

MBCA

morongo basin conservation association

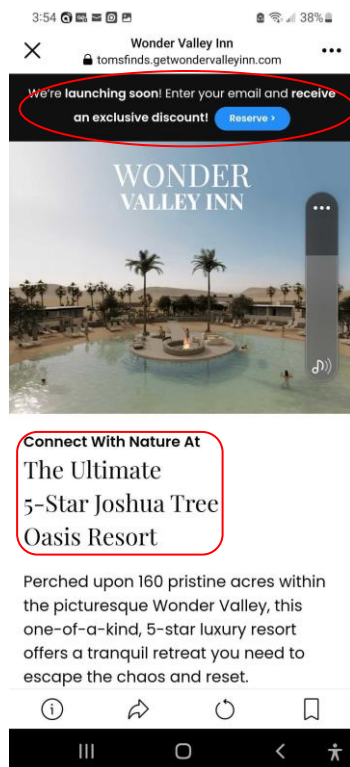
February 21, 2023

Azhar Khan, Planner
County of San Bernardino
Land Use Services Department
385 N. Arrowhead Avenue, 1st Floor
San Bernardino, CA 92415-0182
Azhar.khan@lus.sbcounty.gov

Re: Addendum to Wonder Inn Hotel/Resort (Twentynine Palms) IS/MITIGATED NEGATIVE DECLARATION
Project No. J-2021-00163. CEQA EIR analysis needed.

Dear Mr. Khan:

The purpose of this addendum is to bring materials recently discovered on social media that are connected to the proposed Wonder Valley Inn. The Facebook pages and the Blog page are selling amenities, activities, and a subdivision with 24 luxury homes on 5-acre lots, that are not approved and permitted. These proposed project additions are not in the original documents provided for analysis but are linked activities and must be analyzed under cumulative impacts in an EIR under CEQA,



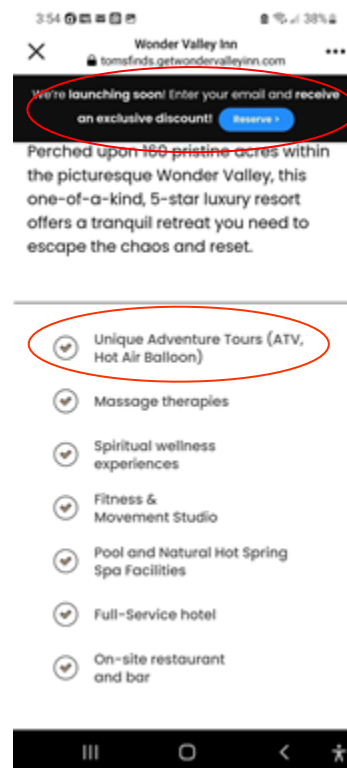
Facebook Page 1

The Ultimate 5-Star Joshua Tree Oasis Resort. Huh?

launching soon
Is that before permits or after?

Are they opening their doors or breaking ground?

Receive an exclusive discount



Facebook Page 2

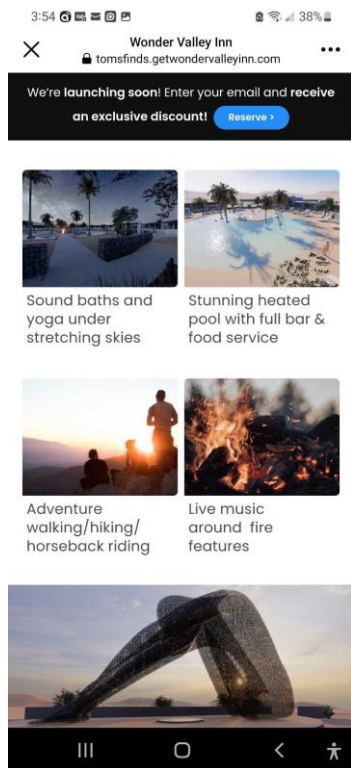
Unique Adventure Tours

ATV, Hot Air Balloons

ATV riding is illegal under the County OHV Ordinance §28.0400.

Hot Air Balloons
Permitted under FAA not likely in a Rural Residential area?

Receive an exclusive discount



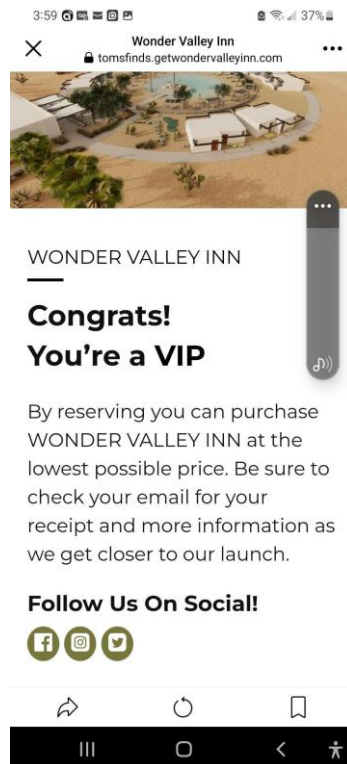
Facebook No. 3

HEATED POOL
No solar to reduce greenhouse gas emissions.

LIVE MUSIC
carried into the surrounding desert where 60 db is the legal noise limit.

FIRE FEATURES
DANGER Response time is 15 minutes minimum from 29 Palms.

Code:
All lights out by 11 PM (enforced by??)



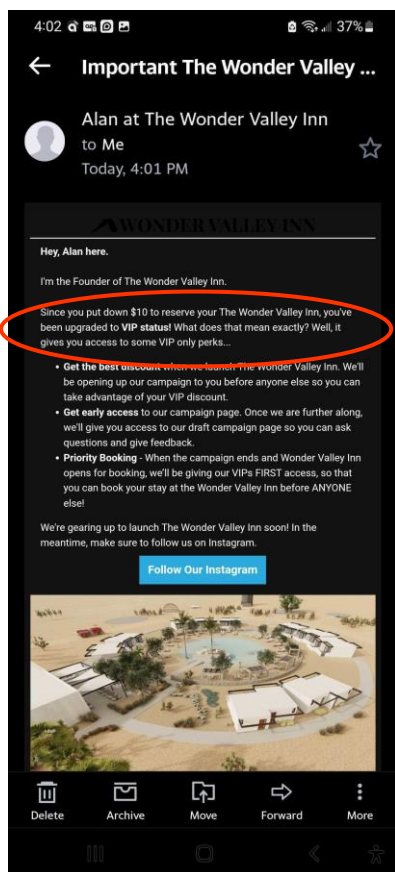
Facebook No. 4

Question:
Is it legal to sell what you do not yet have permission to build?

"Launch"
what is being launched?
The Opening or the first shovel?

SCAM??
at the County and rural residents' expense

VIP Send \$\$\$



Facebook 5

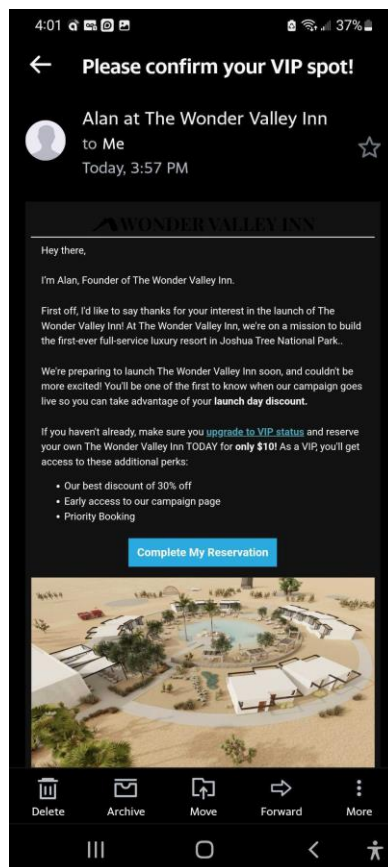
We are introduced to Alan – the owner.

"On a mission to build the first full-service luxury resort in Joshua Tree National Park."

WOW
Now JTNP can be just like Yosemite National Park?

Who is really being pitched to?

PUT DOWN \$\$\$\$ NOW



Facebook 6

Hey there
"Take Advantage of your LAUNCH DAY DISCOUNT"

And,
If required to do an EIR and no launch until 202???
(If ever)

Will \$\$\$ be refunded?

POST OFFICE BOX 24, JOSHUA TREE, CALIFORNIA 92252 email: INFO@MBCONSERVATION.ORG
WWW.MBCONSERVATION.ORG

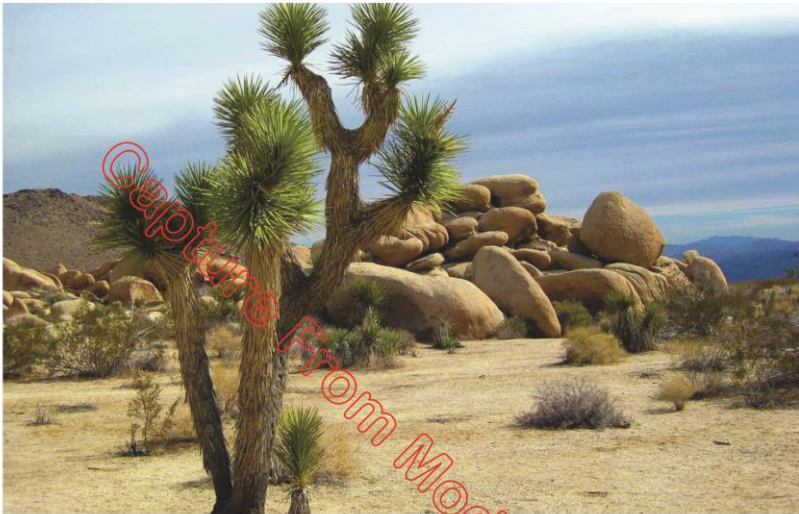
MBCA is a 501(c)3 non-profit, community based, all volunteer organization



JOSHUA TREE, CA

Modular Community

Homes developed in collaboration with Joshua Tree's newest luxury resort.



MODLY, INC.

Modly follows ATV and Hot Air Balloon adventures with building a high-end community of 24 private villa homes rentable at \$1,000/night when not in use by the owner.

All without San Bernardino County Approval

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

<https://www.modly.com/community/joshua-tree>

1/2

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 such as stocks and bonds. Vacation rentals can pay for themselves, provide a passive income stream, and appreciate in value over time.

In conclusion MBCA would like to emphasize the following subjects from this CEQA Addendum:

- Materials previously unknown to MBCA that bear on the proposed Wonder Inn Hotel/Resort project have been discovered on multiple social media sites.
- These social media materials step beyond puffery and make claims implying the resort is already constructed and should be invested in.
- Recreational activities are offered that are unstated in the applicant's proposal to San Bernardino County. These stated recreational activities are activities known to cause significant environmental damages.
- Other stated uses would indicate potential noise issues and fire activities that present potential firefighting response time challenges.
- The applicant makes the bold claim that the proposed project is ...“in Joshua Tree National Park”
- Unstated in the applicant's proposal to San Bernardino County is the plan to build a high-end community of 24 “private villa homes”.
- Investors are further invited to turn these dwell units into short-term-rentals. Associated activities would add to the cumulative impacts (traffic, dust, light, sound, etc.) of the initial proposed project. These issues are unaddressed in the Mitigated Negative Declaration.
- Related but not new information; in MBCA's email of January 20, 2023 with the response of Ed LaRue, Circle Mountain Biological Consultants, we provided documentation of the location and photographic evidence of the applicant's biologists failure to detect multiple instances of the occurrence of Desert Tortoises (*Gopherus agassizii*).

MBCA feels that these late breaking details nullify the applicants proposed use of a Mitigated Negative Declaration.

These stated series of factors and other unstated factors demand that the applicants Mitigated Negative Declaration be abandoned, and the applicant be required by San Bernardino County to perform a full multiyear environmental study by qualified parties. Furthermore, the results of the environment study to be documented and published in an Environmental Impact Report to be performed by qualified parties.

MBCA reserves the right to submit additional comments as ongoing research may find currently unknown factors that should be considered by San Bernardino County.

Sincerely,



Board, Morongo Basin Conservation Association

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