May 27, 2022
Irene Romero
County of San Bernardino
Via email to: irene.romero@lus.sbcounty.gov

Re: PROJ-2021-00169 Tentative Tract Map 20443,
Assessor parcel no: 0602-361-04

Dear Ms. Romero,

Thank you for the opportunity to comment upon this proposed project. The Morongo Basin Conservation Association (MBCA) has serious concerns about the scale and density of this project and its compatibility with the Joshua Tree Community Plan and the goals and aspirations contained within the Joshua Tree Community Action Guide as stated below:

1. **A model Community for Sustainability** – This project would require the complete removal of the existing native plants. The sustainability and resilience of the existing functioning eco-system on site would be destroyed.

2. **Responsible and Respectful Growth and Development** – Growth and development would be maximized at the expense of measured growth through the maximization of lots within the development again at the expense of the desert environment.

3. **A Gateway to Nature** – The complete removal of all native plantings does not support this aspiration. This project would not enhance the Rural Desert Lifestyle and Character through a dense tract of housing on site denuded of the natural landscape.

MBCA would support a development of the property that addresses the need to construct additional affordable housing for the community and that is respectful and sensitive to the desert environment. The project as proposed is too dense and would require the complete destruction of the native flora and fauna.

Following are some additional issues and questions that remain of concern and are un-resolved:
1. **DENSITY.** Accounting for the land required for roads, that leaves approximately 15 acres for use by the 75 parcels, or 0.2 acres per site. This small lot size compares with the properties immediately to the east of .41 acres +/-, to the south larger 1 acre and 2 acre plus, and to the west of 2 to 2.5 acres. To the north, the much smaller lots of .2 to .3 acre are bereft of native plants. The larger lot sizes of the Joshua Tree community contribute to the rural character of Joshua Tree.

2. **FLOODING.** This site is within a larger wash flowing from the south which occasionally floods (in 2014 the border road to the south, Alta Loma, flooded, leading to the death of one man). Clearing this area could imperil houses to the north with flooding. Any plans for development must address these serious flooding concerns.

3. **FLORA.** A complete plant survey to locate all Joshua trees, yuccas, and other protected desert plants must be undertaken with the design of the development reflecting their presence. These native plants (e.g. yucca, Joshua tree and black brush) are often a hundred or more years old and cannot be replaced. A design that reflects and respects the value of these native plants is essential to preserve the rural character of Joshua Tree.

4. **TRAFFIC.** Alta Loma has become a busy traffic thoroughfare over recent years and safety concerns have increased. The intersection of Sunset and Alta Loma is particularly dangerous. The proposed tract map shows 11 parcels utilizing Alta Loma for access. The additional traffic created by this project would add to existing vehicle safety concerns, and demand for public services (fire, ambulance, law enforcement etc.). Increased use would hasten current pavement deterioration. A thorough traffic study must be undertaken as any condition of approval.

5. **WASTE WATER.** The proposed on-site waste water treatment system (OWTS) is not in compliance with the mandated ½ acre minimum lot size. Western Joshua Tree (mostly downtown), to which this property is adjacent, is already saturating ground water with nitrates according to a United States Geological Service study. That is due to existing high-density housing to the south using septic tank sewage treatment. According to the Joshua Basin Water District's Wastewater Treatment Strategy, new developments of this type are not be allowed to use septic, to protect the aquifers, and “Existing vacant land will not be allowed to use on-site septic systems as tract development over 15 units occurs.”

6. **AFFORDABLE HOMES.** We need affordable family homes to replace homes being converted into short-term rentals. We do not need more
short-term rentals. See our recent video regarding the local housing crisis caused by a surfeit of short-term rentals. Iron-clad assurances must be obtained from the developer to assure that affordable family homes are built on this parcel and not more STRs.

MBCA would support a development of the property that addresses the need to construct additional affordable housing for the community while being respectful and sensitive to the desert environment on lots that are over \( \frac{1}{2} \) an acre to allow for animal movement and native plants. To support opportunities for our local builders, lots should be sold and built-on individually. There must be no grading prior to building permit approval for each lot. There should be no mass grading, with grading limited to the building pad and surrounding yard with clear encouragement to leave as much of the native desert intact as possible. Pre-construction inspection must occur on each lot, prior to plan submittal.

Respectfully,

Steve Bardwell, President
Morongo Basin Conservation Association

Photograph of site