mrs. H. Stone, 3rd.

East-west: Major and Mrs. B. Fellner, 1st; Lt. Col. & Mrs. O-

Giants 15, White Sox 4, Art Kat- | TWENTYNINE PALMS ALL STARS WIN | NEWCOMER

The building was then acquired by Southern California Electric sometime before 1981 and used as a large switching station before being retired and sold.



Tax Collector » Owner History for Parcel 0625-071-04-0000

Name	Owner Status	Percent Ownership	Relationship	Document Number	Recording Date	Acquire Date	Roll Year
LANDVER , JASON	Present Owner	48%	TENANCY IN COMMON	20200047628	2020/02/10	2020/02/10	202
GREENBERG , ALAN R	Present Owner	52%	TENANCY IN COMMON	20200047628	2020/02/10	2020/02/10	202
ITTLESON , MARGOT P	Past Owner	50%	SPOUSAL	20050911815	2005/12/06	2005/12/06	200
ITTLESON , HENRY P	Past Owner	50%	SPOUSAL	20050911815	2005/12/06	2005/12/06	200
(DT ERR) LANDVER , JASON	Past Owner	48%	TENANCY IN COMMON	20200047628	2020/02/07	2020/02/07	
(DT ERR) GREENBERG , ALAN R	Past Owner	52%	TENANCY IN COMMON	20200047628	2020/02/07	2020/02/07	
WILLIAMS FAM 2000 EX TR 11/21/00 -EST OF	Past Owner	100%	TRUST REVOCABLE	2003020100006	2003/02/01	2003/02/01	200
WILLIAMS FAMILY 2000 TRUST (11-21-00)	Past Owner	100%	TRUST REVOCABLE	20010042374	2001/02/05	2001/02/05	200
WILLIAMS , PRISCILLA R	Past Owner	0%	UNKNOWN	0000000008695	1981/02/09		198
WILLIAMS , DAVID M	Past Owner	0%	UNKNOWN	0000000008695	1981/02/09		198
SOUTHERN CALIFORNIA EDISON COMPANY	Past Owner	0%	SOLE OWNER	0000000000000			

Click here for a printer friendly version of this page.

Given the history of this site, there is a strong possibility that the soil is contaminated with PCBs (Polychlorinated biphenyls) which were widely used in electrical equipment like capacitors and transformers. They also were used in hydraulic fluids, heat transfer fluids, lubricants, and plasticizers. Given the history of the site as a location for electrical equipment and vehicle maintenance there is a strong possibility of PCB contamination of the soils.

Conclusion: A full EIR is necessary to investigate the potential presence of PCBs and assess the extensive remediation that would be needed if PCBs were found in the soil. PCBs can last

for decades in soils and are hazardous at even low doses. The developers plan to “recharge” our aquifer with their waste water could also result in PCB contamination of our groundwater.

COMMENT: The IS/MND does not adequately address potential soil contamination on the site of the proposed Wonder Inn with Mining Waste. The determination that the potential hazard impact of mining activities on the property is less than significant is purely speculative and is not based on any actual soil testing. A visual inspection is not adequate to determine contamination.

On page 54/92 of the IS/MND the developers acknowledge that there were complaints filed to the San Bernardino Fire Department regarding the presence of mining wastes.

> “*Further, the ESA identified that in 1996, the San Bernardino County Fire Department (SBCFD) completed a site inspection of the property due to a complaint about cyanide mining wastes being present. According to the property owner, the site was formerly a mining operation for gold but ceased its operations approximately ten years before the SBCFD inspection (approximately 1986). Mercury was used to extract gold from ore, and “...cyanide was not used in any capacity.” According to the SBCFD, much of the mining equipment was present, although had not been operational for years. No mining wastes or chemicals were observed on the premises.*”

This site has an established history of mining operations which makes it part of the extensive mining activities that occurred in the Southern California desert. How was this waste disposed of?

Conclusion: The presence of degraded mining equipment on-site as noted in the IS/MND and the probable use of cyanide/mercury in gold extraction requires that an EIR be performed to test the soil for cyanide and other mining wastes and to develop a mitigation plan that does not compromise the health of guests, residents and our groundwater.

CONCERN: The IS/MND does not adequately address potential asbestos and lead contamination in the existing commercial building requiring an EIR to determine a mitigation plan.

On page 53/92 of the IS/ NMD the developer acknowledges the following:

> “*Based on the age of the existing commercial structure (pre-1970) and that modifications to that structure are part of the Proposed Project, the Phase 1 Environmental Site Assessment (Appendix E) identified that may be asbestos containing materials (ACMs) and lead based paint (LBP).*”

Given the utility and industrial history of the building asbestos and lead contamination could be extensive. The subsequent renovations and improper handling of ACM material in and around the site means that asbestos could potentially be found in the soils as well and friable asbestos could be released into the air during construction.

Conclusion: An EIR is required to test the building and surrounding areas for asbestos and lead contamination and to develop an appropriate mitigation plan.

X. HYDROLOGY AND WATER QUALITY

HYDROLOGY AND WATER QUALITY - Would the project:

a) Violate any water quality standards or waste discharge requirements?

COMMENT: The Wonder Inn Project and submitted Initial Study/Mitigated Negative Declaration (IS/MND) violates Countywide Plan Goal:

Goal IU-1 Water Supply

Water supply and infrastructure are sufficient for the needs of residents and businesses and resilient to drought.

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.

Potable water is defined in the California Plumbing Code as water that is "satisfactory for drinking, culinary, and domestic purposes and that meets the requirements of the Health Authority Having Jurisdiction." Title 22 of the California Code of Regulations provides water quality standards for potable water

There are 2 serious concerns with the IS/MND as it relates to the potability of the Wonder Inn's water supply.

1. The IS/MND states that the water is potable on 3 occasions. Based on the high levels of dissolved solids and naturally occurring contaminants, the groundwater in Wonder Valley is not potable.

As per www.mywaterquality.ca.gov, potable water is defined as drinking water that is safe for consumption, cooking and bathing. Drinking water standards are defined as MCLs (Maximum Contaminant Levels).

Based on the high levels of some MCLs including dissolved solids found in Appendix A, the water in Wonder Valley is not potable. In addition to the Wonder Inn's own studies, the County has on several occasions deemed the water in Wonder valley as non-potable. This recognized lack of potable water was the basis of the suspension of several critical public services in Wonder Valley; namely, the fire station was closed in September of 2017 due to issues with potable water and the Wonder Valley Community Center's kitchen has also been shut down due to non-potable water issues. The Project presents a plan that cosmetically treats the groundwater but does not improve potability.

Potable water references IS/MND:

pg. 3, paragraph 3, Utilities

pg. 57, paragraph 3. Hydrology Report and Calculations

Conclusion: An Environmental Impact Report (EIR) should be completed to determine the safety of the drinking water and independent testing should be conducted to verify that the wells at the Project Site were actually tested.

Comment: The Wonder Inn's transient non-community (TNC) public water system designation is inappropriate and not applicable to a project of this scale and violates Countywide Plan Goal 1U-1, Policy 1U1.1 Water Supply, which states:

> *"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."*

From page 730/895 of Appendix A

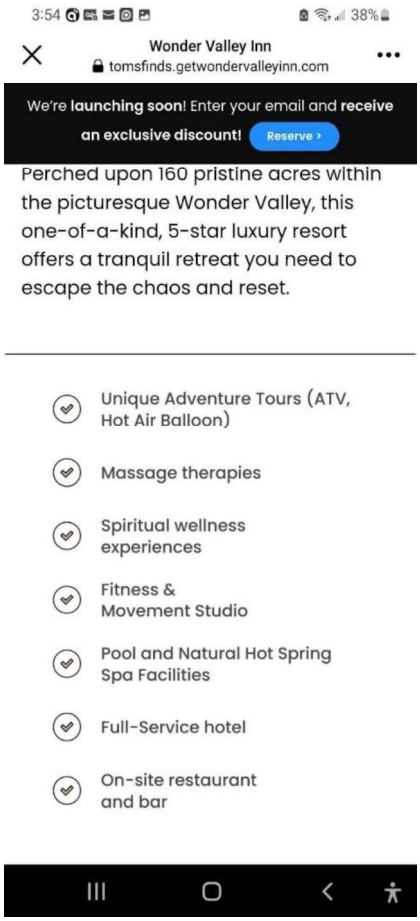
> *"A public water system is defined as providing water for human consumption to at least 15 service connections or to at least 25 people for at least 60 days per year, Wonder Inn would meet this classification. The drinking water standards required to be met depend on how the public water system is defined: a community water system (CWS), non-transient non-community (NTNC) water system or a transient non-community (TNC) water system. A TNC water system is a public water system that does not regularly serve at least 25 of the same persons over six months of the year, such as a campground or highway rest stop. Wonder Inn intends to operate the development as a TNC water system, limiting the number of employees to less than 25 and limiting guest stays to less than 60 days to prevent the development being classified as a CWS. The purpose of this technical report is to obtain a TNC water system permit for Wonder Inn near Twentynine Palms, California."*

The Wonder Inn is self-described and being advertised as a luxury 5- star resort. According to www.hotelmanagement.net a 100-room hotel supports 66 jobs at the hotel itself.

> *"The hotel industry supported more than one in 25 U.S. jobs in 2018, according to a study conducted by Oxford Economics and sponsored by the American Hotel & Lodging Association and the American Hotel & Lodging Educational Foundation. The total number of U.S. jobs supported by the industry rose 1.1 million from 2015 to 8.3 million in 2018. The industry directly employed 2.3 million people in the U.S. in 2018, a gain of 160,000 from 2015. The study found that a representative hotel with 100 occupied rooms supports 241 total jobs: 137 directly and 104 indirectly. This includes 66 jobs at the hotel representing $2.8 million of wages, salaries and other labor income."*

https://www.hotelmanagement.net/human-resources/hotel-industry-accounts-for-more-than-1-25-u-s-jobs#:~:text=The%20study%20found%20that%20a,salaries%20and%20other%20labor%20income

In addition to the 106 hotel guest rooms, the Wonder Inn hotel complex also advertises a 24-hour restaurant, a full service spa and conference rooms year round. The Wonder Inn has also advertised that it would manage 24 future luxury villas located on the additional 133 adjacent acres owned by the Wonder Inn developers. (See section "Size, Scope, and Piecemealing" in these Response Comments.) It is highly unlikely that the Wonder Inn and its future planned developments would be able to maintain an appropriate level of service with a staff of less than 25 employees total over 3 shifts. It appears that this staffing number was presented to gain approval for a TNC water system but in reality, is significantly under the staffing requirements of a hotel advertising the following offerings.



Conclusion: An EIR is needed to determine whether the Wonder Inn hotel qualifies for the TNC well designation based on realistic staffing levels for a 5-star, 106 room hotel to avoid exposing

guests and employees to minimally treated non-potable water with high levels of contaminants/ dissolved solids.

HYDROLOGY AND WATER QUALITY - Would the project:

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Comment (a): The Wonder Inn project and submitted IS/MND violates Order 9.b of EXECUTIVE DEPARTMENT. STATE OF CALIFORNIA EXECUTIVE ORDER N-7-22 (Gavin Newsom) which states the following:

"WHEREAS on April 12, 202 l, May l0, 2021, July 8, 202l, and October 19, 2021, I proclaimed states of emergency that continue today and exist across all the counties of California, due to extreme and expanding drought conditions;

9. To protect health, safety, and the environment during this drought emergency, a county, city, or other public agency shall not:

b. Issue a permit for a new groundwater well or for alteration of an existing well without first determining that extraction of groundwater from the proposed well is (1) not likely to interfere with the production and functioning of existing nearby wells, and (2) not likely to cause subsidence that would adversely impact or damage nearby infrastructure."

Comment (b): The Wonder Inn and submitted IS/MND does not address the impact on residential wells in the area surrounding the project and is not in alignment with the Countywide Plan Policy IU-1.8 Groundwater management coordination, which states:

"We collaborate with watermasters, groundwater sustainability agencies, water purveyors, and other government agencies to ensure groundwater basins are being sustainably managed. We discourage new development when it would create or aggravate groundwater overdraft conditions, land subsidence, or other "undesirable results" as defined in the California Water Code."

The Wonder Inn plans to utilize the Dale Valley Basin Aquifer for their extensive water needs. The last official studies conducted on the draft and recharge rates of the Dale Basin Aquifer were completed in 1961 and 1979. See following pages for references.

STATE OF CALIFORNIA

DEPARTMENT OF WATER RESOURCES

BULLETIN NO. 91-5

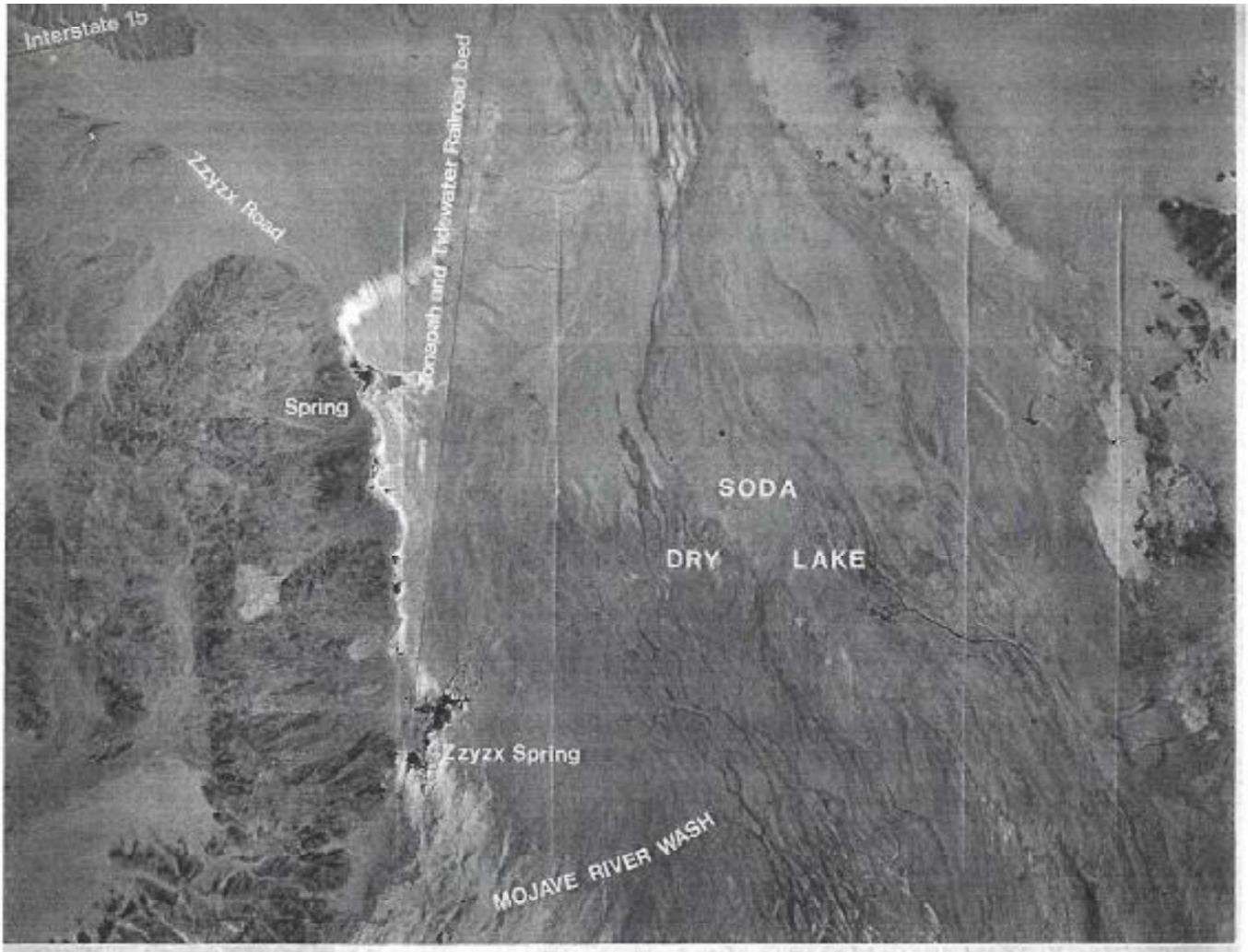
DATA ON WATER WELLS IN THE DALE VALLEY AREA, SAN BERNARDINO AND RIVERSIDE COUNTIES, CALIFORNIA

PREPARED BY

UNITED STATES DEPARTMENT OF INTERIOR
GEOLOGICAL SURVEY

FEDERAL-STATE
COOPERATIVE GROUND WATER INVESTIGATIONS

MARCH 1961



State of California
The Resources Agency

Department of
Water Resources

save water
DWR

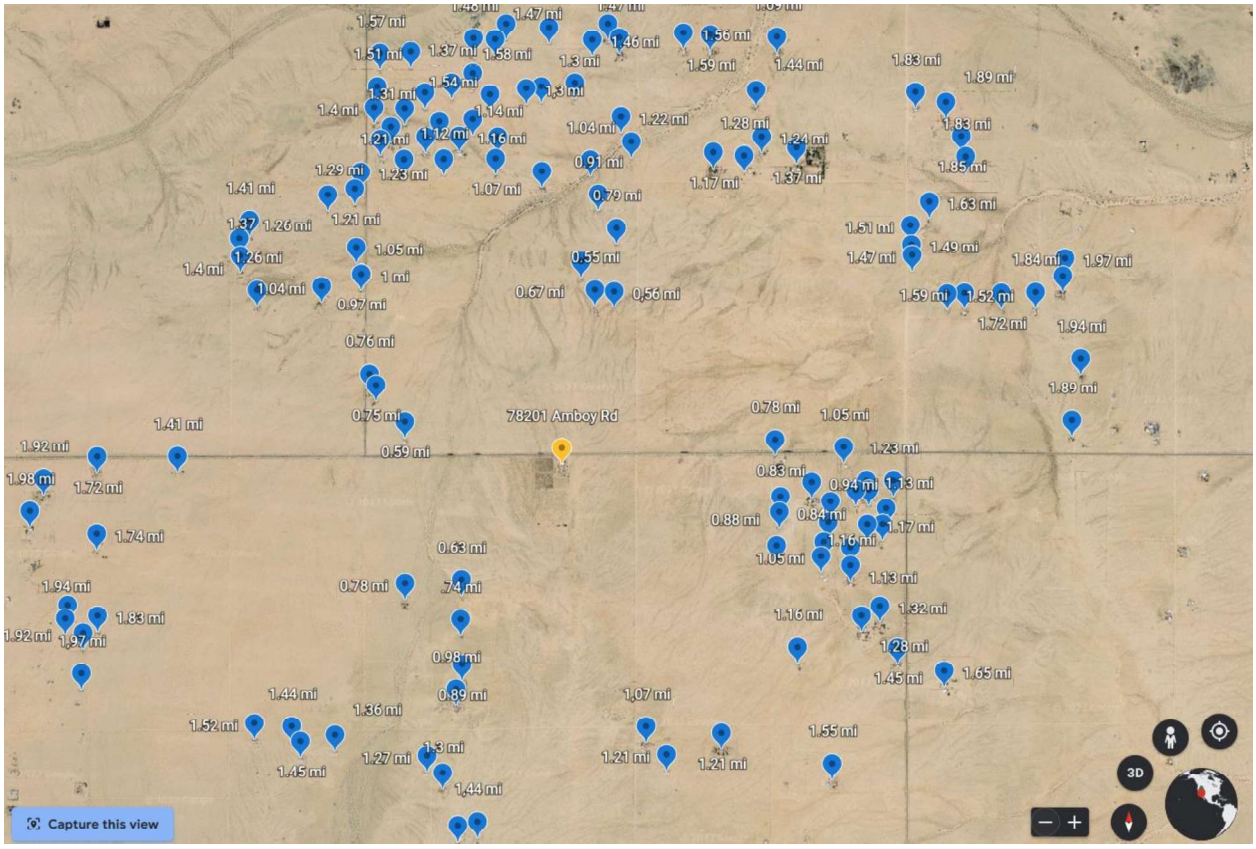
Sources of Powerplant Cooling Water in the Desert Area of Southern California—Reconnaissance Study

Bulletin 91-24
August 1979

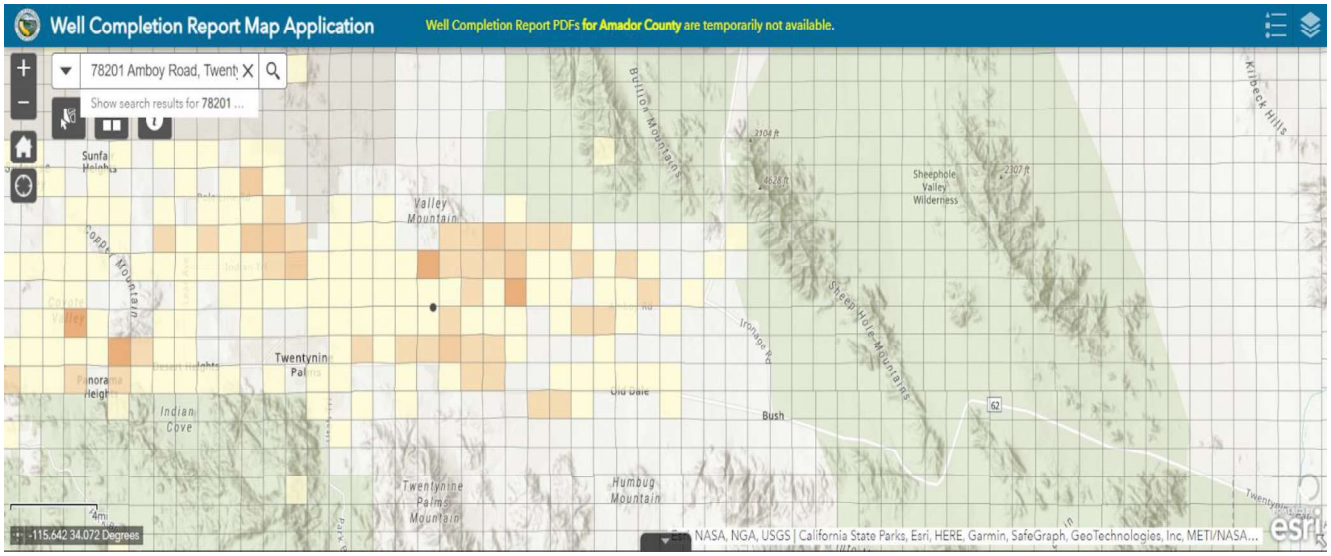
There is a huge concern that the Wonder Inn and the planned future development at that site could result in residential wells running dry in the area surrounding the Wonder Inn. The map below shows the large number of residences located within 1.5 miles of the Wonder Inn and could be impacted negatively by the proposed Project. This is contrary to the Wonder Inn developer's claim, below, which posits arbitrary boundaries on the Wonder Valley population, making it seem like no residents would be impacted by this project.

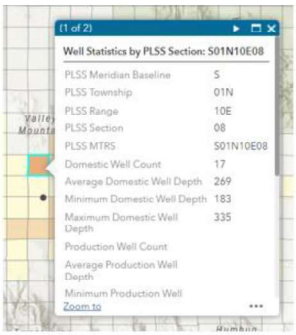
Page 4/92 IS/MND:

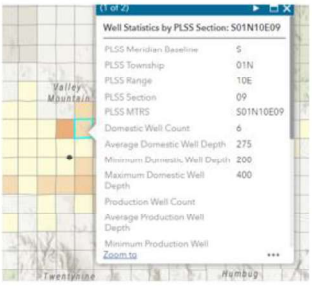
> *"The Project vicinity is primarily an unincorporated, undeveloped area, approximately 4.5 miles east of the City of Twentynine Palms and approximately 9 miles south of the Bullion Mountains. The Project Site is located within an area that is primarily vacant for approximately 1 mile on the north, south, east and west. Large-lot rural residential land uses exist primarily on Goodwin Road to the east and Mojave Road to the west."*

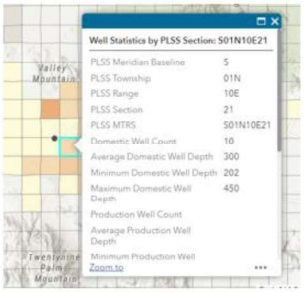


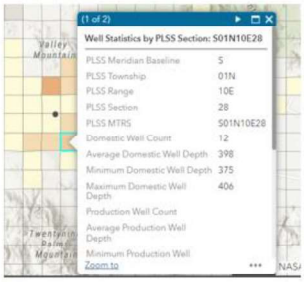
The map below is taken from California Department of Water Resources Well Completion Report Map:











A rough count using this map shows that there were at least 51 completed well reports for residences within a mile of Wonder Inn.

Conclusion: An EIR is needed to ensure that the Wonder Inn will not have a detrimental negative impact on the numerous residential wells surrounding the Project Site and that the project is part of the sustainable management of the Dale Basin Aquifer. The most recent studies are too old to determine the real impact of Wonder Inn on Dale Basin Aquifer, and the Wonder Inn proponents have not investigated this impact in any of their Conditional Use Permit (CUP) submittal documents. This impact should be determined before a CUP is awarded.

Comment: The Wonder Inn Project and submitted IS/MND violates the California Environmental Quality Act's (CEQA) Environmental Justice Provisions which state the following:

> *"Under CEQA, "public agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects …." (Pub. Res. Code, § 21002.) Human beings are an integral part of the "environment." An agency is required to find that a "project may have a 'significant effect on the environment'" if, among other things, "[t]he environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly[.]" (Pub. Res. Code, § 21083, subd. (b)(3); see also CEQA Guidelines,2 § 15126.2 [noting that a project may cause a significant effect by bringing people to hazards].)"*
>
> *" We must "[t]ake all action necessary to provide the people of this state with clean air and water, enjoyment of aesthetic, natural, scenic, and historic environmental qualities, and freedom from excessive noise." (Pub. Res. Code, § 21001, subd. (b).)"*

The Hydrology/ Water studies completed by the Wonder Inn do not address the potential impact of this large-scale project and planned future development on the residents and community of Wonder Valley which is considered an economically disadvantaged area. The decrease in groundwater supplies could have devastating effects on the surrounding community. The IS/MND does not address/ investigate the potential impact of the increased groundwater use on wells in the surrounding area where many residents rely on wells as their sole source of drinking water. A drop in ground water levels would require many residents to re-drill their wells which is costly and unaffordable for the majority of Wonder Valley residents. The cost of hauled water may also be too expensive for many residents, leaving them in an incredibly vulnerable position without consistent access to drinking water. Hauled water may also not be an option for homes that were not grandfathered in before the banning of hauled water for new construction. What are the options for these residents?

The Wonder Inn developers' attempt to posit the comparative water usage of the Wonder Inn to a Jojoba farm (page 833/895 Appendix A) is inappropriate, highly speculative, and insufficient to assess the effect of the Wonder Inn's water usage on existing wells. This analysis is based on the assumption that the fictional Jojoba farm would pull groundwater from the Joshua Tree Basin and Mesquite Lake Basin whereas the Wonder Valley Inn would only pull water from the Dale Valley Basin Aquifer. It should be noted that there isn't a single mention of the Dale Valley Basin Aquifer in any of the Wonder Inn's reports.

Page 833/895 Appendix A

> *"The farm pulls groundwater from several surrounding basins (Joshua Tree Basin and Mesquite Lake Basin). According to a report submitted by Kennedy/Jenks Consultants in 2017, the historical yearly average from the period of 1990-2015 has shown an average*

> *pumping level of 3045 acre-feet/year. In 2011, water management strategies called for a reduction in pumping to prevent overdraft, with an average over that period of 2746.8 acre-feet/year. Between all basins, the DWP limited groundwater pumping capacity is 6995 acre-feet/year."*

Unlike the Joshua Tree and Mesquite Lake Basins which were studied in 2017, The Dale Valley Basin was last studied in 1979 by the State of California Department of Water Resources as a source of Power Plant Cooling Water. The wells in the Dale Valley Basin were last studied in 1961 (see previous citation). There is no recent data available on the status of the aquifer or the recharge rate which has undoubtedly been affected by California's 20-year drought, the increase in residents to Wonder Valley and an increase in short-term rentals. San Bernardino County is listed by the state as Covered by Drought Emergency Proclamations. The entire jojoba farm analysis is irrelevant.

Conclusion: An EIR is needed to determine the impact of the Wonder Inn's water usage on existing nearby residential wells. The Wonder Inn's comparative studies are insufficient to an accurate analysis. The ability to live and prosper in the diverse physical setting of San Bernardino County is dependent on the effective provision and management of water, wastewater, stormwater, solid waste, power, and communication systems. The effective management of these systems helps fulfill the County's obligation to protect the lives and property of residents and businesses, while also protecting the natural environment from the impacts of human development.

Comment: The Wonder Inn's estimated water usage as detailed on page 733 of Appendix A does not align with industry standard estimates/calculations and are significantly lower than comparable projects.

Table 1: Estimated Water Demands

Hotel Component	Average Annual Demand (gallons per year)	Average Daily Demand (gallons per day)
Guest Rooms	2,177,000	6,000
Public Restrooms	66,100	200
Guest Ice and Laundry	1,104,000	3,000
Commercial Kitchen	2,844,000	7,800
Dishwashing	145,000	400
Pool & Spa	435,700	1,200
Total (gallons per year)	**6,771,800**	
Total Average Day Demand (ADD) (gpd)		**18,600**
Total Max Day Demand (ADD x 2) (gpd)		**37,200**

According to Calrecycle.org a typical hotel room utilizes 218 gallons of water/day per occupied room https://calrecycle.ca.gov/epp/greenlodging/#:~:text=Typical%20hotels%20use%20218%20gallons,bills%20by%2025%2D30%20percent.

Based on that assumption, at 75% occupancy the Wonder Inn guest rooms alone would use roughly 6,325,815 gallons annually, almost 3 times the guest room water usage proposed by the Wonder Inn developers. The total water consumption listed above is also missing any estimates on irrigation water usage and visitors (40 estimated which seems low) who attend events and concerts at the Wonder Inn. Even desert tolerant plants like olive trees and mesquites need at least 25 gallons of water/day. The Wonder Inn proposes planting over 100 trees which would be equivalent to over 750,000 gallons annually. Based on these numbers, the sum of just my guest room and irrigation calculations (7,092,315 gallons) exceeds the Wonder Inn's proposed total water usage. If the Wonder Inn developers are required to develop a large-scale RO (reverse osmosis) system the water usage could double at a minimum. The treatment/disposal of RO waste water is also not addressed by the Wonder Inn developers.

Conclusion: An EIR is needed to adequately assess the Wonder Inn's proposed water usage, any future reverse osmosis treatment plans and the impact this would have on the Dale Valley Aquifer.

HYDROLOGY AND WATER QUALITY - Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Comment: A septic system of the size required by the Wonder Inn is governed by the EPA's large-capacity septic systems (LCSSs) regulations. Though the reports mention a septic system on a few occasions no additional details relating to the size and environmental impact of a large commercial septic system was included in any of the Wonder Inn reports. LCSSs can pose a hazard to underground water systems and several characteristics including soil type, hydrogeology, wastewater characteristics system design increases the potential for contamination of groundwater.

Conclusion: An EIR is needed to investigate whether the planned septic system for the Wonder Inn hotel would have a negative impact on the environment, community, and groundwater.

Comment: The methodology calculations and conclusions of the Hydrology study completed by TransTech Engineers is based on the development of only 12.3 acres whereas the Initial Study/Mitigated Negative Declaration form clearly states that the CUP application is for the development of 24.4 acres. Therefore, this TransTech study and associated conclusions used to support the Initial Study is invalid. See references below:

PROJECT DESCRIPTION:

Summary

The proposed project is a concurrent submittal of a General Plan Land Use Amendment from Rural Living (RL) to Commercial (C) and a Zoning Amendment from Rural Living, 5-acre minimum lot size (RL-5) to Service Commercial (CS) and a Conditional Use Permit for a proposed hotel use with the conversion of an existing 4,407- square foot office building to a restaurant/lobby and the construction of 106 guest rooms, 5,000 square foot conference room, 3,985 square foot wellness center and ancillary structures on a 24.4-acre site, located at 78201 Amboy Road, Twentynine in an unincorporated area of San Bernardino County known as Wonder Valley (see **Exhibit 1- *Regional Location*** and **Exhibit 2 – *Project Location: Aerial*** and **Exhibit 3 – *Project Location: USGS***). The Project Site is not located within any Countywide Plan Area.

Entitlements include the following:

- Conditional Use Permit PROJ-2021-00163 to approve a 106-room resort complex on 24.4 acres that will includes a main pool, shade structures for gathering facilities and the wellness center and use of an existing 4,407 sf building for clubhouse.
- General Plan Amendment from Rural Living (RL) to Commercial (C) and a Zoning Amendment from Rural Living, 5-acre minimum lot size (RL-5) to Service Commercial (CS) on 21.22 acres of 134.6 acres.

Methodology

The hydrologic calculations for this Project were conducted for both the existing and developed conditions of the site. The area that will be impacted by the development is about 12.3 acres, based on the preliminary site improvement and grading plan for the Project. From this, it is estimated that about 40% of this area will be covered and will be considered "impervious", or 60% "perviousness," a factor considered in the calculations.

Because of the small area of development compared to the total drainage tributary area (12.3 ac vs. 68.0 ac), it is then expected that the "existing" and "proposed" scenarios will show relatively the same peak flow results. But given the requirements of the Manual memo revision of 1987, the existing scenario was adjusted and consequently more mitigation is anticipated.

The analyses for the Project were conducted using the Rational Method as described in the Manual. The drainage tributary area to the Project site is about 68.0 acres, an area less than one square mile, the maximum area by which this method can be used. The software used for the calculations was developed by Advanced Engineering Software (AES) with built in data from the San Bernardino County Hydrology Manual.

Part III – Evaluation and Conclusion

The rational method calculations for existing and proposed condition, resulted in significant differences due to the requirements of the Hydrology Manual when calculating the pre-development Q's. The 100-year storm peak discharge for the proposed condition in Node 6 is 17.81 cfs and for the pre-develop condition is 29.54 cfs, a 65% increase. Similar results are provided for the 2yr, 10yr, 25 yr. storms. The AES Hydrologic Results for the Wonder Inn Hotel project are included in the appendix. This result is duplicated in Node 15 and both concentration points, 6 and 15, are the target of not only attenuation of flows but also mitigation of runoff from developed areas.

Only 12.3 acres of the 68.0 acres are being developed (Nodes 6 and 15). The intent is to intercept and convey the runoff from development site without mixing storm water from offsite watershed. Treatment of this runoff will be localized and its separation from greater volume will greatly decrease the extent of mitigation. The Manual, in its Detention Basin Criteria, indicates that "local detention basins shall not be fed by natural drainage courses with undeveloped watersheds…"

Appendices - page 587 Section on Hydrology, Part II – Hydrologic Criteria, Methodology, and Results Hydrologic Criteria ;page 590, section on Hydrology, Part III - Evaluation and Conclusion, paragraph 1-2:

Conclusion: An EIR is needed to establish accurate calculations and conclusions as the TransTech Hydrology Study is based on an area roughly half the size of the planned development.

HYDROLOGY AND WATER QUALITY - Would the project:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Comment: The proposed implementation of a SWPPP is too vague. Given the potential presence of soil contaminants (see Hazardous Materials section), stormwater discharge and the planned use of waste water to recharge the aquifer could indirectly result in the pollution of groundwater supplies when a concentrated water supply is pumped back into the aquifer at a potentially contaminated location.

Pg 61/92 IS/MND:

"The Proposed Project is subject to the NPDES permit. Requirements of the permit would include development and implementation of a SWPPP, which is subject to RWQCB review and approval. The purpose of an SWPPP is to: 1) identify pollutant sources that may affect the quality of discharges of stormwater associated with construction activities; and 2) identify, construct and implement stormwater pollution control measures to reduce pollutants in stormwater discharges from the construction site during and after construction. The SWPPP would include BMPs to control and abate pollutants, and treat runoff that can be used for groundwater recharge. The Proposed Project would not otherwise substantially degrade water quality, as appropriate measures relating to water quality protection would be implemented as BMPs. Appropriate BMPs will be reviewed and approved by the County. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required."

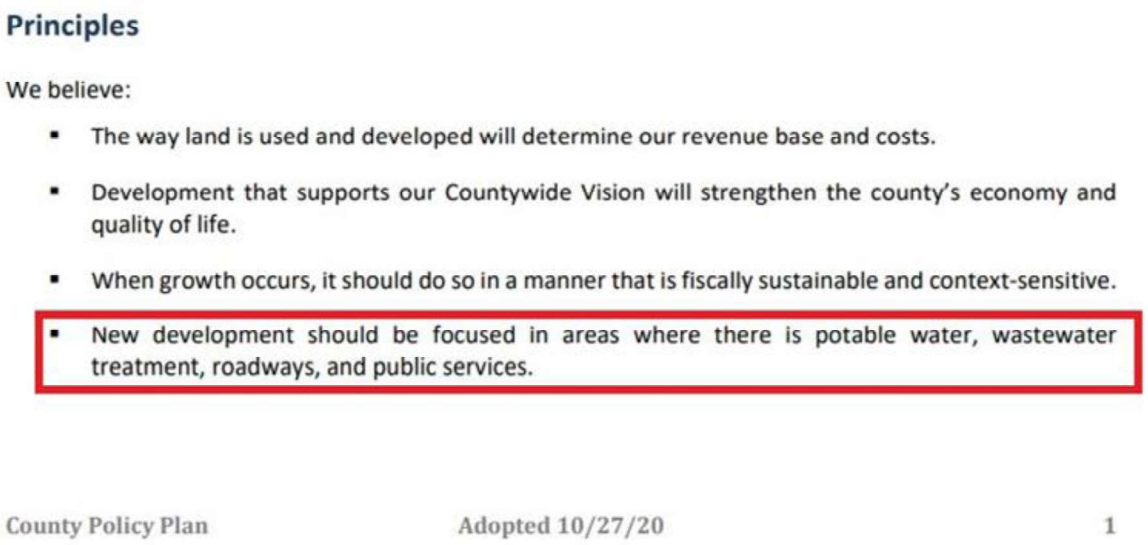
Conclusion: An EIR is needed to further elaborate on the SWPPP and assess the potential for groundwater contamination through the concentrated discharge of stormwater through contaminated soils.

XI. LAND USE AND PLANNING

In the Initial Study, this California Environmental Quality Act (CEQA) question is asked:

> *b) (Would this development) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? (p.62)*

In the San Bernardino Countywide Plan, Land Use Principles states:



Principles

We believe:

- The way land is used and developed will determine our revenue base and costs.
- Development that supports our Countywide Vision will strengthen the county's economy and quality of life.
- When growth occurs, it should do so in a manner that is fiscally sustainable and context-sensitive.
- New development should be focused in areas where there is potable water, wastewater treatment, roadways, and public services.

County Policy Plan Adopted 10/27/20 1

Comment: Yes, the Proposed Project ***would*** cause a significant environmental impact. Wonder Valley has **NO potable water**, **NO wastewater treatment**, **NO sewage system**, **unsubstantial roads and mostly dirt roadways to handle the increased traffic for this Project, and currently there are NO public services in Wonder Valley. This Proposed Project would have a significant environmental impact on Wonder Valley and its community.**

This question must be asked:

-How could Land Use and the County of San Bernardino even consider to approve this Project when the basic Principles of the San Bernardino County Plan are not met?

Here is part (in red) of the developers' answer to above question:

> "The Project Site is located within an unincorporated area of the County and has a zoning designation of Rural Living and is not subject to a Community Plan. The Project vicinity is primarily an unincorporated, undeveloped area, approximately 4.5 miles east of the City of Twentynine Palms and approximately 9 miles south of the Bullion Mountains. The Project Site is located within an area that is primarily vacant for

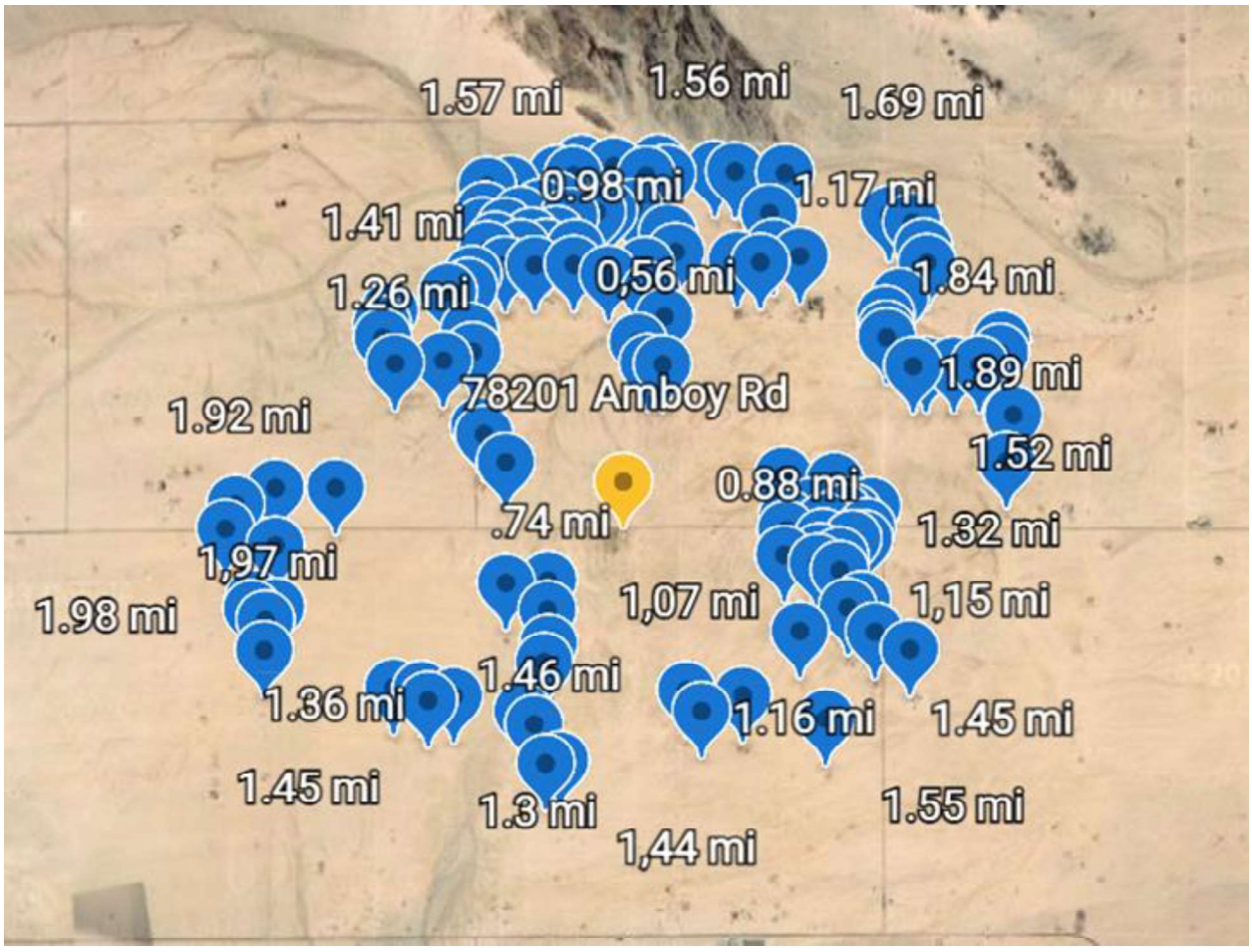
approximately 1 mile on the north, south, east and west. Large-lot rural residential land uses exist primarily on Goodwin Road to the east and Mojave Road to the west." (p.62)

This answer to this CEQA question is not given by the developers. They only claim to be "within an area that is primarily vacant for approximately 1 mile" in each direction.

-How do we know this is an accurate statement?

-And why is only "1 mile" noted as a basis for measuring a vacant area in rural living?

The map below pins residences (blue) in Wonder Valley within a two-mile radius of proposed Wonder Inn (yellow pin) *Courtesy Google Earth*



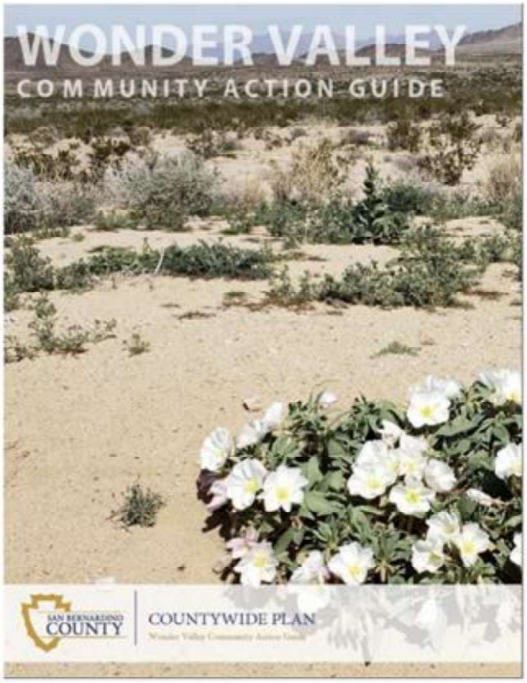
Comment: This map shows that the proposed Wonder Inn would reside directly in the center of a large number of rural residences. The effect of this Proposed Project would be significant due to the amount of resources (water, public services, dark sky, road wear, emissions) that this

hotel/resort would impose on the community, even more so for the residences directly within its vicinity.

> *b) (Would the project) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? (p.62)*

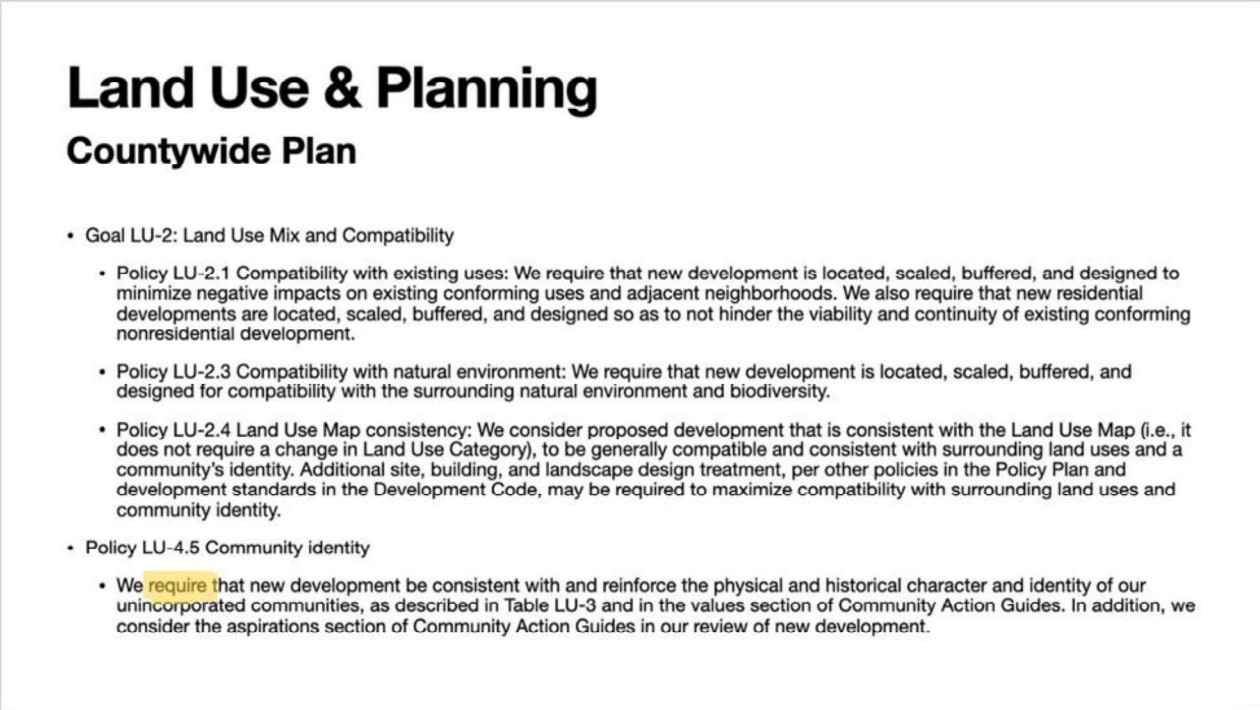
Here is another part (in red) of their answer to question b) p.62:

> "The Project Site is located within an unincorporated area of the County and has a zoning designation of Rural Living and is not subject to a Community Plan. The Project vicinity is primarily an unincorporated, undeveloped area, approximately 4.5 miles east of the City of Twentynine Palms and approximately 9 miles south of the Bullion Mountains. The Project Site is located within an area that is primarily vacant for approximately 1 mile on the north, south, east and west. Large-lot rural residential land uses exist primarily on Goodwin Road to the east and Mojave Road to the west."



Comment: The community is subject to and has a Community Plan. The Wonder Valley Community Action Guide already existed before the developers purchased the property. It has been available to them, but they chose to ignore the existence of our community and the Wonder Valley Community Action Guide as part of the San Bernardino Countywide Plan.

As shown below, the Countywide Plan "*requires* that new development be consistent with and reinforce the physical and historical character and identity of our unincorporated communities, as described in Table LU-3 and in the values section of Community Action Guides. In addition, we consider the aspirations section of Community Action Guides in review of new development."



Land Use & Planning

Countywide Plan

- Goal LU-2: Land Use Mix and Compatibility
  - Policy LU-2.1 Compatibility with existing uses: We require that new development is located, scaled, buffered, and designed to minimize negative impacts on existing conforming uses and adjacent neighborhoods. We also require that new residential developments are located, scaled, buffered, and designed so as to not hinder the viability and continuity of existing conforming nonresidential development.
  - Policy LU-2.3 Compatibility with natural environment: We require that new development is located, scaled, buffered, and designed for compatibility with the surrounding natural environment and biodiversity.
  - Policy LU-2.4 Land Use Map consistency: We consider proposed development that is consistent with the Land Use Map (i.e., it does not require a change in Land Use Category), to be generally compatible and consistent with surrounding land uses and a community's identity. Additional site, building, and landscape design treatment, per other policies in the Policy Plan and development standards in the Development Code, may be required to maximize compatibility with surrounding land uses and community identity.
- 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, as described in Table LU-3 and in the values section of Community Action Guides. In addition, we consider the aspirations section of Community Action Guides in our review of new development.

-How can this new development be consistent with and reinforce the physical and historical character and identity of Wonder Valley per the requirements of Land Use Policies and the Community Action Guide when the developers fail to acknowledge the existence of these CEQA and San Bernardino County related documents?

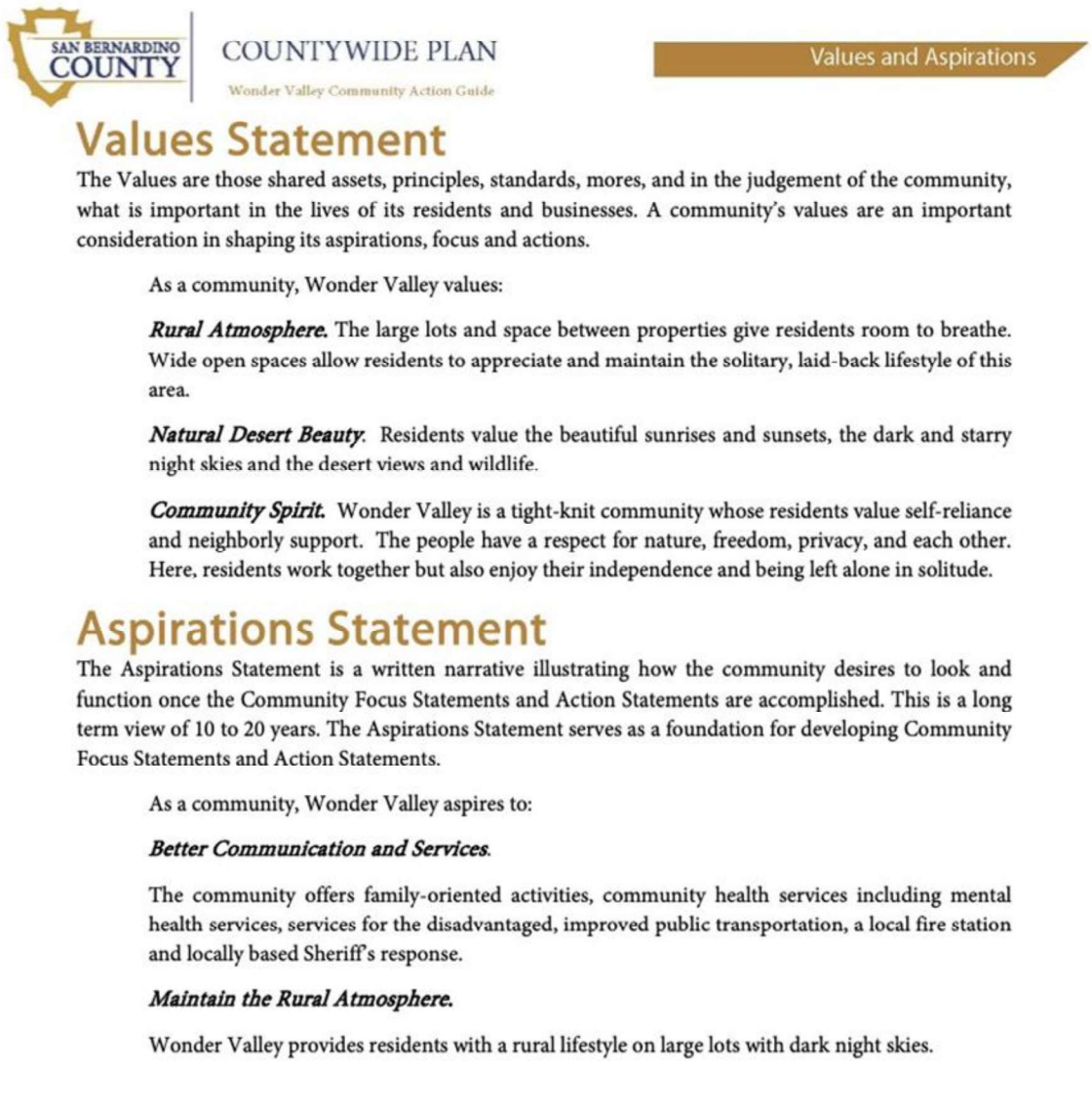
Table LU-3. Community Character

Community Category	Key Characteristics and Features
Valley Communities Bloomington, Mentone, Muscoy, San Antonio Heights	▪ A suburban lifestyle characterized by a mix of lot sizes and/or land uses in proximity to urban services and facilities. ▪ Views of canyons and hills within the community planning area (Mentone and San Antonio Heights). ▪ Economic activity that benefits local residents and/or serves the local economy.
Mountain Communities Angelus Oaks, Bear Valley [1], Crest Forest [2], Hilltop [3], Lake Arrowhead [4], Lytle Creek, Mt Baldy, Oak Glen, Wrightwood	▪ A rural lifestyle characterized by low density neighborhoods oriented around commercial or recreational nodes, and the prevalence of the forest and mountain landscapes and natural resources. ▪ Abundant views of open spaces, natural features, and dark skies. ▪ Scenic, natural, and recreational features that serve as the foundation of the community's local economy and attract tourists. ▪ Small businesses that serve local residents and visitors, compatible with the natural environment and surrounding uses.
Rural Desert Communities Baker, El Mirage, Homestead Valley [5], Lucerne Valley, Morongo Valley, Newberry Springs, Oak Hills, Pioneertown [6], Phelan/Pinon Hills	▪ A rural lifestyle characterized by the predominance of large lots, limited commercial development, and the prevalence of the desert landscape and natural resources. ▪ Abundant views of open spaces, natural features, and dark skies. ▪ Scenic, natural, and/or recreational features that serve as the foundation of the community's local economy and attract tourists. ▪ Small businesses that serve local residents and visitors, compatible with the natural environment and surrounding uses. ▪ Mining of mineral resources with minimal negative impacts on local residents.
Desert Village Communities Daggett, Helendale, Joshua Tree, Oro Grande, Yermo	▪ A rural context with clusters of housing in proximity to commercial development and public facilities, and larger lots farther from the commercial core. ▪ Abundant views of open spaces, natural features, and dark skies especially outside of clustered development. ▪ Scenic, natural, and/or recreational features that serve as the foundation of the community's local economy and attract tourists. ▪ Small businesses that serve local residents and visitors, compatible with the natural environment and surrounding uses. ▪ Mining of mineral resources with minimal negative impacts on local residents (Oro Grande and Yermo).

Notes:

1. Bear Valley includes: Baldwin Lake, Big Bear City, Erwin Lake, Fawnskin/Northshore, Lake Williams, Moonridge, Sugarloaf.
2. Crest Forest includes: Cedarpines Park, Crestline, Lake Gregory, Valley of Enchantment.
3. Hilltop includes: Arrowbear, Green Valley Lake, Running Springs.
4. Lake Arrowhead includes: Agua Fria, Blue Jay, Cedar Glen, Crest Park, Deer Lodge Park, Lake Arrowhead, Rimforest, Skyforest, Twin Peaks.
5. Homestead Valley includes: Flamingo Heights, Johnson Valley, Landers, Yucca Mesa.
6. Pioneertown includes: Gamma Gulch, Pioneertown, Pipes Canyon, Rimrock.

This is page 5 of the Wonder Valley Community Action Guide that is referenced from Land Use Policy:



SAN BERNARDINO COUNTY COUNTYWIDE PLAN
Wonder Valley Community Action Guide
Values and Aspirations

Values Statement

The Values are those shared assets, principles, standards, mores, and in the judgement of the community, what is important in the lives of its residents and businesses. A community's values are an important consideration in shaping its aspirations, focus and actions.

As a community, Wonder Valley values:

Rural Atmosphere. The large lots and space between properties give residents room to breathe. Wide open spaces allow residents to appreciate and maintain the solitary, laid-back lifestyle of this area.

Natural Desert Beauty. Residents value the beautiful sunrises and sunsets, the dark and starry night skies and the desert views and wildlife.

Community Spirit. Wonder Valley is a tight-knit community whose residents value self-reliance and neighborly support. The people have a respect for nature, freedom, privacy, and each other. Here, residents work together but also enjoy their independence and being left alone in solitude.

Aspirations Statement

The Aspirations Statement is a written narrative illustrating how the community desires to look and function once the Community Focus Statements and Action Statements are accomplished. This is a long term view of 10 to 20 years. The Aspirations Statement serves as a foundation for developing Community Focus Statements and Action Statements.

As a community, Wonder Valley aspires to:

Better Communication and Services.

The community offers family-oriented activities, community health services including mental health services, services for the disadvantaged, improved public transportation, a local fire station and locally based Sheriff's response.

Maintain the Rural Atmosphere.

Wonder Valley provides residents with a rural lifestyle on large lots with dark night skies.

Again,

> *b) (Would this development) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect? (p.62)*

Here's the answer by the developers: "Project would neither physically divide an established community nor cause a significant environmental impact due to conflict with any land use plans or policies. No significant impacts are identified or anticipated, and no mitigation measures are required."

Comment: How this community wanted to be represented is stated and included in the Countywide Plan, Land Use Services Element and in the Wonder Valley Community Action Guide, as directed by CEQA to be instituted into the Countywide Plan. The Proposed Project

Initial Study states that Wonder Valley "is not subject to a Community Plan," ignores and does NOT reference any of the county guidelines and ignores the Wonder Valley Community Action Guide and the requirements of the San Bernardino Countywide Plan and CEQA. The proposed Wonder Inn new development does NOT maintain any of the Values Statement as *required* by the county. This Project would only degrade the rural atmosphere, diminish the natural desert beauty, lighten the starry dark night skies, take away from our distinct desert views and does not have respect for solitude, privacy and community values. This is NOT a small business that would serve the local community and is NOT compatible with our natural environment. See above Table LU-3 Community Character and page 5 of the Wonder Valley Community Action Guide.

-Why didn't the developers reference the Countywide Plan and The Wonder Valley Community Action Guide regarding Land Use and Planning?

-Why did the developers ignore the entirety of the Land Use Element and the Wonder Valley Community Action Guide and numerous CEQA requirements related to Land Use?

San Bernardino Countywide Plan Land Use Element Purpose and Principles:

- Designates the distribution, location, intensity, and balance of land uses for the unincorporated areas of the county.
- Establishes goals for where, when, and how the county grows, which is also guided by policies in other elements.
- Provides direction for new development on community design, land use compatibility, and interagency coordination.
- Provides guidance for orderly expansion of incorporated areas.

-Why have the developers ignored the Purpose and Principles of the Land Use Element?

The developer has shown blatant disregard for CEQA, the County of San Bernardino policies and plans and for Wonder Valley as a community and its community design, and this Proposed Project is extremely conflicting with land use plans, policies and requirements and ***should not*** be built in this Rural Living community that does not have the resources required, nor does this Project meet the Values and Aspirations as defined by the Countywide Plan and community per the requirements of CEQA.

***Of Concern:** The developers state the size of the Project site as:

- 24.4 acres (IS/MND p.1)
- 25 acres listed on NOA and NOI SB County letter, as stated in the Project Description
- 28-acre destination hotel (IS/MND p.16)

-How many actual acres do the developers plan to use?

***Of Concern-** This same paragraph taken from pages 4 and 62 of IS/MND:

> "The Project occurs within portions of six parcels that total 134.6 acres that are zoned Rural Living (RL-5) with the exception of 3.18 acres of APN 0625-071-04 which is zoned Service Commercial (CS). The RL (Rural Living) land use zoning district provides sites for rural residential uses, incidental agricultural uses, and similar and compatible uses. The CS (Service Commercial) land use zoning district provides sites for a mixture of heavy commercial uses and light industrial uses, including light manufacturing uses, and similar and compatible uses."

***Of Concern:** 134.4 acres are listed on page 2 of the Initial Study in the Project Description, as well as above paragraph on pages 4 and 62. Maps shown on pages 7 and 8 (Exhibitions 2 and 3) outline the Project location as the larger, 134.6 acres.

Comment: The County of San Bernardino NOA/NOI letter notes "a 25-acre site" in the Project Description. See letter below.

COUNTY OF SAN BERNARDINO
NOTICE OF AVAILABILITY (NOA) AND NOTICE OF INTENT (NOI) TO ADOPT
AN INITIAL STUDY / MITIGATED NEGATIVE DECLARATION

In accordance with the California Environmental Quality Act (CEQA) and the CEQA Guidelines, County Staff prepared an Initial Study / Mitigated Negative Declaration (IS/MND) that identify and evaluate the environmental impacts of the below-named project.

Project Title: Wonder Inn Hotel/Resort (Twentynine Palms)

Project No.: PROJ-2021-00163

Project Location: 78201 Amboy Road, Twentynine Palms, CA 92277

Assessor Parcel Numbers: 0625-071-04, -05, -07, -08, -09 and -10

Project Description: A Concurrent filing of a Tentative Parcel Map to consolidate six parcels into two parcels, a General Plan Land Use Amendment from Rural Living (RL) to Commercial (C) and a Zoning Amendment from Rural Living, 5-acre minimum lot size (RL-5) to Service Commercial (CS), a Conditional Use Permit for a proposed hotel use with the conversion of an existing 4,407- square foot office building to a restaurant/lobby and the construction of 106 guest rooms, 5,000 square foot conference room, 3,985 square foot wellness center and ancillary structures on a 25-acre site, located at 78201 Amboy Road, Twentynine Palms.

Environmental Review and Public Comment:
The document meets the State requirements of the California Environmental Quality Act. Interested parties can view the Initial Study/Environmental Checklist and supporting documentation online at: https://lus.sbcounty.gov/planning-home/environmental/desert-region/ and the following offices:

High Desert Government Center
Land Use Services – Planning Division
15900 Smoke Tree Street, Suite 131
Hesperia, CA 92345

San Bernardino Government Center
Land Use Services – Planning Division
385 N. Arrowhead Avenue, 1st Floor
San Bernardino, CA 92415

The comment period on the Initial Study begins on **January 17, 2023** and closes on **February 7, 2023 at 4:30 PM**. Please submit comments to azhar.khan@lus.sbcounty.gov or to:

Azhar Khan, Planner
County of San Bernardino
Land Use Services Department, Planning Division
385 N. Arrowhead Ave 1st Flr
San Bernardino, CA 92415

(Note: The comment period has since been extended to February 22)

On page 1 of the IS/MND, these additional parcels are added:

> 0625-071-05 (34.5 ac): RL-5 0625-071-07 (10 ac): RL-5 0625-071-08 (10 ac): RL-5 0625-071-09 (10 ac): RL-5 0625-071-10 (40 ac): RL-5

-What amount of acreage are they actually planning to use for the proposed facility?

-Why are they including this much additional acreage (which now totals 134.6 acres) in the IS/MND when it's not part of the Project Description in the NOA/NOI letter?

-What was the developer's intent when adding this additional acreage to the IS/MND when it's not included in the NOA/NOI letter?

-Will there be "weddings and other events" taking place outside of the 25-acre site?

The developers do not address any of these questions. Please refer to this section of CEQA:

From "Piecemealing or Segmenting" in the CEQA Portal:

> "When future phases of a project are possible, but too speculative to be evaluated, the EIR should still mention that future phases may occur, provide as much information as is available about these future phases, and indicate that they would be subject to future CEQA review.
>
> "CEQA case law has established the following general principles on project segmentation for different project types:
>
> • For a phased development project, even if details about future phases are not known, future phases must be included in the project description if they are a reasonably foreseeable consequence of the initial phase and will significantly change the initial project or its impacts. Laurel Heights Improvement Association v Regents of University of California (1988) 47 Cal. 3d 376"

Policy LU-1.2 Infill development:

> "We prefer new development to take place on existing vacant and underutilized lots where public services and infrastructure are available."

Comment: No infrastructure and limited public services are available in Wonder Valley.

-Why would this Project be considered for approval when there are no public services and no infrastructure available in Wonder Valley?

Policy LU-2.10 Unincorporated commercial development:

> **"**We intend that new commercial development in the unincorporated areas serve unincorporated residential areas, tourists, and/or freeway travelers. We encourage new commercial development to be concentrated to enhance pedestrian circulation and reduce vehicular congestion and vehicle miles traveled, with new development directed into existing centralized areas when possible."

Comment: The location for the proposed Wonder Inn would not be located in an existing centralized area. Wonder Valley is zoned as Rural Living. The proposed location will increase vehicular congestion and vehicle miles traveled.

-Why have the developers chosen an area that is not centralized and that will only increase, not decrease traffic, due to increased miles to the proposed destination?

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."

Comment: The Proposed Project has many structures over 20 feet tall and some over 30 feet tall which will certainly change the existing visual landscape. It would be the largest resort in the entire Morongo Basin. Only Motel 6 in 29 Palms has more rooms than the proposed hotel, yet the Motel 6 is in a centralized location with a much, much smaller footprint, has potable water and public services available. In addition, this proposed development would NOT preserve scenic resources. This Policy is a requirement.

-With so many tall structures atop a large footprint of 25 acres (+134.6 acres?), how does this Project "reflect the desert environment and preserve scenic resources?

Comment: The developers have not provided any information about building materials that reflect the desert environment and preserve scenic resources. This is a requirement per the Policy.

-What materials will be used and how will those materials "reflect the desert environment and preserve scenic resources?"

Policy LU-2.3 Compatibility with natural environment:

> **"**We require that new development is located, scaled, buffered, and designed for compatibility with the surrounding natural environment and biodiversity."

Comment: The developers don't state in the IS/MND *anything* related to this Land Use requirement. Based on size, location, design and compatibility with the environment, and in accordance with the requirements of Land Use Services and the Countywide Plan, this Proposed Project is *huge* in comparison with the surroundings, and definitely is NOT "located, scaled, buffered, and designed for compatibility with the surrounding natural environment and biodiversity" as required, and should NOT be allowed to be built in Wonder Valley.

-How would this new development be located, scaled, buffered, and designed for compatibility with the surrounding natural environment and biodiversity?

This question was not answered in the IS/MND.

Policy LU-4.7 Dark skies:

> "We minimize light pollution and glare to preserve views of the night sky, particularly in the Mountain and Desert regions where dark skies are fundamentally connected to community identities and local economies. We also promote the preservation of dark skies to assist the military in testing, training, and operations."

Comment: As of now, the existing commercial building on the Project site (the "Pink Building") meets the requirements of Policy LU-4.7. If the proposed Wonder Inn were to be built it would not. The amount of artificial lights and lighting to illuminate a 24-hour facility this large with all the lights atop the tall structures, the parking lots, the signage, the gardens, the pools, the pathways, the stairways, the hotel rooms, the entire site. All this additional artificial lighting would certainly NOT meet the requirements of the Wonder Valley Community Action Guide Values Statement and Aspiration Statement, as well as the requirements of the Countywide Plan Policy LU-4.5 and Table LU-3.

-With so much additional artificial lighting required for such a large Proposed Project, how can this actually meet the dark sky requirements per the referenced Countywide Plan and Land Use Policies?

Please also reference section "I: Aesthetics" in these Response Comments for more information regarding Dark Skies.

Goal LU-5 Military Mission

-Would this Proposed Project's new, excessive artificial illumination have any effect regarding the Twentynine Palms Marine Corps Air Ground Combat Center?

Policy LU-2.4 Land Use Map consistency:

> "We consider proposed development that is consistent with the Land Use Map (i.e., it does not require a change in Land Use Category), to be generally compatible and consistent with surrounding land uses and a community's identity. Additional site, building, and landscape design treatment, per other policies in the Policy Plan and development standards in the Development Code, may be required to maximize compatibility with surrounding land uses and community identity."

Comment: Only 3.18 of the Project Site is currently zoned for Commercial Service. The remaining 21.22 acres are zoned for Rural Living, which is what the developer is proposing to change to a CS zone. This is in contrast with the Land Use Map LU-1, as well as Land Use Tables LU-1 and LU-2. In the Initial Study, the developers failed to reference any studies for the proposed change in zoning as required by CEQA, as well as any reference to "Additional site, building, and landscape design treatment, per other policies in the Policy Plan and development

standards in the Development Code, may be required to maximize compatibility with surrounding land uses and community identity." See IS/MND page 62 where the CEQA questions and Land Use consistencies have not been answered.

-How could the County of San Bernardino allow this significant change of land zoning from RL-5 to CS when the developers have failed to follow the Land Use Policy plan and requirements by CEQA?

Policy LU-6.3 Commercial amendments.

> "We will only approve Land Use Plan amendments that would introduce new commercial areas in the context of a comprehensive Land Use Plan amendment. We may waive this requirement when the proposed amended area abuts an existing or designated commercial area and the amount of land available for new commercial uses falls below 15 percent of the total commercially-designated land in the area."

-Is there a comprehensive Land Use amendment for the proposed Wonder Inn site?

Comment: The Proposed Project abuts to an existing CS zoned 3.18 acres. The amount of land the developers have applied to change from RL-5 zoned to CS zoned is 22.18 acres. The total commercially designated land in the area is 3.18 acres. New commercial use must fall below 0.48 acres (15% of 3.18), and the proposed change of RL-5 to CS zoning of 22.18 acres far exceeds the 15% of the total commercially designated land in the area, therefore a comprehensive Land Use Plan amendment is required for the proposed Wonder Inn.

Comment: If the county approves this Project, it will cause a precedence and open the doors to other projects anywhere else in Wonder Valley for developers to change the zoning requirement of Rural Living to Commercial, which would only increase the erosion of the natural desert beauty, dark night skies, privacy, solitude and wide-open spaces which are some of the principles, standards and mores in accordance with the Wonder Valley Community Action Guide, San Bernardino Countywide Policy Plan.

-Why is this Project even being considered when the Principles of the San Bernardino Countywide Plan Land Use states that "New development should be focused in areas where there is potable water, wastewater treatment, roadways, and public services"?

Comment: Wonder Valley has none of the above. Wonder Valley was not established for large commercial development such as this hotel/resort/restaurant/event center/wedding site/spa/wellness center/conference hall. This is significant and bears repeating- **Wonder Valley has NO potable water, NO wastewater service or treatment, mostly dirt roads, and currently has NO public services.**

As per the San Bernardino Countywide Plan and Land Use Services Element and CEQA, the proposed Wonder Inn and all other large new proposed developments should NOT be

approved for construction in Wonder Valley. As set by the County of San Bernardino Land Use Services, Wonder Valley was not, and is not meant for large-scale development such as this proposed Wonder Inn.

-If the County of San Bernardino fails to follow its own Principles, how could we expect any developer to comply with those same Principles?

-If the County of San Bernardino fails to follow its own Countywide Plan, Policy Plan and Land Use Elements, how can we expect any developer to do the same?

-If this proposed development gets approved for construction, what are the representatives of the County showing and telling the community and their constituents when the County of San Bernardino doesn't stand by its own documents?

Numerous questions remain unanswered about this Proposed Project in LAND USE AND PLANNING, and in order to make an adequate determination of significant impacts this must be addressed with further study, and we request that a full, certified Environmental Impact Report per CEQA requirements should be completed for the Project and Project Site of the proposed Wonder Inn.

XIII. NOISE

The criteria characterized in the Initial Study/Mitigated Negative Declaration (IS/MND) are not consistent with the criteria required to characterize according to the California Environmental Quality Act (CEQA).

Initial Study	CEQA Checklist
	a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?
b) Generation of excessive groundborne vibration or groundborne noise levels?	b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other Agencies?	c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?
	d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the Project expose people residing or working in the project area to excessive noise levels?	e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

Not adhering to the CEQA criteria as such is not only a procedural omission that by itself must lead to further evaluation and an Environmental Impact Report. The criteria left out are indicative of the project's disregard for the wellbeing and aspirations of the Wonder Valley residents.

No mention is made of or weight given to The Wonder Valley Community Action Guide of May 2019 on page 4, which identifies “Quiet” as one of the main Strengths and aspects of Wonder Valley to preserve.

No mention is made of the Hazard Element section of the 2020 San Bernardino County Wide Plan which also states.:

> **Policy HZ-2.8 Proximity to noise generating uses**
>
> ***We limit or restrict new noise sensitive land uses in proximity to existing conforming noise generating uses and planned industrial areas***.

Below follows a review of and commentary on various of the criteria of the actual CEQA checklist for Noise. The indications a), c) etc. below are aligned to the criteria “coding” in the actual CEQA checklist.

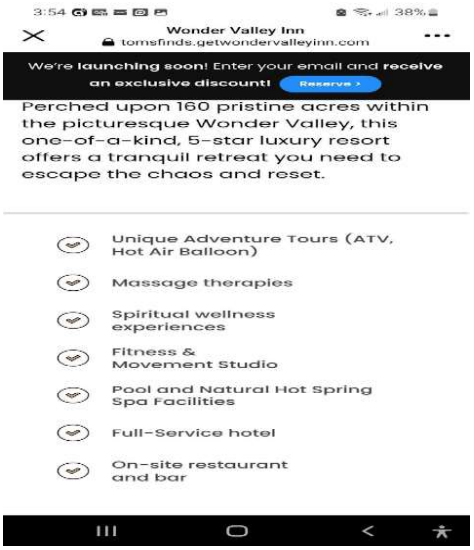
Criteria a) and c) of the actual CEQA checklist:

a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?

Yes, it is likely the Project will lead to this exposure and permanent increase, both direct and indirect. The sources of noise that will exist as a result of this Project will include:

- Increased traffic, not only on Amboy and on the Project’s parking lot, but throughout Wonder Valley, with visitors not only utilizing cars, but also All-Terrain Vehicles (ATV), Off Road Vehicles (ORV), and Motor Cycles. No assessment of the impact of this factor is provided in the IS/MND. Note that on the Facebook page promoting the project mention is made of “Unique Adventures Tours involving ATV’s:



- As most Wonder Valley residents can attest to, especially visitors utilizing ATV, ORV, and motorcycles will roam the whole area, not only on paved roads and unpaved roads, but also just crisscrossing the desert, ignoring private property lines or BLM areas, creating loud intrusions (and also dust…). No assessment of the impact of this factor is provided in the IS/MND.

- It is not unlikely air traffic will increase, with planes coming in and taking off from the Twentynine Palms Airport that is located just south of the project in Wonder Valley, *less than 2 miles away as the crow flies*. No assessment of the impact of this factor is provided in the IS/MND.

- Urban and rural noise travels very differently where there are open spaces. In addition the location of the Project is elevated, in comparison with a large part of Wonder Valley. No assessment of the impact of this factor is provided in the IS/MND.

- It is likely there will be music, events (including weddings) and live music at the proposed Wonder Inn. The IS/MND makes no mention of any of these activities or the size thereof and no analysis was done to project the impact on noise.

- The IS/MND states the following regarding the Existing Noise Environment:

  > "Based on one 24-hour ambient Noise measurement at the site, with the primary source being traffic on Amboy, the average noise level is 63.3 dB and the maximum noise level is 69.3dB

- The scope of the evaluation in the IS/MND, only considering traffic, is insufficient; the above mentioned factors have not been taken into consideration.

- The time period taken into account for the IS/MND's assertions re Existing Noise Levels is inadequate: 24 hours? Why only 24 hours? What day was looked at and why? A day with a lot of traffic for a particular reason? A study taking a much longer time period into account is required.

- The Appendices to the IS/MND have two tables that show measurement of the Ambient Noise Level: Table 5 on page 860 and Table 1 on page 870. The table on page 860 has measurements purportedly over a 24-hour period on 8/20/2021. The table on page 870 has measurements purportedly over a 24-hour period on 3/10-3/11-2022. The two tables, aside from the dates, ***are identical***, with exactly the same measurements over the same time slots. This must be either a clerical error, it may indicate only one day was measured (which day) or it may indicate general sloppiness with data.

- The IS/MND and the Appendix state (cursive and bold added):

  > "Noise data ***indicates*** the ambient noise level average was 63.3 dBA CNEL at the project site. Maximum hourly levels reached up to 69.3 dBA at 2:00 p.m. as a result of traffic along Amboy Road".

  The word "indicate" does not mean "show", it means "points to". This leaves room for error or an alternate interpretation of the data. In fact, there is good reason to believe that the data as presented in the IS/MND does support a different and **lower** ambient noise level average than the 63.3 dBA CNEL stated in the Initial Sat the project site. Using the same data as in both tables (sic!), and, calculating the average for each Percentile level in noise and weighing the different percentile brackets according to their bandwidth, the average is calculated at 52.3 dB.

  Also, using the same data, and highlighting when the measured ambient noise level is below 50 dB, it becomes clear that it is from the early evening until later in the morning that the noise levels are lowest, see below table:

Date	Time	1-Hour dB(A)							
		LEQ	LMAX	LMIN	L2	L8	L25	L50	L90
8/20/2021	11:00AM-12:00PM	63.3	78.9	42.0	68.2	67.3	63.4	62.0	58.8
8/20/2021	12:00PM-1:00PM	62.9	78.8	38.5	69.0	66.5	63.8	61.9	53.5
8/20/2021	1:00PM-2:00PM	65.1	78.9	41.9	70.6	68.7	66.1	63.7	57.5
8/20/2021	2:00PM-3:00PM	69.3	83.2	45.9	74.4	72.8	70.7	67.9	63.3
8/20/2021	3:00PM-4:00PM	68.7	80.3	45.0	73.2	72.0	70.3	67.9	62.2
8/20/2021	4:00PM-5:00PM	67.1	81.8	44.6	71.9	70.1	68.0	66.2	62.1
8/20/2021	5:00PM-6:00PM	61.1	75.7	35.4	66.6	64.9	62.3	60.0	50.9
8/20/2021	6:00PM-7:00PM	61.1	86.1	34.6	67.0	64.6	61.0	58.4	51.5
8/20/2021	7:00PM-8:00PM	55.5	78.9	30.5	64.5	60.1	54.5	48.1	33.6
8/20/2021	8:00PM-9:00PM	50.1	70.1	30.5	55.3	54.5	52.3	47.8	33.6
8/20/2021	9:00PM-10:00PM	50.8	71.9	30.5	57.9	55.2	52.4	47.4	36.9
8/20/2021	10:00PM-11:00PM	56.1	72.5	36.9	62.0	58.7	56.5	54.8	51.6
8/20/2021	11:00PM-12:00AM	56.7	75.5	33.6	62.3	59.6	57.9	55.8	49.4
8/20/2021	12:00AM-1:00AM	51.9	72.3	30.4	59.3	57.7	51.9	46.8	35.3
8/20/2021	1:00AM-2:00AM	47.9	72.8	30.4	57.9	51.7	44.1	37.5	32.3
8/20/2021	2:00AM-3:00AM	47.1	65.6	30.4	54.4	51.6	47.3	44.3	37.4
8/20/2021	3:00AM-4:00AM	46.7	68.1	30.4	55.4	52.9	44.8	41.3	33.9
8/20/2021	4:00AM-5:00AM	43.1	68.9	30.4	53.1	44.6	40.4	37.2	31.5
8/20/2021	5:00AM-6:00AM	57.1	85.1	30.3	62.9	57.4	51.6	35.2	30.5
8/20/2021	6:00AM-7:00AM	52.9	75.6	30.7	60.3	57.7	54.1	45.7	37.7
8/20/2021	7:00AM-8:00AM	55.4	77.1	31.1	63.1	60.2	56.7	52.0	39.7
8/20/2021	8:00AM-9:00AM	57.5	80.3	30.8	65.0	62.0	57.9	53.3	46.1
8/20/2021	9:00AM-10:00AM	55.4	73.5	30.7	61.1	60.2	56.5	54.0	43.0
8/20/2021	10:00AM-11:00AM	56.8	74.5	30.3	62.4	60.7	57.8	55.8	47.1
CNEL									63.3
Notes:									
[1] Short-term noise monitoring location (ST1) is illustrated in Exhibit E.									

The average noise level over the time period from the 12 hours from 7PM until 7AM is 45.5 dB, calculated in the same way as the 52.3 dB for the full day was arrived at mentioned above.

Note that according to Caltrans in 2013 the noise level in a quiet rural area is 20 dB.

The IS/MND does not differentiate the noise impacts by time of day, where it is likely that, especially but not only with events in the evening, the addition to the noise levels from the Project to the ambient noise level will be even greater than during the day.

- The IS/MND completely ignores the County policies as mentioned above that state:

  > We limit or restrict new noise sensitive land uses in proximity to existing conforming noise generating uses and planned industrial areas (Policy HZ-2.8).

No mention is made of or weight given to The Wonder Valley Community Action Guide of May 2019 on page 4, which identifies “Quiet” as one of the main Strengths and aspects of Wonder Valley to preserve.

Note the developers for this Project have acquired more land around the current project site, 20 acres North across from the project's site off of Amboy and a 5-acre parcel just east on Gammel South of Amboy, to be used likely for "event parking", housing or service buildings, all with further noise increase impacts, none of which have been addressed in the IS/MND.

Criterion b) of the actual CEQA checklist:

b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?

- The project will utilize a back-up generator for when electricity is out. This is likely to occur in the future, from personal experience any Wonder valley resident will attest that power outages happen say 2-5 times a year, lasting up to 24 hours. The electricity draw from the project is likely to increase the frequency of power outages since some are caused by excessive demand. The IS/MND does not provide any information regarding the impact on noise levels of the use of the planned generator in case of power outages.

- The IS/MND states that construction, repair, or excavation work performed must occur within the permissible hours. There are no sensitive receptors within 1,000 feet of the Project Site, and the Project would comply with the County's Noise Ordinance and that therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

- This evaluation does not include any objective measurements, does not take into account that sound travels much more in the desert, that urban and rural noise travel very differently and that, even a temporary increase in noise level would detrimental to the Wonder Valley community's stated element of "Quiet" as one of the main Strengths and aspects of Wonder Valley to preserve in addition to being inconsistent with the San Bernardino County General Plan, in particular with the elements outline above.

Criteria d) and e) of the actual CEQA checklist:

d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?

- Sound travels much more in the desert. Urban and rural noise travels very differently. The Initial Study's prediction regarding the amount of noise that will happen during construction, and how far the noise will travel in this rural environment is not substantiated with objective analysis / measurements.

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

The distance between the project site and the Twentynine Palms Airport is less than 2 miles as the crow flies. No impact assessment has been provided in the IS/MND to evaluate whether the project will expose people residing or working in the project area to excessive noise levels. For the purposes of effectively evaluating the effects of air traffic noise from the Project, Wonder Valley should be considered as a collective whole for the impact of increased air traffic assessment.

Conclusion: a full Environmental Impact Report must be done to assess the effects of noise upon surrounding residences before this project can move forward.

XIV. POPULATION AND HOUSING

POPULATION AND HOUSING - Would the project:

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

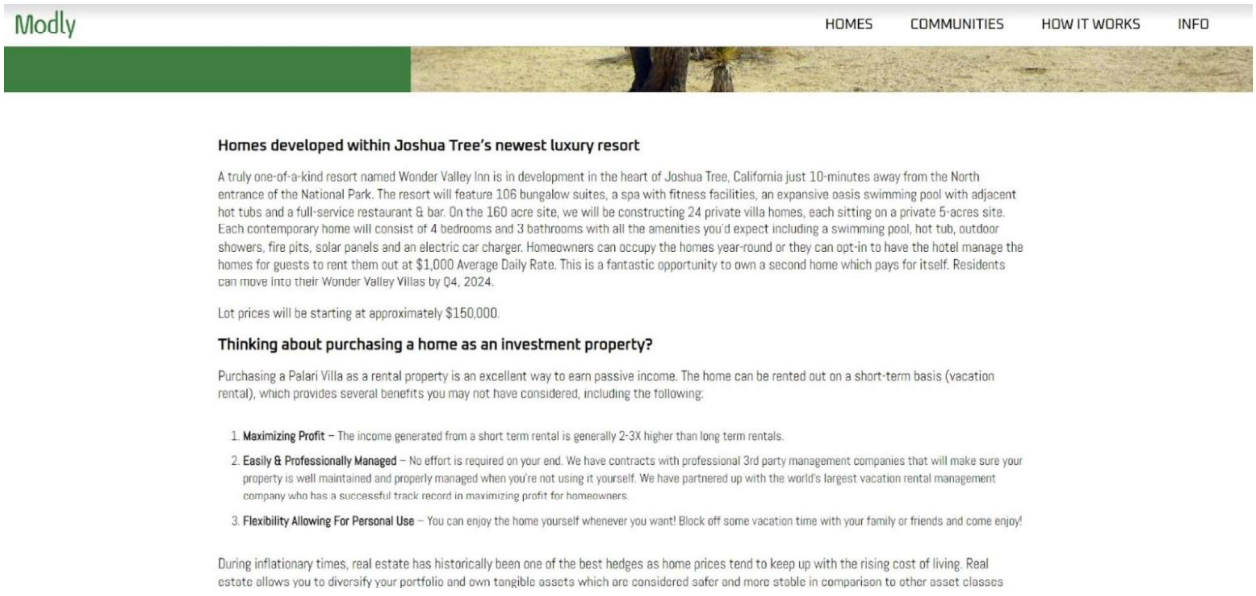
Comment: The Wonder Inn project would create substantial unplanned and unsupported population growth in Wonder Valley. On a daily basis the operation of the Wonder Inn Hotel would result in a concentrated increase in the population of Wonder Valley by approximately 250 people including guests, visitors, and workers. This represents an increase in population by 24.5% based on Wonder Valley Census data from 2020 and the expected occupancy from the Wonder Inn developers themselves.

A 24.5% increase in daily population could have significant negative impacts on infrastructure and the limited public services available to Wonder Valley residents. An Environmental Impact Report (EIR) is needed to assess the impact of this influx of daily visitors on the population of Wonder Valley.

Referencing page 69/92 Initial Study/Mitigated Negative Declaration (IS/MND):

"With approval of the CUP and zone change to Service Commercial, the Proposed Project would be consistent with the Countywide Policy Plan. The Proposed Project does not involve construction of new homes so it would not induce unplanned population growth. No significant adverse impacts are identified or anticipated, and no mitigation measures are required."

The Wonder Inn developers have stated above in their IS/MND that the proposed project does not include the construction of new homes. It has come to light in recent days, however, that the owners of the Wonder Inn have begun publicly advertising the sale of 24 "luxury villas homes" which will be built on the remaining 113.4 acres they own adjacent to the Wonder Inn. It should also be noted that in addition to the original 136.4 acres, the owners of the Wonder Inn had purchased an additional 50 acres in 2021. This indicates their intention of significant future development on the remaining acreage leading to a cumulative impact on the population of Wonder Valley which has not been studied in any capacity. Please see the advertisement below (https://www.modly.com/community/joshua-tree):



Modly

HOMES COMMUNITIES HOW IT WORKS INFO

Homes developed within Joshua Tree's newest luxury resort

A truly one-of-a-kind resort named Wonder Valley Inn is in development in the heart of Joshua Tree, California just 10-minutes away from the North entrance of the National Park. The resort will feature 106 bungalow suites, a spa with fitness facilities, an expansive oasis swimming pool with adjacent hot tubs and a full-service restaurant & bar. On the 160 acre site, we will be constructing 24 private villa homes, each sitting on a private 5-acres site. Each contemporary home will consist of 4 bedrooms and 3 bathrooms with all the amenities you'd expect including a swimming pool, hot tub, outdoor showers, fire pits, solar panels and an electric car charger. Homeowners can occupy the homes year-round or they can opt-in to have the hotel manage the homes for guests to rent them out at $1,000 Average Daily Rate. This is a fantastic opportunity to own a second home which pays for itself. Residents can move into their Wonder Valley Villas by Q4, 2024.

Lot prices will be starting at approximately $150,000.

Thinking about purchasing a home as an investment property?

Purchasing a Palari Villa as a rental property is an excellent way to earn passive income. The home can be rented out on a short-term basis (vacation rental), which provides several benefits you may not have considered, including the following:

1. **Maximizing Profit** – The income generated from a short term rental is generally 2-3X higher than long term rentals.
2. **Easily & Professionally Managed** – No effort is required on your end. We have contracts with professional 3rd party management companies that will make sure your property is well maintained and properly managed when you're not using it yourself. We have partnered up with the world's largest vacation rental management company who has a successful track record in maximizing profit for homeowners.
3. **Flexibility Allowing For Personal Use** – You can enjoy the home yourself whenever you want! Block off some vacation time with your family or friends and come enjoy!

During inflationary times, real estate has historically been one of the best hedges as home prices tend to keep up with the rising cost of living. Real estate allows you to diversify your portfolio and own tangible assets which are considered safer and more stable in comparison to other asset classes

The above advertisement indicates the plan of the Wonder Inn developers to establish a $1000/rate for a short-term rental villa community that will be managed by the hotel/ inn. This exploits a known loophole in San Bernardino County's Short-Term Rental (STR) ordinance that allows multiple co-developed "single family homes" to be managed as a hotel. The Wonder Inn developers can effectively create hotels of unlimited size in areas where zoning would not otherwise allow them.

Given this loophole in the zoning code, the developers plan for extensive future development and the potential cumulative impact of the current and future Wonder Inn related projects an EIR is needed to determine the overall impact on the population and housing situation in Wonder Valley.

The Wonder Inn and any planned future development would not only have an impact on the resources available to the current population of Wonder Valley like access to water, access to public services, traffic issues etc., but is in opposition to the Values of the Wonder Valley population/ community as outlined in the Wonder Valley Community Action guide highlighted in the following paragraph.

From Wonder Valley Community Action Guide, page 4:

> *The Values are those shared assets, principles, standards, mores, and in the judgment of the community, what is important in the lives of its residents and businesses. A community's values are an important consideration in shaping its aspirations, focus and actions.*
>
> *As a community, Wonder Valley values:*

- *Rural Atmosphere. The large lots and space between properties give residents room to breathe. Wide open spaces allow residents to appreciate and maintain the solitary, laid-back lifestyle of this area.*
- *Natural Desert Beauty. Residents value the beautiful sunrises and sunsets, the dark and starry night skies and the desert views and wildlife.*
- *Community Spirit. Wonder Valley is a tight-knit community whose residents value self-reliance and neighborly support. The people have a respect for nature, freedom, privacy, and each other. Here, residents work together but also enjoy their independence and being left alone in solitude.*

With the Wonder Inn developers owning a combined total of 180+ acres in a localized area of Wonder Valley the large-scale development would be in sharp contrast to the values of the Wonder Valley population. The project would effectively destroy the rural atmosphere, the natural desert beauty and with future development of STRs will effectively destroy the community spirit of Wonder Valley. An Environmental Impact Report (EIR) is needed to determine what effect such dramatic and rapid changes (both the Wonder Inn and Villas are advertised as opening in 2023) would have on the emotional and psychological well-being of the current Wonder Valley population.

Comment: The Wonder Inn IS/MND failed to disclose their plans to develop additional STR villas on the additional 113.4 acres surrounding the Wonder Inn. Despite not disclosing this information or including it in the initial study the Wonder Inn developers and their agents have gone forward with advertising the villa development publicly and are seemingly soliciting investment into the development as well. As per CEQA this would be considered Piecemealing or Segmenting.

From Piecemealing or Segmenting in the CEQA Portal (https://ceqaportal.org/tp/CEQA%20Project%20Description%202020%20Update.pdf):

> "When future phases of a project are possible, but too speculative to be evaluated, the EIR should still mention that future phases may occur, provide as much information as is available about these future phases, and indicate that they would be subject to future CEQA review.
>
> "CEQA case law has established the following general principles on project segmentation for different project types:
>
> "For a phased development project, even if details about future phases are not known, future phases must be included in the project description if they are a reasonably foreseeable consequence of the initial phase and will significantly change the initial project or its impacts. *Laurel Heights Improvement Association v Regents of University of California* (1988) 47Cal. 3d 376"

As noted in the CEQA case law established above, future phases MUST BE INCLUDED in project description. The developers of the proposed Wonder Inn failed to inform the County of their plans to build these additional 24 homes, they are already soliciting buyers for these homes, and have shown blatant disregard for CEQA and the County of San Bernardino Land Use Services by withholding their intent for this land use, to build residential private villas.

The current IS/MND is not sufficient to make an adequate assessment of the potential significant impacts of Wonder Inn and its undisclosed villa development. A full, certified Environmental Impact Report per CEQA requirements should be completed for the Wonder Inn project site, additional adjoining acreage included in the advertised villa development and any unaccounted-for parcels in the Wonder Valley area owned by the developers of the Wonder Inn.

POPULATION AND HOUSING - Would the project:

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

Comment: Trends in real estate transactions show that tourism brings an increase in investors seeking to capitalize on possible profitability. Throughout the Morongo Basin there has been a trend in the increase in conversion of existing homes into STRs and the building of new homes as VHRs (vacation home rentals) by investors. The effect of this has been housing being removed from the market and new home builders incentivized to build VHRs versus new homes for the existing population and new arrivals seeking/ needing affordable permanent housing. This has effectively resulted in an unprecedented housing crisis for long-term residents who have lived in this historically disadvantaged area before the boom in tourism associated with visits to Joshua Tree National Park.

The same displacement could occur in Wonder Valley where low-income and older residents could face eviction from their rented housing and any new housing would focus on luxury developments designed primarily for the STR market. The Wonder Inn seeks to establish Wonder Valley as a destination for well-heeled travelers and are already advertising investment opportunities through real estate development in the area. An EIR is needed to conform with the environmental justice requirements of CEQA to determine whether this development will result in the displacement of existing residents who may be forced to seek already limited housing resources elsewhere and whose needs are not being considered in any development plans.

Comment: The significant increase in the population of Wonder Valley by affluent visitors combined with the extensive planned development and advertising of luxury villas in a disadvantaged community signals the gentrification of Wonder Valley and potential displacement of low income and elderly residents in favor of wealthier investor owners. In December 2022, the Court of Appeal for the First Circuit of California issued a tentative court ruling that gentrification and displacement are issues that must be analyzed under the California

Environmental Quality Act (People's Park UC Berkeley). Developers may now be required under CEQA to consider a proposed project's "indirect displacement" of residents and potential effect on gentrification and homelessness. A full EIR is required to determine if the Wonder Inn project and any of its planned future development will result in the gentrification of Wonder valley and the displacement of vulnerable residents.

XV. PUBLIC SERVICES

Welcome to Wonder Valley!

COMMUNITY OVERVIEW: Wonder Valley is located in the southeastern area of San Bernardino County, which is by area the largest county in the United States, consisting of 20,105 square miles. The majority of the 2.2 million people who reside in San Bernardino County live in a relatively small urban section of the southwest part of the county.

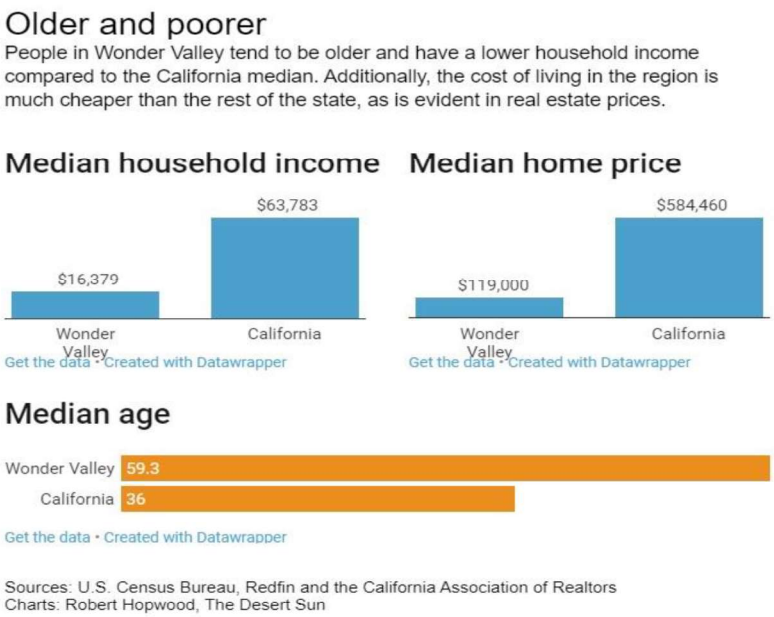
By contrast, Wonder Valley is a 147 square mile rural and sparsely populated high desert community, established in 1938 with the historical Small Tract Homestead act. It is exactly this rural and sparse quality that gives Wonder Valley its unique character and bestows its most prized assets: quiet, solitude, spaciousness, dark night skies, and abundant wildlife, to name a few. Wonder Valley is the type of community that gets excited about a beautiful sunset, and spreads the word when the snakes come out in the Spring (be careful, folks!)

The following word cloud was created during a community survey done in 2018, and highlights the values of this community. It is also from the Wonder Valley Action Guide, part of the San Bernardino County Wide Plan. The size of the words are indicators of how often that word was mentioned in the survey.

As a community, Wonder Valley values: *(source: Wonder Valley Community Action Guide https://countywideplan.com),*

- **Rural Atmosphere**. The large lots and space between properties give residents room to breathe. Wide open spaces allow residents to appreciate and maintain the solitary, laid-back lifestyle of this area.
- **Natural Desert Beauty**. Residents value the beautiful sunrises and sunsets, the dark and starry night skies and the desert views and wildlife.
- **Community Spirit**. Wonder Valley is a tight-knit community whose residents value self-reliance and neighborly support. The people have a respect for nature, freedom, privacy, and each other. Here, residents work together but also enjoy their independence and being left alone in solitude.

Wonder Valley is a poor community with a median income of $16,379 *(Source below).* We are a sparsely populated community of 1019, mostly older residents (average age 59.3), many of which have lived here most of their lives. We have many artists, performers, musicians, and people who simply want to live a quiet, affordable life away from the bright lights and noise of the city.



Source: Desert Sun 2018 desertsun.com

In recent years, Wonder Valley has seen a significant increase in population. In 2013, Wonder Valley population was estimated to be 615 *(sbcsentinel.com).* In the 2020 census, Wonder Valley population was estimated to be 1019, almost doubling in 10 years. There are a few reasons for the recent upward trends:

- Tourism has substantially increased at Joshua Tree National Park, having increased from 1.4 million visitors in 2012 to well over 3 million visitors per year in 2022.

- Simultaneous to the increase of tourism to the park, Short Term Rentals exploded upon the scene. Beginning in roughly 2012, numerous properties (including some uninhabited or abandoned properties) in Wonder Valley were being purchased, renovated, and turned into STR's. There are currently an estimated 60 active STR's in Wonder Valley. *(Note: the many guests that enjoy these short-term rentals are not included in the population count used to estimate the Public Services needed to safely cover Wonder Valley.)*

- Property prices are low in Wonder Valley. The median home price in California is $834,400. The median home price in Wonder Valley is $135,000. *(redfin.com)* Many people who have been priced out of their former neighborhoods have migrated to Wonder Valley, where one can buy a home on 5 acres for less than the price of rent in the cities. (The average rent in California was $2,686 a month in 2022; a mortgage payment on $135,000 is roughly $900 per month.) As tourism surges at Joshua Tree National Park, the desert region has become California's hottest housing market. (*theguardian.com*)

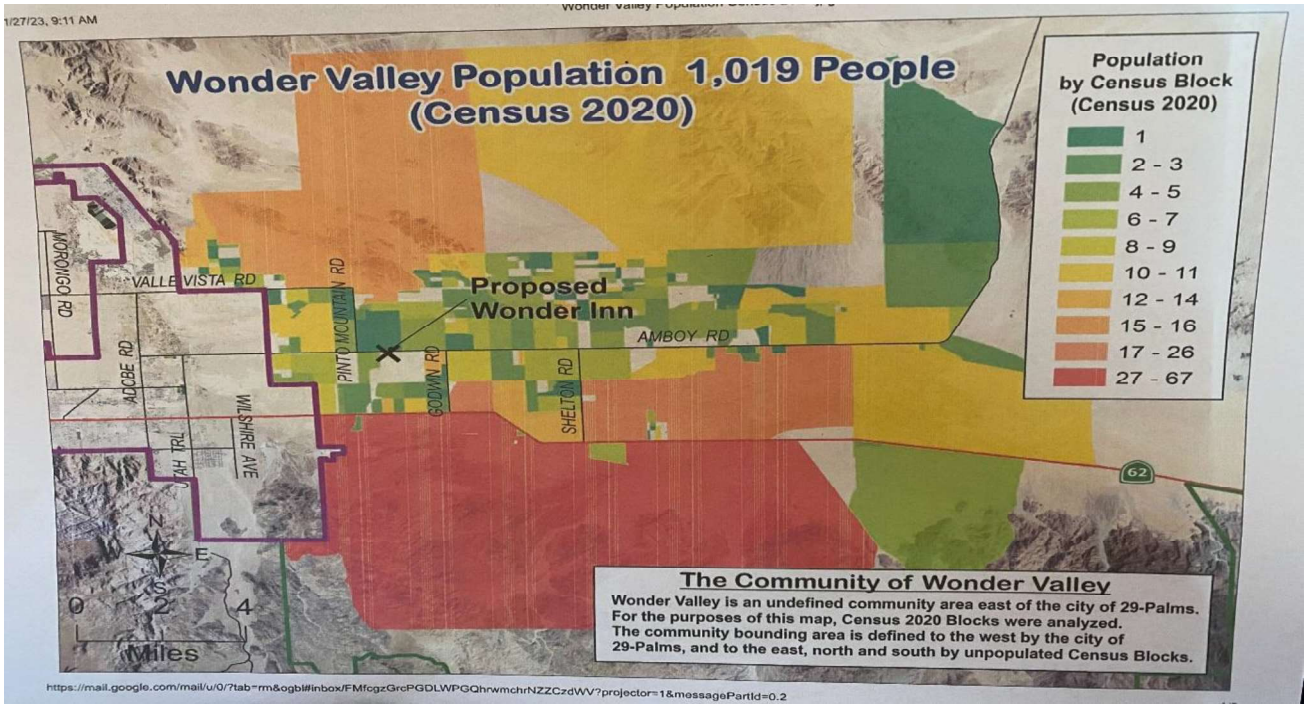
- During the 2 years of isolating at home during the pandemic, many people shifted to telecommuting, and are now able to live in this rural area and maintain employment.

An increase in population creates a need to increase public services. However, during the time the population of Wonder Valley was rising, the Wonder Valley fire station was closed (2017), and our fire and paramedic response now comes from the City of Twentynine Palms. This change increased our response times to dangerous lengths. We currently do not have adequate Public Services for our community - especially Fire and Paramedic services, resulting in numerous homes burning to the ground due to insufficient fire response. (More on this later.)

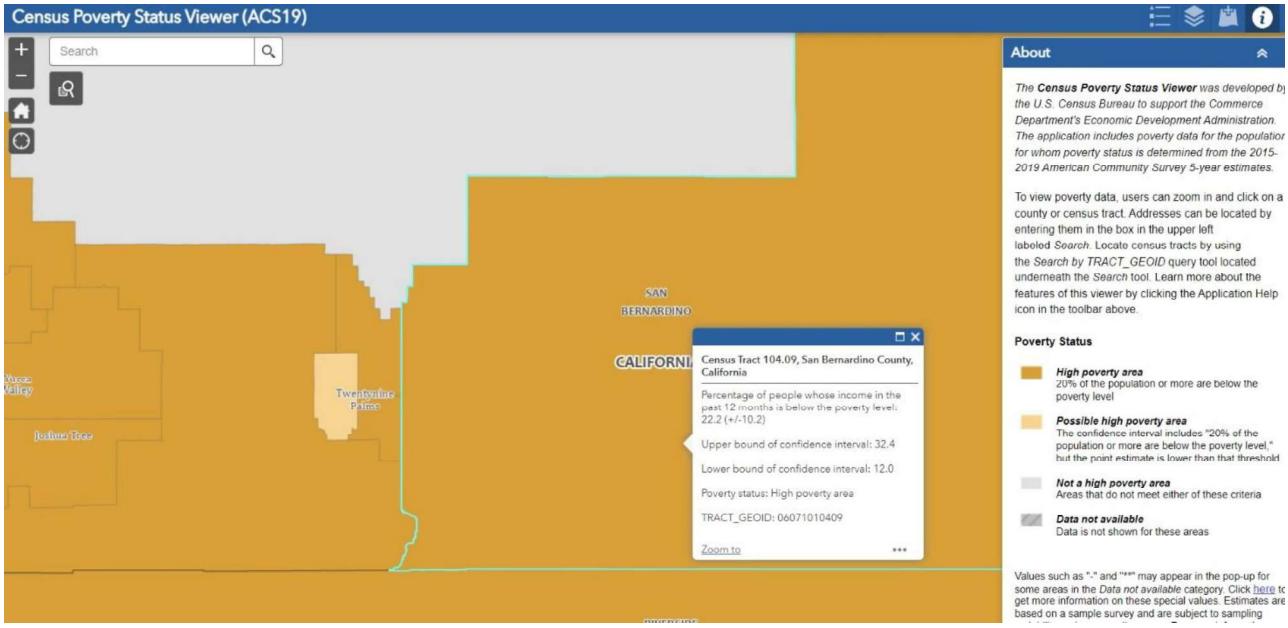
The addition of the proposed Wonder Inn will further increase the burden upon Wonder Valley's already stressed Public Services. This proposal estimates 160 daily guests, 40 visitors and 20 staff. That is an additional 220 people added to our existing population of 1019, increasing demand for services in our area by roughly **20%.**

We've recently learned that there is to be an additional 24 – 4-bedroom STR homes built on the currently owned 183 acre property, which would increase demand upon Public Services even more. (Please see 'Size, Scope and Piecemealing' in this Response Comment Document for more information.) Using a rough estimate of 2 persons per household, this phase of the project would increase population by 48, adding an additional burden of roughly 5%, for a total of 26% increased demand upon our Public Services. As the Luxury Villas are planned to be 4 bedroom and will also be made available as Short-Term Rentals, we can expect the occupancy will be higher than 2 people per household.

I should mention that it is very difficult to find consistent statistics on the population, income level, average age and other demographics for Wonder Valley, including in the 2020 Census, City Data website and several professional news sources. I presume this is because we are an unincorporated area and our boundaries are not clearly defined. Sadly, this leaves me with the impression that the Wonder Valley community is so underserved that we don't even merit study. For the purposes of this comment document, I will be using this number for current population:



And, this poverty status map from the US Census, indicating Wonder Valley is a high Poverty area:



From the San Bernardino County Policy Plan 2020: Safety & Security Section, Hazards Element

Principles: We believe:

- A safe environment is necessary to build and maintain a sustainable and prosperous county.
- The County is proactive in lessening risks from natural and human-generated hazards.
- Reduction in the loss of life, injury, private property damage, infrastructure damage, economic losses, and social dislocation can be achieved through planning and preparedness.
- Emergency response and recovery efforts contribute to a resilient county, given unavoidable emergencies and natural disasters.
- Those who live in unincorporated disadvantaged communities should not be burdened with elevated exposure to pollution risks and reduced access to public facilities and services.

THE PROPOSED WONDER INN PROJECT

The Wonder Inn project aims to exploit Wonder Valley's community assets (our quiet, solitude, spaciousness, dark night skies, and abundant wildlife, etc.) for profit, and will destroy these community assets by building this large luxury resort and event space here in our quiet valley.

On page 584 (pdf page) of the Proposal Appendices, we can read about the project's intention: "The goal is to create peace. The lodge provides guests a rural experience that frames and creates a slow, secluded moment to relax and connect with the landscape, horizon, and a dark, starlit sky." I understand the allure of Wonder Valley and why people would be drawn to this area – it is why we chose to live here. But the project developers fail to see how this large hotel would negate the very experience they hope to create. The project proponent mentioned that he has been coming here for 2 years (*Source youtube*), which corresponds to the purchase of the bulk of this land in 2020. We are not confident that the developers know this community at all, and we fear that they only see an opportunity to exploit this undeveloped land for their own profit.

This project would offer no benefits to Wonder Valley residents. The fire department collects only 2.5% of the property taxes collected from the residents of Wonder Valley (compared with 22-25% of the taxes collected in Yucca Valley.) So, the increase in tax revenue generated by this hotel would not be sufficient to cover the additional services needed to cover the extra burden they will create. Instead, as an underserved rural community, this proposed luxury resort will draw upon the already insufficient Public Services responsible for covering this undeveloped CS70M service area. (More on this later.)

Keep in mind the following visual of the endless views of this Wonder Valley neighborhood, (which is just south of the proposed location for the proposed Wonder Inn) as you read the project description:

An aerial view of Wonder Valley. *Jay Calderon/The Desert Sun*

The Wonder Inn proposal includes a 4,407 sq.ft. lobby/restaurant, a 5,000 sq.ft conference room, a 3,985 sq.ft. spa/wellness center, 106 guest rooms, plus ancillary structures for staff, a 3,300 sq.ft. multipurpose tent for gatherings, including a 1,700 sq.ft. building for restrooms, a 6,300 sq.ft./ 214,000-gallon swimming pool (almost half the size of an Olympic pool), a 40 sq ft / 1,100-gallon hot tub, an astronomy pergola, sunken gardens, etc. This Proposed Project also includes a 210-space parking lot onsite – and (not stated in original application, but purchased in 2021) an additional 20 acres across the street, northwest on Amboy, presumably for event parking.

This proposed project will include amending 21.22 acres of the site from Rural Living (RL) to Service Commercial (SC) zoning. The current 3.18 acres of CS zoning on this property was part of a jojoba farm, which is a quiet and peaceful use of the land that was compatible with Wonder Valley's way of life and population level (though not compatible with the water needs of this area.)

As a large luxury hotel and event center, the proposed Wonder Inn project is vastly different from the community it plans to locate into, and it does not fit in with the existing local character of Wonder Valley *(https://countywideplan.com).* There is only 1 other SC zoned parcel in Wonder Valley, which is the Palms restaurant, roughly 6 miles east of the site of this Proposed Wonder Inn Project. The Palms is a historic community gathering place, established in 1961, owned and operated since 1996 by The Sibley's, a local Wonder Valley family. Of note, the Palms is a rustic, rural, tavern type establishment, and is quite consistent with the laid back, rural character of Wonder Valley. The Palms does not have streetlights, nor outdoor building lights. The Palms preserves the dark desert night, which supports stargazing, one of our favorite activities in Wonder Valley.

This is the Palms, as viewed on Google Maps Street View:

ENVIRONMENTAL JUSTICE: There is no mention of the Wonder Valley community - nor any community descriptors, in the Initial Study, nor in the 895 pages of analysis reports and information included in the Appendices. This reflects poorly upon the project applicants. One might conclude that they have neither interest in, nor concern about our Wonder Valley community - or their impact upon it. Fortunately, the California Environmental Quality Act (CEQA) requires Environmental Justice be included in the CEQA studies, which it appears may not have been done for this project. Therefore, a complete Environmental Impact Report (EIR) must be done to include this vital area of study.

Per former California Attorney General Kamala Harris, "Human beings are an integral part of the 'environment.' An agency is required to find that a 'project may have a 'significant effect on the environment' if, among other things, 'the environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly." (*Source: https://oag.ca.gov*) Further, "The Attorney General is particularly concerned that land use planning and permitting decisions consider and address any additional burdens on environmental justice communities." *(Source: oag.ca.gov/environment/justice)*

Indeed, people are part of the environment and this project will have significant impacts upon our rural and underserved community, especially for the people who live here full time. At minimum, the character of our community will be significantly impacted and devalued by the addition of this large, luxury hotel and event space. Our quality of life will be dramatically changed. And, at worst, our safety will be at risk, and lives and property may be lost due to the increasing demand upon the already insufficient Public Services in this underserved community.

From the San Bernardino County Policy Plan 2020:

Policy HZ-3.18 **Application requirements.** In order for a Planning Project Application (excluding Minor Use Permits) to be deemed complete, we require applicants to indicate whether the project is within, adjacent to, or nearby an unincorporated environmental justice focus area and, if so, to:

- document to the County's satisfaction how an applicant will address environmental justice concerns potentially created by the project; and

- present a plan to conduct at least two public meetings for nearby residents, businesses, and property owners to obtain public input for applications involving a change in zoning or the Policy Plan. The County will require additional public outreach if the proposed project changes substantively in use, scale, or intensity from the proposed project presented at previous public outreach meeting(s).

Wonder Valley is indeed in an unincorporated environmental justice focus area. In addition, this project proposes to change zoning on 24 acres. To date, the applicants have not conducted a public meeting. In addition, we have recently learned that there are additional plans for 24 STR homes – not included in the original application, which will indeed substantially change the scale of the project.

These are a few of the many reasons why I am requesting that a complete, certified Environmental Impact Report per the requirements of CEQA be done to fully address the

significant numerous adverse impacts upon this peaceful desert community. It is my belief that this full study will reveal the many reasons why this project is not suitable for this area.

PUBLIC SERVICES – CONCERNS AND QUESTIONS

PROJ-2021-00163CEQA INITIAL STUDY - MND: Public Services Area

CEQA: San Bernardino County Initial Study/Mitigated Negative Declaration Environmental Checklist, doc, page 69-71:

XV. PUBLIC SERVICES
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Fire Protection? FINDING: "Less than significant"
>study is not sufficient to support this determination

Police Protection? FINDING: "Less than significant"
>study is not sufficient to support this determination

Before we can effectively evaluate the impact this project would have upon Wonder Valley and its community, we first must be clear on the actual size and scope of the project. There are 2 essential areas in which we need more information: staffing numbers and size and scope of the project.

STAFFING: The estimated staffing number given for the proposed Wonder Inn seems insufficient. For a luxury hotel with all the amenities mentioned in the project description, it seems we could expect the following staffing possibilities:

- Manager (General and Assistant), likely 1 onsite at all times
- Housekeeping: 8-9 maids, depending on occupancy (*Source: allianceonline.co.uk*)
- Janitorial for public areas and public restrooms and showers
- Lobby: reception desk / reservations agent, cashier, concierge, Security,
- Restaurant *(24 hour restaurant with seating for 100):* hostess, servers, bartender, prep cooks, sous-chef, chef, dish bussing staff, dishwashers, etc. – estimate between 10 to 40 employees (*Source: escoffier.edu*)
- Spa services: reservation coordinator, massage staff, yoga instructor, mani/pedi services, skin care, etc.
- Pool and Hot tub maintenance, lifeguard

In addition to the proposed Wonder Inn's restaurant, bar and 106 guest rooms, this luxury hotel also plans to be an event space. We need clarification of the size and scope of possible events this venue might host, including how many additional staff may be required for event support. Here are a few possible staffing needs:

- Weddings / Parties / Corporate meetings / Conventions could include 50-100-200-500 or more guests, and staffing to support this number of guests could include an Event Coordinator, set up crew (chairs/tables/stage/shade covers/additional dining

areas, etc.), catering staff, additional servers, additional dish staff, additional dishwashers, additional security, parking attendants, clean-up crew, etc.
- Larger events such as music festivals or Bhakti-Fest type events could include a couple thousand event participants and would require delivery of Porta Potties, Event Coordinators and assistants, cashier/ticketing staff, seating hosts, lighting and audio staff, stage crew, set up crew or delivery and set up by rental equipment vendors, additional reception desk staff, hosts, additional ticketing/reservation/will call agents, additional security, additional parking attendants, additional catering staff and servers, additional clean-up crew, etc.
- *NOTE: for the purpose of evaluating the impact of the proposed Wonder Inn upon Wonder Valley, all contract staff and vendors should also be included in the staffing estimates.*

What will be the effect of this project on Public Services availability to Wonder Valley residents? Without this information, it is impossible to know. We need a full Environmental Impact Report to assess this.

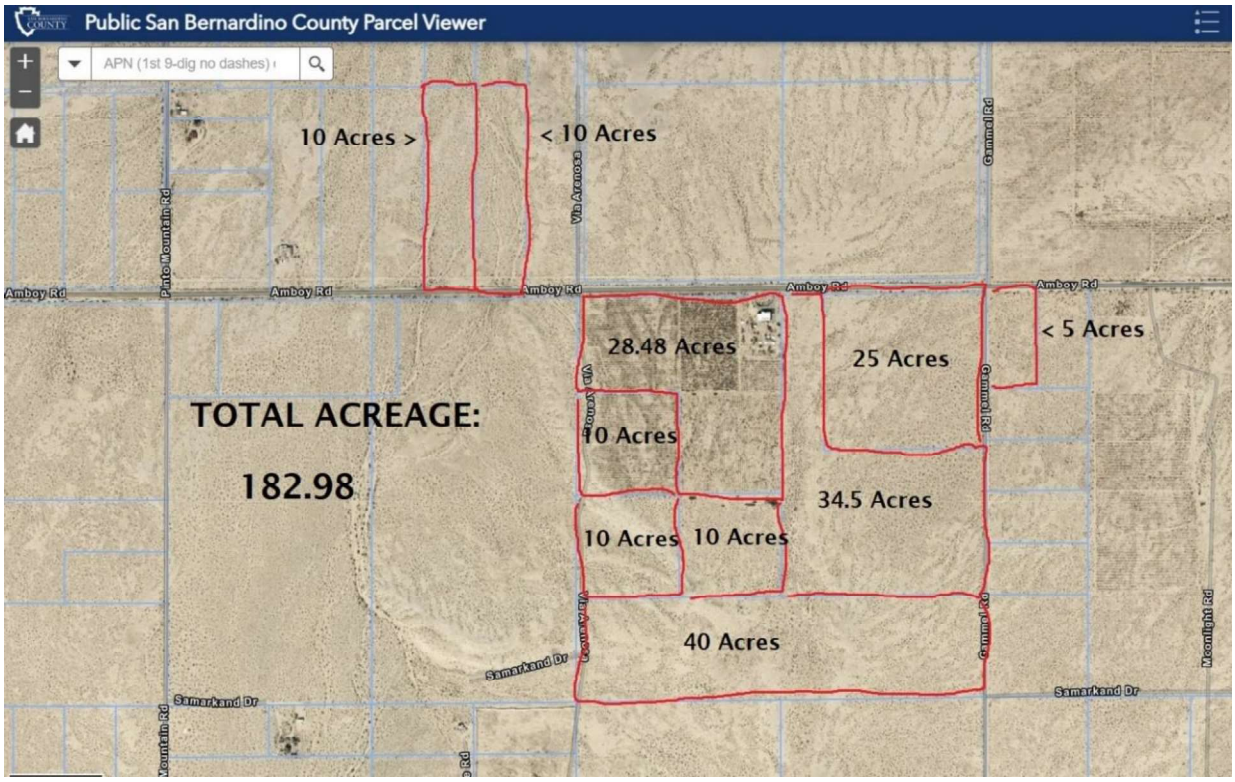
- **QUESTION:** How many events does the proposed wonder inn expect to host per month? per year?
- **QUESTION:** What is the anticipated average number of guests expected to attend weddings and similar parties?
- **QUESTION:** What is the maximum number of event attendees possible with the current building plans?
- **QUESTION:** Will outdoor events increase the number of guests possible?
- **QUESTION:** What plans might there be to expand this hotel and its amenities in the future?
- **QUESTION:** Assuming events guests will be in addition to the 160 hotel guests, 40 visitors and "20 staff" (please see sections above on staffing estimate), how often would the number of guests and event participants, plus the additional event staff outnumber the total residents of Wonder Valley?
- **QUESTION:** Does the Wonder Inn plan to host large events, such as Bhakti Fest, or music festival type events?
- **QUESTION:** How will large events impact Wonder Valley residents' ability to get the emergency services that we need, when an event over 1,019 people would outnumber the total population of wonder valley?
- **QUESTION:** How many service calls might a large event with 200 people require? or an event with 500 people? with 1,000 people? with 2,000? with 5,000 attending?
- **QUESTION**: As a point of reference, what were the service calls generated by the Bhakti-Fest event held at Joshua Tree Retreat Center (aka Mental Physics) in September 2015, when roughly 2,000 attendees, 50 music groups and 100 vendors were expected to attend? what Fire / EMT personnel and equipment were assigned to the event site during the event?
- **QUESTION:** Will there be any County limits on the size of events at this location?

Included in the total acres owned by the project proponents is 20 acres northwest across Amboy, presumably for overflow event parking for this facility. One acre of empty land can accommodate roughly 150 vehicles; 20 acres would be able to accommodate as many as 3,000 vehicles. (*Source: utia.tennessee.edu*) This means thousands of pedestrians could be walking across this busy scenic route, where cars are traveling 60-70 mph, and there is enough of an incline to make pedestrian visibility difficult for west bound traffic. *(Please see photos in EMS / RESCUE / TRAFFIC section of this comment section.)*

- **QUESTION:** Why were these 20 acres not included in the proposal?
- **QUESTION:** Can the project applicant confirm, or explain, what is intended for the 20 acres north of Amboy Road?
- **QUESTION:** Would these individual parcels (#2 - 10-acre parcels) require a separate CEQA study if the project developers decide to grade and/or pave them at a later date? What permitting would be required?
- **QUESTION:** Will a traffic light and pedestrian crosswalk be installed at the project entrance?
- **QUESTION:** Will sidewalks be installed to keep pedestrians from having to walk on the highway?
- **QUESTION:** If so, who will pay for these improvements? Is this a taxpayer expense? Will Wonder Valley residents be assessed for the cost?

PROJECT SIZE AND SCOPE is unclear. The Wonder Inn project applicants have given us a broad stroke view of their project, but there is much information missing. We have many questions regarding the total acreage of the parcels currently owned by the project applicants and how this land will be used.

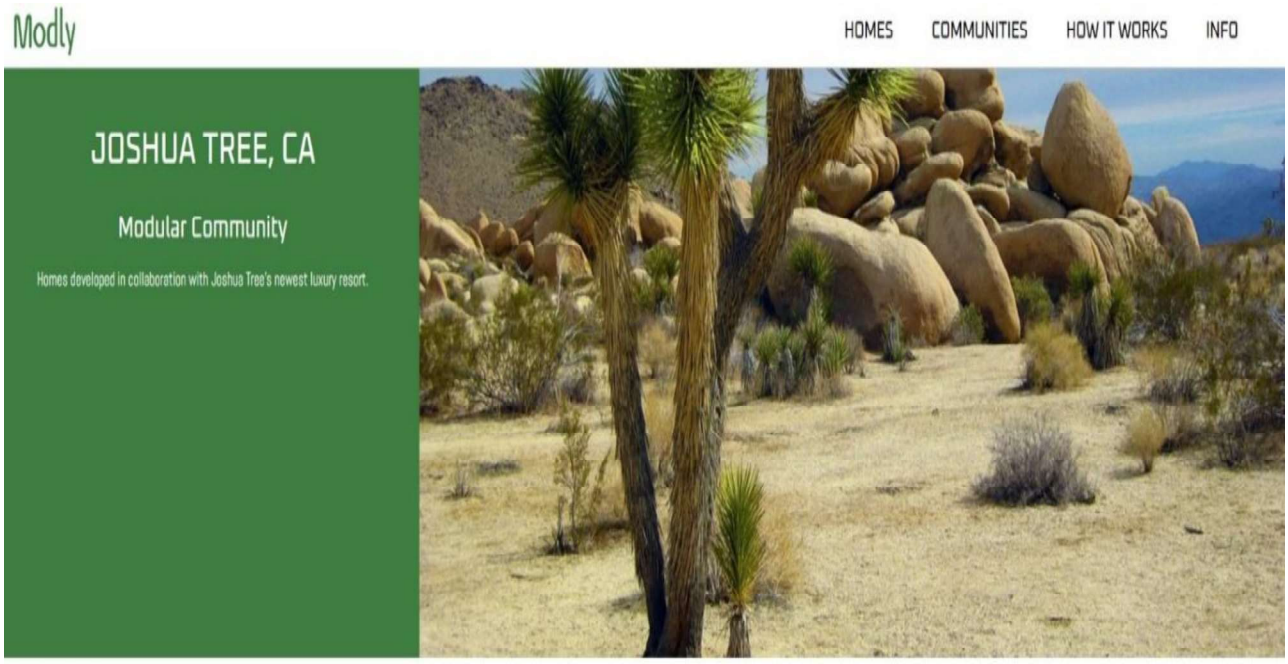
The proposed Wonder Inn project is to be situated on **24.4** acres of the 132.98 acres mentioned in the proposal. It is unclear what is planned for the remaining 130.58 acres mentioned in the proposal. In 2021 the proponents of this project purchased an additional 50 acres, for a total of **182.98** acres. It is also unclear what is planned for these additional acres. (Please see map below.)



- **QUESTION:** Why were 4 of these parcels (purchased in 2021) not included in the project description?
- **QUESTION:** What future development or land use is planned for the remaining 158.58 acres owned by the project developers?

In doing a simple Google search for Wonder Inn / Wonder Valley Inn, a few links came up which are of great concern.

- Modly – Joshua Tree *(modly.com/community/joshua-tree)* Note the similar description of "106 bungalow suites, restaurant and bar…". This description mentions 24 private homes on 5 acres each.

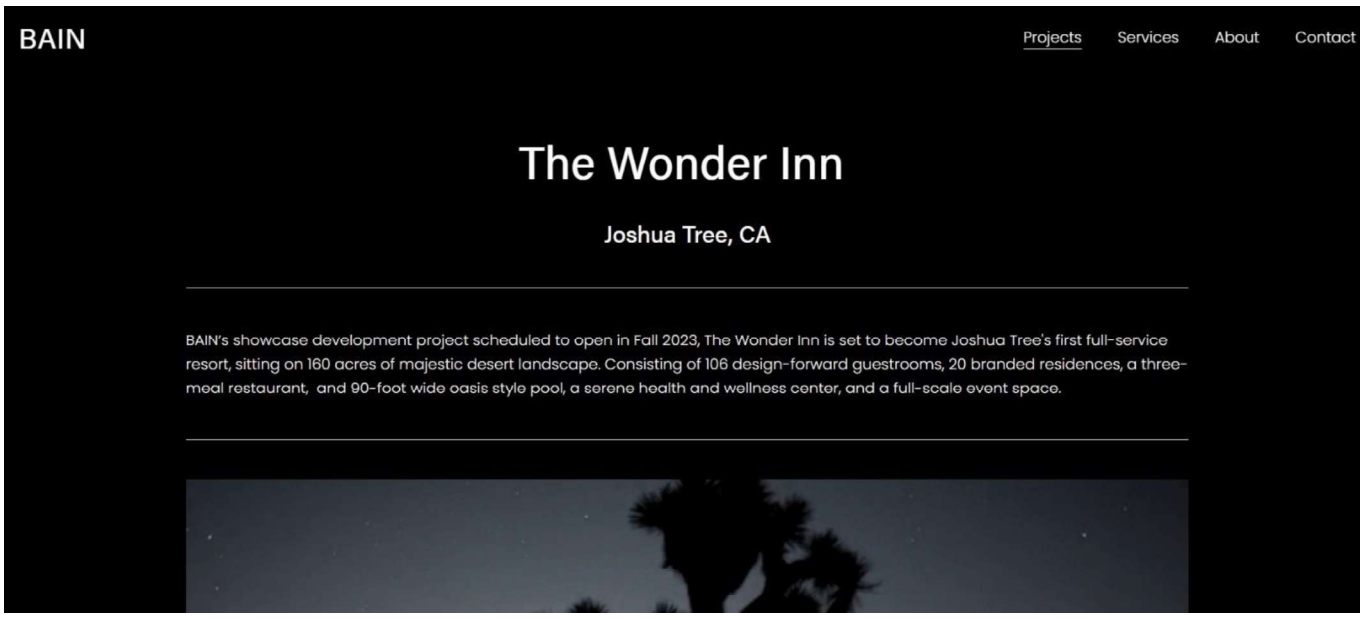


Homes developed within Joshua Tree's newest luxury resort

A truly one-of-a-kind resort named Wonder Valley Inn is in development in the heart of Joshua Tree, California just 10-minutes away from the North entrance of the National Park. The resort will feature 106 bungalow suites, a spa with fitness facilities, an expansive oasis swimming pool with adjacent hot tubs and a full-service restaurant & bar. On the 160 acre site, we will be constructing 24 private villa homes, each sitting on a private 5-acres site. Each contemporary home will consist of 4 bedrooms and 3 bathrooms with all the amenities you'd expect including a swimming pool, hot tub, outdoor showers, fire pits, solar panels and an electric car charger. Homeowners can occupy the homes year-round or they can opt-in to have the hotel manage the homes for guests to rent them out at $1,000 Average Daily Rate. This is a fantastic opportunity to own a second home which pays for itself. Residents can move into their Wonder Valley Villas by Q4, 2024.

Lot prices will be starting at approximately $150,000.

- Bain Hospitality *(bainhospitality/thewonderinn),* which includes this description: "The Wonder Inn is set to become Joshua Tree's first full-service resort, sitting on 160 acres of majestic desert landscape. Consisting of 106 design-forward guestrooms, **20 branded residences**, a three-meal restaurant, and 90-foot-wide oasis style pool, a serene health and wellness center, and a full-scale event space."



Based on this, it seems the project developers plan to begin with this hotel/resort with the many amenities mentioned, then expand into a luxury home development of 20-24 homes, each on 5 acres, each with swimming pool, hot tub, outdoor showers and fire features – each requiring a well, and each home adding to the already over stressed Public Services. The lack of full disclosure of these plans in the currently submitted project plans seems deceptive. It is already being advertised as available, yet the first application for the core of the project has not been approved yet, and there are no application for permits yet on the second phase. (Is it legal to sell homes / properties for which there has been no LUS permits filed?)

Again, it is not possible to effectively evaluate the impact this project will have upon Wonder Valley and the Wonder Valley community without a complete description of this project. We must have a full Environmental Impact Report to assess this.

PIECEMEALING: CEQA prohibits Piecemealing. Per*:* ceqaportal:

"When future phases of a project are possible, but too speculative to be evaluated, the EIR should still mention that future phases may occur, provide as much information as is available about these future phases, and indicate that they would be subject to future CEQA review.

- CEQA case law has established the following general principles on project segmentation for different project types:
  - For a phased development project, even if details about future phases are not known, future phases must be included in the project description if they are a reasonably foreseeable consequence of the initial phase and will significantly change the initial project or its impacts. *Laurel Heights Improvement Association v Regents of University of California* (1988) 47 Cal. 3d 376.

Based on the websites listed above, it appears that the next phase(s) of this project are indeed known. In fact, it seems sales are already underway.

PUBLIC SERVICES

From the San Bernardino County Policy Plan 2020:

Goal PP-3 Fire and Emergency Medical

Reduced risk of death, injury, property damage, and economic loss due to fires and other natural disasters, accidents, and medical incidents through prompt and capable emergency response.

Policy PP-3.1 **Fire and emergency medical services.** We maintain a sufficient number and distribution of fire stations, up-to-date equipment, and fully-trained staff to respond effectively to emergencies.

Policy PP-3.6 **Concurrent protection services.** We require that fire department facilities, equipment, and staffing required to serve new development are operating prior to, or in conjunction with new development.

Policy PP-3.12 **Fire protection and emergency medical resource allocation.** We use fire and emergency services data analysis and professional expertise to allocate resources, reduce fire risks, and improve emergency response.

Policy PP-3.13 **Periodic needs assessment.** We periodically assess our facility, equipment, and staffing needs and use the assessment to allocate funding resources in the annual budget and capital improvement program.

Goal LU-6 Amendments to the Policy Plan

Growth and development in the unincorporated county in a manner that requires few and infrequent amendments to the Policy Plan.

Policy LU-6.1 **Residential amendments that increase density in the Desert and Mountain regions.** We discourage policy plan amendments that would permit new development on lots smaller than 2.5 acres in the Desert regions and lots smaller than one-half acre in the Mountain region. We approve general plan amendments that would increase residential density only if:

- The proposed change is determined to be compatible in accordance with policies LU-2.1, 2.2, 2.3, and 4.5.
- Adequate infrastructure and services are available concurrently.
- The increase in density would not degrade existing levels of service for fire protection, sheriff, water, or wastewater service in the area.

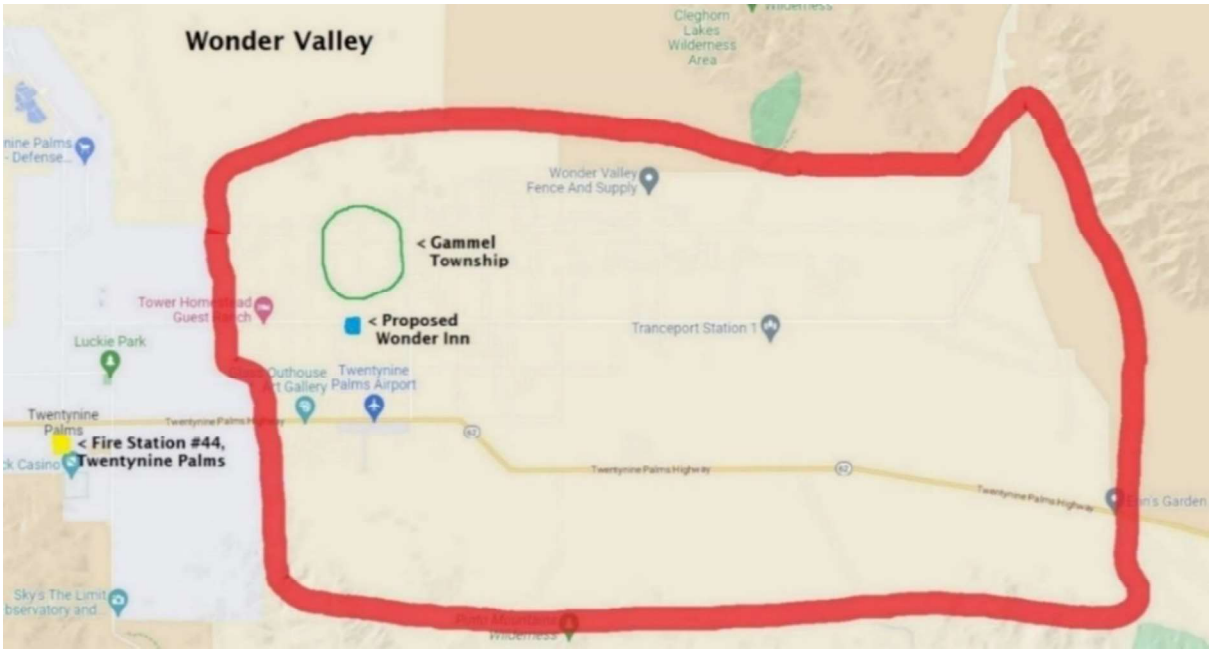
FIRE SERVICES: Per the 2020 San Bernardino County General plan,

> "The County Fire District provides fire prevention services, fire protection for wild fires and urban fires, and emergency medical response in unincorporated areas, portions of incorporated jurisdictions included in the district, and, under contract, in some incorporated jurisdictions. The County plans for and responds to emergencies and natural disasters countywide, and County Fire also provides regional urban search and rescue services."

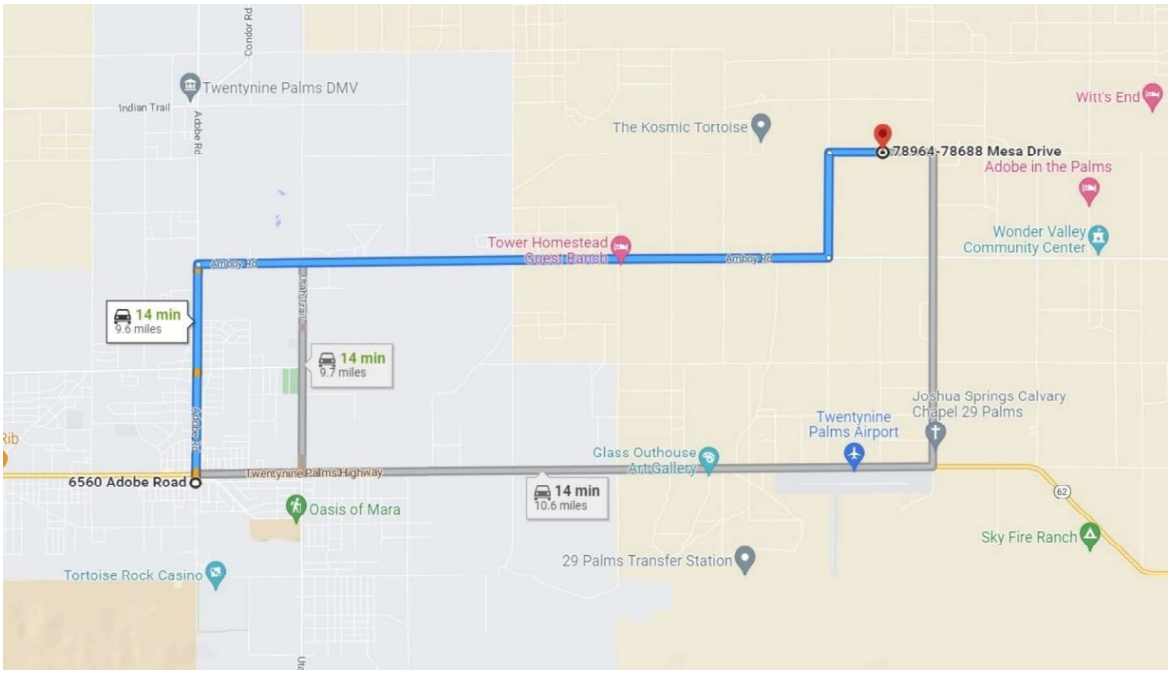
HISTORY: Prior to 2017, Wonder Valley Fire Station #45 was a little over 3 miles or 6 minutes from our home. Sadly, this station was temporarily closed in September of 2017 due to "contaminated water." In 2018 Wonder Valley property owners were given a tax increase from $35 to $157 to cover fire services to Wonder Valley (currently $166.84 for our 5-acre parcel.) By comparison, residents of Los Angeles pay $73.68 for fire and emergency medical services *(fire.lacounty.gov).* In August of 2019 the Wonder Valley Fire Station was permanently closed due to budget issues *(https://sbcsentinel.com),* resulting in the Wonder Valley community paying more for less services. Of note: per Division Chief John Chamberlin, the fire department only receives 2.5% of taxes collected from Wonder Valley, compared to 22-25% taxes from Yucca Valley. *(Source: https://www.youtube.com).*

- **QUESTION:** What is the estimated tax amount that will be generated by this proposed Wonder Inn?
- **QUESTION:** What is the estimated need for increased Fire services for this hotel/event venue?
- **QUESTION:** How does the tax generated by the proposed Wonder Inn compare to the cost of the increased need for public services that this project will generate?

As mentioned, since 2017, residents of the 147 square mile community known as Wonder Valley must depend on the Twentynine Palms Fire Station #44 in the city of Twentynine Palms for Fire and EMT/Paramedic response. This station is located on Adobe Road, south of Hwy 62 in the City of Twentynine Palms. This location is about 9.5 miles or 14 minutes from our home in the Gammel Township (the last 1.5 miles are dirt road). The Wonder Inn proposed project includes 106 guest rooms, plus ancillary structures for staff, a 4,407 sq.ft. lobby / restaurant with seating for 100, a 5,000 sq.ft conference room, a 3,985 sq.ft. spa/wellness center - a total of 60,737 sq.ft. of building space, and also includes 24 private residence homes (unstated in their application.) With the addition of this luxury resort and event center, and luxury homes, Wonder Valley residents will have increased competition for basic fire response services, which are already inadequate. Wonder Valley is roughly 20 miles east to west and 6.5 miles north to south. Here is a map which reflects the location of the proposed Wonder Inn project (turquoise), the Gammel Township neighborhood that I live in (green circle), and the Twentynine Palms Fire Station #44 (yellow.) Note that our neighborhood is closer to the western edge of Wonder Valley; residents that live east of us are at greater risk due to even longer response times.



And, here is a screenshot of Google maps/directions, indicating travel times and miles from Twentynine Palms Fire Station #44 to our neighborhood:



- **QUESTION**: How many calls for fire services to Wonder Valley were there per month and per year for the years 2012, 2014 and 2016, before the Wonder Valley fire station closed?
- **QUESTION**: How many calls for fire services to Wonder Valley were there per month and per year in 2018, 2020, and 2022, after the Wonder Valley Fire Station closed?
- **QUESTION**: How many homes in Wonder Valley burned down in 2018, 2020, 2022?
- **QUESTION**: What were average fire response times to Wonder Valley prior to 2015 when Wonder Valley Fire Station was closed?
- **QUESTION**: What are average response times to Wonder Valley since the Wonder Valley Station 45 closed in September of 2017?

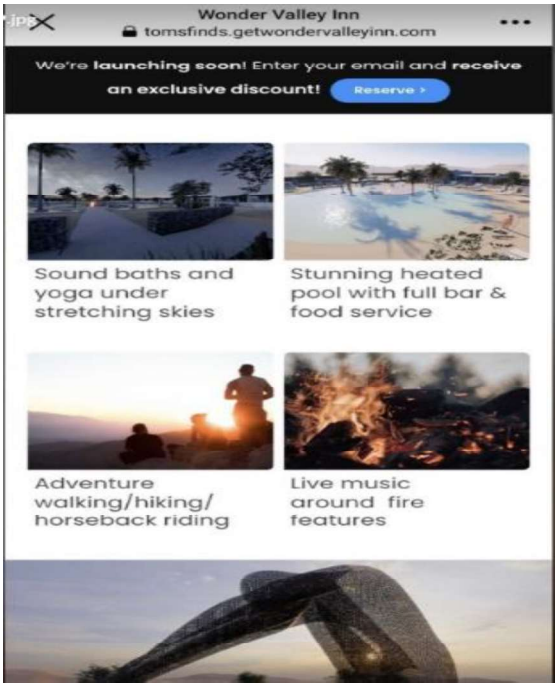
A home fire doubles in size every minute (Per J. Brakebill, instructor of Fire Sciences at Copper Mountain Community College, as stated during a community meeting at Wonder Valley Community Center.) A cooking fire can completely engulf a home in 5 minutes (*firefighterinsider*) Wonder Valley already has inadequate fire response times, which means in the event of a fire in a home in Wonder Valley, total loss is highly likely.

In the past 5 years - between January 2017 and January 2023, there have been over 33 structure fires in Wonder Valley that resulted in the total loss of property, and some families being left homeless *(Source: https://z1077fm.com)*. Sadly, some residents of Wonder Valley refer to the fire department as the "Slab Savers."

- **QUESTION:** What will the impact of this large luxury resort be upon the already inadequate fire services that cover Wonder Valley?
- **QUESTION:** What are the average service calls needed for a large 106 room hotel / spa / event center / resort of this size? how does this compare to the existing service call needs for current Wonder Valley residents?
- **QUESTION:** What fire coverage is needed for an event with 200 guests in attendance (in addition to the 200 hotel guests, visitors and staff)?
- **QUESTION:** What fire coverage is needed to host an event with 500 attendees? or, 1,000 attendees? or, 2,000? or, 5,000?
- **QUESTION:** If this proposal is approved, does the county plan to expand fire services in Wonder Valley to cover the roughly 20% increase in fire service needs for this large resort?
- **QUESTION:** If the county expands fire services to cover this large luxury hotel and event space, will the cost of additional fire services be imposed upon the residents of Wonder Valley?
- **QUESTION:** If the county imposes additional taxes upon the residents of Wonder Valley, will this be in the form of an annual property tax increase, which could cause the loss of homes for the residents who are unable to pay the increased taxes?

WILDFIRE: California has seen record breaking destruction from wildfires in recent years, due to years of extreme drought and weather conditions. People may think that a wildfire cannot happen in the desert because there's 'nothing to burn.' However, wildfires do happen in the desert. Within this geographical area, it is common to have multiple wind advisories and wind warnings several times per month for several months of the year. During a wind advisory, winds can blow sustained 25-30 mph with gusts up to 50-60 mph (*https://www.weather.gov/safety/wind*). Winds such as these will fan the flames of a wildfire and spread the fire quickly. Here are a few examples of wildfires threatening our area:

- The Elk fire burned 431 acres in the area between Yucca Valley and the village of Joshua Tree, threatening homes in 2022 *(https://www.desertsun.com)*
- 25 acres vegetation fire Flamingo Heights *(https://z1077fm.com)*
- The Elk Fire, south end of Yucca Valley burned 431 acres in 2022 *(fire.ca.gov*
- The Dome Fire in the Mojave Preserve burned 43,273 acres in 2020 *(latimes.com)*
- The Sawtooth Complex fire burned 61,700 acres in 2006 *(fire.ca.gov)*



Of note, the proposed Wonder Inn project promotional materials portray outdoor bonfires. (https://www.aearchitect.com/wonder-inn)
Note: this promotion refers to the "Wonder Valley Inn", but the promotional image of the pool and sound bath areas are from the Wonder Inn's own architect images.

In the Wonder Valley Community Meeting, held in May of 2022 at the Wonder Valley Community Center, the project proponent stated that they planned to buy their own firetruck and have their own volunteer fire department (*source: youtu.be @ 0:42).* Yet, this is not mentioned in the Initial Study, nor the Appendices.

- **QUESTION:** Will the proposed Wonder Inn be required to obtain a burn permit, as residents do when an outdoor burn is planned?
- **QUESTION:** Will the proposed Wonder Inn be dependent upon county fire services?
- **QUESTION:** Will the proposed Wonder Inn have their own fire engine?
- **QUESTION:** Will the proposed Wonder Inn have their own trained fire response team? If so:
  - **QUESTION:** What training and/or certification will this team have?
  - **QUESTION:** Will the team members be paid firefighting staff?

- **QUESTION:** Will this in-house team be dedicated to fire services, or will they have other duties too?
- **QUESTION:** Who will oversee this team and evaluate their effectiveness? what qualifications will this person(s) have?
- **QUESTION:** How will this in-house fire response team interface with the county fire department?
- **QUESTION:** Will their fire response team have adequate training in *wildfire suppression?
- **QUESTION:** Will their equipment be adequate for wildfire suppression?
- **QUESTION:** What if a fire occurs on a windy day? will they be able to control a fire and prevent spread into nearby neighborhoods?
- **QUESTION:** What exactly is their plan for fire response, to ensure that nearby residential homes are not threatened?

EMT/PARAMEDIC SERVICES: As mentioned in the previous sections, Wonder Valley Fire Station #45 was closed in 2017 due to 'contaminated water', and permanently closed in 2019 due to budgetary reasons. Since 2017, residents of Wonder Valley must depend on Emergency Medical / Paramedic response from the 29 Palms Fire Station #44 on Adobe Road in the City of Twentynine Palms. This station is 14 min from our home in the Gammel Township, which is 1.5 miles from the proposed project. (Please see map above, in fire section, for reference.) Our home is on the western side of Wonder Valley; residents who live east of us are at greater risk due to even longer response times.

Wonder Valley has a population of approximately 1019 people, with an average age of 59.3. The proposed Wonder Inn expects 160 daily guests, plus 40 visitors and *20 staff: that's at least 220 people daily, increasing the total population who will be sharing Public Services in Wonder Valley by roughly 20%. And, as previously mentioned, the additional 24 homes / STR's will add another 5% demand, for **a total of 25% increased demand** upon Wonder Valley's already inadequate public services.

In addition, as mentioned on page 13 of this document, the estimated staffing number given for the proposed Wonder Inn seems insufficient. For a 106-room hotel, with a 24-hour restaurant and all the amenities listed in the project description, it seems we could expect staffing to be *at minimum* closer to 25 and as high as 50 (depending on how "luxury" the hotel will be) for usual daily function. During events, staffing will increase in proportion to the size of the event attendance. If the proposed project will someday be hosting large events such as music festivals, etc., there could be thousands of people in attendance, and staffing needs would increase dramatically, placing greater burden upon our EMS services.

In order to effectively evaluate what impact events at the proposed Wonder Inn would have on Wonder Valley Public Services, we first must clearly understand the size and scope and type of events the owners plan to host at their venue. And, because the proposed Wonder Inn has not shared any information about possible events, it is unclear how large the events could be, and if they plan to hire extra security or EMS staff to support their events. We must have a full project description and a full EIR to assess these points.

The proposed Wonder Inn plans also include a large 24-hour, 100-seat restaurant and bar, a 6400-square foot swimming pool, and a 40 square foot hot tub.

- **QUESTION:** How many EMS calls might be generated by a 24 hour, 100 seat restaurant and bar?
- **QUESTION**: How many calls for paramedic services to Wonder Valley were there per month and per year for the years 2012? 2016, before the Wonder Valley Fire Station closed?
- **QUESTION**: How many calls for paramedic services to Wonder Valley were there in 2018, 2020, and 2022, after the Wonder Valley Fire Station closed?
- **QUESTION**: How many people died after calling for paramedic services each of these years?
- **QUESTION**: What were average paramedic response times to Wonder Valley prior to 2015 when Wonder Valley Fire Station was closed?
- **QUESTION**: What are average paramedic response times to Wonder Valley since Wonder Valley station 45 closed in September of 2017?
- **QUESTION:** What is the average number of drownings or other pool accidents related to a 6,400 square foot pool that is next to a bar?
- **QUESTION**: What is the average number of incidents involving drunk drivers associated with a restaurant / bar of this size?
- **QUESTION**: What is the likelihood of drunk drivers leaving the bar / event venue and causing an accident?
- **QUESTION:** Will CHP and Sheriff patrols be increased in Wonder Valley to protect residents and other drivers from injury or death resulting from DUI drivers?

In the event of choking, drowning or a heart attack, permanent brain damage begins after 4-5 minutes without oxygen *(medlineplus.gov/).* The current Emergency Medical Response times for Wonder Valley residents are already inadequate to save lives in the event of a life-threatening medical emergency. Will this proposed luxury resort also be dependent upon county Paramedic services?

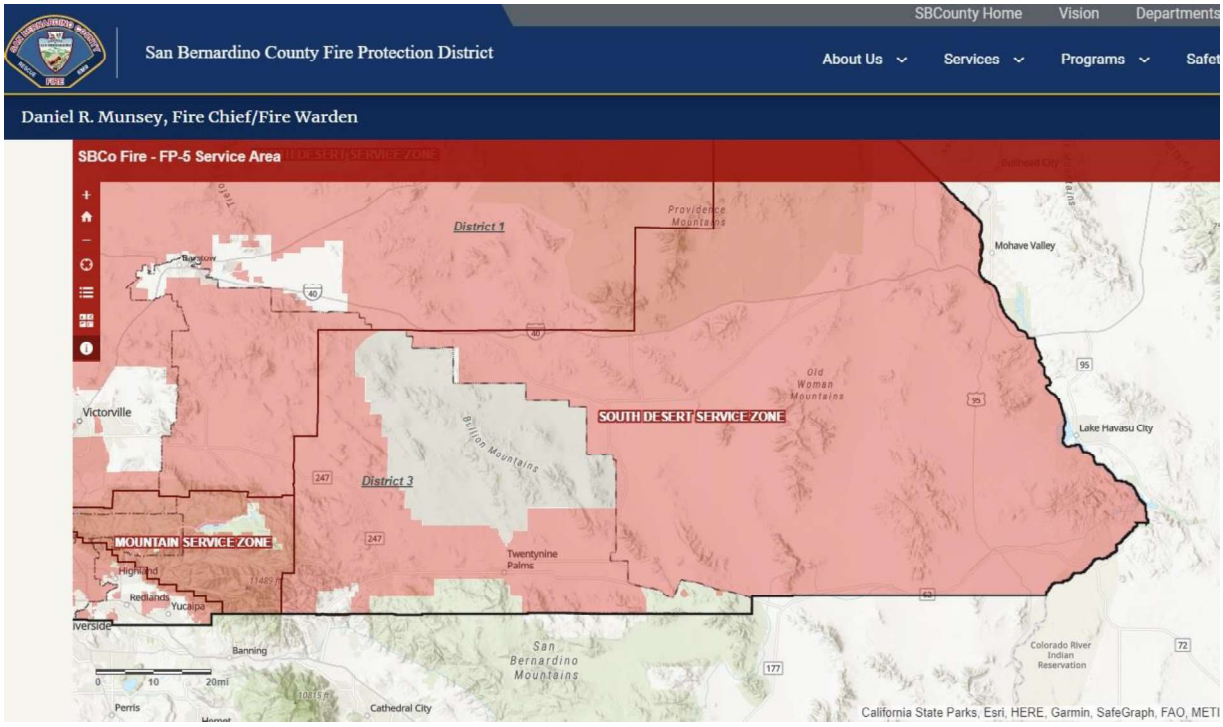
- **QUESTION:** Will the Wonder Inn have its own emergency medical response services? If so:
  - **QUESTION:** What training and/or certification will the Wonder Inn first responders have?
  - **QUESTION:** Will the first responders be paid or volunteer staff?
- **QUESTION:** Will there be a fence around the pool and hot tub?
- **QUESTION:** Will the pool be open to guests 24 hours?
- **QUESTION:** Will the Wonder Inn have full time lifeguard staff stationed poolside?
- **QUESTION:** Will all Wonder Inn hotel staff be trained in CPR? First aid? Will certificates of completion be on file at the hotel? will staff be required to get annual recertification?
- **QUESTION:** What are the average number of EMT/paramedic service calls generated by a large hotel resort that expects 160 daily guests plus 40 visitors plus 20 staff per day?
- **QUESTION:** What are the average number of service calls for a restaurant that has an 1,860 square-foot clubhouse restaurant and dining room with 457 square feet of outdoor seating, and a 1,125 square-foot kitchen?

- **QUESTION:** What is the likelihood of drunk drivers leaving the bar / event venue and causing an accident? how often does this happen? what are the current DUI stats for Wonder Valley?

Conclusion: I respectfully request a full environmental impact report be done to study these issues before this project is approved.

EMS / RESCUE / TRAFFIC ACCIDENTS

SBCounty Fire Dept #44 in Twentynine Palms shares coverage of a service area between Twentynine Palms, Needles and Havasu Landing, with approximately 131-142 miles and over 2 hours travel time between Twentynine Palms and Needles. This area is desolate, and traffic accidents are fairly common. Per San Bernardino County Fire Protection District website (*sbcfire.org*), there were **363** traffic collisions in our area, Division 4 South Desert Region, just in the **7 months** between July 1, 2022 and January 31, 2023.



Traffic collisions are fairly common in this area, on both Amboy Road and Highway 62, especially east of Wonder Valley. Amboy, a county scenic route, is a common route for people travelling to Las Vegas, while Hwy 62 is a common route for people travelling to the Colorado River recreational areas of Parker Dam, Lake Havasu, etc. Travelling at a high rate of speed, as is common on the open roads outside of populated areas, contribute to traffic accidents, and driving under the influence of alcohol also contributes to traffic accidents. SB County Fire Dept #44 provides emergency response for these roads and highways.

- **QUESTION:** Were any studies done to evaluate traffic volume on Amboy Road and Hwy 62 from 29 Palms to Needles and the Colorado River (the area within our service zone)? If so, what time of day were the observations performed?
- **QUESTION:** How many vehicles travel Amboy Road each day? each week?

- **QUESTION:** How many vehicles travel on Amboy between 2:00 pm and 9:00 pm on a Friday and a Sunday, when many travelers are headed to and from Las Vegas or the Colorado River recreational areas?

The proposed Wonder Inn estimates an increase in traffic of 604 additional vehicle trips daily. Further, this proposed luxury hotel and event center sits atop a small rise on Amboy Road, which blocks the view of the road ahead and increases the possibility of motor vehicle accidents, especially for drivers making a turn. For example, we turn left/north onto Gammel Road from Amboy Road when returning home from town, and more than once have almost been t-boned by speeding vehicles anxious to pass us as we slowed to turn.

This photo was taken roughly ¼ mile east of the existing commercial building (the “pink building”), and is looking west on Amboy. (Sorry for the dirty windshield; dust is a thing out here.) Note the pink building on the left:

The following photo was taken roughly ½ mile west of the proposed Wonder Inn, and is looking east on Amboy. Note the pink building on the right, on top of the rise:

Once again, Wonder Valley residents will be burdened with more risk, further stressing an already overburdened and inadequate EMT/Paramedic response system.

- **QUESTION:** Have there been any traffic studies done for the area including at least one mile east and one mile west of this proposed project?
- **QUESTION:** Is there enough visibility for drivers heading westbound to safely turn left into the proposed wonder inn ahead of eastbound drivers coming quickly up the blind incline?
- **QUESTION:** Will there be a pedestrian sidewalk installed along Amboy Road?
- **QUESTION:** Will there be a pedestrian crossing installed across Amboy Road?
- **QUESTION:** How many traffic accidents have there been on Amboy Road between Twentynine Palms and the intersection of Amboy Road and national trails highway this year?
- **QUESTION:** How many accidents were there on Amboy Road between Twentynine Palms and National Trails Highway per year prior to 2017, when the Wonder Valley Fire Station closed?
- **QUESTION:** How many traffic accidents have there been on Amboy Road between Twentynine Palms and the intersection of Amboy Road and National Trails Highway in 2020? in 2022?
- **QUESTION:** Please define the service area that crews from Twentynine Palms station 44 are responsible for covering.
- **QUESTION:** What are the EMS services currently available in Needles?
- **QUESTION:** How many service calls for traffic collisions / accidents were there in Wonder Valley in 2016 (before the Wonder Valley Fire Station was closed)? How many service calls were there in 2020? 2022?
- **QUESTION:** How many service calls for traffic collisions / accidents were received for areas east of Wonder Valley, between our community and Needles?

Conclusion: I respectfully request a full environmental impact report be done to study these issues before this project is approved.

Swift water rescues are sometimes needed during flash floods in the desert areas, which can be a fatal event.

- **QUESTION:** How many swift water rescues were there in Wonder Valley in 2015-16, before the Wonder Valley Fire Station was closed?
- **QUESTION:** How many swift water rescues have there been in Wonder Valley since the fire station closed in 2017?

Conclusion: I respectfully request a full environmental impact report be done to study these issues before this project is approved.

OTHER PUBLIC SERVICES

The sections above include only Fire, Paramedic/EMT and EMS for traffic accidents. There are many more elements included in Public Services, which could be further stressed by this project. Here are a few brief mentions:

From the San Bernardino County Policy Plan 2020:

> **Goal PP-1 Law Enforcement**
> Effective crime prevention and law enforcement that leads to a real and perceived sense of public safety for residents, visitors, and businesses.
>
> Policy PP-1.1 **Law enforcement services.** The Sheriff's Department provides law enforcement services for unincorporated areas and distributes resources geographically while balancing levels of service and financial

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POLICE / SHERIFF: The Morongo Basin Station is the third largest Sheriff's station in both area and total number of calls for law enforcement services in San Bernardino County. Within the station's area of responsibility are the incorporated communities of Twenty-nine Palms and the Town of Yucca Valley, as well as the unincorporated communities of Morongo Valley, Landers, Johnson Valley, Joshua Tree, Wonder Valley, Pioneertown, Amboy, Cadiz and Flamingo Heights. (sbcounty.gov/sheriff)

This Sheriff station is roughly 23 miles west of the Wonder Valley Community Center (the heart of Wonder Valley.) Sheriff response to Wonder Valley has been inconsistent through the years. Calls for help sometimes will bring a police response, but often our Sheriffs are not able to respond due to higher priorities in other areas. Sometimes a report will be taken over the phone, sometimes we are told to 'call back if it happens again.' And, sometimes the sheriff is knocking on our door within 10 minutes of placing a call for help. We never know when or if we will get a response, which means we can't depend upon our sheriff's ability to respond to our calls for help. Because of this, we feel vulnerable.

The proposed Wonder Inn is to be a luxury resort hotel, with 200 daily guests and 210 parking spaces in front. It seems likely that this resort could attract thieves looking for opportunities. With the addition of proposed Wonder Inn, there will be more competition for Wonder Valley residents for sheriff attention or response.

- **QUESTION:** Does the wonder inn plan to have security staff onsite?
- **QUESTION:** Will the proposed Wonder Inn rely upon Morongo Basin Sheriff Department for services?
- **QUESTION:** What will the impact be upon Wonder Valley residents' access to police / sheriff support?
- **QUESTION:** Will Sheriff services be increased to cover this large luxury resort hotel? if so, who will pay for it? will the fees for this be added to resident's taxes?
- **QUESTION:** Have any studies been done to evaluate the possible impact upon Wonder Valley property owner's taxes?
- **QUESTION:** How many services calls for Sheriff/police have there been in Wonder Valley in 2023?
- **QUESTION:** What is the average response time for Sheriff service calls to Wonder Valley?
- **QUESTION:** How many service calls Sheriff/police for Wonder Valley were there in 2018? 2019? 2020? 2022? 2021? 2022? are the number of service calls increasing as the population increases?
- **QUESTION:** How many calls for service result in a deputy actually showing up at a resident's door in Wonder Valley?

ROADS/ROAD MAINTENANCE : Briefly, this project estimates an additional 604 daily trips, which will accelerate the deterioration of Wonder Valley roads, especially impacting Amboy Road, Godwin Road, and Gammel Road, causing increased need for more frequent road repairs, paid for by taxpayers via a $50.00 annual assessment. Gammel Road, a direct route between the proposed Wonder Inn on Amboy and Gammel, and Hwy 62, is currently a dirt road, and would likely need to be paved to accommodate the increased visitors travelling from this hotel to Joshua Tree National Park.

- **QUESTION:** Have any traffic studies been done to assess this?
- **QUESTION:** What will the cost be to pave this 2 mile stretch of dirt road, and maintain it?
- **QUESTION:** Will the cost of paving Gammel Road be passed on to the taxpayers?

I'm also concerned about the possibility of 'poverty tourism', that is, the guests of this luxury hotel/spa wanting to explore our neighborhoods to 'see how the other half live', which would stress our already fragile dirt roads, which are maintained by CSA 70M, and paid for by resident's tax assessment. This area is listed as a "High Poverty Area", with over 22% of residents living in poverty. Many can't afford the increased taxes to support this luxury resort hotel.

- **QUESTION:** Would the increased neighborhood traffic generated by hotel guests "exploring" cause increased maintenance and repair needs and therefore increased taxes on our community?

ANIMAL CONTROL: Animal Control is a public service provided by the county of San Bernardino and paid for by the taxpayers. San Bernardino County Animal Care is a program managed by the San Bernardino County Department of Public Health (DPH). The mission of the

San Bernardino County Animal Care is to prevent rabies in humans and pets, to educate the public about responsible pet ownership, including the importance of spaying and neutering, to protect and serve the public and pets by enforcing all laws and ordinances pertaining to animal care, to care for all animals domestic and wild, to reunite lost pets with their owners, to place unwanted pets into new homes, and to maintain a high quality of service.

There are many animals in Wonder Valley, including many pet dogs that escape their enclosure, or stray dogs that sometimes roam in packs. This pack (there are 5 total dogs, but only 3 in photo) has been roaming in Wonder Valley in recent weeks and was reported as being aggressive toward people at times:

It bears mentioning that the Wonder Inn project plans to allow pets onsite, which will draw wild coyotes looking for a meal.

- **QUESTION:** Will there be any fences around this resort hotel to contain pets, and keep coyotes or stray packs of dogs out?
- **QUESTION:** Will leashes be required for guest's pets at all times when outdoors?
- **QUESTION:** Will pets be required to be current on all vaccinations to prevent exposing wildlife to disease?
- **QUESTION:** Will Animal Control services be needed to control wild coyotes near the proposed hotel?
- **QUESTION:** What measures will be in place to avoid attracting wild animals to garbage?
- **QUESTION:** Will hotel guests be educated about not feeding wildlife?
- **QUESTION:** What safety measures will be put in place to protect hotel guests from rattlesnakes?
- **QUESTION:** What measures will be put in place to protect snakes from harm on this property?
- **QUESTION:** Will the proposed hotel call animal control to remove rattlesnakes from their property?

An aerial view of a Wonder Valley property. *Jay Calderon/The Desert Sun*

CODE ENFORCEMENT Code Enforcement administers programs designed to protect the public's safety, welfare, and property value through enforcement of San Bernardino County ordinances and State/Federal laws relating to land use, zoning, housing, public nuisances, and vehicle abatement within the unincorporated areas of the County. This includes issues such as nuisance properties, community cleanup programs, Off Highway Vehicle education (illegal in Wonder Valley), illegal dumping, building permits, and Short-Term Rental permits including fielding complaints related to STR's in unincorporated areas. Of note, in Wonder Valley there are many, many areas and some properties that need evaluation by Code Enforcement due to public nuisance (including multiple sites of trash dumped in Wonder Valley, which is an ongoing issue), vehicle abatement (abandoned cars and RV's left on a dirt road somewhere), OHV education, etc. It seems there are not enough CE staff to adequately cover the Wonder Valley area.

- **QUESTION:** How many permits will Code Enforcement (CE) be required to issue for this project?
- **QUESTION:** How much time will Code Enforcement officers need to inspect and issue the permits required for the proposed Wonder Inn project?
- **QUESTION:** How many CE service requests come from Wonder Valley in a month (average)?
- **QUESTION:** How many CE service requests were there for Wonder Valley in 2022? 2021? 2020?
- **QUESTION:** For point of reference, how many CE service requests were there for Wonder Valley in 2017? 2015? 2013? (prior to the population growing, and the number of STR's growing)?
- **QUESTION:** Have any CE staff been added since the population of Wonder Valley increased?
- **QUESTION:** What is the average response time to requests for service from CE in Wonder Valley?
- **QUESTION:** Will the permitting needed for the proposed Wonder Inn project impact CE's ability to provide service to Wonder Valley residents?

Conclusion: We respectfully request a full environmental impact report be done to study these issues before this project is approved.

MISC POINTS OF CONCERN

The Wonder Inn proposal's description includes a 4,407 sq.ft. lobby/restaurant, a 5,000 sq.ft conference room, a 3,985 sq.ft. spa/wellness center, 106 guest rooms, plus ancillary structures for staff, a 3,300 sq.ft. multipurpose tent for gatherings, including a 1,700 sq.ft. building for restrooms, a 6,300 sq.ft./ 214,000-gallon swimming pool (almost half the size of an Olympic pool), a 40 sq ft / 1,100 gallon hot tub, an astronomy pergola, sunken gardens, etc. This proposed project also includes a 210-space parking lot onsite – and (not stated in original application) an additional 20 acres across the street, NW on Amboy for event parking. Project developer needs to explain what is planned for this additional property.

In addition, there is some discrepancy in the project maps included in this Initial Study. On page 7 and 8 (of 92), the maps are "L" shaped, and does not include the northeast 25 acres owned by the project proponents. However, on page 10 and 11 (of 92), this 25 acre parcel is included in the map. What maps or areas were all of their studies based upon? How could this affect study results? Which reports could be impacted by the addition – or, subtraction of this 25 acre parcel?

Of note, on page 584 of the Appendices, paragraph 2 states, "The project proposes the tenant improvement of an existing 4,407 square-foot single story commercial structure, to become a lodging clubhouse …. Improvements of the commercial building include an 1,860 square-foot clubhouse restaurant and dining room with 457 square feet of outdoor seating, and a 1,125 square-foot kitchen. The proposed 1,939 square-foot restaurant and dining room have 100 seats, 74 of which are indoor and 26 outdoor." 1860 + 457 + 1125 +1939 = 5,381 square feet, not 4,407 as mentioned in the first sentence. This is confusing and needs to be clarified.

A minor point: Godwin Road is misspelled as "Goodwin" on a few pages. This is an inconsequential point, but inspires concerns about how careful the developers and their agents were in conducting these studies. When several little mistakes such as these are made, it causes one to question how accurate the reports actually are.

SUMMARY

Based upon the numerous questions raised above, it is clear that a full and complete Environmental Impact Report must be completed to thoroughly study the many significant impacts that the proposed Wonder Inn project would have on the Wonder Valley community, the safety of Wonder Valley residents, and the environmental impacts this resort hotel will have upon this rural, sparsely populated and underserved area.

To conclude, I respectfully request a full Environmental Impact Report be done to study these issues before this project is approved.

Sincerely,
Beth Sheffield
(Full time resident of Wonder Valley since 2013 – I'm a newbie by Wonder Valley standards!)

PUBLIC SERVICES REFERENCES:

CEQA INITIAL STUDY/MND: Public Services Area

CEQA: San Bernardino County Initial Study/Mitigated Negative Declaration Environmental Checklist, doc, page 69-71:

XV. PUBLIC SERVICES
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Fire Protection? FINDING: "Less than significant"
>study is not sufficient to support this determination

Police Protection? FINDING: "Less than significant"
>study is not sufficient to support this determination

Schools? FINDING "Less than significant"

Parks? FINDING: "No impact"

Other Public Facilities? FINDING: "No impact"

SUBSTANTIATION: Countywide Policy Plan, 2020; Submitted Project Materials

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

>PUBLIC SERVICES IN WONDER VALLEY ARE ALREADY INADEQUATE. THIS PROJECT WOULD INCREASE THE BURDEN UPON THESE SERVICES

Fire Protection?
San Bernardino County Fire Station 44, located at 6560 Adobe Rd, Twentynine Palms, CA 92277, is approximately **7 miles** southwest of the Project Site. New development within the unincorporated county would not combine with other development in the county to result in a cumulatively considerable impact to fire and emergency services. The County would maintain sufficient services within its boundaries as well as expand to serve other incorporated jurisdictions to improve service and coverage.

>NOTE: THE FIRE STATION IN TWENTYNINE PLAMS IS FURTHER AWAY THAN 7 MILES.

Comprehensive safety measures that comply with federal, state, and local worker safety and fire protection codes and regulations would be implemented into project design to minimize the potential for fires to occur during construction and operations. The Proposed Project would be required to comply with County fire suppression standards, provide adequate fire access and pay required development impact fees. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Less Than Significant Impact >study is not sufficient to support this determination

Police Protection?
The San Bernardino County Sheriff's Department (SBCSD) serves the unincorporated portions of the County. The nearest police station to the Project Site is the SBCSD-Morongo Basin station located at 6527 White Feather Road, Joshua Tree, approximately **18 miles** southwest of the Project Site. The SBCSD reviews staffing needs on a yearly basis and adjusts service levels as needed to maintain an adequate level of public protection. Additionally, development impact fees are collected at the time of building permit issuance to offset project impacts. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

>NOTE: SHERIFF DEPT IS FURTHER AWAY THAN 18 MILES

Less Than Significant Impact >study is not sufficient to support this determination

Schools?
The Project Site is served by the Morongo Unified School District. Construction activities would be temporary and would not result in substantial population growth. The approximately 160 guests per day would not need school services. The estimated 20 employees required for operations are expected to come from the local labor force with school children already attending school in their home district. The Proposed Project is not expected to draw any new residents to the region that would require expansion of existing schools or additional schools. With the collection of development impact fees,
impacts related to school facilities are expected to be less than significant. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

Less Than Significant Impact

Parks?
The Proposed Project would neither induce residential development nor significantly increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of any facilities would result. Operation of the Proposed Project would place no demands on parks because it would not involve the construction of housing and would not involve the introduction of a permanent human population into the area. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
No Impact

Other Public Facilities?
The Proposed Project would not result in an increased residential population or a significant increase in the work force. Implementation of the Proposed Project would not

adversely affect other public facilities or require the construction of new or modified facilities. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

No Impact

Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required. >study is not sufficient to support this determination

SAN BERNARDINO COUNTY GENERAL PLAN: website: https://countywideplan.com/policy-plan/personal-property-protection/

PERSONAL & PROPERTY PROTECTION ELEMENT - Last updated: 10/27/2020

- INTRODUCTION

The benefits, public goods, and investments associated with a high quality of life in San Bernardino County—strong neighborhoods, economic prosperity, cradle-to-career education, a vibrant culture, and civic engagement—**can only be achieved when people experience a real and perceived sense of safety**. Public safety is also directly related to the County's resilience—its ability to adapt to changing conditions and prepare for, withstand, and rapidly recover from disruption or disasters.

The County provides law enforcement, including crime prevention, in unincorporated areas and under contract to some incorporated jurisdictions. It also provides **some countywide law enforcement services, including the coroner**, and when requested, special investigation assistance to incorporated jurisdictions. **The County is also responsible for: the administration of justice, both prosecutions and public defenders, for crimes committed in the county; operation of County jails, including rehabilitation of inmates in its custody; holistically rehabilitate and assist the reentry and transition of parolees, probationers, and others living in the county engaged by the criminal justice system, and assistance to victims of and witnesses to crimes committed in the county.**

The County Fire District provides fire prevention services, fire protection for wild fires and urban fires, and emergency medical response in unincorporated areas, portions of incorporated jurisdictions included in the district, and, under contract, in some incorporated jurisdictions. The County plans for and responds to emergencies and natural disasters countywide, and **County Fire also provides regional urban search and rescue services.**

The Sheriff is responsible for law enforcement and is elected by voters countywide. The Board of Supervisors appropriates funds to supplement state and federal funding for law enforcement. Achieving the Policy Plan's goals for law enforcement is, thus, a collaborative effort between the Board of Supervisors and the Sheriff. **The Sheriff also provides countywide wilderness rescue services.**

The County makes a maintenance of effort payment for courts, but the state is primarily responsible for funding courts and fully responsible for any expansion. However, the **County funds the elected District Attorney's office, the Public Defender's office, and the Sheriff's department's court services.** Thus, state decisions on court funding will influence the ability of the County to achieve this element's law and justice goal.

GOAL PP-1: LAW ENFORCEMENT

Effective crime prevention and law enforcement that leads to a real and perceived sense of public safety for residents, visitors, and businesses.

Policy PP-1.1 Law enforcement services
The Sheriff's Department provides law enforcement services for unincorporated areas and distributes resources geographically while balancing levels of service and financial resources with continuously changing needs for personal and property protection.

Policy PP-1.2 Contract law enforcement
When requested, the Sheriff's Department provide law enforcement services to incorporated jurisdictions by contract at the full cost of services as determined by the County, without direct subsidy by the County.

Policy PP-1.3 Holistic approach to crime prevention
We recognize that the roots of crime are found throughout a spectrum of psychological, social, economic, and environmental issues, and we coordinate proactive planning and activities among the Sheriff's Department and county and non-county agencies and organizations to intervene and effectively prevent crime. *(Continued on website)*

An equitable justice system for violations of law in the county, adequate care and effective rehabilitation for inmates in the County's custody, and the holistic rehabilitation and aided reentry and transition of parolees, probationers, and others living in the county engaged by the criminal justice system

GOAL PP-3 FIRE AND EMERGENCY MEDICAL

Reduced risk of death, injury, property damage, and economic loss due to fires and other natural disasters, accidents, and medical incidents through prompt and capable emergency response.

Policy PP-3.1 Fire and emergency medical services

We maintain a sufficient number and distribution of fire stations, up-to-date equipment, and fully-trained staff to respond effectively to emergencies.

Policy PP-3.2 Fire District
We support the expansion of the Fire District to serve additional incorporated jurisdictions, and the use of special funding and financing mechanisms to augment Fire District revenues to improve service and coverage.

Policy PP-3.3 Search and rescue
We maintain up-to-date equipment and fully-trained staff to provide urban search and rescue and swift water rescue emergency response.

Policy PP-3.4 Fire prevention services
We proactively mitigate or reduce the negative effects of fire, hazardous materials release, and structural collapse by implementing the California Fire Code, adopted with County amendments.

Policy PP-3.5 Firefighting water supply and facilities
We coordinate with water providers to maintain adequate water supply, pressure, and facilities to protect people and property from urban fires and wildfires.

Policy PP-3.6 Concurrent protection services
We require that fire department facilities, equipment, and staffing required to serve new development are operating prior to, or in conjunction with new development.

Policy PP-3.7 Fire safe design
We require new development in the Fire Safety Overlay to comply with additional site design, building, and access standards to provide enhanced resistance to fire hazards.

Policy PP-3.8 Fire-adapted communities
We inform and prepare our residents and businesses to collaboratively plan and take action to more safely coexist with the risk of wildfires.

Policy PP-3.9 Street and premise signage
We require adequate street signage and premise identification be provided and maintained to ensure emergency services can quickly and efficiently respond.

Policy PP-3.10 Community outreach
We engage with local schools, community groups, and businesses to increase awareness of fire risk, prevention, and evacuation.

Policy PP-3.12 Fire protection and emergency medical resource allocation
We use fire and emergency services data analysis and professional expertise to allocate resources, reduce fire risks, and improve emergency response.

Policy PP-3.13 Periodic needs assessment
We periodically assess our facility, equipment, and staffing needs and use the assessment to allocate funding resources in the annual budget and capital improvement program.

Policy PP-3.14 Qualified workforce
We attract and retain a qualified workforce of fire fighters, emergency medical technicians, and support personnel, and invest in training and ongoing education.

PUBLIC SERVICES COMMENT REFERENCES:

https://countywideplan.com

https://www.desertsun.com/story/news/2018/05/24/wonder-valley-life-threatened-nature-authorities-and-tourists/612176002/

https://sbcsentinel.com/2017/07/county-takeover-of-wonder-valley-fd-presaged-issues-with-later-mergers/

https://www.redfin.com/neighborhood/42433/CA/Bush/Wonder-Valley/housing-market

https://www.theguardian.com/us-news/2022/sep/15/joshua-tree-housing-real-estate-gentrification#:~:text=Tourists%20and%20home%2Dbuyers%20from,local%20workers%20with%20dwindling%20options.

https://www.youtube.com/watch?v=cCu7uAV-P2o&list=PLBRjpgBWGMCbbvPWEXYiA08g3GGsmwUSl&t=119s

https://countywideplan.com/

https://oag.ca.gov/sites/all/files/agweb/pdfs/environment/ej_fact_sheet.pdf

https://oag.ca.gov/environment/justice

https://www.allianceonline.co.uk/blog/2019/06/hotel-housekeeping-101-tips-tricks-for-clean-hotel-rooms/#:~:text=It%20takes%20roughly%2045%20minutes,turn%2Ddown%20service%20is%20needed.

https://www.escoffier.edu/blog/food-entrepreneurship/how-many-employees-does-it-take-to-run-a-restaurant/

https://utia.tennessee.edu/cpa/wp-content/uploads/sites/106/2020/10/CPA-222.pdf

https://www.modly.com/community/joshua-tree

https://www.bainhospitality.com/work/thewonderinn

https://ceqaportal.org/tp/CEQA%20Project%20Description%202020%20Update.pdf

https://fire.lacounty.gov/summary-tax-rates/

https://sbcsentinel.com/2019/08/permanent-closure-of-fire-station-in-wonder-valley/

https://www.youtube.com/watch?v=c8mlH77UBPQ

https://firefighterinsider.com/how-fast-does-fire-spread/

https://z1077fm.com/page/2/?s=fire+wonder+valley

https://www.weather.gov/safety/wind-ww#:~:text=not%20caught%20outside.-,NWS%20offices%20issue%20this%20product%20based%20on%20local%20criteria.,should%20be%20taken%20if%20driving.

https://www.desertsun.com/story/news/2022/05/26/elk-fire-threatens-homes-yucca-valley-near-joshua-tree/9951357002/

https://z1077fm.com/vegetation-fire-in-flamingo-heights-confined-to-15-acres/

https://www.fire.ca.gov/incidents/2022/5/26/elk-fire/

https://www.latimes.com/environment/story/2020-09-06/mojave-desert-fire-destroys-the-heart-of-a-beloved-joshua-tree-forest

https://www.fire.ca.gov/incidents/2006/7/9/sawtooth-complex/

https://youtu.be/locy-iZboQs?t=43 at 0:42

https://medlineplus.gov/ency/article/001435.htm

https://sbcfire.org/statistics/#div4-anchor

https://wp.sbcounty.gov/sheriff/patrol-stations/morongo-basin/

XV. RECREATION

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

In the Initial Study/Mitigated Negative Declaration (IS/MND) the developers are indicating the adverse physical effects on the environment of the Project as “less than significant.”

This on the face of it is an unreasonable assertion. The Wonder Valley environment can be characterized as: quiet, rural, with unimpeded views, a dark sky night, and with residents that have made a choice to live here in large part because of those characteristics.

It is clear that this project will significantly and adversely affect all these elements.

It will do so by itself and also by the precedent it will create for like projects.

Like projects that will also need rezoning, will bring more traffic, will bring more dust, will bring noise, will bring unwanted light, and will bring more trash.

To not recommend this element to be investigated much more thoroughly under an Environmental Impact Report process would be a disavowal of the responsibilities of the San Bernardino Land Use Services Department.

On the other hand, were an Environmental Impact Report recommended, and subsequently decided as required by the San Bernardino County Board of Supervisors, this County would show its forward-thinking ability, would maintain and preserve the rich and diverse natural resources of Wonder Valley, resources that in years to come will be of great value, historically, environmentally and economically to this, perhaps the most opportunity and resource rich County in the State of California.

XVII. TRANSPORTATION

We disagree with the Initial Study/Mitigated Negative Declaration (IS/MND) assessment of Criteria a, b, and c as documented below and state that they should be judged to have "Potentially Significant Impact." A full Environmental Impact Report (EIR) should be performed.

Issues	Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
XVII. TRANSPORTATION – Would the project:				

Issues		Potentially Significant Impact	Less than Significant with Mitigation Incorporated	Less than Significant	No Impact
a)	Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?	☐	☐	☒	☐
b)	Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)?	☐	☐	☒	☐
c)	Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d)	Result in inadequate emergency access?	☐	☐	☒	☐

SUBSTANTIATION:

Countywide Policy Plan; Submitted Project Materials; Wonder Inn Project Trip Generation & Vehicle Miles Traveled Screening Assessment, Ganddini Group, May 19, 2021 (Appendix H-1); Wonder Inn Hotel Project Vehicle Miles Traveled Analysis, Environment, Planning, Development Solutions, July 15, 2021 (Appendix H-2)

a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle and pedestrian facilities?

IS/MND States:

Goal TM-2: Roads designed and built to standards in the unincorporated areas that reflect the rural, suburban, and urban context as well as the regional (valley, mountain, and desert) context.

> **Consistent:** Project improvements along Amboy Road include right-of-way dedication and widening the existing roadway 29 feet from the centerline to facilitate driveway entry, which creates a 40-foot-wide roadway section from the centerline to the Project Site curb. The Project is not in an urbanized area, therefore, only curb and gutter are proposed, and no sidewalks are required. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

OUR RESPONSE to Criterion a): Upon examination we assess that this mitigation is incorrect, inadequate and does not address the reality of the environment of Wonder Valley.

We *disagree* with the IS/MND. Considering all road factors and the Wonder Valley Community as it exists the developer's proposal would drastically change that "rural … context". There are currently NO business developments existing in Wonder Valley of this type and scale and therefore no current need for such "road designs". This is quiet, rural/residential area. The proposed resort's establishment would be drastically different than the existing character of this area. There are currently NO traffic controls (e.g., stop signs) from the entry to Wonder Valley eastward at Adobe Road in Twentynine Palms in the approximately 60 miles through the Sheephole Pass to the town of Amboy. Wonder Valley residents and visitors enjoy the wide-open vistas and unimpeded access on Amboy Road, with, of course, taking into account the normal safety concerns of cross traffic. The establishment of the proposed resort at the intersection of Amboy Road and Gammel Road would create congestion from entry and exit to this resort in the normal course of business and would increase in concerns with the potential of special events, such as music festivals, that the developers may plan to host. There is no mention of, much less any mitigations in the IS/MND, related to traffic and congestion caused by travel north and south on the unpaved Gammel Road that bounds the proposed development on the east.

The developers proposed road modification are not in the current "rural … context" and are inappropriate in that "context" and contrary to most of the LU-2 Land Use Mix and Compatibility elements of the Countywide Plan.

IS/MND States:

> ***Policy TM-2.3:*** *We require new development to mitigate project transportation impacts no later than prior to occupancy of the development to ensure transportation improvements are delivered concurrent with future development.*
>
> The Proposed Project would be consistent with the goals and policies as set forth in the Transportation and Mobility Element of the Countywide Policy Plan. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

OUR RESPONSE to Criterion b): Upon examination we assess that this mitigation is incorrect, incomplete and inadequate and does not address the reality of the environment of Wonder Valley.

We *disagree* with the IS/MND. The proposed mitigations are inconsistent with the LU-2 goals of the Countywide Plan. The establishment of the proposed resort at the intersection of Amboy Road and Gammel Road would create congestion from entry and exit to this resort in the normal course of business and would increase in concerns with the potential of special events such as music festivals, that the developers may be planning to conduct. There is no mention, much less

any mitigations in the IS/MND, related to traffic and congestion caused by travel north and south on the unpaved Gammel Road that bounds the proposed development on the east.

In addition, outside of the proposal and text of the IS/MND we have learned that the developers are marketing, and soliciting deposits for an additional housing development south to the proposed Wonder Inn Hotel/Resort. None of the impact of such as housing development is addressed in any way related to transportation concerns. (*See* "Size, Scope, and Piecemealing" in these Response Comments.)

An EIR should be conducted to explore and address the above concerns that the developers and the County's mitigation do not deal with the existing "rural … context" nor conform to the LU-2 goals of the Countywide Plan.

b) Would the project conflict or be inconsistent with CEQA Guidelines section 15064.3 subdivision (b)

OUR RESPONSE to Criterion b): Upon examination we assess that this mitigation is incorrect, incomplete and inadequate and does not address the reality of the environment of Wonder Valley.

The traffic "assessment and technical information" used as a basis for this mitigation is incomplete and inadequate. It justifies the impacts "to be less than significant" based on the conclusion that because there are already adequate accommodations in the Joshua Tree National Park vicinity this project "would not induce additional travel to the area." This begs the issue. Even if this were true, once established, if the Project is successfully marketed and implemented it would logically impose increased traffic to it and the adjacent areas. Additionally, the project proposal indicates that the Wonder Inn resort applicants have marketed the facility to conduct events (e.g., music, weddings, conferences, etc.) that will draw additional traffic that would exceed that which would be generated from hotel room guests. Those factors are not addressed or accounted for in the Initial Study mitigations or associated appendices.

In the applicant's Project proposal and marketing there appears to be a lot of promotions for and infrastructure dedicated to hosting Events. If these facilities are made available for anyone other than a registered guest, San Bernardino County has consistently designated these as separate "Meeting Facility, Public or Private" Uses. This would have a significant impact on the Vehicle Miles Traveled (VMT) study, Noise Study, parking demand, and water use calculations. If this is not the case, the Project should be conditioned to allow events only for registered guests. We have no documented information related to the number of projected sizes of these events such as a wedding or music events as to how many attendees and associated vehicles will appear in concentrated period both arriving and departing, or how big the conference center is and how many attendees and associated vehicles will create peaks in traffic during such events. Detailed information is needed to understand what impacts this will have. An EIR regarding this must be performed. Of course, there will be increased impacts related to lighting, noise, and dust that will increase related impacts not considered in the IS and appendices.

There is no mention, not to mention mitigation, of factors caused by visitors to the proposed Inn of "exploration' of the surrounding neighborhood or Wonder Valley at large that will cause additional traffic on the surrounding dirt roads, causing increased disruption, noise, dust, and potential thefts of residents' property.

In addition, outside of the proposal and text of the IS/MND we have learned that the developers are marketing, and soliciting deposits for an additional housing development south to the proposed Wonder Inn Hotel/Resort. None of the impact of such as housing development is addressed in any way related to transportation concerns. (*See* "Size, Scope, and Piecemealing" in these Response Comments.)

An EIR should be conducted to explore and address the above concerns that the developers and the County's mitigation do not deal with the existing "rural … context" nor conform to the LU-2 goals of the Countywide Plan.

> *c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?*

IS/MND States:

> … the Proposed Project will be subject to review by the County Department of Public Works: Traffic Division to ensure that the Project does not substantially increase hazards
>
> … no significant impacts are identified or anticipated, and no mitigation measures are required.
>
> Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

<u>OUR RESPONSE to Criteron c)</u>: Upon examination we assess that this mitigation is incorrect, incomplete and inadequate and does not address the reality of the environment of Wonder Valley.

When will the "review by the County Department of Public Works" take place? The community deserves such review to take place <u>and be made public</u> *before* the approval of this project to assure that it doesn't "substantially increase hazards".

We anticipate that there are and will be hazards imposed by current road conditions and geography on Amboy Road in front of the proposed project. There is a significant rise in road in front of the existing building that causes a dangerous "blind spot" impeding visibility in both directions on Amboy Road. Current residents and travelers on that road have experienced impatient, speeding drivers attempting to pass vehicles that are attempting to make turns off of Amboy Road to their homes. This hazard will be exacerbated by entries and exits to the proposed Inn as visitors to the proposed Inn enter and exit it. In addition, the IS/MND make NO mention of any additional traffic that will occur from new traffic both north and southbound on Gammel Road. There are no mitigations proposed for any traffic control in this area. The two photos below document the hazard.

Road rise blind spots hazards heading west & east bound:

In addition, outside of the proposal and text of the IS/MND we have learned that the developers are marketing and soliciting deposits for an additional housing development south to the

proposed Wonder Inn Hotel/Resort. None of the impact of such as housing development is addressed in any way related to transportation concerns. (*See* "Size, Scope, and Piecemealing" in these Response Comments.)

Conclusion: An EIR should be conducted to explore and address the above concerns that the developers and the County's mitigation do not deal with the existing "rural … context" nor conform to the LU-2 goals of the Countywide Plan.

XIX. UTILITIES

UTILITIES AND SERVICE SYSTEMS - Would the project:

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Comment: The Wonder Inn project requires the building of a new septic/ wastewater treatment system which has not been studied in a manner to determine if it would have significant environmental effects. See section "X: Hydrology and Water Quality" and section "VII: Geology and Soils" in these Response Comments regarding the lack of an approved percolation report. The Wonder Inn's Initial Study/Mitigated Negative Declaration (IS/MND) does not address any impact on the broader environment beyond municipal water, wastewater and stormwater systems which are unaffected by the project.

Page 80/92 IS/MND:

"The Project would be served by an on-site water well, an on-site septic system, therefore, there would be no impact to water and wastewater systems. Stormwater will be handled on-site via swales and allowed to percolate into the ground; therefore, there would be no impact to stormwater drainage facilities. The Project Site would also be serviced by commercially available propane, electrical and telecommunications facilities. The commercial building on site and former uses were previously served by commercially available propane, electrical and telecommunications facilities, therefore, these utilities are established on site. (p.80)"

The Wonder Inn developers state that propane, electrical and telecommunication utilities are already established onsite. However, given the scale of the Wonder Inn Project those utilities will have to be expanded and rebuilt. Will new electric lines result in planned outages that will affect residents of Wonder Valley?

Conclusion: An Environmental Impact Report (EIR) is needed to determine the environmental impact of the construction of new wastewater systems and the expansion of the on-site utilities to accommodate a project the size of the Wonder Inn.

Comment: The estimated 1 GWh per year by the developers will stress an already stressed electrical grid in Wonder Valley. In addition to the many scheduled power shut down periods that Southern California Edison (SCE) does during the year in Wonder Valley, there are many random outages that occur unannounced, affecting the community.

Page 80/92 IS/MND:

> ***"Electrical service to the Proposed Project would be serviced by Southern California Edison (SCE), which provides the electrical service to the general area. The Proposed Project will receive electrical power by connecting to existing power lines. The increased demand from the Proposed Project is expected to be sufficiently served by the existing SCE electrical facilities. According to the California Energy Commission, the commercial building sector of the Southern California Edison planning area consumed 36,202.653241 GWh of electricity in 2019.17 The estimated electricity demand for the Proposed Project is approximately 1 GWh per year. The Proposed Project's estimated annual electricity consumption compared to the 2019 annual electricity consumption of the overall commercial building sector in the SCE Planning Area would be insignificant. (p.80)"***

Using the commercial building sector as a metric to determine the impact of the additional 1GWh consumed by the Wonder Inn is not an accurate comparison. Additionally, the impact of a project this size would affect electrical service in the entire area of Wonder Valley. Wonder Valley is part of the Yucca Valley service district which has one of the worse reliability metrics in the state of California. Reference: 2020 San Bernardino Countywide Zero-Emission Bus Study Master Plan (https://www.gosbcta.com/wp-content/uploads/2020/08/SBCTA-ZEB-Final-Master-Plan_04.24.20.pdf)

The charts below illustrate the vulnerability of the local grid independent of the broader SCE commercial building sector. The Wonder Inn IS/MND also fails to take into consideration the impact of our incredibly hot summers (averaging over 102 degrees in Wonder Valley during the summer) that would put increased burden on the local electric grid. Since the Wonder Inn plans to operate during the summer the increased HVAC demand would likely result in power outages for the low-income, elderly, and vulnerable local community.

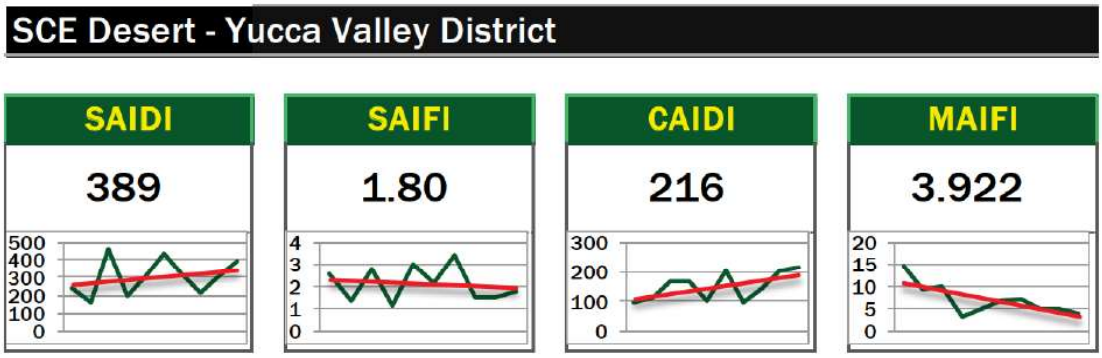
Table 1-15: Reliability by SCE District

District Name	SBCTA Sites	2014		2015		2016		2017		2018		Average	
		District SAIDI	District SAIFI	District SAIDI	District SAIFI	District SAIDI	District SAIFI	District SAIDI	District SAIFI	District SAIDI	District SAIFI	SAIDI Avg	SAIFI Avg
VICTORVILLE	Hesperia	58.9	0.6	87.0	0.9	79.4	0.9	84.1	0.9	125.9	0.9	87	0.8
ONTARIO	West Valley	97.9	1.0	94.0	0.7	105.1	3.9	100.4	1.1	80.0	0.7	95	1.5
FOOTHILL	Fontana	93.4	0.9	109.6	1.0	142.8	1.0	110.5	1.1	117.6	1.0	115	1.0
SCE System Wide		**112.1**	**1.0**	**114.8**	**0.9**	**134.5**	**1.1**	**139.7**	**1.2**	**136.8**	**0.9**	**128**	**1.0**
REDLANDS	East Valley, Yucaipa, SBTC	154.3	1.0	124.5	1.0	137.1	1.0	142.6	1.0	88.9	1.0	129	1.0
BARSTOW	Barstow	201.5	1.3	187.1	1.2	134.8	1.4	357.5	2.6	115.7	1.4	199	1.6
YUCCA VALLEY	Joshua T., 29 Palms, YVTC	304.3	1.5	389.1	1.8	463.7	3.4	300.3	2.0	353.8	1.9	362	2.1
ARROWHEAD	Crestline	193.3	1.6	362.6	4.0	659.5	2.9	816.5	3.9	68.5	1.5	420	2.8

Source: SCE

From a resiliency perspective, all of the MBTA sites are located in SCE's Yucca Valley district. This district has one of the worst reliability metrics in the state of California. See Section 1.5.1.3 for more details about reliability of SCE's electric grid. WSP recommends that MBTA consider a diesel generator at this site to help improve reliability and redundancy. Figure 3-9 shows the reliability figure for Joshua Tree. The left side of each chart is 2006, and the end of each chart is 2015, when this comprehensive overview was completed. Despite some blips in years, performance improved generally over time. The red line is the overall trend line. The most recent reliability data published by SCE is 2018 currently.

Figure 3-9: Joshua Tree Yard (SCE Yucca Valley District) Energy Reliability Figures



Source: SCE

The 2015 SAIDI score of 389 minutes indicates that each customer was without power for an average of 389 minutes throughout the year. The SAIFI score of 1.8 indicates that most customers had less than 2 average outages per year, but it took nearly 4 hours to restore power (CAIDI). 1.8 outages * 216 minutes per outage = 389 total outage minutes. Finally, in 2015, Yucca Valley customers experienced 3.9 momentary outages, which will reset all chargers, unless they are provided with uninterrupted power supplies, which adds cost.

Conclusion: An EIR is needed to determine the impact of the additional load on the local grid and the community surrounding the Wonder Inn.

UTILITIES AND SERVICE SYSTEMS - Would the project:

b) Have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years?

Comment: See section "X: Hydrology and Water Quality" in these Response Comments. There is no proof that the Wonder Inn's use of the Dale Basin Aquifer will be sufficient to serve the project and not impact the surrounding residential wells as no recent studies have been completed to assess the health and availability of groundwater in the area. To make comparisons of the proposed resort to long-ago jojoba farm watering is irrelevant, as well as the questionable methods used to compare them. The population of Wonder Valley has grown along with the increase in short-term rentals, and it has been many, many years since the jojoba farm was active (30? 40 years inactive?), and we currently are in a severe drought. The

transient non-community water system (TNC) well certification is also questionable based on the realistic staffing levels of a 106-room 5-star hotel, restaurant, spa and event center.

Page 80-81/92 IS/MND:

> ***"The Project Site has two existing wells, one of which will serve as the source of domestic, irrigation, and fire suppression water for the Proposed Project. Because the well will be providing water for human consumption to at least 15 service connections or to at least 25 people for at least 60 days per year, the water system proposed for the Project meets the classification as a public water system, more specifically, a transient non-community water system (TNC), which limits the number of employees to less than 25 and limiting guest stays to less than 60 days. It is anticipated that the smaller capacity well, located near the existing commercial building may be used for irrigation only. The TNC designation was approved by the County of San Bernardino Environmental Health Services on August 20, 2021 (Appendix F-2) (p.80-81)***
>
> **** The analysis in Appendix F-2 identified that the Proposed Project is estimated to utilize 20.7-acre feet annually (approximately 6.7 million gallons). The former use of the jojoba farm was anticipated to utilize approximately 35.04 acre-feet (9.51 million gallons) annually. Therefore, the Proposed Project is anticipated to consume approximately 14.29-acre feet less annually than the jojoba farm had previously for decades. The hotel would be equipped with modern low-flow fixtures, and the Proposed Project includes a grey water reclamation system that would return approximately 65 percent of the hotel's consumption to the aquifer. Because the Proposed Project is anticipated to use less than the previous use of a jojoba farm, and because the Proposed Project includes water-saving fixtures and a grey water reclamation system for water return, it is estimate that the Proposed Project would have sufficient water supplies available to serve the Project and reasonably foreseeable future development during normal, dry and multiple dry years. No significant impacts are identified or anticipated, and no mitigation measures are required. (p.81)"***

Conclusion: An EIR is needed to determine if there is enough available groundwater to serve this project and any future phased construction over drought conditions and multiple dry years.

UTILITIES AND SERVICE SYSTEMS - Would the project:

c) Result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments?

Comment: Since there are no municipal wastewater/ sewage services in Wonder Valley, a San Bernardino EHS approved percolation report should have been provided by the developers when the Conditional Use Permit (CUP) was submitted, as it is one of the requirements to process the CUP. The statement below implies that the system has not been designed or approved by any San Bernardino agency so any assertion by the developers that there will be adequate capacity is an unverified assumption.

Page 81/91 IS/MND:

"The Proposed Project would connect each proposed structure to a sewer system and leach field. The system will also require approval by the San Bernardino County Department of Health Services. Therefore, as the Project would not be connecting to a wastewater treatment provider, the Proposed Project would not result in a determination by the wastewater treatment provider which serves or may serve the Project that it has adequate capacity to serve the Project's projected demand in addition to the provider's existing commitments. Therefore, no impacts are identified or anticipated, and no mitigation measures are required."

Conclusion: The Wonder Inn CUP should be withdrawn until a septic/ wastewater system or percolation test has been reviewed and approved by San Bernardino EHS and Department of Health Services. If the San Bernardino Land Use department decides to circumvent their own requirements then an EIR is needed to assess that the proposed future septic system will have an adequate capacity to serve the Wonder Inn.

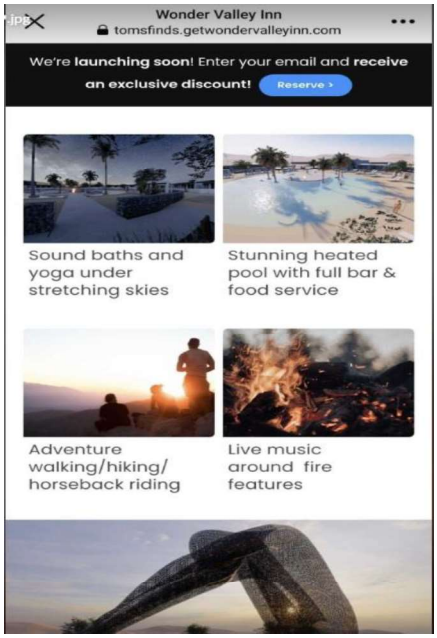
XX. WILDFIRE

> "As of 2010, about one-third of California's housing units were located within the wildland-urban interface.17 Residential developments in the wildland-urban interface and other wildfire prone areas can significantly increase the risks of wildfires and the risk to public safety for several reasons. First, introducing more people—via additional development—into a flammable landscape increases the likelihood of: (1) a wildfire igniting due to the increased presence of people; and (2) the ignition becoming a wildfire because of the placement of homes amongst the flammable vegetation. Second, building housing units in the wildland-urban interface puts more people in harm's way. Wildfires, particularly those that impact developments in relatively remote locations, may impede the evacuation of communities and emergency access, making it more difficult to ensure public safety and to limit, control, or extinguish wildfires. Finally, fires in remote locations require significant fire-fighting resources and mobilization of fire-fighters from all over the State—putting a major strain on the State's fire-fighters and the State's budget. Put simply, bringing more people into or near flammable wildlands leads to more frequent, intense, destructive, costly, and dangerous wildfires." *(Source: oag.ca.gov)*

California has seen record breaking destruction from wildfires in recent years, due to years of extreme drought and weather conditions. People may think that a wildfire cannot happen in the desert because there's 'nothing to burn.' However, wildfires do happen in the desert. Within this geographical area, it is common to have multiple wind advisories and wind warnings several times per month for several months of the year. During a wind advisory, winds can blow sustained 25-35 mph with gusts up to 60 mph (*https://www.weather.gov/safety/wind*). Winds such as these will fan the flames of a wildfire and spread the fire quickly. Here are a few examples of wildfires threatening our area:

- The Elk fire burned 431 acres in the area between Yucca Valley and the village of Joshua Tree, threatening homes in 2022 *(https://www.desertsun.com)*
- 25 acres vegetation fire Flamingo Heights *(https://z1077fm.com)*
- The Elk Fire, south end of Yucca Valley burned 431 acres in 2022 *(fire.ca.gov)*
- The Dome Fire in the Mojave Preserve burned 43,273 acres in 2020 *(latimes.com)*
- The Sawtooth Complex fire burned 61,700 acres in 2006 *(fire.ca.gov)*

Of note, the proposed Wonder Inn project's promotional materials portray outdoor bonfires:



Note: this promotion refers to the "Wonder Valley Inn", but the promotional image of the pool and sound bath areas are from the Wonder Inn's own architect images. (https://www.aearchitect.com/wonder-inn)

Regarding Criterion a), emergency response:

> *a) Substantially impair an adopted emergency response plan or emergency evacuation plan?*
>
> "The Project Site does not contain any emergency facilities."

In the Wonder Valley Community Meeting, held in May of 2022 at the Wonder Valley Community Center, the project proponent stated that they planned to buy their own firetruck and have their own volunteer fire department (*source: https://www.youtube.com @ 0:42).* Yet, this is not mentioned in the Initial Study, nor the Appendices.

> **QUESTION:** will the proposed Wonder Inn be dependent upon county fire services for either primary response or back up response to wildfires?
> **QUESTION:** will the proposed Wonder Inn have their own fire engine?
> **QUESTION:** will the proposed Wonder Inn have their own trained fire response team?
> **QUESTION:** what training and/or certification will this team have?
> **QUESTION:** will the team members be paid firefighting staff?
> **QUESTION:** will this in-house team be dedicated to fire services, or will they have other duties too?
> **QUESTION:** who will oversee this team and evaluate their effectiveness? what qualifications will this person(s) have?

QUESTION: how will this in-house fire response team interface with the county fire department?
QUESTION: will their fire response team have adequate training in *wildfire suppression?
QUESTION: will their equipment be adequate for wildfire suppression?
QUESTION: what if a fire occurs on a windy day? will they be able to control a fire and prevent the spread of wildfire into nearby neighborhoods?
QUESTION: what exactly is their plan for fire response, to ensure that nearby residential homes are not threatened by wildfire?
QUESTION: have any studies been done on this issue??

Regarding Criterion a), evacuation plan:

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

"Project Site is adjacent to Amboy Road, which is not a designated evacuation route within the County."

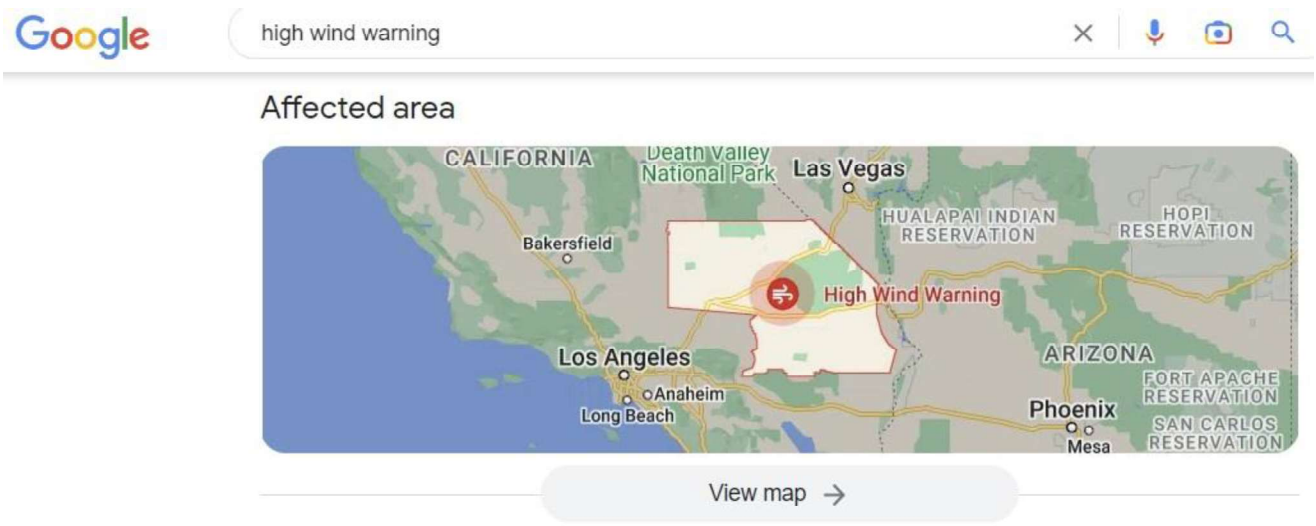
There are only 2 paved east-west roads through Wonder Valley: Hwy 62 and Amboy. Both of these roads are little rural 2 lane roads. In the event that a wildfire moved through this area – especially the fast-moving wildfires that are fanned by the high winds that frequent our valley, these are the only roads that Wonder Valley residents would be able to evacuate through to the east to escape a fire. There are over 1,000 residents in Wonder Valley, plus 60 Short Term Rentals with guests; this luxury hotel will add about 220 people per their estimates – plus the occupants of the 24 homes they also plan to develop (not included in their application, but currently being sold through online websites such as Modly), increasing population by roughly 25%. (See Public Services section.) Is *one* 2 lane road enough to evacuate 1300+ people if a wildfire came from the west, moving toward the east? Would emergency vehicles be able to get through? Remember, our roads have soft, sandy shoulders, prohibiting passing around any other vehicles. We could be looking at a situation like Paradise, CA if we have a fast moving wildfire and inadequate evacuation routes.

QUESTION: Have any studies been done to analyze this?

Regarding Criterion b):

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from wildfire or the uncontrolled spread of a wildfire?

Wonder Valley has numerous high wind events per year, that can have sustained winds of 25-35 mph and wing gusts of up to 60 mph. Here is a wind warning from today, 2/13/23:



...HIGH WIND WARNING REMAINS IN EFFECT FROM 3 AM TO 10 PM PST TUESDAY...

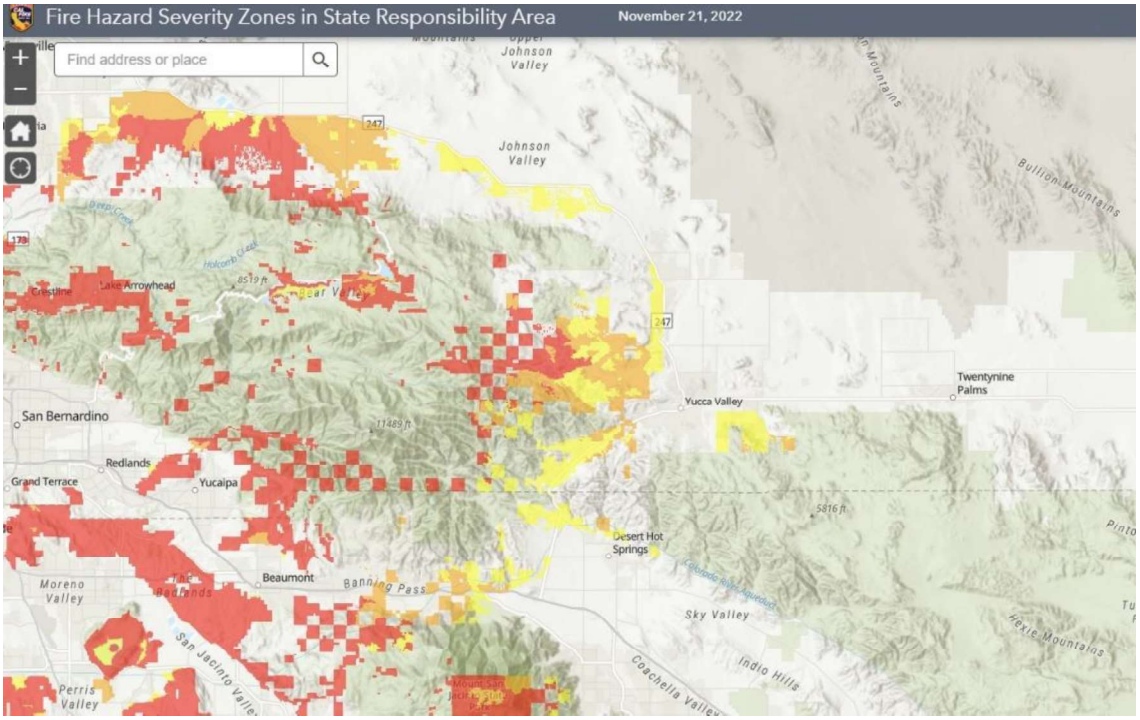
* WHAT...West winds 25 to 35 mph with gusts up to 60 mph possible.

* WHERE...Western Mojave Desert, Eastern Mojave Desert, Morongo Basin and Cadiz Basin.

* WHEN...From 3 AM to 10 PM PST Tuesday.

* IMPACTS...Damaging winds could blow down trees and power lines. Some power outages are likely. Travel will be difficult, especially for high profile vehicles due to hazardous crosswinds and low visibility due to blowing dust.

Winds like these usually come from the west, blowing towards the east – towards Wonder Valley from the more densely populated areas in the Morongo Basin. In addition, there are fire hazard zones to the west of Wonder Valley, as close as Yucca Valley.



Wonder Valley is bordered by Bullion Mountains to the north and Pinto Mountains to the south, creating a channel for high winds. As has been evident in the past several years of California's devastating wildfires, high winds will move a wildfire very quickly. As cited earlier, there have been wildfires / vegetation fires in our area. Most of these fires were exacerbated by high winds. These are but a few mentions in local news about winds exacerbating fire supression efforts:

- "Despite the erratic winds, high temperatures, and extremely dry vegetation, fire crews managed to contain the wildfire to 160 acres, and prevented the fire from spreading into BLM land. More than 40 county firefighters and BLM firefighters, along with hand crews, and water tenders worked to contain the fire." *(Source: Z1077)*
- "Throughout the afternoon strong erratic winds pushed the fire through the dry vegetation. By 5PM the fire had grown to more than 200 acres." *(Source: Z1077)*
- "…the winds were a significant factor in fanning the blaze." *(Source: Z1077)*

QUESTION: Have any studies been done on this issue?

CONCLUSION: I request that a full Environmental Impact Report be done to effectively study the possible dangers of wildfires to Wonder Valley before this project is considered.

Wildfire Comment References:

https://oag.ca.gov/system/files/attachments/press-docs/Wildfire%20guidance%20final%20%283%29.pdf

https://www.desertsun.com/story/news/2022/05/26/elk-fire-threatens-homes-yucca-valley-near-joshua-tree/9951357002/

https://z1077fm.com/vegetation-fire-in-flamingo-heights-confined-to-15-acres/

https://www.fire.ca.gov/incidents/2022/5/26/elk-fire/

https://www.latimes.com/environment/story/2020-09-06/mojave-desert-fire-destroys-the-heart-of-a-beloved-joshua-tree-forest

https://www.fire.ca.gov/incidents/2006/7/9/sawtooth-complex/

https://www.youtube.com/watch?v=locy-iZboQs&t=43s

XXI. MANDATORY FINDINGS OF SIGNIFICANCE

Regarding Criterion a):

> *a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?*

The potential to substantially degrade the quality of the environment is detailed throughout these Response Comments and must be considered Mandatory Findings of Significance.

In particular, as documented in section "IV: Biological Resources" of these Response Comments, the Initial Study/Mitigated Negative Declaration (IS/MND) fails to include a study the applicant commissioned to be done on 40 acres of the project site by Circle Mountain Biological Consultants, Inc., that revealed evidence of the presence of the threatened Agassiz's Desert Tortoise. This omission is critical and significant, should be graded as a "Potentially Significant Impact," and should trigger an Environmental Impact Report (EIR). Based on this omission, the extremely opposing data, the lack of a valid focused desert tortoise survey, and other issues noted in Section IV, a full, certified Environmental Impact Report per California Environmental Quality Act (CEQA) requirements should be completed for the Project and Project Site of the proposed Wonder Inn.

Also, of particular importance under Criterion a), the potential to "eliminate important examples of the major periods of California history or prehistory" is discussed in detail in section "V: Cultural Resources" of these Response Comments. The IS/MND has failed to properly evaluate for historical significance both the existing commercial building and the setting as a Small Tract Act homestead legacy community. The potential for significant impact to the historical significance of these resources and for elimination of the resources as important examples of California history is clear and must be considered a Mandatory Finding of Significance. Adequate evaluation will require a thorough EIR as require by CEQA.

Regarding Criterion b):

> *b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?*

We contend that our documentation of shortcomings throughout the IS/MND in multiple environmental factor areas demonstrate that the Project will have impacts that may be

individually limited but cumulatively considerable. See especially but not only sections "I: Aesthetics", "V: Cultural Resources", "X: Hydrology and Water Quality", "XI: Land Use and Planning", and "XIV: Population and Housing" in these Response Comments.

Of greatest concern are the issues detailed in section "Size, Scope, and Piecemealing" in the Response Comments. Inconsistencies in the representation of the Project size and scope and most especially the discovery of an undisclosed plan for a luxury housing development on adjacent acreage owned by the developers *already in promotion* but not included in the Project description raise serious questions of piecemealing. These issues must be clarified and a complete evaluation of potential cumulative impacts as a Mandatory Finding of Significance must be performed in a full Environmental Impact Report as required by CEQA.

Regarding Criterion c):

> *c) Does the project have environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly?*

The IS/MND substantiation of Criterion c) reads as follows:

> All potential impacts have been thoroughly evaluated and have been deemed to be neither individually significant nor cumulatively considerable in terms of any adverse effects upon the region, the local community or its inhabitants. At a minimum, the Project will be required to meet the conditions of approval for the project to be implemented. It is anticipated that all such conditions of approval will further ensure that no potential for adverse impacts will be introduced by construction activities, initial or future land uses authorized by the project approval.
>
> The incorporation of design measures, County of San Bernardino policies, standards, and guidelines and proposed mitigation measures as identified within this Initial Study would ensure that the Proposed Project would have no significant adverse effects on human beings, either directly or indirectly on an individual or cumulative basis.

Contrary to the above contention, our Response Comments amply demonstrate that potential impacts have NOT been thoroughly evaluated, determinations of potential impacts cannot properly be made, and the proposed mitigations cannot be supported based on the information contained in the IS/MND. We believe our documentation of shortcomings found throughout the IS/MND and our contentions in these Response Comments that the Project would cause "environmental effects, which would cause substantial adverse effects on human beings, either directly or indirectly" amount to Mandatory Findings of Significance and therefore must trigger a complete, Certified EIR as required by CEQA.

CONCLUSION

As a large luxury hotel and event center, the Proposed Wonder Inn Project is starkly different from the community it plans to locate into, and it does not fit in with the existing local character of Wonder Valley *(https://countywideplan.com)*. There is only one other parcel zoned Services Commercial in Wonder Valley, which is the Palms restaurant, roughly 6 miles east of the Project Site. The Palms is a historic community gathering place, established in 1961, owned and operated since 1996 by a local Wonder Valley family. Of note, the Palms is a rustic, rural, tavern-type establishment, and is quite consistent with the laid back, rural character of Wonder Valley. The Palms does not have streetlights, nor outdoor building lights. The Palms preserves the dark desert night, which supports stargazing, one of our favorite activities in Wonder Valley. The Palms welcomes its neighbors.

This is the Palms, as viewed on Google Maps Street View:

Though humble, the Palms is emblematic of a unique, historical, homestead community that retains wild desert homestead values and has built a character that suits the unpretentious but resourceful folks who live in Wonder Valley. The contrast with the Proposed Project could not be greater. The Wonder Inn would destroy the community, setting, resources, assets, and values that it hopes to exploit and then replace.

It is not welcome to do so.

Given the existing rural/residential environment, the Project's conflict with the Goals stated in the Land Use Elements of the Countywide Plan that apply to Wonder Valley, and the fact there is *nothing* of this type of major development in existence in Wonder Valley, a hotel/resort of this type is anomalous, inappropriate, and undesired. It would establish an unacceptable precedent in the Wonder Valley area that would likely open the door to further highly undesired development.

We therefore request that the rezoning applied for in the Conditional Use Permit and the amendment to the General Plan be denied.

Further, as documented in these pages, the IS/MND contains numerous deficiencies and further study is needed to adequately evaluate potential significant impacts on the Wonder Valley community, environment, and resources. Substantial evidence demonstrates that impacts from the Project are individually and cumulatively significant.

Accordingly, the County must prepare a complete, certified EIR addressing these impacts, in full compliance with CEQA, before it can approve the Project.

We ask to be kept fully informed of any and all developments in the CEQA and permitting processes, as our interest in this matter is vital. Email correspondence may be sent to info@stopwonderinn.org. Postal correspondence may be sent to PO Box 1722, Twentynine Palms, CA 92277. We ask that the undersigned be kept informed at their individual addresses, as well.

Again, we thank you for the opportunity to comment on the Wonder Inn Project Proposal.

Sincerely,

The Stop Wonder Inn Project Working Group

Christine Carraher
PO Box 935
Twentynine Palms, CA 92277

Eric Hamburg
PO Box 1722
Twentynine Palms, CA 92277

Gina Kohn
71212 El Paseo Dr.
Twentynine Palms, CA 92277

Russ Kohn
71212 El Paseo Dr.
Twentynine Palms, CA 92277

Maarten Oostendorp
PO Box 1192
Twentynine Palms, CA 92277

Margaret Oostendorp
PO Box 1192
Twentynine Palms, CA 92277

Beth Sheffield
PO Box 935
Twentynine Palms, CA 92277

cc: Dawn Rowe
Supervisor – 3rd District
385 N. Arrowhead Ave., Fifth Floor
San Bernardino, CA 92415-0110
Supervisor.Rowe@bos.sbcounty.gov

Michael Stoffel
Planning Commissioner – 3rd District
planningcommissioncomments@lus.sbcounty.gov

Steve Reyes
Field Representative – 3rd District
Steve.Reyes@bos.sbcounty.gov

From:	Beth Sheffield
To:	Khan, Azhar
Cc:	Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject:	PROJ-2021-00163 proposed Wonder Inn project
Date:	Wednesday, February 22, 2023 7:21:52 AM
Attachments:	PROJ-2021-00163 Public Services Comments.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Mr. Khan,

Thank you for the opportunity to comment on the proposed Wonder Inn PROJ-2021-00163.

My first visit to Wonder Valley was on November 8, 2011. I remember it well. (I know, that's what all of us old folks say!)

At the time I was living in a meditation ashram in Oakland, CA. After 10 years of full-time spiritual practices while serving on staff there, I had learned how to let my mind rest, and let my thoughts become still while sitting quietly in meditation. My challenge was learning to hold this inner peacefulness as I moved through my day.

When I first arrived in Wonder Valley, I was stunned by the vast, unobstructed, 360 degree views. I could see for miles and miles in any direction that I looked. I was also profoundly affected by the deep silence of the desert. The desert seemed to reflect back to me the same inner stillness and peace that I experienced during meditation. I felt as if I had stepped into the source of that peace. It seemed as if the desert had opened its arms and enfolded me in its embrace. At that first visit, I knew that I had found my new home, the place where I would eventually retire and enjoy my 'golden years.'

Even after living here these many years, I still love this desert. Wonder Valley is truly a magical place. The wide open space, the dark night sky that showcases the millions of dancing stars, the total silence, where the sound of a soft breeze seems loud and I can hear the sound of the UPS truck coming from a half a mile away, having lots of space between neighbors, the incredible sunsets, and the many creatures that live here with me - everything about this place is wonder-filled and unique. And, fragile. It can be irreparably changed in a very short time.

Which brings me to the proposed Wonder Inn. After reading the Initial Study MND, I am concerned that the applicants have not provided you with enough information for you to be able to effectively evaluate their project. One of my biggest concerns is that there was no description of this area or this community in the applicant's project description. I think this is critical information to consider when evaluating the impact this project will have upon our desert, our community and our lives.

With that in mind, I would like to share with you my concerns about Public Services in my community. I have attached the document to this email. It is also included in the Stop Wonder Inn working group comments.

Thank you again for the opportunity to share a bit about my community and my home with you. I wish you and yours the very best.

Sincerely,

Beth Sheffield

cc: Dawn Rowe, Supervisor – 3rd District

cc: Michael Stoffel, Planning Commissioner – 3rd District

cc: Steve Reyes, Field Representative – 3rd District

XV. PUBLIC SERVICES

Welcome to Wonder Valley!

COMMUNITY OVERVIEW: Wonder Valley is located in the southeastern area of San Bernardino County, which is by area the largest county in the United States, consisting of 20,105 square miles. The majority of the 2.2 million people who reside in San Bernardino County live in a relatively small urban section of the southwest part of the county.

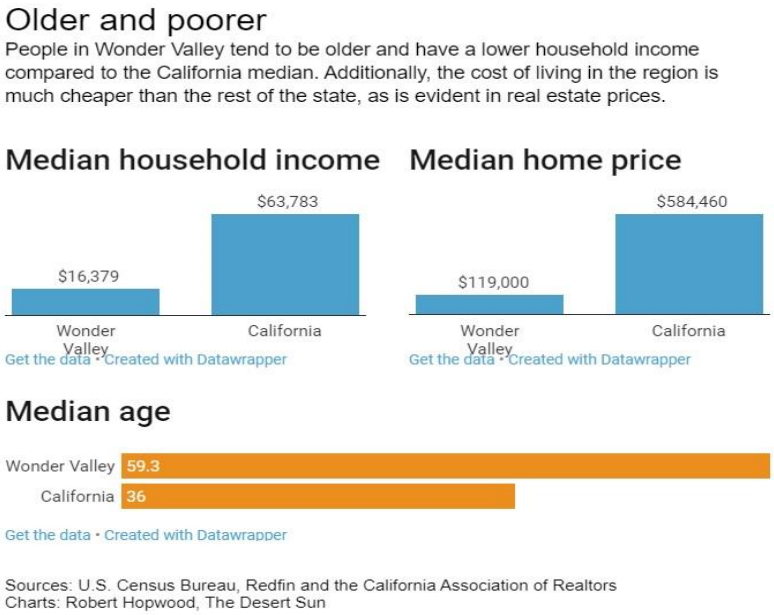
By contrast, Wonder Valley is a 147 square mile rural and sparsely populated high desert community, established in 1938 with the historical Small Tract Homestead act. It is exactly this rural and sparse quality that gives Wonder Valley its unique character and bestows its most prized assets: quiet, solitude, spaciousness, dark night skies, and abundant wildlife, to name a few. Wonder Valley is the type of community that gets excited about a beautiful sunset, and spreads the word when the snakes come out in the Spring (be careful, folks!)

The following word cloud was created during a community survey done in 2018, and highlights the values of this community. It is also from the Wonder Valley Action Guide, part of the San Bernardino County Wide Plan. The size of the words are indicators of how often that word was mentioned in the survey.

As a community, Wonder Valley values: *(source: Wonder Valley Community Action Guide https://countywideplan.com),*

- **Rural Atmosphere**. The large lots and space between properties give residents room to breathe. Wide open spaces allow residents to appreciate and maintain the solitary, laid-back lifestyle of this area.
- **Natural Desert Beauty**. Residents value the beautiful sunrises and sunsets, the dark and starry night skies and the desert views and wildlife.
- **Community Spirit**. Wonder Valley is a tight-knit community whose residents value self-reliance and neighborly support. The people have a respect for nature, freedom, privacy, and each other. Here, residents work together but also enjoy their independence and being left alone in solitude.

Wonder Valley is a poor community with a median income of $16,379 *(Source below).* We are a sparsely populated community of 1019, mostly older residents (average age 59.3), many of which have lived here most of their lives. We have many artists, performers, musicians, and people who simply want to live a quiet, affordable life away from the bright lights and noise of the city.



Source: Desert Sun 2018 desertsun.com

In recent years, Wonder Valley has seen a significant increase in population. In 2013, Wonder Valley population was estimated to be 615 *(sbcsentinel.com).* In the 2020 census, Wonder Valley population was estimated to be 1019, almost doubling in 10 years. There are a few reasons for the recent upward trends:

- Tourism has substantially increased at Joshua Tree National Park, having increased from 1.4 million visitors in 2012 to well over 3 million visitors per year in 2022.

- Simultaneous to the increase of tourism to the park, Short Term Rentals exploded upon the scene. Beginning in roughly 2012, numerous properties (including some uninhabited or abandoned properties) in Wonder Valley were being purchased, renovated, and turned into STR's. There are currently an estimated 60 active STR's in Wonder Valley. *(Note: the many guests that enjoy these short-term rentals are not included in the population count used to estimate the Public Services needed to safely cover Wonder Valley.)*

- Property prices are low in Wonder Valley. The median home price in California is $834,400. The median home price in Wonder Valley is $135,000. *(redfin.com)* Many people who have been priced out of their former neighborhoods have migrated to Wonder Valley, where one can buy a home on 5 acres for less than the price of rent in the cities. (The average rent in California was $2,686 a month in 2022; a mortgage payment on $135,000 is roughly $900 per month.) As tourism surges at Joshua Tree National Park, the desert region has become California's hottest housing market. (theguardian.com)

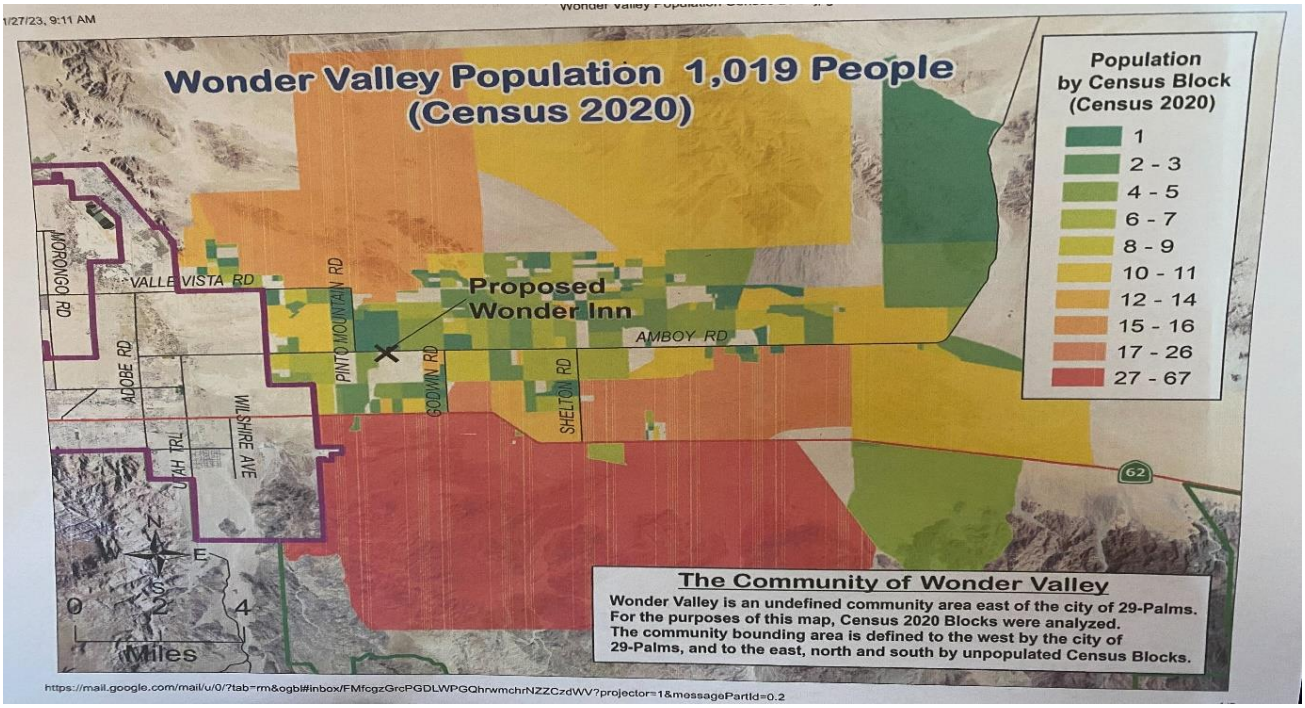
- During the 2 years of isolating at home during the pandemic, many people shifted to telecommuting, and are now able to live in this rural area and maintain employment.

An increase in population creates a need to increase public services. However, during the time the population of Wonder Valley was rising, the Wonder Valley fire station was closed (2017), and our fire and paramedic response now comes from the City of Twentynine Palms. This change increased our response times to dangerous lengths. We currently do not have adequate Public Services for our community - especially Fire and Paramedic services, resulting in numerous homes burning to the ground due to insufficient fire response. (More on this later.)

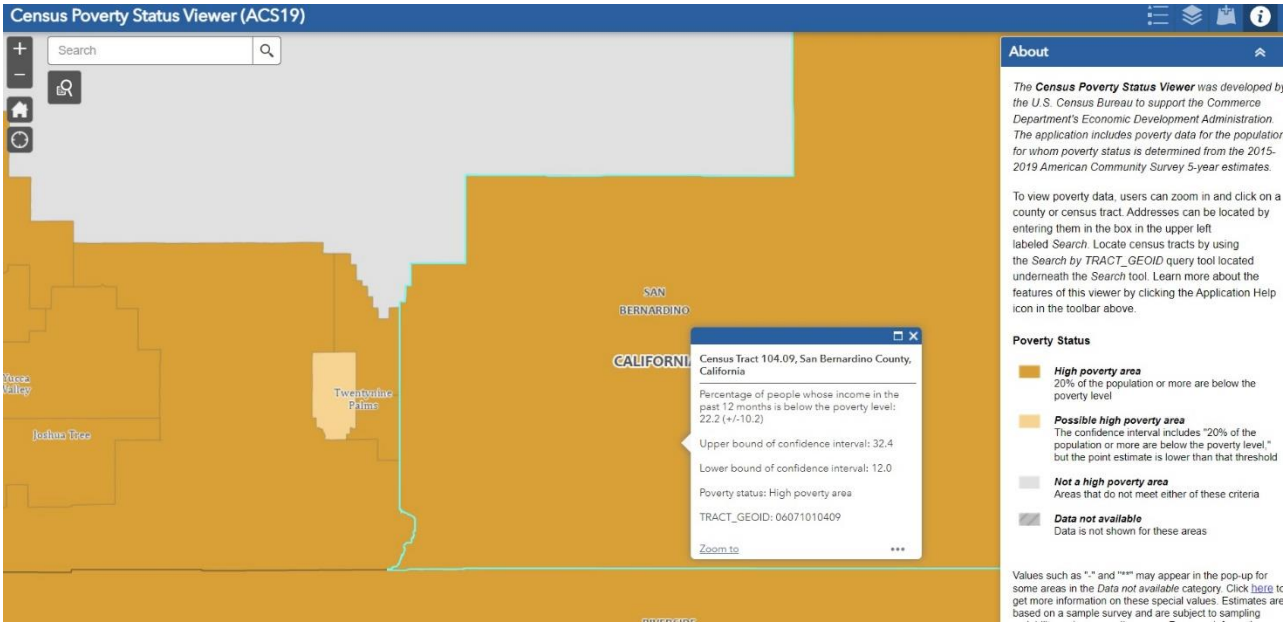
The addition of the proposed Wonder Inn will further increase the burden upon Wonder Valley's already stressed Public Services. This proposal estimates 160 daily guests, 40 visitors and 20 staff. That is an additional 220 people added to our existing population of 1019, increasing demand for services in our area by roughly **20%.**

We've recently learned that there is to be an additional 24 – 4-bedroom STR homes built on the currently owned 183 acre property, which would increase demand upon Public Services even more. (Please see 'Size, Scope and Piecemealing' in this Response Comment Document for more information.) Using a rough estimate of 2 persons per household, this phase of the project would increase population by 48, adding an additional burden of roughly 5%, for a total of 26% increased demand upon our Public Services. As the Luxury Villas are planned to be 4 bedroom and will also be made available as Short-Term Rentals, we can expect the occupancy will be higher than 2 people per household.

I should mention that it is very difficult to find consistent statistics on the population, income level, average age and other demographics for Wonder Valley, including in the 2020 Census, City Data website and several professional news sources. I presume this is because we are an unincorporated area and our boundaries are not clearly defined. Sadly, this leaves me with the impression that the Wonder Valley community is so underserved that we don't even merit study. For the purposes of this comment document, I will be using this number for current population:



And, this poverty status map from the US Census, indicating Wonder Valley is a high Poverty area:



From the San Bernardino County Policy Plan 2020: Safety & Security Section, Hazards Element

Principles: We believe:

- A safe environment is necessary to build and maintain a sustainable and prosperous county.
- The County is proactive in lessening risks from natural and human-generated hazards.
- Reduction in the loss of life, injury, private property damage, infrastructure damage, economic losses, and social dislocation can be achieved through planning and preparedness.
- Emergency response and recovery efforts contribute to a resilient county, given unavoidable emergencies and natural disasters.
- Those who live in unincorporated disadvantaged communities should not be burdened with elevated exposure to pollution risks and reduced access to public facilities and services.

THE PROPOSED WONDER INN PROJECT

The Wonder Inn project aims to exploit Wonder Valley's community assets (our quiet, solitude, spaciousness, dark night skies, and abundant wildlife, etc.) for profit, and will destroy these community assets by building this large luxury resort and event space here in our quiet valley.

On page 584 (pdf page) of the Proposal Appendices, we can read about the project's intention: "The goal is to create peace. The lodge provides guests a rural experience that frames and creates a slow, secluded moment to relax and connect with the landscape, horizon, and a dark, starlit sky." I understand the allure of Wonder Valley and why people would be drawn to this area – it is why we chose to live here. But the project developers fail to see how this large hotel would negate the very experience they hope to create. The project proponent mentioned that he has been coming here for 2 years (*Source youtube*), which corresponds to the purchase of the bulk of this land in 2020. We are not confident that the developers know this community at all, and we fear that they only see an opportunity to exploit this undeveloped land for their own profit.

This project would offer no benefits to Wonder Valley residents. The fire department collects only 2.5% of the property taxes collected from the residents of Wonder Valley (compared with 22-25% of the taxes collected in Yucca Valley.) So, the increase in tax revenue generated by this hotel would not be sufficient to cover the additional services needed to cover the extra burden they will create. Instead, as an underserved rural community, this proposed luxury resort will draw upon the already insufficient Public Services responsible for covering this undeveloped CS70M service area. (More on this later.)

Keep in mind the following visual of the endless views of this Wonder Valley neighborhood, (which is just south of the proposed location for the proposed Wonder Inn) as you read the project description:

An aerial view of Wonder Valley. *Jay Calderon/The Desert Sun*

The Wonder Inn proposal includes a 4,407 sq.ft. lobby/restaurant, a 5,000 sq.ft conference room, a 3,985 sq.ft. spa/wellness center, 106 guest rooms, plus ancillary structures for staff, a 3,300 sq.ft. multipurpose tent for gatherings, including a 1,700 sq.ft. building for restrooms, a 6,300 sq.ft./ 214,000-gallon swimming pool (almost half the size of an Olympic pool), a 40 sq ft / 1,100-gallon hot tub, an astronomy pergola, sunken gardens, etc. This Proposed Project also includes a 210-space parking lot onsite – and (not stated in original application, but purchased in 2021) an additional 20 acres across the street, northwest on Amboy, presumably for event parking.

This proposed project will include amending 21.22 acres of the site from Rural Living (RL) to Service Commercial (SC) zoning. The current 3.18 acres of CS zoning on this property was part of a jojoba farm, which is a quiet and peaceful use of the land that was compatible with Wonder Valley's way of life and population level (though not compatible with the water needs of this area.)

As a large luxury hotel and event center, the proposed Wonder Inn project is vastly different from the community it plans to locate into, and it does not fit in with the existing local character of Wonder Valley *(https://countywideplan.com).* There is only 1 other SC zoned parcel in Wonder Valley, which is the Palms restaurant, roughly 6 miles east of the site of this Proposed Wonder Inn Project. The Palms is a historic community gathering place, established in 1961, owned and operated since 1996 by The Sibley's, a local Wonder Valley family. Of note, the Palms is a rustic, rural, tavern type establishment, and is quite consistent with the laid back, rural character of Wonder Valley. The Palms does not have streetlights, nor outdoor building lights. The Palms preserves the dark desert night, which supports stargazing, one of our favorite activities in Wonder Valley.

This is the Palms, as viewed on Google Maps Street View:

ENVIRONMENTAL JUSTICE: There is no mention of the Wonder Valley community - nor any community descriptors, in the Initial Study, nor in the 895 pages of analysis reports and information included in the Appendices. This reflects poorly upon the project applicants. One might conclude that they have neither interest in, nor concern about our Wonder Valley community - or their impact upon it. Fortunately, the California Environmental Quality Act (CEQA) requires Environmental Justice be included in the CEQA studies, which it appears may not have been done for this project. Therefore, a complete Environmental Impact Report (EIR) must be done to include this vital area of study.

Per former California Attorney General Kamala Harris, "Human beings are an integral part of the 'environment.' An agency is required to find that a 'project may have a 'significant effect on the environment' if, among other things, 'the environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly." (*Source: https://oag.ca.gov*) Further, "The Attorney General is particularly concerned that land use planning and permitting decisions consider and address any additional burdens on environmental justice communities." *(Source: oag.ca.gov/environment/justice)*

Indeed, people are part of the environment and this project will have significant impacts upon our rural and underserved community, especially for the people who live here full time. At minimum, the character of our community will be significantly impacted and devalued by the addition of this large, luxury hotel and event space. Our quality of life will be dramatically changed. And, at worst, our safety will be at risk, and lives and property may be lost due to the increasing demand upon the already insufficient Public Services in this underserved community.

From the San Bernardino County Policy Plan 2020:

Policy HZ-3.18 **Application requirements.** In order for a Planning Project Application (excluding Minor Use Permits) to be deemed complete, we require applicants to indicate whether the project is within, adjacent to, or nearby an unincorporated environmental justice focus area and, if so, to:

- document to the County's satisfaction how an applicant will address environmental justice concerns potentially created by the project; and

- present a plan to conduct at least two public meetings for nearby residents, businesses, and property owners to obtain public input for applications involving a change in zoning or the Policy Plan. The County will require additional public outreach if the proposed project changes substantively in use, scale, or intensity from the proposed project presented at previous public outreach meeting(s).

Wonder Valley is indeed in an unincorporated environmental justice focus area. In addition, this project proposes to change zoning on 24 acres. To date, the applicants have not conducted a public meeting. In addition, we have recently learned that there are additional plans for 24 STR homes – not included in the original application, which will indeed substantially change the scale of the project.

These are a few of the many reasons why I am requesting that a complete, certified Environmental Impact Report per the requirements of CEQA be done to fully address the

significant numerous adverse impacts upon this peaceful desert community. It is my belief that this full study will reveal the many reasons why this project is not suitable for this area.

PUBLIC SERVICES – CONCERNS AND QUESTIONS

PROJ-2021-00163CEQA INITIAL STUDY - MND: Public Services Area

CEQA: San Bernardino County Initial Study/Mitigated Negative Declaration Environmental Checklist, doc, page 69-71:

XV. PUBLIC SERVICES
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Fire Protection? FINDING: "Less than significant"
>study is not sufficient to support this determination

Police Protection? FINDING: "Less than significant"
>study is not sufficient to support this determination

Before we can effectively evaluate the impact this project would have upon Wonder Valley and its community, we first must be clear on the actual size and scope of the project. There are 2 essential areas in which we need more information: staffing numbers and size and scope of the project.

STAFFING: The estimated staffing number given for the proposed Wonder Inn seems insufficient. For a luxury hotel with all the amenities mentioned in the project description, it seems we could expect the following staffing possibilities:

- Manager (General and Assistant), likely 1 onsite at all times
- Housekeeping: 8-9 maids, depending on occupancy (*Source: allianceonline.co.uk*)
- Janitorial for public areas and public restrooms and showers
- Lobby: reception desk / reservations agent, cashier, concierge, Security,
- Restaurant *(24 hour restaurant with seating for 100):* hostess, servers, bartender, prep cooks, sous-chef, chef, dish bussing staff, dishwashers, etc. – estimate between 10 to 40 employees (*Source: escoffier.edu*)
- Spa services: reservation coordinator, massage staff, yoga instructor, mani/pedi services, skin care, etc.
- Pool and Hot tub maintenance, lifeguard

In addition to the proposed Wonder Inn's restaurant, bar and 106 guest rooms, this luxury hotel also plans to be an event space. We need clarification of the size and scope of possible events this venue might host, including how many additional staff may be required for event support. Here are a few possible staffing needs:

- Weddings / Parties / Corporate meetings / Conventions could include 50-100-200-500 or more guests, and staffing to support this number of guests could include an Event Coordinator, set up crew (chairs/tables/stage/shade covers/additional dining

areas, etc.), catering staff, additional servers, additional dish staff, additional dishwashers, additional security, parking attendants, clean-up crew, etc.
    - Larger events such as music festivals or Bhakti-Fest type events could include a couple thousand event participants and would require delivery of Porta Potties, Event Coordinators and assistants, cashier/ticketing staff, seating hosts, lighting and audio staff, stage crew, set up crew or delivery and set up by rental equipment vendors, additional reception desk staff, hosts, additional ticketing/reservation/will call agents, additional security, additional parking attendants, additional catering staff and servers, additional clean-up crew, etc.
    - *NOTE: for the purpose of evaluating the impact of the proposed Wonder Inn upon Wonder Valley, all contract staff and vendors should also be included in the staffing estimates.*

What will be the effect of this project on Public Services availability to Wonder Valley residents? Without this information, it is impossible to know. We need a full Environmental Impact Report to assess this.

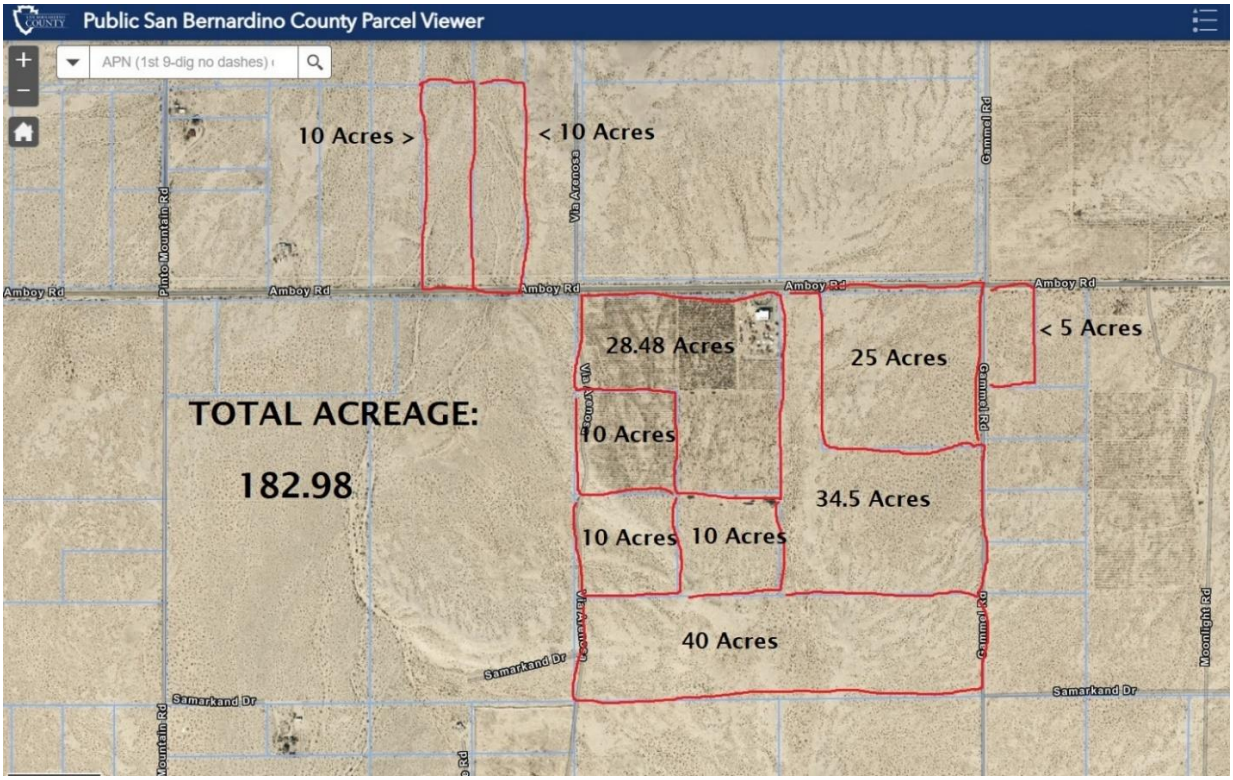
- **QUESTION:** How many events does the proposed wonder inn expect to host per month? per year?
- **QUESTION:** What is the anticipated average number of guests expected to attend weddings and similar parties?
- **QUESTION:** What is the maximum number of event attendees possible with the current building plans?
- **QUESTION:** Will outdoor events increase the number of guests possible?
- **QUESTION:** What plans might there be to expand this hotel and its amenities in the future?
- **QUESTION:** Assuming events guests will be in addition to the 160 hotel guests, 40 visitors and “20 staff” (please see sections above on staffing estimate), how often would the number of guests and event participants, plus the additional event staff outnumber the total residents of Wonder Valley?
- **QUESTION:** Does the Wonder Inn plan to host large events, such as Bhakti Fest, or music festival type events?
- **QUESTION:** How will large events impact Wonder Valley residents’ ability to get the emergency services that we need, when an event over 1,019 people would outnumber the total population of wonder valley?
- **QUESTION:** How many service calls might a large event with 200 people require? or an event with 500 people? with 1,000 people? with 2,000? with 5,000 attending?
- **QUESTION**: As a point of reference, what were the service calls generated by the Bhakti-Fest event held at Joshua Tree Retreat Center (aka Mental Physics) in September 2015, when roughly 2,000 attendees, 50 music groups and 100 vendors were expected to attend? what Fire / EMT personnel and equipment were assigned to the event site during the event?
- **QUESTION:** Will there be any County limits on the size of events at this location?

Included in the total acres owned by the project proponents is 20 acres northwest across Amboy, presumably for overflow event parking for this facility. One acre of empty land can accommodate roughly 150 vehicles; 20 acres would be able to accommodate as many as 3,000 vehicles. (*Source: utia.tennessee.edu*) This means thousands of pedestrians could be walking across this busy scenic route, where cars are traveling 60-70 mph, and there is enough of an incline to make pedestrian visibility difficult for west bound traffic. *(Please see photos in EMS / RESCUE / TRAFFIC section of this comment section.)*

- **QUESTION:** Why were these 20 acres not included in the proposal?
- **QUESTION:** Can the project applicant confirm, or explain, what is intended for the 20 acres north of Amboy Road?
- **QUESTION:** Would these individual parcels (#2 - 10-acre parcels) require a separate CEQA study if the project developers decide to grade and/or pave them at a later date? What permitting would be required?
- **QUESTION:** Will a traffic light and pedestrian crosswalk be installed at the project entrance?
- **QUESTION:** Will sidewalks be installed to keep pedestrians from having to walk on the highway?
- **QUESTION:** If so, who will pay for these improvements? Is this a taxpayer expense? Will Wonder Valley residents be assessed for the cost?

PROJECT SIZE AND SCOPE is unclear. The Wonder Inn project applicants have given us a broad stroke view of their project, but there is much information missing. We have many questions regarding the total acreage of the parcels currently owned by the project applicants and how this land will be used.

The proposed Wonder Inn project is to be situated on **24.4** acres of the 132.98 acres mentioned in the proposal. It is unclear what is planned for the remaining 130.58 acres mentioned in the proposal. In 2021 the proponents of this project purchased an additional 50 acres, for a total of **182.98** acres. It is also unclear what is planned for these additional acres. (Please see map below.)



- **QUESTION:** Why were 4 of these parcels (purchased in 2021) not included in the project description?
- **QUESTION:** What future development or land use is planned for the remaining 158.58 acres owned by the project developers?

In doing a simple Google search for Wonder Inn / Wonder Valley Inn, a few links came up which are of great concern.

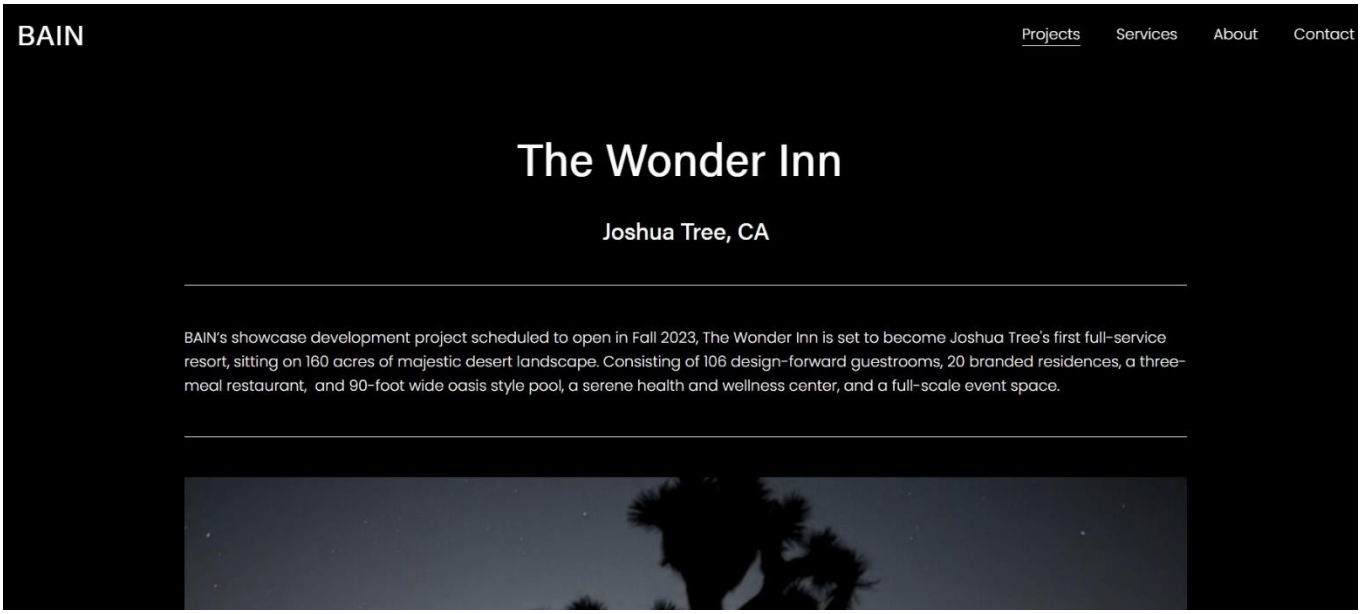
- Modly – Joshua Tree *(modly.com/community/joshua-tree)* Note the similar description of "106 bungalow suites, restaurant and bar…". This description mentions 24 private homes on 5 acres each.

Homes developed within Joshua Tree's newest luxury resort

A truly one-of-a-kind resort named Wonder Valley Inn is in development in the heart of Joshua Tree, California just 10-minutes away from the North entrance of the National Park. The resort will feature 106 bungalow suites, a spa with fitness facilities, an expansive oasis swimming pool with adjacent hot tubs and a full-service restaurant & bar. On the 160 acre site, we will be constructing 24 private villa homes, each sitting on a private 5-acres site. Each contemporary home will consist of 4 bedrooms and 3 bathrooms with all the amenities you'd expect including a swimming pool, hot tub, outdoor showers, fire pits, solar panels and an electric car charger. Homeowners can occupy the homes year-round or they can opt-in to have the hotel manage the homes for guests to rent them out at $1,000 Average Daily Rate. This is a fantastic opportunity to own a second home which pays for itself. Residents can move into their Wonder Valley Villas by Q4, 2024.

Lot prices will be starting at approximately $150,000.

- Bain Hospitality (*bainhospitality/thewonderinn*), which includes this description: “The Wonder Inn is set to become Joshua Tree's first full-service resort, sitting on 160 acres of majestic desert landscape. Consisting of 106 design-forward guestrooms, **20 branded residences**, a three-meal restaurant, and 90-foot-wide oasis style pool, a serene health and wellness center, and a full-scale event space.”



Based on this, it seems the project developers plan to begin with this hotel/resort with the many amenities mentioned, then expand into a luxury home development of 20-24 homes, each on 5 acres, each with swimming pool, hot tub, outdoor showers and fire features – each requiring a well, and each home adding to the already over stressed Public Services. The lack of full disclosure of these plans in the currently submitted project plans seems deceptive. It is already being advertised as available, yet the first application for the core of the project has not been approved yet, and there are no application for permits yet on the second phase. (Is it legal to sell homes / properties for which there has been no LUS permits filed?)

Again, it is not possible to effectively evaluate the impact this project will have upon Wonder Valley and the Wonder Valley community without a complete description of this project. We must have a full Environmental Impact Report to assess this.

PIECEMEALING: CEQA prohibits Piecemealing. Per*:* ceqaportal:

> “When future phases of a project are possible, but too speculative to be evaluated, the EIR should still mention that future phases may occur, provide as much information as is available about these future phases, and indicate that they would be subject to future CEQA review.
>
> - CEQA case law has established the following general principles on project segmentation for different project types:
>   - For a phased development project, even if details about future phases are not known, future phases must be included in the project description if they are a reasonably foreseeable consequence of the initial phase and will significantly change the initial project or its impacts. *Laurel Heights Improvement Association v Regents of University of California* (1988) 47 Cal. 3d 376.

Based on the websites listed above, it appears that the next phase(s) of this project are indeed known. In fact, it seems sales are already underway.

PUBLIC SERVICES

From the San Bernardino County Policy Plan 2020:

Goal PP-3 Fire and Emergency Medical

Reduced risk of death, injury, property damage, and economic loss due to fires and other natural disasters, accidents, and medical incidents through prompt and capable emergency response.

Policy PP-3.1 **Fire and emergency medical services.** We maintain a sufficient number and distribution of fire stations, up-to-date equipment, and fully-trained staff to respond effectively to emergencies.

Policy PP-3.6 **Concurrent protection services.** We require that fire department facilities, equipment, and staffing required to serve new development are operating prior to, or in conjunction with new development.

Policy PP-3.12 **Fire protection and emergency medical resource allocation.** We use fire and emergency services data analysis and professional expertise to allocate resources, reduce fire risks, and improve emergency response.

Policy PP-3.13 **Periodic needs assessment.** We periodically assess our facility, equipment, and staffing needs and use the assessment to allocate funding resources in the annual budget and capital improvement program.

Goal LU-6 Amendments to the Policy Plan

Growth and development in the unincorporated county in a manner that requires few and infrequent amendments to the Policy Plan.

Policy LU-6.1 **Residential amendments that increase density in the Desert and Mountain regions.** We discourage policy plan amendments that would permit new development on lots smaller than 2.5 acres in the Desert regions and lots smaller than one-half acre in the Mountain region. We approve general plan amendments that would increase residential density only if:

- The proposed change is determined to be compatible in accordance with policies LU-2.1, 2.2, 2.3, and 4.5.
- Adequate infrastructure and services are available concurrently.
- The increase in density would not degrade existing levels of service for fire protection, sheriff, water, or wastewater service in the area.

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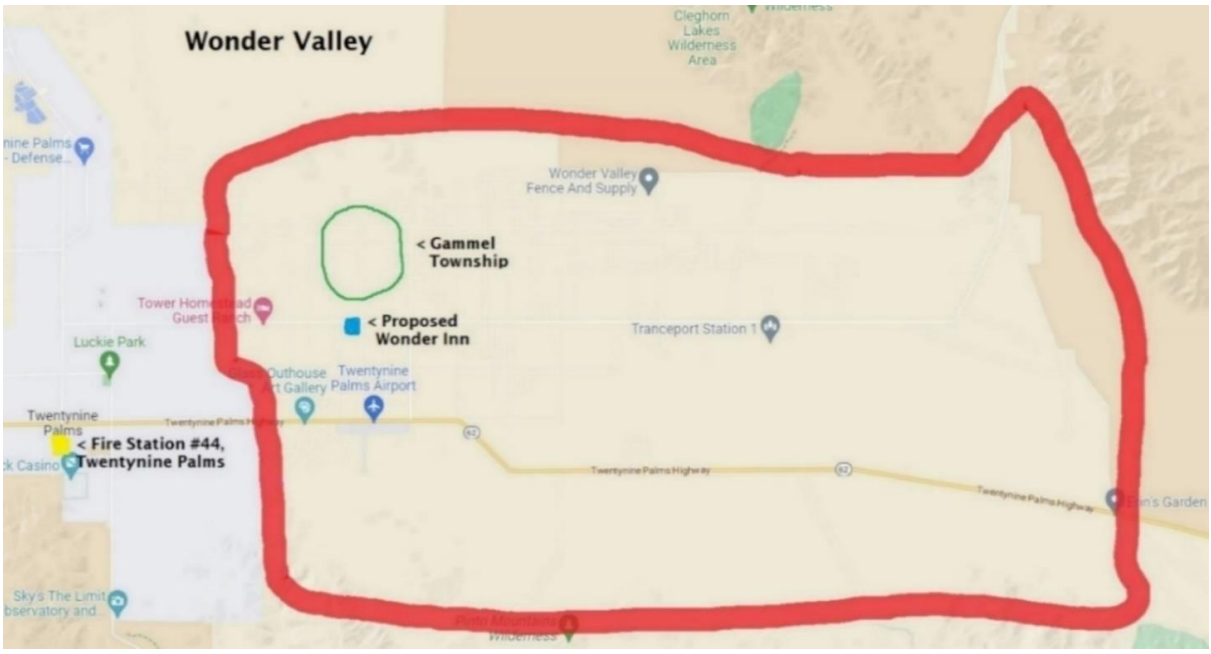
FIRE SERVICES: Per the 2020 San Bernardino County General plan,

> "The County Fire District provides fire prevention services, fire protection for wild fires and urban fires, and emergency medical response in unincorporated areas, portions of incorporated jurisdictions included in the district, and, under contract, in some incorporated jurisdictions. The County plans for and responds to emergencies and natural disasters countywide, and County Fire also provides regional urban search and rescue services."

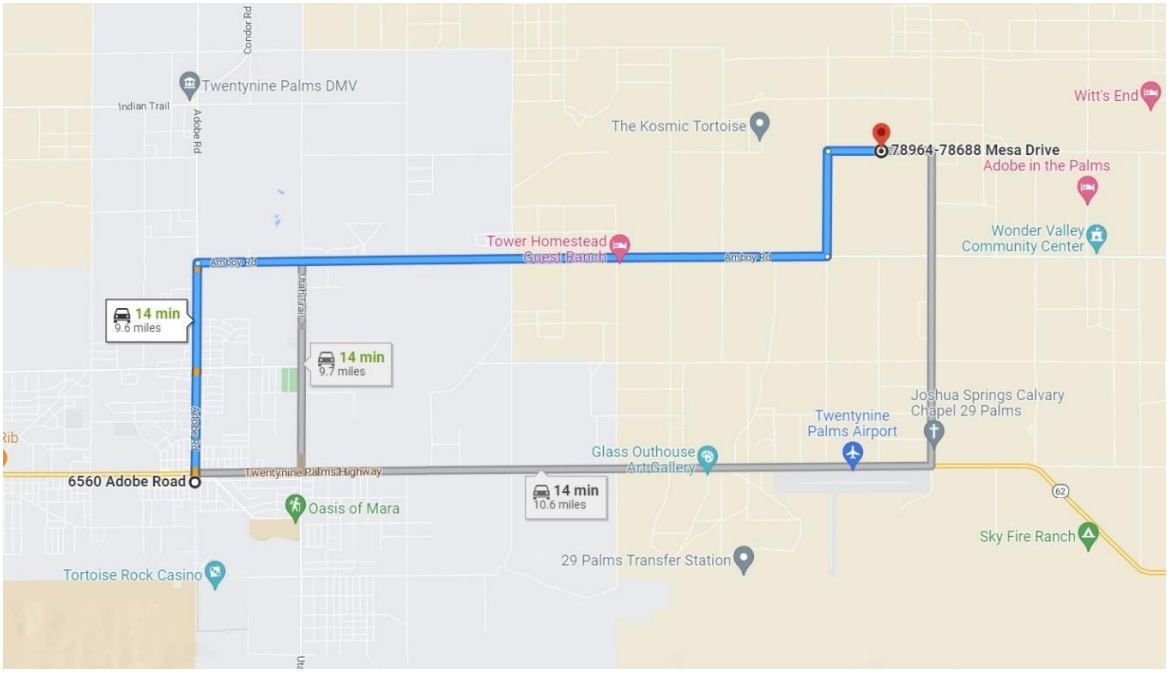
HISTORY: Prior to 2017, Wonder Valley Fire Station #45 was a little over 3 miles or 6 minutes from our home. Sadly, this station was temporarily closed in September of 2017 due to "contaminated water." In 2018 Wonder Valley property owners were given a tax increase from $35 to $157 to cover fire services to Wonder Valley (currently $166.84 for our 5-acre parcel.) By comparison, residents of Los Angeles pay $73.68 for fire and emergency medical services *(fire.lacounty.gov).* In August of 2019 the Wonder Valley Fire Station was permanently closed due to budget issues *(https://sbcsentinel.com),* resulting in the Wonder Valley community paying more for less services. Of note: per Division Chief John Chamberlin, the fire department only receives 2.5% of taxes collected from Wonder Valley, compared to 22-25% taxes from Yucca Valley. *(Source: https://www.youtube.com).*

- **QUESTION:** What is the estimated tax amount that will be generated by this proposed Wonder Inn?
- **QUESTION:** What is the estimated need for increased Fire services for this hotel/event venue?
- **QUESTION:** How does the tax generated by the proposed Wonder Inn compare to the cost of the increased need for public services that this project will generate?

As mentioned, since 2017, residents of the 147 square mile community known as Wonder Valley must depend on the Twentynine Palms Fire Station #44 in the city of Twentynine Palms for Fire and EMT/Paramedic response. This station is located on Adobe Road, south of Hwy 62 in the City of Twentynine Palms. This location is about 9.5 miles or 14 minutes from our home in the Gammel Township (the last 1.5 miles are dirt road). The Wonder Inn proposed project includes 106 guest rooms, plus ancillary structures for staff, a 4,407 sq.ft. lobby / restaurant with seating for 100, a 5,000 sq.ft conference room, a 3,985 sq.ft. spa/wellness center - a total of 60,737 sq.ft. of building space, and also includes 24 private residence homes (unstated in their application.) With the addition of this luxury resort and event center, and luxury homes, Wonder Valley residents will have increased competition for basic fire response services, which are already inadequate. Wonder Valley is roughly 20 miles east to west and 6.5 miles north to south. Here is a map which reflects the location of the proposed Wonder Inn project (turquoise), the Gammel Township neighborhood that I live in (green circle), and the Twentynine Palms Fire Station #44 (yellow.) Note that our neighborhood is closer to the western edge of Wonder Valley; residents that live east of us are at greater risk due to even longer response times.



And, here is a screenshot of Google maps/directions, indicating travel times and miles from Twentynine Palms Fire Station #44 to our neighborhood:



- **QUESTION**: How many calls for fire services to Wonder Valley were there per month and per year for the years 2012, 2014 and 2016, before the Wonder Valley fire station closed?
- **QUESTION**: How many calls for fire services to Wonder Valley were there per month and per year in 2018, 2020, and 2022, after the Wonder Valley Fire Station closed?
- **QUESTION**: How many homes in Wonder Valley burned down in 2018, 2020, 2022?
- **QUESTION**: What were average fire response times to Wonder Valley prior to 2015 when Wonder Valley Fire Station was closed?
- **QUESTION**: What are average response times to Wonder Valley since the Wonder Valley Station 45 closed in September of 2017?

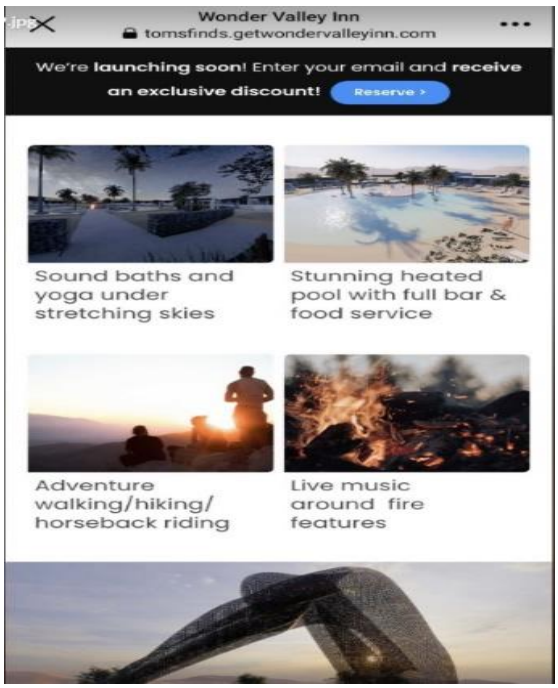
A home fire doubles in size every minute (Per J. Brakebill, instructor of Fire Sciences at Copper Mountain Community College, as stated during a community meeting at Wonder Valley Community Center.) A cooking fire can completely engulf a home in 5 minutes (*firefighterinsider*) Wonder Valley already has inadequate fire response times, which means in the event of a fire in a home in Wonder Valley, total loss is highly likely.

In the past 5 years - between January 2017 and January 2023, there have been over 33 structure fires in Wonder Valley that resulted in the total loss of property, and some families being left homeless *(Source: https://z1077fm.com)*. Sadly, some residents of Wonder Valley refer to the fire department as the "Slab Savers."

- **QUESTION:** What will the impact of this large luxury resort be upon the already inadequate fire services that cover Wonder Valley?
- **QUESTION:** What are the average service calls needed for a large 106 room hotel / spa / event center / resort of this size? how does this compare to the existing service call needs for current Wonder Valley residents?
- **QUESTION:** What fire coverage is needed for an event with 200 guests in attendance (in addition to the 200 hotel guests, visitors and staff)?
- **QUESTION:** What fire coverage is needed to host an event with 500 attendees? or, 1,000 attendees? or, 2,000? or, 5,000?
- **QUESTION:** If this proposal is approved, does the county plan to expand fire services in Wonder Valley to cover the roughly 20% increase in fire service needs for this large resort?
- **QUESTION:** If the county expands fire services to cover this large luxury hotel and event space, will the cost of additional fire services be imposed upon the residents of Wonder Valley?
- **QUESTION:** If the county imposes additional taxes upon the residents of Wonder Valley, will this be in the form of an annual property tax increase, which could cause the loss of homes for the residents who are unable to pay the increased taxes?

WILDFIRE: California has seen record breaking destruction from wildfires in recent years, due to years of extreme drought and weather conditions. People may think that a wildfire cannot happen in the desert because there's 'nothing to burn.' However, wildfires do happen in the desert. Within this geographical area, it is common to have multiple wind advisories and wind warnings several times per month for several months of the year. During a wind advisory, winds can blow sustained 25-30 mph with gusts up to 50-60 mph (*https://www.weather.gov/safety/wind*). Winds such as these will fan the flames of a wildfire and spread the fire quickly. Here are a few examples of wildfires threatening our area:

- The Elk fire burned 431 acres in the area between Yucca Valley and the village of Joshua Tree, threatening homes in 2022 *(https://www.desertsun.com)*
- 25 acres vegetation fire Flamingo Heights *(https://z1077fm.com)*
- The Elk Fire, south end of Yucca Valley burned 431 acres in 2022 *(fire.ca.gov*
- The Dome Fire in the Mojave Preserve burned 43,273 acres in 2020 *(latimes.com)*
- The Sawtooth Complex fire burned 61,700 acres in 2006 *(fire.ca.gov)*



Of note, the proposed Wonder Inn project promotional materials portray outdoor bonfires. (https://www.aearchitect.com/wonder-inn)
Note: this promotion refers to the "Wonder Valley Inn", but the promotional image of the pool and sound bath areas are from the Wonder Inn's own architect images.

In the Wonder Valley Community Meeting, held in May of 2022 at the Wonder Valley Community Center, the project proponent stated that they planned to buy their own firetruck and have their own volunteer fire department (*source: youtu.be @ 0:42).* Yet, this is not mentioned in the Initial Study, nor the Appendices.

- **QUESTION:** Will the proposed Wonder Inn be required to obtain a burn permit, as residents do when an outdoor burn is planned?
- **QUESTION:** Will the proposed Wonder Inn be dependent upon county fire services?
- **QUESTION:** Will the proposed Wonder Inn have their own fire engine?
- **QUESTION:** Will the proposed Wonder Inn have their own trained fire response team? If so:
  - **QUESTION:** What training and/or certification will this team have?
  - **QUESTION:** Will the team members be paid firefighting staff?

- **QUESTION:** Will this in-house team be dedicated to fire services, or will they have other duties too?
- **QUESTION:** Who will oversee this team and evaluate their effectiveness? what qualifications will this person(s) have?
- **QUESTION:** How will this in-house fire response team interface with the county fire department?
- **QUESTION:** Will their fire response team have adequate training in *wildfire suppression?
- **QUESTION:** Will their equipment be adequate for wildfire suppression?
- **QUESTION:** What if a fire occurs on a windy day? will they be able to control a fire and prevent spread into nearby neighborhoods?
- **QUESTION:** What exactly is their plan for fire response, to ensure that nearby residential homes are not threatened?

EMT/PARAMEDIC SERVICES: As mentioned in the previous sections, Wonder Valley Fire Station #45 was closed in 2017 due to 'contaminated water', and permanently closed in 2019 due to budgetary reasons. Since 2017, residents of Wonder Valley must depend on Emergency Medical / Paramedic response from the 29 Palms Fire Station #44 on Adobe Road in the City of Twentynine Palms. This station is 14 min from our home in the Gammel Township, which is 1.5 miles from the proposed project. (Please see map above, in fire section, for reference.) Our home is on the western side of Wonder Valley; residents who live east of us are at greater risk due to even longer response times.

Wonder Valley has a population of approximately 1019 people, with an average age of 59.3. The proposed Wonder Inn expects 160 daily guests, plus 40 visitors and *20 staff: that's at least 220 people daily, increasing the total population who will be sharing Public Services in Wonder Valley by roughly 20%. And, as previously mentioned, the additional 24 homes / STR's will add another 5% demand, for **a total of 25% increased demand** upon Wonder Valley's already inadequate public services.

In addition, as mentioned on page 13 of this document, the estimated staffing number given for the proposed Wonder Inn seems insufficient. For a 106-room hotel, with a 24-hour restaurant and all the amenities listed in the project description, it seems we could expect staffing to be *at minimum* closer to 25 and as high as 50 (depending on how "luxury" the hotel will be) for usual daily function. During events, staffing will increase in proportion to the size of the event attendance. If the proposed project will someday be hosting large events such as music festivals, etc., there could be thousands of people in attendance, and staffing needs would increase dramatically, placing greater burden upon our EMS services.

In order to effectively evaluate what impact events at the proposed Wonder Inn would have on Wonder Valley Public Services, we first must clearly understand the size and scope and type of events the owners plan to host at their venue. And, because the proposed Wonder Inn has not shared any information about possible events, it is unclear how large the events could be, and if they plan to hire extra security or EMS staff to support their events. We must have a full project description and a full EIR to assess these points.

The proposed Wonder Inn plans also include a large 24-hour, 100-seat restaurant and bar, a 6400-square foot swimming pool, and a 40 square foot hot tub.

- **QUESTION:** How many EMS calls might be generated by a 24 hour, 100 seat restaurant and bar?
- **QUESTION**: How many calls for paramedic services to Wonder Valley were there per month and per year for the years 2012? 2016, before the Wonder Valley Fire Station closed?
- **QUESTION**: How many calls for paramedic services to Wonder Valley were there in 2018, 2020, and 2022, after the Wonder Valley Fire Station closed?
- **QUESTION**: How many people died after calling for paramedic services each of these years?
- **QUESTION**: What were average paramedic response times to Wonder Valley prior to 2015 when Wonder Valley Fire Station was closed?
- **QUESTION**: What are average paramedic response times to Wonder Valley since Wonder Valley station 45 closed in September of 2017?
- **QUESTION:** What is the average number of drownings or other pool accidents related to a 6,400 square foot pool that is next to a bar?
- **QUESTION**: What is the average number of incidents involving drunk drivers associated with a restaurant / bar of this size?
- **QUESTION**: What is the likelihood of drunk drivers leaving the bar / event venue and causing an accident?
- **QUESTION:** Will CHP and Sheriff patrols be increased in Wonder Valley to protect residents and other drivers from injury or death resulting from DUI drivers?

In the event of choking, drowning or a heart attack, permanent brain damage begins after 4-5 minutes without oxygen *(medlineplus.gov/).* The current Emergency Medical Response times for Wonder Valley residents are already inadequate to save lives in the event of a life-threatening medical emergency. Will this proposed luxury resort also be dependent upon county Paramedic services?

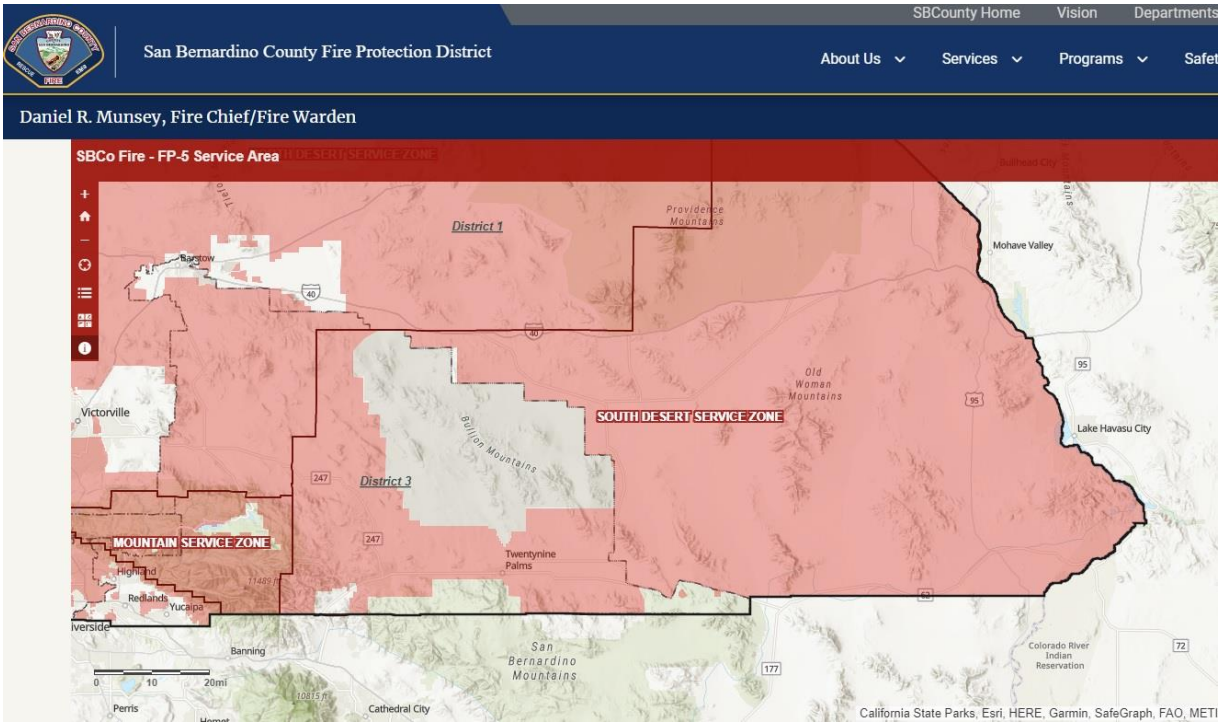
- **QUESTION:** Will the Wonder Inn have its own emergency medical response services? If so:
  - **QUESTION:** What training and/or certification will the Wonder Inn first responders have?
  - **QUESTION:** Will the first responders be paid or volunteer staff?
- **QUESTION:** Will there be a fence around the pool and hot tub?
- **QUESTION:** Will the pool be open to guests 24 hours?
- **QUESTION:** Will the Wonder Inn have full time lifeguard staff stationed poolside?
- **QUESTION:** Will all Wonder Inn hotel staff be trained in CPR? First aid? Will certificates of completion be on file at the hotel? will staff be required to get annual recertification?
- **QUESTION:** What are the average number of EMT/paramedic service calls generated by a large hotel resort that expects 160 daily guests plus 40 visitors plus 20 staff per day?
- **QUESTION:** What are the average number of service calls for a restaurant that has an 1,860 square-foot clubhouse restaurant and dining room with 457 square feet of outdoor seating, and a 1,125 square-foot kitchen?

- **QUESTION:** What is the likelihood of drunk drivers leaving the bar / event venue and causing an accident? how often does this happen? what are the current DUI stats for Wonder Valley?

Conclusion: I respectfully request a full environmental impact report be done to study these issues before this project is approved.

EMS / RESCUE / TRAFFIC ACCIDENTS

SBCounty Fire Dept #44 in Twentynine Palms shares coverage of a service area between Twentynine Palms, Needles and Havasu Landing, with approximately 131-142 miles and over 2 hours travel time between Twentynine Palms and Needles. This area is desolate, and traffic accidents are fairly common. Per San Bernardino County Fire Protection District website (*sbcfire.org*), there were **363** traffic collisions in our area, Division 4 South Desert Region, just in the **7 months** between July 1, 2022 and January 31, 2023.



Traffic collisions are fairly common in this area, on both Amboy Road and Highway 62, especially east of Wonder Valley. Amboy, a county scenic route, is a common route for people travelling to Las Vegas, while Hwy 62 is a common route for people travelling to the Colorado River recreational areas of Parker Dam, Lake Havasu, etc. Travelling at a high rate of speed, as is common on the open roads outside of populated areas, contribute to traffic accidents, and driving under the influence of alcohol also contributes to traffic accidents. SB County Fire Dept #44 provides emergency response for these roads and highways.

- **QUESTION:** Were any studies done to evaluate traffic volume on Amboy Road and Hwy 62 from 29 Palms to Needles and the Colorado River (the area within our service zone)? If so, what time of day were the observations performed?
- **QUESTION:** How many vehicles travel Amboy Road each day? each week?

- **QUESTION:** How many vehicles travel on Amboy between 2:00 pm and 9:00 pm on a Friday and a Sunday, when many travelers are headed to and from Las Vegas or the Colorado River recreational areas?

The proposed Wonder Inn estimates an increase in traffic of 604 additional vehicle trips daily. Further, this proposed luxury hotel and event center sits atop a small rise on Amboy Road, which blocks the view of the road ahead and increases the possibility of motor vehicle accidents, especially for drivers making a turn. For example, we turn left/north onto Gammel Road from Amboy Road when returning home from town, and more than once have almost been t-boned by speeding vehicles anxious to pass us as we slowed to turn.

This photo was taken roughly ¼ mile east of the existing commercial building (the “pink building”), and is looking west on Amboy. (Sorry for the dirty windshield; dust is a thing out here.) Note the pink building on the left:

The following photo was taken roughly ½ mile west of the proposed Wonder Inn, and is looking east on Amboy. Note the pink building on the right, on top of the rise:

Once again, Wonder Valley residents will be burdened with more risk, further stressing an already overburdened and inadequate EMT/Paramedic response system.

- **QUESTION:** Have there been any traffic studies done for the area including at least one mile east and one mile west of this proposed project?
- **QUESTION:** Is there enough visibility for drivers heading westbound to safely turn left into the proposed wonder inn ahead of eastbound drivers coming quickly up the blind incline?
- **QUESTION:** Will there be a pedestrian sidewalk installed along Amboy Road?
- **QUESTION:** Will there be a pedestrian crossing installed across Amboy Road?
- **QUESTION:** How many traffic accidents have there been on Amboy Road between Twentynine Palms and the intersection of Amboy Road and national trails highway this year?
- **QUESTION:** How many accidents were there on Amboy Road between Twentynine Palms and National Trails Highway per year prior to 2017, when the Wonder Valley Fire Station closed?
- **QUESTION:** How many traffic accidents have there been on Amboy Road between Twentynine Palms and the intersection of Amboy Road and National Trails Highway in 2020? in 2022?
- **QUESTION:** Please define the service area that crews from Twentynine Palms station 44 are responsible for covering.
- **QUESTION:** What are the EMS services currently available in Needles?
- **QUESTION:** How many service calls for traffic collisions / accidents were there in Wonder Valley in 2016 (before the Wonder Valley Fire Station was closed)? How many service calls were there in 2020? 2022?
- **QUESTION:** How many service calls for traffic collisions / accidents were received for areas east of Wonder Valley, between our community and Needles?

Conclusion: I respectfully request a full environmental impact report be done to study these issues before this project is approved.

Swift water rescues are sometimes needed during flash floods in the desert areas, which can be a fatal event.

- **QUESTION:** How many swift water rescues were there in Wonder Valley in 2015-16, before the Wonder Valley Fire Station was closed?
- **QUESTION:** How many swift water rescues have there been in Wonder Valley since the fire station closed in 2017?

Conclusion: I respectfully request a full environmental impact report be done to study these issues before this project is approved.

OTHER PUBLIC SERVICES

The sections above include only Fire, Paramedic/EMT and EMS for traffic accidents. There are many more elements included in Public Services, which could be further stressed by this project. Here are a few brief mentions:

From the San Bernardino County Policy Plan 2020:

> **Goal PP-1 Law Enforcement**
> Effective crime prevention and law enforcement that leads to a real and perceived sense of public safety for residents, visitors, and businesses.
>
> Policy PP-1.1 **Law enforcement services.** The Sheriff's Department provides law enforcement services for unincorporated areas and distributes resources geographically while balancing levels of service and financial

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POLICE / SHERIFF: The Morongo Basin Station is the third largest Sheriff's station in both area and total number of calls for law enforcement services in San Bernardino County. Within the station's area of responsibility are the incorporated communities of Twenty-nine Palms and the Town of Yucca Valley, as well as the unincorporated communities of Morongo Valley, Landers, Johnson Valley, Joshua Tree, Wonder Valley, Pioneertown, Amboy, Cadiz and Flamingo Heights. (sbcounty.gov/sheriff)

This Sheriff station is roughly 23 miles west of the Wonder Valley Community Center (the heart of Wonder Valley.) Sheriff response to Wonder Valley has been inconsistent through the years. Calls for help sometimes will bring a police response, but often our Sheriffs are not able to respond due to higher priorities in other areas. Sometimes a report will be taken over the phone, sometimes we are told to 'call back if it happens again.' And, sometimes the sheriff is knocking on our door within 10 minutes of placing a call for help. We never know when or if we will get a response, which means we can't depend upon our sheriff's ability to respond to our calls for help. Because of this, we feel vulnerable.

The proposed Wonder Inn is to be a luxury resort hotel, with 200 daily guests and 210 parking spaces in front. It seems likely that this resort could attract thieves looking for opportunities. With the addition of proposed Wonder Inn, there will be more competition for Wonder Valley residents for sheriff attention or response.

- **QUESTION:** Does the wonder inn plan to have security staff onsite?
- **QUESTION:** Will the proposed Wonder Inn rely upon Morongo Basin Sheriff Department for services?
- **QUESTION:** What will the impact be upon Wonder Valley residents' access to police / sheriff support?
- **QUESTION:** Will Sheriff services be increased to cover this large luxury resort hotel? if so, who will pay for it? will the fees for this be added to resident's taxes?
- **QUESTION:** Have any studies been done to evaluate the possible impact upon Wonder Valley property owner's taxes?
- **QUESTION:** How many services calls for Sheriff/police have there been in Wonder Valley in 2023?
- **QUESTION:** What is the average response time for Sheriff service calls to Wonder Valley?
- **QUESTION:** How many service calls Sheriff/police for Wonder Valley were there in 2018? 2019? 2020? 2022? 2021? 2022? are the number of service calls increasing as the population increases?
- **QUESTION:** How many calls for service result in a deputy actually showing up at a resident's door in Wonder Valley?

ROADS/ROAD MAINTENANCE : Briefly, this project estimates an additional 604 daily trips, which will accelerate the deterioration of Wonder Valley roads, especially impacting Amboy Road, Godwin Road, and Gammel Road, causing increased need for more frequent road repairs, paid for by taxpayers via a $50.00 annual assessment. Gammel Road, a direct route between the proposed Wonder Inn on Amboy and Gammel, and Hwy 62, is currently a dirt road, and would likely need to be paved to accommodate the increased visitors travelling from this hotel to Joshua Tree National Park.

- **QUESTION:** Have any traffic studies been done to assess this?
- **QUESTION:** What will the cost be to pave this 2 mile stretch of dirt road, and maintain it?
- **QUESTION:** Will the cost of paving Gammel Road be passed on to the taxpayers?

I'm also concerned about the possibility of 'poverty tourism', that is, the guests of this luxury hotel/spa wanting to explore our neighborhoods to 'see how the other half live', which would stress our already fragile dirt roads, which are maintained by CSA 70M, and paid for by resident's tax assessment. This area is listed as a "High Poverty Area", with over 22% of residents living in poverty. Many can't afford the increased taxes to support this luxury resort hotel.

- **QUESTION:** Would the increased neighborhood traffic generated by hotel guests "exploring" cause increased maintenance and repair needs and therefore increased taxes on our community?

ANIMAL CONTROL: Animal Control is a public service provided by the county of San Bernardino and paid for by the taxpayers. San Bernardino County Animal Care is a program managed by the San Bernardino County Department of Public Health (DPH). The mission of the San Bernardino County Animal Care is to prevent rabies in humans and pets, to educate the

public about responsible pet ownership, including the importance of spaying and neutering, to protect and serve the public and pets by enforcing all laws and ordinances pertaining to animal care, to care for all animals domestic and wild, to reunite lost pets with their owners, to place unwanted pets into new homes, and to maintain a high quality of service.

There are many animals in Wonder Valley, including many pet dogs that escape their enclosure, or stray dogs that sometimes roam in packs. This pack (there are 5 total dogs, but only 3 in photo) has been roaming in Wonder Valley in recent weeks and was reported as being aggressive toward people at times:

It bears mentioning that the Wonder Inn project plans to allow pets onsite, which will draw wild coyotes looking for a meal.

- **QUESTION:** Will there be any fences around this resort hotel to contain pets, and keep coyotes or stray packs of dogs out?
- **QUESTION:** Will leashes be required for guest's pets at all times when outdoors?
- **QUESTION:** Will pets be required to be current on all vaccinations to prevent exposing wildlife to disease?
- **QUESTION:** Will Animal Control services be needed to control wild coyotes near the proposed hotel?
- **QUESTION:** What measures will be in place to avoid attracting wild animals to garbage?
- **QUESTION:** Will hotel guests be educated about not feeding wildlife?
- **QUESTION:** What safety measures will be put in place to protect hotel guests from rattlesnakes?
- **QUESTION:** What measures will be put in place to protect snakes from harm on this property?
- **QUESTION:** Will the proposed hotel call animal control to remove rattlesnakes from their property?

An aerial view of a Wonder Valley property. *Jay Calderon/The Desert Sun*

CODE ENFORCEMENT Code Enforcement administers programs designed to protect the public's safety, welfare, and property value through enforcement of San Bernardino County ordinances and State/Federal laws relating to land use, zoning, housing, public nuisances, and vehicle abatement within the unincorporated areas of the County. This includes issues such as nuisance properties, community cleanup programs, Off Highway Vehicle education (illegal in Wonder Valley), illegal dumping, building permits, and Short-Term Rental permits including fielding complaints related to STR's in unincorporated areas. Of note, in Wonder Valley there are many, many areas and some properties that need evaluation by Code Enforcement due to public nuisance (including multiple sites of trash dumped in Wonder Valley, which is an ongoing issue), vehicle abatement (abandoned cars and RV's left on a dirt road somewhere), OHV education, etc. It seems there are not enough CE staff to adequately cover the Wonder Valley area.

- **QUESTION:** How many permits will Code Enforcement (CE) be required to issue for this project?
- **QUESTION:** How much time will Code Enforcement officers need to inspect and issue the permits required for the proposed Wonder Inn project?
- **QUESTION:** How many CE service requests come from Wonder Valley in a month (average)?
- **QUESTION:** How many CE service requests were there for Wonder Valley in 2022? 2021? 2020?
- **QUESTION:** For point of reference, how many CE service requests were there for Wonder Valley in 2017? 2015? 2013? (prior to the population growing, and the number of STR's growing)?
- **QUESTION:** Have any CE staff been added since the population of Wonder Valley increased?
- **QUESTION:** What is the average response time to requests for service from CE in Wonder Valley?
- **QUESTION:** Will the permitting needed for the proposed Wonder Inn project impact CE's ability to provide service to Wonder Valley residents?

Conclusion: We respectfully request a full environmental impact report be done to study these issues before this project is approved.

MISC POINTS OF CONCERN

The Wonder Inn proposal's description includes a 4,407 sq.ft. lobby/restaurant, a 5,000 sq.ft conference room, a 3,985 sq.ft. spa/wellness center, 106 guest rooms, plus ancillary structures for staff, a 3,300 sq.ft. multipurpose tent for gatherings, including a 1,700 sq.ft. building for restrooms, a 6,300 sq.ft./ 214,000-gallon swimming pool (almost half the size of an Olympic pool), a 40 sq ft / 1,100 gallon hot tub, an astronomy pergola, sunken gardens, etc. This proposed project also includes a 210-space parking lot onsite – and (not stated in original application) an additional 20 acres across the street, NW on Amboy for event parking. Project developer needs to explain what is planned for this additional property.

In addition, there is some discrepancy in the project maps included in this Initial Study. On page 7 and 8 (of 92), the maps are "L" shaped, and does not include the northeast 25 acres owned by the project proponents. However, on page 10 and 11 (of 92), this 25 acre parcel is included in the map. What maps or areas were all of their studies based upon? How could this affect study results? Which reports could be impacted by the addition – or, subtraction of this 25 acre parcel?

Of note, on page 584 of the Appendices, paragraph 2 states, "The project proposes the tenant improvement of an existing 4,407 square-foot single story commercial structure, to become a lodging clubhouse …. Improvements of the commercial building include an 1,860 square-foot clubhouse restaurant and dining room with 457 square feet of outdoor seating, and a 1,125 square-foot kitchen. The proposed 1,939 square-foot restaurant and dining room have 100 seats, 74 of which are indoor and 26 outdoor." 1860 + 457 + 1125 +1939 = 5,381 square feet, not 4,407 as mentioned in the first sentence. This is confusing and needs to be clarified.

A minor point: Godwin Road is misspelled as "Goodwin" on a few pages. This is an inconsequential point, but inspires concerns about how careful the developers and their agents were in conducting these studies. When several little mistakes such as these are made, it causes one to question how accurate the reports actually are.

SUMMARY

Based upon the numerous questions raised above, it is clear that a full and complete Environmental Impact Report must be completed to thoroughly study the many significant impacts that the proposed Wonder Inn project would have on the Wonder Valley community, the safety of Wonder Valley residents, and the environmental impacts this resort hotel will have upon this rural, sparsely populated and underserved area.

To conclude, I respectfully request a full Environmental Impact Report be done to study these issues before this project is approved.

Sincerely,
Beth Sheffield
(Full time resident of Wonder Valley since 2013 – I'm a newbie by Wonder Valley standards!)

PUBLIC SERVICES REFERENCES:

CEQA INITIAL STUDY/MND: Public Services Area

CEQA: San Bernardino County Initial Study/Mitigated Negative Declaration Environmental Checklist, doc, page 69-71:

XV. PUBLIC SERVICES
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

Fire Protection? FINDING: "Less than significant"
>study is not sufficient to support this determination

Police Protection? FINDING: "Less than significant"
>study is not sufficient to support this determination

Schools? FINDING "Less than significant"

Parks? FINDING: "No impact"

Other Public Facilities? FINDING: "No impact"

SUBSTANTIATION: Countywide Policy Plan, 2020; Submitted Project Materials

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:

>PUBLIC SERVICES IN WONDER VALLEY ARE ALREADY INADEQUATE. THIS PROJECT WOULD INCREASE THE BURDEN UPON THESE SERVICES

Fire Protection?
San Bernardino County Fire Station 44, located at 6560 Adobe Rd, Twentynine Palms, CA 92277, is approximately **7 miles** southwest of the Project Site. New development within the unincorporated county would not combine with other development in the county to result in a cumulatively considerable impact to fire and emergency services. The County would maintain sufficient services within its boundaries as well as expand to serve other incorporated jurisdictions to improve service and coverage.

>NOTE: THE FIRE STATION IN TWENTYNINE PLAMS IS FURTHER AWAY THAN 7 MILES.

Comprehensive safety measures that comply with federal, state, and local worker safety

and fire protection codes and regulations would be implemented into project design to minimize the potential for fires to occur during construction and operations. The Proposed Project would be required to comply with County fire suppression standards, provide adequate fire access and pay required development impact fees. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

Less Than Significant Impact >study is not sufficient to support this determination

Police Protection?
The San Bernardino County Sheriff's Department (SBCSD) serves the unincorporated portions of the County. The nearest police station to the Project Site is the SBCSD-Morongo Basin station located at 6527 White Feather Road, Joshua Tree, approximately **18 miles** southwest of the Project Site. The SBCSD reviews staffing needs on a yearly basis and adjusts service levels as needed to maintain an adequate level of public protection. Additionally, development impact fees are collected at the time of building permit issuance to offset project impacts. Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

>NOTE: SHERIFF DEPT IS FURTHER AWAY THAN 18 MILES

Less Than Significant Impact >study is not sufficient to support this determination

Schools?
The Project Site is served by the Morongo Unified School District. Construction activities would be temporary and would not result in substantial population growth. The approximately 160 guests per day would not need school services. The estimated 20 employees required for operations are expected to come from the local labor force with school children already attending school in their home district. The Proposed Project is not expected to draw any new residents to the region that would require expansion of existing schools or additional schools. With the collection of development impact fees,
impacts related to school facilities are expected to be less than significant. Therefore, no significant impacts are identified or anticipated, and no mitigation measures are required.

Less Than Significant Impact

Parks?
The Proposed Project would neither induce residential development nor significantly increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of any facilities would result. Operation of the Proposed Project would place no demands on parks because it would not involve the construction of housing and would not involve the introduction of a permanent human population into the area. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.
No Impact

Other Public Facilities?
The Proposed Project would not result in an increased residential population or a significant increase in the work force. Implementation of the Proposed Project would not adversely affect other public facilities or require the construction of new or modified

facilities. Therefore, no impacts are identified or anticipated, and no mitigation measures are required.

No Impact

Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required. >study is not sufficient to support this determination

SAN BERNARDINO COUNTY GENERAL PLAN: website: https://countywideplan.com/policy-plan/personal-property-protection/

PERSONAL & PROPERTY PROTECTION ELEMENT - Last updated: 10/27/2020

- INTRODUCTION

The benefits, public goods, and investments associated with a high quality of life in San Bernardino County—strong neighborhoods, economic prosperity, cradle-to-career education, a vibrant culture, and civic engagement—**can only be achieved when people experience a real and perceived sense of safety**. Public safety is also directly related to the County's resilience—its ability to adapt to changing conditions and prepare for, withstand, and rapidly recover from disruption or disasters.

The County provides law enforcement, including crime prevention, in unincorporated areas and under contract to some incorporated jurisdictions. It also provides **some countywide law enforcement services, including the coroner**, and when requested, special investigation assistance to incorporated jurisdictions. **The County is also responsible for: the administration of justice, both prosecutions and public defenders, for crimes committed in the county; operation of County jails, including rehabilitation of inmates in its custody; holistically rehabilitate and assist the reentry and transition of parolees, probationers, and others living in the county engaged by the criminal justice system, and assistance to victims of and witnesses to crimes committed in the county.**

The County Fire District provides fire prevention services, fire protection for wild fires and urban fires, and emergency medical response in unincorporated areas, portions of incorporated jurisdictions included in the district, and, under contract, in some incorporated jurisdictions. The County plans for and responds to emergencies and natural disasters countywide, and **County Fire also provides regional urban search and rescue services.**

The Sheriff is responsible for law enforcement and is elected by voters countywide. The Board of Supervisors appropriates funds to supplement state and federal funding for law enforcement. Achieving the Policy Plan's goals for law enforcement is, thus, a collaborative effort between the Board of Supervisors and the Sheriff. **The Sheriff also provides countywide wilderness rescue services.**

The County makes a maintenance of effort payment for courts, but the state is primarily responsible for funding courts and fully responsible for any expansion. However, the **County funds the elected District Attorney's office, the Public Defender's office, and the Sheriff's department's court services.** Thus, state decisions on court funding will influence the ability of the County to achieve this element's law and justice goal.

GOAL PP-1: LAW ENFORCEMENT

Effective crime prevention and law enforcement that leads to a real and perceived sense of public safety for residents, visitors, and businesses.

Policy PP-1.1 Law enforcement services
The Sheriff's Department provides law enforcement services for unincorporated areas and distributes resources geographically while balancing levels of service and financial resources with continuously changing needs for personal and property protection.

Policy PP-1.2 Contract law enforcement
When requested, the Sheriff's Department provide law enforcement services to incorporated jurisdictions by contract at the full cost of services as determined by the County, without direct subsidy by the County.

Policy PP-1.3 Holistic approach to crime prevention
We recognize that the roots of crime are found throughout a spectrum of psychological, social, economic, and environmental issues, and we coordinate proactive planning and activities among the Sheriff's Department and county and non-county agencies and organizations to intervene and effectively prevent crime. *(Continued on website)*

An equitable justice system for violations of law in the county, adequate care and effective rehabilitation for inmates in the County's custody, and the holistic rehabilitation and aided reentry and transition of parolees, probationers, and others living in the county engaged by the criminal justice system

GOAL PP-3 FIRE AND EMERGENCY MEDICAL

Reduced risk of death, injury, property damage, and economic loss due to fires and other natural disasters, accidents, and medical incidents through prompt and capable emergency response.

Policy PP-3.1 Fire and emergency medical services

We maintain a sufficient number and distribution of fire stations, up-to-date equipment, and fully-trained staff to respond effectively to emergencies.

Policy PP-3.2 Fire District
We support the expansion of the Fire District to serve additional incorporated jurisdictions, and the use of special funding and financing mechanisms to augment Fire District revenues to improve service and coverage.

Policy PP-3.3 Search and rescue
We maintain up-to-date equipment and fully-trained staff to provide urban search and rescue and swift water rescue emergency response.

Policy PP-3.4 Fire prevention services
We proactively mitigate or reduce the negative effects of fire, hazardous materials release, and structural collapse by implementing the California Fire Code, adopted with County amendments.

Policy PP-3.5 Firefighting water supply and facilities
We coordinate with water providers to maintain adequate water supply, pressure, and facilities to protect people and property from urban fires and wildfires.

Policy PP-3.6 Concurrent protection services
We require that fire department facilities, equipment, and staffing required to serve new development are operating prior to, or in conjunction with new development.

Policy PP-3.7 Fire safe design
We require new development in the Fire Safety Overlay to comply with additional site design, building, and access standards to provide enhanced resistance to fire hazards.

Policy PP-3.8 Fire-adapted communities
We inform and prepare our residents and businesses to collaboratively plan and take action to more safely coexist with the risk of wildfires.

Policy PP-3.9 Street and premise signage
We require adequate street signage and premise identification be provided and maintained to ensure emergency services can quickly and efficiently respond.

Policy PP-3.10 Community outreach
We engage with local schools, community groups, and businesses to increase awareness of fire risk, prevention, and evacuation.

Policy PP-3.12 Fire protection and emergency medical resource allocation
We use fire and emergency services data analysis and professional expertise to allocate resources, reduce fire risks, and improve emergency response.

Policy PP-3.13 Periodic needs assessment
We periodically assess our facility, equipment, and staffing needs and use the assessment to allocate funding resources in the annual budget and capital improvement program.

Policy PP-3.14 Qualified workforce
We attract and retain a qualified workforce of fire fighters, emergency medical technicians, and support personnel, and invest in training and ongoing education.

PUBLIC SERVICES COMMENT REFERENCES:

https://countywideplan.com

https://www.desertsun.com/story/news/2018/05/24/wonder-valley-life-threatened-nature-authorities-and-tourists/612176002/

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https://www.allianceonline.co.uk/blog/2019/06/hotel-housekeeping-101-tips-tricks-for-clean-hotel-rooms/#:~:text=It%20takes%20roughly%2045%20minutes,turn%2Ddown%20service%20is%20needed.

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https://www.modly.com/community/joshua-tree

https://www.bainhospitality.com/work/thewonderinn

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https://z1077fm.com/page/2/?s=fire+wonder+valley

https://www.weather.gov/safety/wind-ww#:~:text=not%20caught%20outside.-,NWS%20offices%20issue%20this%20product%20based%20on%20local%20criteria.,should%20be%20taken%20if%20driving.

https://www.desertsun.com/story/news/2022/05/26/elk-fire-threatens-homes-yucca-valley-near-joshua-tree/9951357002/

https://z1077fm.com/vegetation-fire-in-flamingo-heights-confined-to-15-acres/

https://www.fire.ca.gov/incidents/2022/5/26/elk-fire/

https://www.latimes.com/environment/story/2020-09-06/mojave-desert-fire-destroys-the-heart-of-a-beloved-joshua-tree-forest

https://www.fire.ca.gov/incidents/2006/7/9/sawtooth-complex/

https://youtu.be/locy-iZboQs?t=43 at 0:42

https://medlineplus.gov/ency/article/001435.htm

https://sbcfire.org/statistics/#div4-anchor

https://wp.sbcounty.gov/sheriff/patrol-stations/morongo-basin/

From:	Saving Slowpoke
To:	Khan, Azhar
Cc:	Supervisor Rowe; Reyes, Steve; Planning Commission Comments; info@stopwonderinn.org
Subject:	Comment for Wonder Inn Hotel/Resort (Twentynine Palms), PROJ-2021-00163.
Date:	Wednesday, February 22, 2023 11:49:00 AM
Attachments:	SSP Comment Letter SWI23.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Please find the attached comment letter in reference to:

Wonder Inn Hotel/Resort (Twentynine Palms), **PROJ-2021-00163**.

Thank you!

Saving Slowpoke
61923 Plaza Rd. Suite A
Joshua Tree, CA 92252
www.savingslowpoke.org
savingslowpoke@gmail.com

22 February 2023
Attn: Azhar Khan, Planner
County of San Bernardino
Land Use Services Department, Planning Division
385 N. Arrowhead Ave 1st Floor
San Bernardino, CA 92415
azhar.khan@lus.sbcounty.gov

RE: Wonder Inn Hotel/Resort (Twentynine Palms) (PROJ-2021-00163)

Dear Mr. Khan,

Saving Slowpoke is a locally led and operated grassroots organization comprised of professional desert conservationists, activists, land management professionals, and laypersons who share a common concern for captive and wild desert tortoises and a commitment to advancing the public's understanding of desert tortoise care and conservation needs. Established in 2019 to promote the love and needs of Mojave Desert Tortoise in the California's deserts. Saving Slowpoke routinely offers free public education to under-represented communities at the heart of and surrounded by desert tortoise habitat. We are actively trying to create more tortoise conservationists and desert protectors in areas often overlooked.

Both our physical and email addresses are provided above in our letterhead for your use when providing future correspondence to us. When given a choice, we prefer that the County of San Bernardino Land Use Services Department (County) email to us future correspondence, as mail delivered via the U.S. Postal Service may take several days to be delivered. Email is an "environmentally friendlier way" of receiving correspondence and documents rather than "snail mail."

Given the location of the proposed project in habitats known to be occupied by Mojave Desert tortoise (*Gopherus agassizii*) (synonymous with Agassiz's desert tortoise), our comments pertain to enhancing protection of this species during activities authorized by the County. Please accept, carefully review, and include in the relevant project file Saving Slowpoke's following comments and attachments for the proposed project.

The Mojave desert tortoise is among the top 50 species on the list of the world's most endangered tortoises and freshwater turtles. The International Union for Conservation of Nature's (IUCN) Species Survival Commission, Tortoise and Freshwater Turtle Specialist Group, now considers the Mojave desert tortoise to be Critically Endangered (Berry et al. 2021), as it is a "species that possess an extremely high risk of extinction as a result of rapid population declines of 80 to more than 90 percent over the previous 10 years (or three generations), population size fewer than 50 individuals, other factors." It is one of three turtle and tortoise species in the United States to be critically endangered.

The following information is provided in the County's Notice of Availability (NOA) and Notice of Intent (NOI), dated 1/17/2023: "A Concurrent filing of a Tentative Parcel Map to consolidate six parcels into two parcels, a General Plan Land Use Amendment from Rural Living (RL) to Commercial (C) and a Zoning Amendment from Rural Living, 5-acre minimum lot size (RL-5) to Service Commercial (CS), a Conditional Use Permit for a proposed hotel use with the conversion of an existing 4,407- square foot office building to a restaurant/lobby and the construction of 106 guest rooms, 5,031 square foot conference room, 4,666 square foot wellness center and ancillary structures on a 24.4-acre site, located at 78201 Amboy Road, Twentynine Palms" (Proposed Project). The total project area is 134.6 acres.

The County's Initial Study/Mitigated Negative Declaration Checklist, dated January 2023, provides the following additional information on page 2:

Accommodations:

- 106 pre-manufactured modular structures placed in pods that will serve as the hotel rooms (total of 42,120 SF).
- 210 vehicle parking stalls, of which 12 contain electric vehicle charging stations, and seven are compliant with the American with Disabilities Act (ADA).
- 10 dedicated to motorcycle parking.

Amenities:

- Lobby, restaurant, kitchen, clubhouse – 4,407 SF (remodel of existing commercial style building).
- Administration/Back of House – 6,310 SF pre-manufactured modular building.
- One Swimming Pool – 6,300 SF.
- Wellness Area with arrival center (a building), shade structure treatment rooms, restroom, and a shade structure fitness room (total 3,985 SF).
- A 3,300 SF multi-purpose tent for gatherings with a 1,700 SF building and restroom area.
- Astronomy pergola – an approximately 250-foot linear, landscaped pathway to an existing on-site metal structure that includes landscaping and benches, and hard surfaces to set up telescopes or sit and watch the stars.
- Sunken Garden – an approximately 250-foot linear, landscaped pathway would lead to a landscaped area that is lower than the ground surface for seating.

Site Features:

- Landscaping features that include a variety of native palm and shade trees, water features, creosote mounds, decomposed granite trails, and water features.
- The parking lot will be asphalt chip seal, but the interior pathways and roadways and trails will be compacted decomposed granite.
- Drainage controls include construction of rock lined swales mostly along southern side of the property, intended to intercept and divert surface runoff to proposed detention ponds on both sides of the development area. This will prevent the offsite runoff from mixing with the rain water in the development zone. The outlet points for these lined swales will be fitted with detention ponds to attenuate the flow as it is released from the site. Outlets for the ponds will also include riprap pads and dissipators, if necessary. Within the development area, inlets and pipe systems will be used to intercept and convey runoff. The runoff will be brought to infiltration ponds for treatment before eventual release to its original flow path.

We note on page 5 of the Initial Study under the list of "Additional Approval Required by Other Public Agencies," that there are no such Federal approvals and several approvals by the State of California. For reasons given herein, we believe that a Federal Section 10(a)(1)(B) incidental take permit will be required from the U.S. Fish and Wildlife Service (USFWS) under the Federal Endangered Species Act (FESA) and a Section 2081 incidental take permit under the California Endangered Species Act (CESA) will be required from the California Department of Fish and Wildlife (CDFW) before any ground disturbance occurs, which we believe will result in the take of the Federal- and State-listed Mojave desert tortoise. In addition, authorizations from both agencies may be required for the take of migratory birds under the Migratory Bird Treaty Act and its implementing regulations, and California Fish and Game Code.

On page 30 of the Initial Study, we read "No special-status wildlife species were observed on-site during the field survey performed as part of the Habitat Assessment (HA) in Appendix B-1. Based on habitat requirements for specific species and the availability and quality of onsite habitats, the HA in Appendix B-1 identified that the Proposed Project site has a low to moderate potential to support the following species as identified in Table 4 - Summary of Sensitive Species and Potential to Occur, although none of the species in Table 3 were identified in the field survey in Appendix B-1." Please revise this section and add the species to the tables.

We read on page 5 of the Habitat Assessment (ELMT 2021), "All available reports, survey results, and literature detailing the biological resources previously observed on or within the vicinity of the project site were reviewed to understand existing site conditions and note the extent of any disturbances that have occurred on the project site that would otherwise limit the distribution of special-status biological resources." Perhaps through no fault of their own, the consultant was not aware that a protocol tortoise survey and habitat assessment was conducted on 40 of the 135-acre± subject property in April 2020 (Circle Mountain Biological Consultants, Inc. 2020). The results of this survey and assessment should be added to the HA and the California Environmental Quality Act (CEQA) document and included in the description and analysis of impacts from implementation of the Proposed Project.

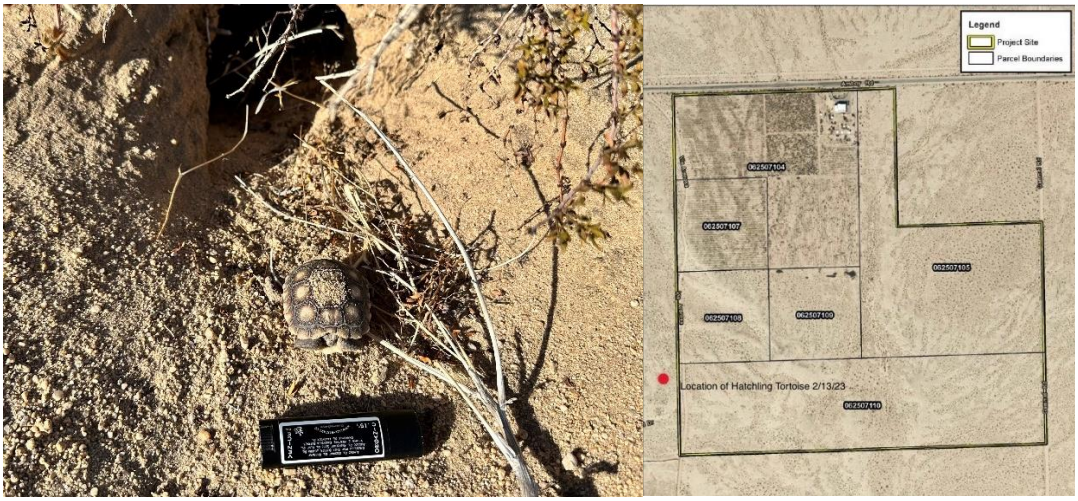
Page 6 of the HA states, "ELMT biologist Travis J. McGill evaluated the extent and conditions of the plant communities found within the boundaries of the project site on March 25, 2021. Plant communities identified on aerial photographs during the literature review were verified in the field by walking *meandering transects* [*emphasis* added] through the on-site plant communities and along

boundaries between plant communities." We note later on page 16 that a "systematic search of the project site" is referenced but not described.

There is no indication that a protocol tortoise survey (USFWS 2019) was performed, either in the text or in the literature cited. We note that given CMBC's researched standards of surveying for tortoises of approximately four acres per hour, that it would take approximately 34 hours to survey a 135-acre site, which excludes peripheral surveys to detect western burrowing owl (*Athene cunicularia*) (CDFG 2012[1]), which would take several more hours. Given that Mr. McGill completed "meandering transects" on the 135-acre site on only one day, and lacking any additional information, we conclude that the requisite protocol survey was not performed.

Importantly, Mr. McGill's reconnaissance survey was performed on 3/25/2021, approximately 11 months after Circle Mountain Biological Consulting (2020) performed its protocol survey on 4/6/2020. During the April survey, two CMBC biologists spent approximately eight hours performing surveys on a 40-acre portion of the same property, encompassing a portion of APN 0625-071-04 and all of APN 0625-071-09. During the CMBC survey, biologists found a 90 mm desert tortoise, the carcass of an adult tortoise that died more than four years ago, 7 fresh scats deposited in 2020 by adult tortoise(s), 2 older scats deposited prior to 2020 by adult tortoise(s), 16+ fresh scats of subadult tortoise(s), and 2 older scats of subadult tortoise(s).

Considering this oversight, possible disregard or concealment of this professionally conducted survey by Circle Mountain Biological and the findings it yielded, Saving Slowpoke representatives opted to conduct a casual and impromptu survey of a public right of way that passes near and through the proposed properties westernmost boundary. To avoid any trespass representatives never ventured further than 50 feet from the shoulder of the public right-of-way. Our staff has formal training and previous experience in conducting presence-absence surveys for desert tortoise and are very experienced in spotting tortoise and their sign. Upon survey of the right-of-way (Via Arenosa Rd.) a hatchling Mojave Desert tortoise (MCL ~50mm) was found approximately 40 feet away from the property's western boundary (Pictured and indicated by a red dot in the figure below). This individual is representative of a desert tortoise no older than 6 months in age and was likely born last autumn. This is indicative of a reproductive population of desert tortoise either adjacent to, or within the proposed development site but certainly within the immediate vicinity.



Collectively our staff has over 50 years of observational, anecdotal, and researched knowledge of Mojave Desert Tortoise, their habitat, and their biology and we can state without reservations that 90% or more of the tortoise sign found in April 2020 CMBC Survey was still present on the smaller 40-acre parcel in March 2021 when the reconnaissance survey was performed. Depending on the biologist's experience level, we are certain that tortoise sign would have been found had the appropriate protocol survey been performed.

Given all this information and available data from peer-reviewed scientific papers on biology of and threats to the tortoise, Saving Slowpoke concludes that development of this site would invariably result in the take of tortoises. Take would occur from direct, indirect, and/or cumulative impacts (e.g., increase in human subsidized predation, entrapment of tortoises in drainage control facilities, etc.), and without the State and Federal incidental take permits listed above, would be in violation of both the California Endangered Species Act and Federal Endangered Species Act. We recommend that the County require a new survey of the 135-acre± site, employing the appropriate tortoise survey protocols (USFWS 2019) onsite and burrowing owl survey protocols in adjacent areas (CDFG 2012). For tortoise surveys, this would include implementing the survey at the appropriate time of the year and by personnel deemed qualified by USFWS and CDFW. In the meantime, the Initial Study, at least with regards to Biological Resources, needs to be revised and redistributed after these surveys are performed.

Finally, given the introduction of people into tortoise-occupied habitats and the likelihood that tortoise predators, including common ravens and coyotes, are likely to be drawn onto the site and adjacent areas seeking new food and water sources (Boarman 2003, Kristan and Boarman 2003), Saving Slowpoke concludes that the County must require an environmental impact report (EIR) for the proposed project that addresses all direct, indirect, and cumulative impacts to tortoises in the area. Importantly, the subject property is only 2.5 miles north of the Pinto Mountains Critical Habitat Unit (USFWS 1994) and Pinto Mountains Area of Critical Environmental Concern (ACEC; BLM 2006). Among other things, the EIR must address impacts to these proximate, essential tortoise habitats (USFWS 1994). The County should require the Project Proponent to contribute to the National Fish and Wildlife Foundation's Raven Management Fund for regional and cumulative impacts as well as other measures to mitigate the direct and indirect impacts during construction and operations and maintenance of the Proposed Project.

We appreciate this opportunity to provide comments on this project and trust they will help protect tortoises during any resulting authorized activities. Herein, we reiterate that Saving Slowpoke wants to be identified as an Affected Interest for this and all other projects funded, authorized, or carried out by the County that may affect species of desert tortoises, and that any subsequent environmental documentation for this project is provided to us at the contact information listed above. Additionally, we ask that you respond in an email that you have received this comment letter so we can be sure our concerns have been registered with the appropriate personnel and office for this project.

Respectfully,

Luke R Basulto

Luke Basulto, Founder
Saving Slowpoke

Literature Cited

Berry, K.H., L.J. Allison, A.M. McLuckie, M. Vaughn, and R.W. Murphy. 2021. *Gopherus agassizii*. The IUCN Red List of Threatened Species 2021: e.T97246272A3150871. https://dx.doi.org/10.2305/IUCN.UK.2021-2.RLTS.T97246272A3150871.en

Boarman, W. 2003. Managing a Subsidized Predator Population: Reducing Common Raven Predation on Desert Tortoises. Environmental Management 32, 205–217 (2003). https://doi.org/10.1007/s00267-003-2982-x

California Department of Fish and Game. 2012. Staff report on burrowing owl mitigation. The 7 March 2012 memo replacing 1995 staff report, State of California Natural Resources Agency, Department of Fish and Wildlife. Sacramento, CA.

Circle Mountain Biological Consultants, Inc. 2020. Focused Survey for Agassiz's Desert Tortoise, Habitat Evaluation for Burrowing Owl, and General Biological Resource Assessment for a 40-acre± Site (APN 0625-071-04 & 09) in the Community of Wonder Valley, San Bernardino County, California. Unpublished report dated April 2020.

Defenders of Wildlife, Desert Tortoise Preserve Committee, and Desert Tortoise Council. 2020. A Petition to the State of California Fish And Game Commission to move the Mojave desert tortoise from listed as threatened to endangered. Formal petition submitted 11 March 2020. https://defenders.org/sites/default/files/2020-03/Desert%20Tortoise%20Petition%203_20_2020%20Final_0.pdf.

ELMT Consulting, Inc. 2021. Habitat assessment for The Wonder Inn Joshua Tree. Unpublished report, dated July 2021, provided by San Bernardino County Planning Department. Santa Ana, CA. 23 pp plus appendices. Desert Tortoise Council/Comments/ Wonder Inn Hotel/Resort.2-10-2023 7

From:	Sarah Jane
To:	Khan, Azhar
Cc:	Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject:	Comments: Initial Study PROJ-2021-00163 /Wonder Inn Hotel / Resort
Date:	Wednesday, February 22, 2023 12:18:09 PM
Attachments:	Wonder Valley Inn Comments 2.23.docx

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Planner Khan,
Please find attached comments regarding the proposed Wonder Valley Inn project / IS.

Initial Study PROJ-2021-00163 /Wonder Inn Hotel / Resort, 78201 Amboy Road, Twentynine Palms, 92277 / APNs: 0625-071-04, -05, -07, -08, -09, -10

Sincerely,
Sarah Kennington & Steve Bardwell
sarah@infinityranch.net
steve@infinityranch.net

22 February 2023

To: Azhar Khan, San Bernardino County Planner II, Land Use Services
Azhar.Khan@lus.sbcounty.gov

RE: Initial Study PROJ-2021-00163
Wonder Inn Hotel / Resort, 78201 Amboy Road, Twentynine Palms, 92277
APNs: 0625-071-04, -05, -07, -08, -09, -10

Thank you for this opportunity to comment on the proposed Wonder Valley Inn development. We have significant concerns about this project based on the following issues:

This construction and continuing operations of the project will certainly have irreversible impacts on the landscape and its natural resources, the flora and fauna. It will also threaten the peace and quiet / quality of lives of the surrounding rural community residents. These impacts have not been adequately assessed in Initial Study (IS). Nor has the developer been forthright.

The project clearly requires a thorough Environmental Impact Report on the basis of undisclosed and inadequately evaluated "Potentially Significant Impacts." The circumstances detailed in MBCA's Addendum submitted to Azhar Kahn on 2/21/2023, alone warrant the County abandon the project's "Mitigated Negative Declaration" status. MBCA's letter documents the full scope of the proposed Inn project. Social media campaigns were discovered that broadcast the applicant's intention to develop 24 luxury homes or "Villas," to be used as STRs, on the adjacent 113.4 acres the developer owns. The IS does not mention intentions to develop the area beyond the Inn project foot-print. In fact, the IS specifically states that the developer had no intent to construct single-family homes! This omission has obvious cumulative environmental impacts and undermines the developer's credibility and quality of intentions. Throw out the Initial Study – it is critically flawed! From our perspective, the developer is ethically suspect!

Zoning - Table 1 – Existing Land Use and Zoning lists the existing adjacent land uses and zoning for the Project Site and the area adjacent to and surrounding the Project Site. Exhibit 5 identifies the Project Site's existing and proposed zoning.

Does the IS accurately define existing zoning? In particular, is the parcel on which the "pink building" sits commercially zoned as stated? Has it in fact reverted to "residential living"? If so, there should be no re-zoning to allow a commercial resort of the nature proposed or the surrounding parcels that are currently zoned Rural Residential. "Spot zoning" of this nature should not be considered in this environmentally sensitive area. Deny the concurrent filings for General Plan Land Use Amendment rezoning from RL-C and the Conditional Use Permit.

The IS is dismissive of the area residents. The IS siting on page 4:
Project Site Location, Existing Site Land Uses and Conditions
"The Project vicinity is primarily an unincorporated, undeveloped area…"
"The Project Site is located within an area that is primarily vacant…"

Resorts of the nature and scale of the proposed Wonder Valley Inn should be located closer to the region's tourist amenities – in particular, closer to Joshua Tree National Park. This would minimize Vehicles Miles Traveled (VMT) to and from accommodations to their destinations. It would reduce carbon use and air pollution. It would isolate damage to the fragile desert environment and associated wildlife corridors. It avoids the creep of noise and light into a pristine environment. It only makes sense!

ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:
I. AESTHETICS
We disagree with the conclusion that project as described in the IS (page 14):
Although the proposed project could have a significant effect on the environment, there shall not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION shall be prepared.

It is disingenuous and erroneous to characterize this project having "Less Than Significant" impact on: *the existing character or quality of public views of the site and its surroundings."* This is virtually an unspoiled, undeveloped landscape prized for the vast and panoramic views as far as the eye can see – particularly by passers-by traveling on Amboy Road ("a public vantage point.")

The new source of substantial light will affect nighttime views in the area.
The night skies prized in the Morongo Basin would definitely be diminished by the artificial lighting introduced by the proposed project. While the applicant promises to comply with the County Light Trespass Ordinance requirements, the many additional indoor lights, especially on the Inn's second floor and automobile headlights entering and exiting the property will impact the area now virtually free of any artificial lighting except the occasional car passing on Amboy Road.

The Project Site includes renovation of the existing vacant commercial building and several of the existing geodesic metal domes that exist on site. <u>These structures were evaluated for their cultural and historical significance, and they were determined not to have historic value.</u> The former use of the Project Site was a jojoba farm.

Research by Wonder Valley residents discovered the existing site's "pink building" does indeed have historic qualities not documented by the IS. There were uses other than the use of the site as a jojoba farm in more recent history. The cultural value to

the community is fuller and more intriguing than that reported. The "Less than Significant Impact" finding is not correct.

II. AGRICULTURE AND FORESTRY RESOURCES

d) Result in the loss of forest land or conversion of forest land to non-forest use?

While this is a desert landscape and not forest land, the development will definitely and significantly convert the native landscape. The surface of the development area will be scraped and significantly impacted. Native desert plants uniquely adapted will be lost and cannot be realistically conserved or replaced.

However, the IS states the native and intact desert landscape will have "Less Than Significant Impact." This finding is not correct.

IV. BIOLOGICAL RESOURCES

The applicant disregarded evidence of the presence of desert tortoise (a State and federally listed threatened species) on the project site. This was reported by Pat Flanagan in an email sent January 20, 2023 to Azhar Kahn, Planner, Supervisor Rowe and others.

The applicant was aware of a survey conducted by tortoise biologist, Ed LaRue that in fact documented evidence of tortoise. In addition, Wonder Valley residents have documented the existence of tortoise on adjacent properties over time and as recently as February, 2023 (see Stop Wonder Valley website: stopwonderinn.org).

Table 4 Summary of Sensitive Species and Potential to Occur

*There are no documented Desert Tortoise occurrences on site or directly adjacent to the Project Site. … No desert tortoises or sign (i.e. scat, bu*rrows, carapaces) were observed on-site. ***Less Than Significant with Mitigation Incorporated***

This is a disingenuous finding. <u>An EIR is required to substantiate that the site does or does not support desert tortoise.</u>

X. HYDROLOGY AND WATER QUALITY

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin? ***Less Than Significant***

There is evidence that the aquifers in the Morongo Basin are experiencing overdraft. Further study is required to understand the impacts of the proposed Wonder Valley Inn will have on water quantity. How can the site's hot tubs a swimming pool of the size proposed be considered to have no impact and be sustainable? The EIR would also substantiate if in fact, the quality of the ground water is safe for use <u>– the fire station in Wonder Valley was closed due to the presence of elements in the water known to cause harm if consumed by drinking or even bathing.</u>

Therefore, the Proposed Project would neither physically divide an established community nor cause a significant environmental impact due to conflict with any land use plans or policies. No significant impacts are identified or anticipated, and no mitigation measures are required. Less Than Significant Impact
Therefore, no significant adverse impacts are identified or anticipated, and no mitigation measures are required.

That statement is a flat-out mis-statement. While the developer in the IS documents communications with Native Americans, he has clearly not talked to other community residents. I attended the well-attended meeting about the Wonder Inn project in January 2023 at the Wonder Valley Community Center. I can attest to the great concern expressed by residents about the harm the project poses to the residents. The Hi-Desert Star reported Jan. 4, 2023 that at that meeting residents expressed: "Concerns included light pollution, noise, disrupting wildlife corridors and damaging the water supply."

The land use proposed is anathema to the residents. It is completely unprecedented and out-of-scale with existing and historic use. It's inaccurate to deny that the development will not "cause significant environmental impact" or "divide an established community." It will indeed!

XIII. NOISE *- Would the project result in: a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?* ***Less Than Significant***

Operations Noise - There are no sensitive receptors or land uses within 1,000 feet of the Project Site. The closest sensitive receptors are residential land uses located approximately 0.75 mile to the east along Gammel Road, and approximately 0.5 mile west of the Project Site, on the north side of Amboy Road. It is anticipated that noise generated from Project operations would not be perceptible to the sensitive receptors near the Project Site due to the distance.

It is a fact well understood by those of us who live in the desert that noise travels great distances. In general and certainly in Wonder Valley with the sparsely populated landscape, the noise from the outdoor merriment at the resort by frolicking visitors will impact the neighbors. While the highway is mentioned in the IS, there is no acknowledgment that there is generally a cone of silence in the Valley. The noise generated by the Wonder Inn will travel and impact further than the .75 and .5 miles from the site.

Residents have good reason to be concerned about introduced noise from the Inn and the loss of their peace and quiet. Perhaps "significant" / or "less than significant" is subjective, but the IS and development should acknowledge and respect the sensibility of the residents.

XV. PUBLIC SERVICES

a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: Fire Protection? Police Protection? ***Less Than Significant***

Has the capacity of first responders to include visitors at the Wonder Inn been adequately analyzed? Since the Wonder Valley fire station has closed, first responders are summoned from 29 Palms. When the anticipated "big one" earthquake strikes, would resources be adequate to ensure both residents and visitors are safe? Does the Wonder Inn pose a threat to the well-being of the full-time residents in the event of a region-wide emergency by stretching-capacity of first responders too thin? The possible threat is "significant" and could only be remedied with substantial additional resources to the area's first responders with the financial impacts in tax increases being absorbed by the economically disadvantaged community residents!

In closing, the Common Sense Rule in my mind clearly rules the day – the proposed Wonder Inn would have a significant and negative effect on the environment. It doesn't fit. It would stick out like a sore thumb. It would damage the quality of life, perhaps life itself for the resident tortoises, other wildlife and humans all the while providing no amenities and little or no economic benefit to the local community.

Sincerely,
Sarah Kennington & Steve Bardwell

Residents of the Morongo Basin
52015 Gamma Gulch Road
Pioneertown, CA 92668

Cc: Supervisor Dawn Rowe, Planning Commissioner Michael Stoffel,
Field Representative Steve Reyes, Stop the Wonder Inn

Supervisor.Rowe@bos.sbcounty.gov; Steve.Reyes@bos.sbcounty.gov;
planningcommissioncomments@lus.sbcounty.gov

From:	Chris Clarke
To:	Khan, Azhar
Cc:	Supervisor Rowe; Reyes, Steve; Planning Commission Comments
Subject:	Comments on Wonder Inn Hotel/Resort (Twentynine Palms), PROJ-2021-00163.
Date:	Wednesday, February 22, 2023 2:09:32 PM
Attachments:	image001.png wonder inn comments.docx

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Mr. Khan;

Attached please find my comments on the proposed Wonder Inn project, submitted in my personal capacity as a nearby homeowner.. I can be reached at this email or the phone number below.

Thank you.

Chris Clarke
Ruth Hammett Associate Director, California Desert Program
National Parks Conservation Association
(760) 600-0038 | cclarke@npca.org | Twitter | Facebook
#LandBack

To: Azhar Khan, Planner, County of San Bernardino (via email) February 22, 2023
cc: Dawn Rowe, Supervisor 3rd District
Michael Stoffel, Planning Commission 3rd District
Steve Reyes, Field Representative 3rd District

Re: Wonder Inn Hotel/Resort (Twentynine Palms), PROJ-2021-00163

Thank you for the opportunity to comment on the Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed Wonder Inn Hotel/Resort (Project).

My name is Chris Clarke. I work as Associate Director of the National Parks Conservation Association, which has long worked in the California desert to protect national parks and monuments, and the land that connects them. Since I am also a homeowner with significant financial stake in the outcome of this decision-making process, I submit my comments here on solely a personal basis in order to spare my employer the possibility of charges of conflict of interest. I mention my role at the National Parks Conservation Association solely to suggest the level of my qualifications to address the likely impact of the Wonder Inn project.

My wife and I own and reside at 4838 Sunmore Parkway in Twentynine Palms, which is 4.1 miles from the proposed Wonder Inn project and just inside the city limits of Twentynine Palms. I oppose the use of a mitigated negative declaration to allow this destructive project to proceed. San Bernardino County must require the preparation of a Draft Environmental Impact Report (EIR) in order to properly assess the effects of this ill-considered project.

I say this despite the fact that I would likely reap significant financial gain from the Wonder Inn project if it is successful, in the form of increased property value. However, my personal gain would come at the cost of significant local values ranging from the ecological to the historical top public health and safety.

The flaws with the analysis contained in the Mitigated Negative Declaration are many and have been abundantly described. I will not duplicate those comments other than to say that I agree with and co-sign the February 10, 2023 letter provided to your office by the Desert Tortoise Council, the letter from Pioneertown resident Kerrie Aley to your office dated February 18, and the Stop Wonder Inn Project's comments of February 22.

I want to call attention in particular to the comments on the site's historic value included in the Stop Wonder Inn Project's comments, beginning on page 59, regarding the "pink building's" historic value. I include them here for your convenience:

> *The IS/MND has denied recommendation for eligibility under California Register Criterion 1 because, as stated on p. 38, "Considerable research, however has not revealed important associations between subject property and the history of the region." This statement and recommendation are not supported as the actual history of the building was not provided or considered and the actual history supports a different conclusion.*

Contrary to the IS/ND recommendation, the building is very likely eligible and must be evaluated for eligibility as follows:
1 The building was constructed in 1962, making it at least 60 years old and therefore within historical time frame.
2. The building is eligible under California Register of Historical Resources Criterion 1: "Associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the United States". Specifically, the building is associated with:
a. The Rural Electrification Administration and the national movement of locally formed electrical cooperatives, as detailed above. The building was constructed as the headquarters for the locally formed Desert Electrical Cooperative with REA loans in 1962.
b. The Small Tract Act of 1938, which reached a maximum expression and fulfillment in Wonder Valley, the setting of the Project and a homestead community eligible for consideration as a historical district.
C.
The Desert Electrical Cooperative and its headquarters building represent a unique intersection of the historic Small Tract Act homesteader movement and the REA and electrical cooperative movement. The building and the community together remain essentially intact as congruent, coherent, and mutually reinforcing living historical artifacts.
3. The building is eligible under California Register of Historical Resources Criterion 3: "Embodies the distinctive characteristics of a type, period, region or method of construction or represents the work of a master or possesses high artistic values." Specifically, the building:
Embodies the distinctive characteristics of a type and period. as described in the Cultural Sources Substantiation (IS/MND, p. 38): "The building is an ordinary example of a mid-century modern commercial/industrial building..." and designed during the era with utilitarian and cost-effectiveness as primary goals.'
Exhibits architectural and historic integrity. The exterior of the building appears to be essentially unchanged from the time of design and construction, as may be seen by comparing photo P5a on p. 1 of Appendix C of the Cultural Resources Assessment (recorded in 2021) with the original architectural rendering shown in Exhibit CR-1 above. The building is able to convey the significance and authenticity of its historic identity through the survival of physical characteristics and character-defining features that existed during its historical period. It appears to retain the seven aspects of integrity: location, design, setting, materials, workmanship, feeling and association.
Potential for substantial adverse change in the significance of a historical resource pursuant to CEQA Section 10564.5: The determination of Less than Significant Impact cannot be supported by the Substantiation as critical information is missing and the determination is therefore flawed. In light of information provided in these comments the eligibility of the existing commercial building as an historical resource under CEQA is likely and remains to be evaluated after thorough research is conducted. Until that evaluation is completed, the potential for substantial adverse change in the significance of the building as historical resource cannot be determined. Therefore. full study and

evaluation with an Environmental Impact Report is mandatory under CEQA and must be completed.

I would only add to this that I intend to submit to California's State Historic Preservation Officer a nomination for this site to be found eligible for inclusion in the California Register of Historic Places.

In addition, there are a few details about the Initial Study and parallel public information provided by the proponent that should have raised significant red flags for County Staff as they considered a Mitigate Negative Declaration. Aside from the misleading representation of the site's historical value and the apparently deliberate misrepresentation of the status of the state and federally protected desert tortoise on the site, I would call your attention to information included in the February 21 addendum to comments by the Morongo Basin Conservation Association, detailing claims and inducements made. In various forms of social media by the proponents of the Wonder Inn that include large additions to the proposed project not covered in the IS/MND, especially including the construction of 24 large homes on 5-acre lots adjacent to the Inn site.

As you are no doubt aware, there is abundant caselaw establishing that separating a proposed project into different pieces for the purposes of CEQA analysis, or "piecemealing," is allowed under CEQA only in quite limited and specific circumstances, none of which would seem to apply to the Wonder Inn project.

More to my intended point, however, is the fact that many of these claims display an apparent deliberate lack of interest in the actual aspects of the site being proposed for development.

- The proponent advertises ATV/OHV rental when no such use of ATVs is legal in the area per county law.
- The proponent describes the project as existing "in Joshua Tree National Park," which is emphatically not the case.
- Proponent claims no tortoises on the site despite freely available information documenting tortoises on the site.
- Proponent advertises the proposed resort as a "wellness retreat" opportunity despite the established fact that the local groundwater is unsafe for sustained human consumption.
- IN a petition launched by the proponent viewable at https://petitions.eko.org/petitions/support-the-wonder-valley-inn, proponent states that "Increased tax revenue [would be] generated which can help our city," despite the site being some miles outside the City of Twentynine Palms, a fact of which one could reasonably assume proponent is aware, since the proposal is before San Bernardino County rather than the City of Twentynine Palms.

These may not be evidence of deliberate misrepresentation of facts by the proponent: they may rarely result from incompetence or ignorance. To be honest I'm not sure that's reassuring. Regardless of their origin, these statements call into question the veracity of the rest of the

information provided in the IS/MND. The County should insist on proceeding with a full Environmental Impact Report in order to sort out this miserable confusion of fact and fiction.

Thank you again for the opportunity to comment.

Chris Clarke
4838 Sunmore Parkway
29 Palms CA 92277

From: Kate Short
To: Planning Commission Comments
Cc: info@stopwonderinn.org
Subject: attn: Michael Stoffel re: PROJ-2021-00163
Date: Wednesday, February 22, 2023 2:10:07 PM
Attachments: PROJ-2021-00163 Comment Letter - KLS.pdf

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Please find my letter of comment for Wonder Inn Hotel/Resort (Twentynine Palms), PROJ-2021-00163 in the attachment below.

Thank you for your time and consideration.

Warmly,

Kate Lee Short

---

www.KateLeeShort.com

February 22, 2023

Attn: Azhar Khan,
Planner County of San Bernardino
Land Use Services Department,
Planning Division
385 N. Arrowhead Ave 1st Floor
San Bernardino, CA 92415
azhar.khan@lus.sbcounty.gov

Re: Wonder Inn Hotel/Resort (Twentynine Palms), PROJ-2021-00163

Dear Mr. Khan,

Thank you for the opportunity to comment on the Initial Study/Mitigated Negative Declaration (IS/MND) for the proposed Wonder Inn Hotel/Resort (Project).

I am a fulltime resident of Wonder Valley and the owner of 50 acres of property in the area. I moved here as an artist who works with sound as a medium. To most this might mean making sound and adding sound to an existing environment. I choose though to focus on silence and sounds of the natural environment for my artwork. That is why I chose Wonder Valley as my home, for its silence. My response to living in this nearly pristine sonic environment, uninterrupted by the sounds of city and commercial life here in Wonder Valley was to start on organization, Mojave Sound Art, to help promote conservation and protection of the invaluable resource.

In this role I have spoken to many people who live in the desert and have found that sound is a major part of their lives here. People often speak of the silence they experience in this desert as profoundly changing them for the better. When asked to describe this area for the 2018 countywide plan, we as a community put forth “Quiet” and “Solitude” as two of the top assets. Clearly, the silence in this area is a rich cultural resource that we wish to preserve and I maintain that the proposed Wonder Inn Project is in direct opposition to these community priorities. The Wonder Inn developers have blatantly decided to disregard our Community action guide. Please see the link below for our Community Action Guide.

(https://countywideplan.com/wp-content/uploads/sites/68/2020/07/34_Wonder-Valley_CAG_2020.pdf)

I stand fully behind the concerns brought to your attention by the Stop Wonder Inn Project in their letter both Emailed and mailed to you dated Feb 22, 2023 Re: Wonder Inn Hotel/Resort (Twentynine Palms), PROJ-2021-00163.

In their comment in section "**XIII. NOISE"** they speak about the use of the propane generator which is of great concern to me. The average commercial propane generator produced decibel readings up to 100db. There is no mention as to how they plan to mitigate this issue. In the desert environment where a person speaking at normal levels can be heard for a mile, the introduction of regular intermittent use of a commercial propane generator will carry throughout wonder valley to distances unknown. This needs to be studied and a full Environmental Impact Report must be done to assess the effects of noise upon surrounding residences before this project can move forward.

Also absent was any mention of the HVAC units to be used on the 109 units, the main reception building and other secondary buildings. Without knowing the types of units, their locations on the buildings and the expected decibel readings from those units we do not know the true sonic impact on the area. The physical construction of the building and placement of these noise generating units impacts how sound will be reflected off the buildings out into the surrounding community. In this desert, buildings work to reflect sound similar to a parabolic dish. They point and direct sound and its movement. Without an adequate study through a full Environmental Impact Report we will not know the true sonic impact on this community.

I would also like to address the issues related to low frequency sound generated by commercial developments such as this. This is a very important issue with dire consequences for those living nearby buildings generating these disruptive frequencies which can cause any number of health and life disrupting issues. Please refer to the article linked below to understand more regarding this issue.

https://windfarmrealities.org/wp-content/uploads/wfr-docs/berglund-sources-effects-1996.pdf

Low Frequency and ultra low frequency sound waves are extremely long in length and determining their impact can be difficult but it is critical that this be done so that we understand the true impact that this commercial development will have on our sonic environment. This includes all HVAC units, the commercial propane generator, pool and hot tub equipment, refrigeration units, irrigation systems, compressors, delivery trucks (idling vehicles), well pumping equipment etc. These low frequencies can carry very long distances and be amplified when they come in contact with our homestead cabins turning them into resonators for the sound. This is something I deal with regularly as

irreverent airbnb guests come and stay at nearby cabins and when recent marijana growers used generators to run their illegal farms.

The increase in sound also has the potential to affect sensitive wildlife in the area. First and foremost there are endangered desert tortoises on the land which the developer went out of their way to hide. For this reason alone the project must be rejected. But beside this, the increase in traffic and sound levels on the property have the potential to affect the wellbeing of other wildlife on and adjoining the proposed site. Please refer to the article below for more information regarding studies done on this subject and the detrimental effect on wildlife.

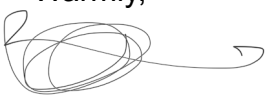
https://news.fullerton.edu/2020/06/desert-noise-research/

As I stated above, I stand behind all concerns raised by the Stop Wonder Inn Project comment letter dated Feb 22, 2023 and for the reasons I stated above I therefore request that the rezoning applied for in the Conditional Use Permit and the amendment to the General Plan be denied. Given the many deficiencies in the IS/MND it is the Counties obligation to its constituants to prepare a **complete**, **certified EIR addressing these impacts, in full compliance with CEQA,** before making any determination about this Project.

I ask to be kept fully informed of any and all developments in the CEQA and permitting processes. Email correspondence may be sent to kateleeshort@gmail.com. Postal correspondence may be sent to PO Box 790, Twentynine Palms, CA 92277.

Thank you again for the opportunity to comment on the Wonder Inn Project Proposal and for doing what is right by this community!

Warmly,



Kate Lee Short
85121 Mesa Dr
Twentynine Palms, CA 92277

From:	Ken Sitz
To:	Khan, Azhar; Planning Commission Comments
Cc:	Supervisor Rowe
Subject:	Comment on Initial Study PROJ-2021-00163, Wonder Inn
Date:	Wednesday, February 22, 2023 4:28:45 PM
Attachments:	34_Wonder-Valley_CAG_2020-compressed.pdf

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Attention: Azhar Khan, Michael Stoffel

My name is Kenneth Sitz and I own a residential property in Wonder Valley that my wife and I bought in 2014. We've lived here ever since. We are now both retired and remain active in the community with volunteer efforts directed at food security, mental health, cultural affairs and overall general welfare for the residents of Wonder Valley.

I strongly urge the Planning Commission to recommend a full Environmental Impact Report be conducted for the proposed Wonder Inn (PROJ-2021-00163). The project is both ill-conceived and ill-placed and if allowed to proceed without a proper EIR assessment will run counter to the Wonder Valley Community Action that San Bernardino County's Community Planning Continuum assembled (attached). The Mitigated Negative Negative Declaration does not adequately address the costly negative impact such a development will have in our community.

Others neighbors and interested parties have raised specific concerns about submitted materials so I won't repeat them. I will add the the project principals, Jason Landver and Allan Greenberg (Wonder Inn LLC) have been releasing marketing materials promoting a greatly expanded scope to their Wonder Inn (sometimes referred to as Wonder Valley Inn) including building and offering 24 single vacation homes on their remaining property outside the immediate area in the Wonder Inn project description. They have not truly engaged with the community after the well attended (95 attendees) Public Information Meeting I arranged last year at the Wonder Valley Community Center on Sunday May 1, 2022 for their project team and attended by the project lead and one of the Wonder Inn LLC's Allan Greenberg.

Beside the possible immediate negative impact of the development, my other concern is the sustainability of such an enterprise in the area. The principals are frank that they are have no experience in the hospitality industry and seek to outsource almost all services. Wonder Valley has a history of failed 'dreams' that have littered and scarred the landscape and frustrated both residents and visitors. The project area's adjacent defunct jojoba fields is a stark reminder of when 'dreams' come here to die.

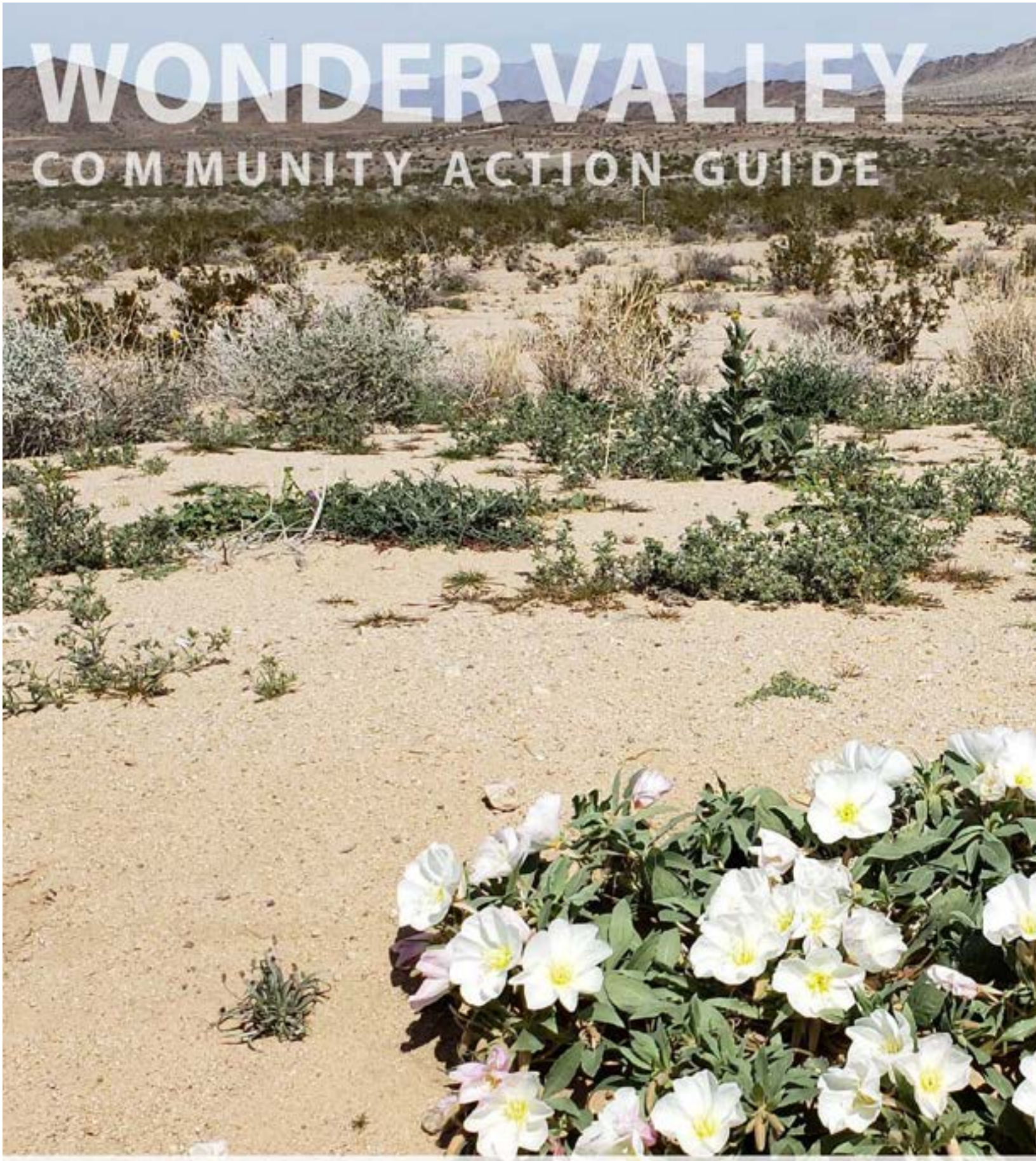
I urge the Planning Commission to recommend a full Environmental Impact Report be conducted for the proposed Wonder Inn project.

Sincerely,

Kenneth Sitz
Mobile/Text: 323-528-7745
Email: ken_sitz@yahoo.com

WONDER VALLEY

COMMUNITY ACTION GUIDE



SAN BERNARDINO COUNTY

COUNTYWIDE PLAN

Wonder Valley Community Action Guide

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Introduction

Wonder Valley is a community within the Morongo Basin, east of Joshua Tree and Twentynine Palms. After homesteaders acquired land following the 1938 Small Tracts Act, hundreds to thousands of homesteader cabins were built in the area. Since then many homesteads have been vacated and demolished. Today Wonder Valley has a sparse but diverse population of nature lovers, outdoor enthusiasts, , retirees and artists.

In 2016, the County embarked on a planning process to update the fourteen existing Community Plans and create over 30 new plans for approximately 80 unincorporated communities. The strategic system of community planning is called the Community Planning Continuum with a continuum of plan-types to provide planning tools and resources to match local conditions and needs. The plan-types are Detailed, Framework, Foundation and Fundamental.

Wonder Valley is a Fundamental community. An online survey was available for five months in early 2018. Approximately 80 surveys were completed by residents. The survey requested information about the community including Values, Aspirations, Strengths, Weaknesses, Opportunities and Threats, local organizations and local history (see Appendix A). The survey information was reviewed to create this Community Action Plan. The Community Action Guides are a framework of actions identified by the community and supports implementation of the actions by the community.

Strengths and Opportunities

As part of the survey, participants defined the strengths of and opportunities for their community. The word cloud below was created using the input provided during the Strengths, Opportunities, Values and Aspirations exercises. The word cloud quickly informs participants of key issues and focus areas that could be addressed in the plan. The more a word or phrase was articulated, the larger the word appears in the cloud.

Values Statement

The Values are those shared assets, principles, standards, mores, and in the judgement of the community, what is important in the lives of its residents and businesses. A community's values are an important consideration in shaping its aspirations, focus and actions.

As a community, Wonder Valley values:

Rural Atmosphere. The large lots and space between properties give residents room to breathe. Wide open spaces allow residents to appreciate and maintain the solitary, laid-back lifestyle of this area.

Natural Desert Beauty. Residents value the beautiful sunrises and sunsets, the dark and starry night skies and the desert views and wildlife.

Community Spirit. Wonder Valley is a tight-knit community whose residents value self-reliance and neighborly support. The people have a respect for nature, freedom, privacy, and each other. Here, residents work together but also enjoy their independence and being left alone in solitude.

Aspirations Statement

The Aspirations Statement is a written narrative illustrating how the community desires to look and function once the Community Focus Statements and Action Statements are accomplished. This is a long term view of 10 to 20 years. The Aspirations Statement serves as a foundation for developing Community Focus Statements and Action Statements.

As a community, Wonder Valley aspires to:

Better Communication and Services.

The community offers family-oriented activities, community health services including mental health services, services for the disadvantaged, improved public transportation, a local fire station and locally based Sheriff's response.

Maintain the Rural Atmosphere.

Wonder Valley provides residents with a rural lifestyle on large lots with dark night skies.

Plan Framework

Community Focus Statement A: Improve the delivery of essential services to the community.

A

Action Statement A.1*: Advocate for periodic health care services through a mobile medical clinic and mental health services.*

Action Statement A.2*: Advocate to County Fire to explore options to re-open the Wonder Valley Fire Station.*

Action Statement A.3*: Advocate to the Twentynine Palms Water District to annex Wonder Valley and provide water connection to the community in order to provide a cleaner and more reliable source of water for residents.*

Action Statement A.4: *Advocate to the Morongo Basin Transit Authority to add transit service to Wonder Valley locations.*

Community Focus Statement B: Support opportunities for Wonder Valley to accommodate travelers and tourists of the Mojave Trails National Monument and Joshua Tree National Park.

B

Action Statement B.1*: Identify local historic, artistic, or recreational areas that may interest travelers or tourists to stop and create brochures to leave in tourism locations throughout the Morongo Basin.*

Action Statement B.2*: Develop a visitor's center with information about the history and natural environment of the area and market to tourists.*

Action Statement B.3: *Advocate to the County Economic Development Agency to help attract local businesses to the area.*

Community Focus Statement C: Create more local activities for Wonder Valley residents.

C

Action Statement C.1: *Create an online and written survey for local residents to list the types of activities they would like to participate in.*

Action Statement C.2: *Create a list of local residents who are willing to share their expertise with others.*

Action Statement C.3*: Compare the survey results and the local expertise to identify opportunities to create local groups (e.g., arts, walking, games, reading, etc.) and educational opportunities (e.g., painting, stargazing, resume writing, or children's programs).*

Community Profile

Overview

The community profile is a summary of the social, cultural, economic and historic dimensions of the Wonder Valley community. It is a gathering of objective data collected through an online survey and secondary sources meant to inform and help facilitate creation of the Community Action Guide. The profile highlights essential facets and "tells the story" of the Wonder Valley community.

History

The community of Wonder Valley was developed in two phases, the first being after World War I in the early 1900's and the second by homesteaders after the approval of the Small Tract Act in 1938. The Small Tract Act was passed and allowed federally owned land to be bought and developed. This resulted in hundreds to thousands of homesteaders' cabins being built in the area. Since then many of these cabins have been demolished. Today, there are still homestead cabins scattered throughout the desert with many being updated. At one time there was a stagecoach stop at the Old Poste Homestead in Wonder Valley which was later used as a hog farm.

On August 14, 1972, the County of San Bernardino Board of Supervisors established County Service Area (CSA) 70 M to provide road maintenance for Wonder Valley, and later a community center. Today, Wonder Valley is home to retirees, academics, new artists and musicians, and people just looking to escape city life. Development in this area is still sparse due to the minimum lot size of 5 acres.

Location & Geography

Wonder Valley is located in the southern portion of San Bernardino County, east of Twentynine Palms, within the Morongo Basin. The community is approximately 10 miles from the east entrance of the Joshua Tree National Park and west of the Sheephole Valley Wilderness Area and south of the Cleghorn Lakes Wilderness Area.

Community Structure (Physical Characteristics)

Wonder Valley consists of single family residential dwellings, primarily single story, located on 5 acre parcels. Many of the old homestead cabins have been updated for use as first or second homes. The main thoroughfare in Wonder Valley is Highway 62 (Twentynine Palms Highway), a paved two lane highway with one lane of travel in each direction. Amboy road is located parallel to the north of Highway 62, and is another main road through the community. Local roads are mainly dirt. There are no pedestrian or bicycle facilities in the area. The closest commercial uses are located within the city limits of Twentynine Palms. The walk score for Wonder Valley indicates that all errands need to be completed by car.

Sources: Google Earth, County of San Bernardino, WalkScore.com

Community Amenities

Parks and Trails

- Wonder Valley Community Center
- Wonder Valley Community Park
- Nearby is Joshua Tree National Park, Cleghorn Lakes Wilderness Area and Sheephole Valley Wilderness Area

Schools

- Morongo Unified School District elementary, junior high and high schools in the City of Twentynine Palms

Hospitals/Medical Facilities

- Hi Desert Medical Center in Joshua Tree (25 miles west)
- Medical clinics in City of Twentynine Palms and Joshua Tree

Fire Protection

- San Bernardino County Fire Department Station #45 in Wonder Valley. Station #47 is closed.

Police

- San Bernardino County Sheriff's Department – Morongo Basin Patrol Station located in Joshua Tree

Source: County of San Bernardino Fire and Sheriff Departments, Wikipedia

Community Identified Issues

SWOT Analysis

A SWOT analysis stands for strengths, weaknesses, opportunities, and threats and is used to help gain insight into the community through local knowledge. Survey participants identify their communities' biggest strengths, such as community assets like a library or community center, along with their biggest weaknesses, which could be a lack of open space or high rates of internal crime. Next, survey participants identified opportunities that the community could look to take advantage of as a part of the community plans process. This builds off of what was identified in the strengths and weaknesses portion. Lastly, participants identify external threats to the community. These are generally concerns that are outside of the control of community members, such as natural disasters or changes in economic conditions.

Strengths

- Everyone looks out for each other
- Relatively close knit group of neighbors (2)
- No encroachment of urban life
- Unique culture that embraces creativity, sustainability and a simple way of life without the burden of taxation and unnecessary services
- Affordability (3)
- Desert beauty/Natural beauty (12)
- Solitude (7)
- Creative community
- Living history
- Well maintained dirt roads (3)
- Old west feel (2)
- Artists (7)
- Musicians (5)
- Film makers
- Writers (5)
- Academics (3)
- Colorful history
- Good people (2)
- Limited number of homes
- Limited number of residents
- Airport
- Neighborhood watch
- Peace & quiet (7)
- Dark night skies (6)
- Star gazing
- Bird watching
- Rural nature of the community (2)
- Positive perception of Wonder Valley by locals, tourists artists and weekenders
- Newer residents
- Jobs
- People know each other
- Community center
- Fire department
- Remote and spacious (2)
- Artists and musicians that share their talents with the community
- Quietness (3)
- Beautiful skies
- Interesting art sprinkled throughout the community
- Peacefulness not found in Joshua Tree
- Neighbors helping neighbors (2)
- Rural living (3)
- Open spaces (3)
- Creative residents with a can-do attitude
- Volunteerism

- Resilience
- Alternate economic strategies
- Wilderness
- No light and sound pollution
- Diversity
- The Palms (2)
- Nature
- Neighborhood watch
- Spacious (3)
- Living with nature
- Limit to the development so people can preserve the solitude and beauty of the community
- Affordable for a wide range of people
- Best maintained dirt roads in the County
- Best people in the County
- Remote – 15 miles or so from services
- Seclusion (2)
- Limited regulations
- Proximity to National Park and Wilderness Areas (2)
- Reasonable home/land prices
- Community center
- Community park
- Volunteers
- Book program
- Two churches
- Monthly community meetings
- Special community meetings
- Potlucks
- NextDoor Wonder Valley
- Community clean-ups
- Local water delivery
- Rural grants available
- Inexpensive rentals
- Special training sessions
- Wonder Valley news column in newspaper
- Solar-use
- Community center coordinator
- Military families
- Love of the land
- Scenic vistas (2)
- Clean air
- Mild winters
- Cost of living
- Growing art community
- Burgeoning vacation rental industry
- Independent spirit
- Privacy
- Major shopping and dining not prohibitively far away
- Zoning mandates of 5 acre lot sizes
- Serenity
- Low government profile
- People respect each other's privacy and property

Weaknesses

- Lack of participation from more residents to have a better shared governance
- Unknown future of development
- Lack of development ideas to improve revenue while keeping the uniqueness of Wonder Valley
- Lack of services – fire, waste management, health, transportation, law enforcement
- Lack of fire services – cannot afford the increase in fire taxes
- Remoteness (3)
- Non-potable well water (3)

- Aging population inhibits some community activities
- Lack of employment opportunities (3)
- Poverty/hunger (5)
- Perceived lack of regular law enforcement
- Dumping of household and construction waste, tires, and trash (2)
- Noise pollution
- Fly-overs
- Lack of maintenance of Amboy Road (3)
- No 24-hour medical resources
- Same zip code as Twentynine Palms (3)
- No water service (5)
- Well water is not potable (2)
- Lack of fire service (6)
- Reputation for substance abuse (2)
- Isolation
- Squatters (3)
- Small population prevents political strength (2)
- Limited public transportation (3)
- Many houses lack addresses (3)
- Restrictive permitting rules (2)
- No speed limits
- General lack of services (5)
- Poorly maintained roads (2)
- Illegal shooting and hunting (7)
- Illegal off-roading (4)
- Lack of emergency services (5)
- Loss of local advisory council with input to county all filtered by Morongo Basin MAC
- Lack of proactive law enforcement
- Increased traffic
- County roadblocks to local control displayed by complex procedures for volunteers
- Negative attitudes by SB Fire to a volunteer/PCF fire operation
- Increasing "distance" between community and county personnel in regards to meeting with community on a face to face basis
- No bars
- Lack of manned fire station for fire services within reasonable distance for effective response
- Lack of paramedics
- Residents' complaints are not taken seriously by sheriff's department
- Higher concentration of fixed income
- Drugs – meth/ meth labs (6)
- Illegal pot farms
- Distance from Government Center
- Burglaries (2)
- Vandalism (3)
- Theft
- Mail theft
- Garbage
- Unregistered vehicles
- Remote location can bring crime (2)
- Community "weaknesses" are also part of what gives Wonder Valley its character: isolation, lack of stores, lack of community based emergency services, etc.
- Our population is largely older, disabled, and living below the poverty line
- Lack of fire services make it difficult for people to get insurance and mortgages
- Lack of a structure of cohesive vision for Wonder Valley
- Crime
- Legislation on water hauling

- Poor police response
- No store or gas station (3)
- Difficult to patrol
- Desolate
- Off-road noises
- Military base bombing/noise (3)
- Inadequate law enforcement (2)
- Selective use of code enforcement
- Inadequate response to shooters violating the county shooting ordinance
- Lack of businesses
- No one gets involved in the community
- Lack of internet (2)
- Lack of respect for the scenic quality of the desert
- Too many Los Angeles and San Francisco progressives are ruining the community
- We are far from services of any kind
- Weekenders coming up and playing on loud SUVs, ORVs, mini-bikes, anything that sounds like a chainsaw

Opportunities

- Improvements of Amboy Road (2)
- Reducing crime
- Thoughtful business development to increase revenue
- Revitalization of the community center to bring people together and provide food and health services
- Vacation rentals for jobs and income (2)
- Community becoming a gateway to Mojave Trails National Monument (4)
- Community center could have additional food programs and services (2)
- Community non-profit could support the community center and the community
- Route to Mojave National Preserve and Las Vegas – steady stream of tourists (2)
- Artists working in the community in the natural environment
- Outdoor sports and activities such as bike lanes and hiking trails (2)
- Rooftop solar
- Increasing services and communication
- Peace and quiet
- Nice weather
- Plenty of room for growth
- Grocery store
- Museum and learning center
- The opportunity to create our own community tailored to the needs and interests of the people who live there
- Getting to know the neighbors
- Community center needs to be used more
- More art events
- Increasing the voice of residents in civil affairs
- Vacation rentals and tourism
- Removing well requirements for new construction to be less cost prohibitive
- Allowing the use of water tanks
- Housing shortage in the state
- Dare to be different
- Any aspiring café would do well
- Build more community programs though the community center, developed and directed by the people of Wonder Valley, including a tourist center. The Wonder Valley Community Center could be the 'welcome center' of the community where tourists and community members could come together and connect with local

resources (tour guides, bicycling, hiking guides,, etc.) as well as connect with local businesses (airbnb listings, services to watch people's cabins,
- Handyman services, housecleaning, personal assistants, etc.)
- Artists could involve the community in their projects
- Wonder Valley has a small enough population and number of households to be able to direct itself
- Wonder Valley could become a desirable, yet affordable, enclave for independently spirited people
- Artistic endeavors
- Quality neighbors
- Influx of money by "outsiders"
- Air B&B opportunities
- Legal
- Marijuana farms
- Community watch
- Small grocery store
- Restaurant
- Community garden
- Small businesses (e.g. small convenience store, gas station, etc.) (3)
- Re-establishing a local fire fighter presence
- Protecting and enhancing ordinances that protect the peace to encourage conservation tourism
- Civic participation
- Public access well
- Better fire, police and EMT coverage
- None (2)
- Ability to get away from it all

Threats

- Increased taxes
- Being saddled to pay into services that are primarily used by surrounding towns and supporting larger county agencies that are underutilized by WV residents
- Vacation rentals reduces residential rentals/ housing stock (3)
- Annexation to Twentynine Palms (3)
- Unethical appropriation of Wonder Valley's image and brand
- Holiday visitors not respecting desert residents and property
- Industrial solar farms (2)
- Off Road Vehicles (4)
- Staging
- Shooting of high powered rifles
- Fireworks
- Pot farms that use our resources and contribute nothing to the wellbeing of the community
- Increased light pollution
- Water exportation
- Loss of emergency services and fire services
- Trespassing
- Theft
- Squatting/Squatters (2)
- Illegal shooting and hunting (4)
- Illegal activities made possible by lack of law enforcement
- The danger of increased traffic on Amboy Road
- Dishonest county officials
- Drugs/meth (4)
- Alcohol
- Lack of concern from county officials
- Industrial or touristic exploitation

- Meth and opioid addiction/dealing
- Cheap land means people buying up properties and affecting the ability for the old timers to find affordable housing
- Marine Corps bombing
- The overall feeling of dismissal that we often experience when we bring concerns or needs to the local councils or County
- Illegal dumping
- Increasing in population but not increased amount of services
- More people having injuries, dying and fired due to close of the fire department
- People from LA who buy up properties and drive up prices/gentrification
- Trying to force the community to develop according to urban standards without the resources
- Unethical use of our name and identity diverts attention from our community needs
- Publicity is often poorly researched, misleading, and drives people to our community
- Seasonal and holiday hi-jinx include illegal ORV miss-use, illegal staging, illegal shooting of high-powered rifles and fireworks
- Illegal pot farms use our resources but contribute nothing to the well being of our community (2)
- Outside speculators raise land prices which make it difficult for people to find affordable housing.
- Forest fires
- Crime (2)
- Planning and Building permits being too difficult and costly to obtain, which curbs improvements (2)
- Transient population
- Legislation
- Our fire department (when closed)
- Inability to fully fund fire department
- Lack of sufficient law enforcement
- Deterioration of Amboy Road
- Speeding on Amboy road
- Flash flooding
- Power outages
- Ugly and dangerous shacks in disrepair
- Bad reputation and image (2)
- No medical services
- No regular public transportation
- New water tanks and new water hauling being prohibited
- High cost of drilling a well
- Community center doors need replacing
- Rapid growth
- Military expansion
- Loud music
- Unregulated short term rentals
- Obvious drug trade without consequences
- The old fashioned, closeminded opinions and acts of the city
- Over regulation from the County that does not respect our unique desert dwellings
- Criminals/ crime (3)
- People who have recently moved here and decide they don't like something that has been here for a significant amount of time such as the airport or the Combat Center

- A group of residents in north Wonder Valley have banded together to get relief from illegal shooters. Although this is fine on it's face, this group is treated like a sub committee of the regular community meetings, as if they are doing the will of the community.
- The unoccupied homes and recreational cabins left unmaintained are an unattractive nuisance; attract squatters and dumping
- Progressives and liberals
- Selling our water from underground

APPENDIX A

How to Use this Guide

Where are the Goals, Policies, and Land Use Map for My Community?

Goals, Policies and Land Use Map will be adopted as part of the County Policy Plan. The content of the Community Action Guide focuses on those actions identified by the community that the community is willing to take to make desired changes to their community. The County Policy Plan and the Community Action Guide will be web-based, with adoption of the Countywide Plan in 2019.

Relationship of the Community Action Guide to the Countywide Plan

In 2010, the San Bernardino County Board of Supervisors set out to establish a vision for the future of the county as a whole, and subsequently adopted a Countywide Vision in 2011 after two years of input from the community and the county's 24 cities and towns. Following the adoption of the Countywide Vision, which calls for the creation of a "complete county", the Board adopted the County paradigm and job statements in 2012.

In 2015, the County of San Bernardino launched an effort to go further than any county or city has ever gone with a general plan by creating a web-based comprehensive "complete county" plan. General plans are almost always strictly rule books for guiding development and growth. The County's General Plan update, last updated in 2007, goes well beyond a traditional general plan to become a comprehensive Countywide Plan that complements and informs the Countywide Vision by taking into account all services—not just land-use planning—provided by County Government, and the unique values and priorities of each unincorporated community.

The Countywide Plan serves as a guide for County decision-making, financial planning, and communications. Its web-based format provides a wealth of easily accessible data on how the County operates, and allow independent research using County data and information.

The Countywide Plan includes:

- A County Policy Plan, which serves in part as the County's General Plan for the unincorporated areas and also provides guidance for regional county services. The Policy Plan establishes goals and policies for the entire county as well as specific sub regions and communities.
- A County Business Plan, which contains governance policies and operational metrics that outline the County's approach to providing municipal and regional services.
- A Regional Issues Forum, which is an online resource for sharing information and resources related to issues confronting the entire county.
- A Community Plans Continuum of 35 Community Action Guides, which articulates what is important to each Community; sets out an Action Plan based on community input, and for the most part, would be implemented by the community; and provides a Community Profile. Links will also be provided for maps, goals, and policies in the Countywide Plan.

The Draft Community Action Guide for Public Review

The final format of the Community Action Guide will be web-based and provided online. This printed version of the Draft Community Action Guide is provided as a courtesy for simplifying community review, but may not be

available once the online version of the guide is finalized. A draft version of the web-based Community Action Guide can be found at www.countywideplan.com/cp. This printed version includes the information provided on the website under each tab except for the information included under the "Maps and Links" tab. A separate Community Profile can be printed from the website.

This Draft Community Action Guide was created by the community members who responded to the online survey in 2018. If no survey was submitted for a community, County staff researched the community to complete the guide. It is written in the words of those participating in the public engagement process. Therefore, the Community Action Guide retains the voice and future image of the community presented by the community members participating in the public engagement process. However, the implementation of each Action Statement is an opportunity for additional discussion by community members and modification of the statement and action steps may be made by the community and Action Teams.

How to Use This Community Action Guide

Overall, the Community Action Guides are a framework for communities to create the future character and independent identity, as identified in the online survey as community values and aspirations through completion of community actions. These Community Action Guides are focused on community self-reliance, grass-roots action, and local implementation. Goals, policies, land use, and infrastructure decisions are addressed in the Policy Plan of the Countywide Plan. The County Development Code will still regulate zoning and land development.

The Community Action Guide includes the community's Values, Aspirations, and Plan Framework, if provided by community members in the online survey. An appendix has a Community Profile with a summary of the social, cultural, economic and historic dimensions of the community as well as the communities online survey responses on strengths, weaknesses, opportunities and threats.

Values – Those shared assets, principles, and in the judgment of the community, what is important to the lives of its residents and businesses.

Aspirations – A written narrative illustrating the community's desired look and function once the Community Action Guide is fully implemented. This is a long-term view of 10 to 20 years. They are written as if the community's desired changes have already occurred.

Plan Framework – Outlines clear Focus Statements and Action Statements identified by the community.

- The Focus Statement provides general direction toward realizing the community's aspirations and helps organize the plan.
- The Action Statement is a measurable statement providing critical information on the program, initiative, or project to complete.

Through the identification of Focus Statements and Action Statements, the community can work toward creating Action Plans and eventually implementing the Community Action Guide.

How to Implement the Community Action Guide

Community's Next Steps

Appendix B contains the Action Plan template that can be used to create the Action Plan. You may request a Word version of the document from CommunityPlans@lus.sbcounty.gov. The Community Action Guide identifies the Focus Statements and Action Statements. The Community may want to meet to identify the top three priority Action Statements to work on first. Some of these may be those actions that the community believes could be completed quickly and easily. Completion of one Action Statement will provide the community and local groups with the motivation to move forward with another Action Statement.

Once an Action Statement is selected for implementation, the community identifies a Champion for that Action Statement to initiate activities, identify those responsible for carrying out action steps, identify and secure resources that will be required, and develop a timeline. The champion is not responsible for completing the action, but serves to facilitate and guide the Action Team.

To initiate Action Statements in the community, the Champion should gather community volunteers, groups and organizations to develop Action Plans and identify the specific steps required to accomplish the Action Statement. Volunteers (e.g., individuals, businesses, property owners, etc.), community groups (e.g., chamber of commerce, non-profits, etc.) and organizations (e.g., scouts, community service districts, churches, schools, etc.) can change for each Action Plan or some groups could work on more than one related Action Plans.

Creating an Action Plan helps better prepare the community by identifying the steps to be accomplished, the resources needed, and who will be responsible for each action step. Some action steps may require guidance by a County department, but the community must take the lead in moving the action forward, scheduling meetings, or requesting information from specific County departments.

The Action Plans should be used to guide community actions and should not be "set in stone". Each Action Plan is a general set of tasks that can be modified if necessary. If needed, the community can find alternatives and make changes as they progress.

How to Create an Action Plan

The community should first identify a champion for the Action Statement. The action champion can be an individual or organization that will help oversee the execution of the Action Plan and ensure steps are completed. It is important to note that the champion is not responsible for carrying out each action step, but is responsible for coordinating communications and ensuring the steps are completed.

After the champion is identified, the community or group can develop action steps. The focus should be on what action steps will occur, who will carry out each action step, when it will take place, and an approximate duration. Again, these are guidelines, and may change, but this planning helps identify resources needed, people or organizations that must be engaged or will lead each action step, and manage expectations on how long it will take to implement each Action Statement.

After completing the action steps, resources should be identified. Resources may include governmental agencies needed to help carry out the action, community and external funding sources, and potential assistance from other communities who implemented similar programs.

Reviewing a Detailed or Framework Plan can assist in providing examples of Action Plans and may have similar actions that can be used or modified to meet identified Foundation Plan actions. In addition, the San Bernardino County Land Use Services Planning Division is preparing a Community Development Toolkit with tools on several topics to help local groups make positive changes in their community. When complete, the Community Development Toolkit will be available at www.countywideplan.com. Other resources and contacts will be provided on the same website.

Placing your Action Plan in the Community Action Guide

Any modifications of the Community Action Guide or Action Plans can be sent to San Bernardino County Land Use Services Planning Division for future updates to your Community Action Guide. The County will provide information on specific contacts for Community Planning assistance. It will be the responsibility of the community to provide requested updates and modifications to the County.

The following page is an example of an Action Plan from the Helendale Community Action Guide.

Each Action Statement Champion and Action Team should review and refine the Action Statement and Action Steps before moving forward.

*The Action Statement is a measurable component used to accomplish the overall focus statement.**

Provides background information on the action that is to be achieved.

*The benchmark is a way to measure the success of the Action Statement. * The estimated cost is an approximate cost to implement the action, if applicable.*

*These should be reviewed with the Champion and Action Team and modified based on current community needs.

APPENDIX B
Action Plan Template

Community Focus Statement:

_____

Action Statement:

_____

Champion:

_____

Estimated Cost:

_____

Action	Action Leader	Timeline	Resources
1.			
2.			
3.			
4.			
5.			

From:	Eric Hamburg
To:	Khan, Azhar
Cc:	Supervisor Rowe; Planning Commission Comments; Reyes, Steve
Subject:	Concerns About The Online "Petition" Created by Alan Greenberg (PROJ-2021-00163)
Date:	Wednesday, February 22, 2023 12:54:38 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Mr. Khan,

There is an online “petition", as linked below, created by Alan Greenberg, one of the developers, for the proposed Wonder Inn. LUS has no doubt been in receipt of submissions to this petition. I am writing you to comment that the petition and any entry submitted via it, does not demonstrate *substantive* input to the County process in review of the IS/MND. This “petition" is a great example of “astroturfing” which as defined on Wikipedia “is the practice of masking the sponsors of a message or organization (e.g., political, advertising, religious or public relations) to make it appear as though it originates from and is supported by grassroots participants. It is a practice intended to give the statements or organizations credibility by withholding information about the source's financial connection.”

Certainly anyone can and should express their views in support or in opposition to this particular issue. But in this case we feel that Greenberg’s “petition" is disingenuous and deceptive (including publicizing it via Jason Landver’s brother Mark Landver's Facebook page) and serves merely as marketing for his financial interests. Therefore we ask that the County NOT include the submissions to it in your staff report and presentation to the Planning Commission and Board of Supervisors.

For the past year the Stop The Wonder Inn Project has worked hard in communicating our and the community’s sincere concerns about the proposed project re the IS/MND as evidenced by the many substantive comments submitted via stopwonderinn.org and in our detailed response to the IS/MND which you are now in receipt of. This “petition” is another example of the developers acting in bad faith as evidenced by their non disclosure of additional development components which are not part of the IS/MND.

FYI, here is the email that we have sent to the company hosting Greenberg’s petition and requesting that they take it down. Via that and multiple phone calls we have, sadly, not yet received a response and the petition remains online.

> *We believe you are hosting a petition that is contrary to your stated values at https://petitions.eko.org/petitions/support-the-wonder-valley-inn?source=facebook-share-button&time=1676537835&utm_source=facebook&share=e9a23ec7-930e-462f-9909-813cd9140339&fbclid=IwAR1SGXCs846oc_D1UhlVnJfj-RtvFlsnVNS_yyzs66yVyi20OhXjYm2O_5Y.*
>
> *The petition is hosted by Alan Greenberg one of the developers of the proposed but not approved Wonder Inn Hotel/Resort in Wonder Valley east of Twentynine Palms, CA. I am a member of the Stop Wonder Inn Project, a grassroots group opposed to this*

environmentally damaging and highly inappropriate development is this quiet, sparsely populated rural desert area. You can see on our website stopwonderinn.org why we and the vast majority of local residents oppose this project.

From the statistics on this petition 291 signatures, at the time of this writing, have been gathered in a very short period of time. It appears that many of these signatures are being generated via a link on the Facebook page of a brother (Mark Landver) of one of the other developers, Jason Landver. We can't tell the names and addresses of the signees and if they are people with local concerns or not. We find that this is an example of astroturfing being forwarded by well monied interests. We believe that the way that these developers are soliciting signatures may be disingenuous and contrary to your stated values:

"Ekō is a community of people from around the world committed to curbing the growing power of corporations. We want to buy from, work for and invest in companies that respect the environment, treat their workers well and respect democracy. And we're not afraid to hold them to account when they don't."

The developers obviously want to counter the large input that the community opposed to this project are submitting re the San Bernardino County review process. This should not be allowed to occur on your platform. Valid views should be expressed but not in this way.

We respectfully request that you take down this deceptive petition and whatever response to our concerns you will provide.

Thanks for listening to our concerns re this.

Sincerely,

Eric Hamburg
Member of the Stop The Wonder Inn Project

From: Brian Laczko
To: Planning Commission Comments
Subject: PROJ-2021-00163 / Attn: Michael Stoffel
Date: Wednesday, February 22, 2023 3:53:42 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

To whom it may concern:

As Assistant Director of Capital Planning and Development Dept. for a public agency, our efforts to evaluate properties for development by our agency, I look at many properties for development potential. An overarching factor in whether to consider a property is what is discovered through the due diligence process. As an architect and planner, I rely deeply on the professional exactitude of consultants to assist in reporting a fair evaluation to decision makers. And this diligence is one of the most crucial aspects in developing a budget for a project. If we overlook some environmental or man-made issue, it could easily cost the agency hundreds of thousands, if not millions, of dollars.

To confirm a site's environmental history, due diligence efforts is a standardized, two-step process. Phase 1 is a comprehensive historical review of uses that have been on the property as far back as recorded. This is a crucial review as prior uses can indicate potential and costly environmental hazards, hidden under the "sands of time."

Should an odd historical use be identified, a consultant will flag it for further evaluation with a client, and likely, an environmental analyst. If, in the analyst's opinion, a potential hazard exists, a work plan is developed to analyze soil and/or structures for trace chemicals associated with that prior use. This second step is commonly referred to as phase 2 study. Should nothing of note be found in phase 1, there is no need to do the phase 2 study.

In my professional experience, had a consultant presented a phase 1 study of a property showing a history of electrical use, I would have engage in environmental analyst. They would need to review the historical data available to us, possibly gather more, so that an understanding could be developed about whether there were problematic chemicals and toxins associated with that use. Notable toxins like PCBs were very common in early electrical transformers and other equipment.

The historical report for the development did not indicate any historical connection to early electrical history in the valley. So their phase 1 report, if there was one, was lacking in this information. Therefore a phase 2 study, evaluating for potential PCBs in an old storage yard, was never considered. I am not saying there were or were not PCBs involved at this location. But neither is this developer's consultant as the diligence was insufficient.

It is easy to draw a conclusion that the developer might not have wanted to hear about this potential constraint for fear that it might look bad in the eyes of the reviewing planners. No appearance of an electrical history in the initial report could have reviewing planners think that an IS/MND was sufficient. But we know from the basic research of the community group that historical information was not difficult to find, and this was a location involved in the valley's

initial electrification. Whether the structure or use is a historically significant fact is not salient to my argument. Rather, this is an argument that an omission of these potentially hazardous materials is either sloppy or a willful omission.

While a property with this kind of history would be problematic for a fund-strapped public agency, an overlooked environmental hazard could possibly be easily budgeted for accommodated in a large private development, “cost of doing business.” But this is just speculation on my part. The only part that is not speculation is the lack of diligence on the part of the developer and their consultant. This potentially willful disregard of readily available facts, in my professional opinion, calls into question the entire process in the preparation of their initial CEQA package. The IS/MND finding favors the developers, instead of requiring a full EIR. And yet this simple omission seems to require San Bernardino County Planning to re-examine their rush to an IS/MND. And my rudimentary understanding of other facts, either overlooked or distorted, further reinforce the idea of reconsideration by county planners of an EIR.

Thank you for the opportunity to comment.

Brian Laczko
blaczko@gmail.comTo

From: Jacqueline Keesee
To: Planning Commission Comments
Subject: PROJ-2021-00163
Date: Wednesday, February 22, 2023 3:22:29 PM

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Public comment reguarding Wonder Inn Hotel

PROJ-2021-00163

Dear Mr. Stoffel

I am a resident of Wonder Valley CA and I am requesting that the county planning commission that is overlooking and making decisions on the Wonder Inn Resort PROJ-2021-00163, comes to the decision that an Environmental Impact Report take place.

Based on the San Bernardino County Wide Plan, this project should NOT have even been given a Negative Impact decision in the CEQA report. The County Wide plan states that "development is to occur in areas with potable water, roadways, and services". This does not describe Wonder Valley CA at all. In 2017, the Fire station was shut down by the county partly due to lack of potable water. Which brings me to the point that there are no services in Wonder Valley, we are serviced by 29Palms, an already stretched thin Fire, EMS and Sheriff Department. There are 2 main Highways that go through Wonder Valley, these are paved roads, over 80% of the other roadways in Wonder Valley are dirt roads which are serviced by a grader that the tax payers of Wonder Valley pays for.

Resource:https://countywideplan.com/

Within the Hydrology section of the CEQA questionnaire, question b asks:
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such the project may impede sustainable groundwater management of the basin?

The latest studies on the Dale Basin which is the basin that most Wonder Valley residents rely on for living not leisure, date back to 1979. We absolutely need updated studies, there has been a lot of movement within the valley over the last 40+ years, the effect the droughts have had on the basin as well as the illegal pot farms that were utilizing the water. We do not know the current status of our basin, an EIR and an updated Hydrology basin study is needed prior to allowing a large resort to move into our Wonderful valley. Is the county and the state really ready to let the leisure of others supersede the people that live in the community in Wonder Valley and rely on the water for LIVING?
Resource: Dale Valley Groundwater Basin
https://water.ca.gov/-/media/DWR-Website/Web-Pages/Programs/Groundwater-Management/Bulletin-118/Files/2003-Basin-Descriptions/7_009_DaleValley.pdf

Also to note, the developers have discussed in their proposal that they would be providing bottled water for consumption for its customers. According to San Bernardino County Land Use Services, hauled water is not permitted for new construction.

Resource: Hauled Water
http://www.sbcounty.gov/Uploads/LUS/BandS/Handouts/HauledWaterHandout.pdf

Additionally, the developers discuss adding a RO system. RO creates a lot of water waste and a poisonous discharge which is not discussed as to how the discharge will be handled.

Other Areas of concern within the CEQA questionnaire is Air Quality, from construction to traffic, and increase of dust and sand will be created in the atmosphere. If you know anything about the community members of Wonder Valley over 50% of the community members are over the age of 65, considered an at risk population which increased air pollution will effect. An EIR is needed.
CEQA also asks about the culture of the community, the Wonder Valley people that are currently living there are part of the culture and they were not once brought up in the developers plans or documents they submitted for the CEAQ process. Wonder Valley has its own Community Action Guide, not once was it mentioned, this project goes against our guide and the values of the Wonder Valley Community.

Resource:
https://countywideplan.com/community/east-desert-unincorporated/wonder-valley/

The developers of this project were even too lazy in their research to find and provide correct information on the true origins of the background of the property they are wanting to develop.

I do hope that you take all of these points in to consideration with the big decision that you are tasked with as it will effect a whole community.

Sincerely

Jacqueline Keesee BSN, RN, PHN, CPN
Wonder Valley Resident
keeseebee@hotmail.com