



November 1, 2023

County of San Bernardino  
Land Use Services Department - Planning Division  
Jim Morrissey, Contract Planner  
Via email: [Jim.Morrissey@lus.sbcounty.gov](mailto:Jim.Morrissey@lus.sbcounty.gov)

Re: Eco Dome '**Campground**'  
PROJ-2022-00119

Dear Reader,

The Morongo Basin Conservation Association is pleased to offer comments on the above project.

We contend that this project is improperly identified as a campground and, as the saying goes 'it looks like a duck; if it walks like a duck; it is a duck'. In this case the duck is a resort hotel / motel. This use is not permitted within the RL zone. The proper method for processing the Eco Dome project is to require a zone change and general plan amendment.

Identifying the proposed geodesic domes as '*temporary sleeping domes*', 6 of which contain a full bathroom and a communal dome containing a full kitchen, cannot be identified as a '*temporary*' improvement. The construction of each bathroom and the kitchen will require the use of a foundation that cannot by any stretch be considered temporary.

Given the proposal to construct the recreational amenities of a pool, Bocce ball court, Horseshoe pit and to provide a yoga studio and a full kitchen, this project would create a resort development within a rural residential zone. This development is in direct conflict with the Homestead Valley Communities Community Action Guide (CAG) where the aspiration states:

*'The residents of Homestead Valley choose to live here because of the natural beauty, wide open spaces, fresh air, dark skies, and the peaceful and **quiet** atmosphere'.*

The Values described within the CAG include:

**Rural Desert Lifestyle.** Homestead Valley residents value the rural lifestyle and character of the area, which includes wide open spaces and stretches of unpaved roads, fresh air, dark night skies, and a **peaceful and quiet atmosphere**. The County must respect the goals and aspirations contained within the Community Action Guides for unincorporated communities. The Countywide Plan states in Goal LU-4.5:

*“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.”*

A hotel/motel resort would not support the stated values and aspirations of the Community.

**Aesthetics, Historic Cultural Resources and Homestead Valley Community Action Guide**  
**Negative Declaration- Aesthetics**

*c) No Impact. The proposed Project would not substantially degrade the existing visual character of the site and its surroundings. The proposed Project is similar in scale and character as the existing use in the immediate vicinity of the site and is not in conflict with existing zoning. **The dome of the Integratron to the west of the proposed project resembles the proposed eco domes architectural style, and the eco-friendly and sustainable campground is intended to preserve the natural beauty of the high desert with its visitors.***

**Finding-** *“Therefore, the proposed Project would have no impact on the existing visual character and quality of the site and its surroundings.”*

The Negative Declaration fails to acknowledge the impacts or provide mitigation for the negative impacts on Aesthetics, Historic Cultural Resources, rural character and qualities described in the Homestead Valley Community Action Guide.

The Negative Declaration claims that the proposed project “**resembles**” the nearby historic Integratron. This statement clearly shows a lack of understanding of both the project design and the Integratron and fails to provide analysis or mitigation in this Negative Declaration. The construction of the Integratron is completely dissimilar to the proposed prefabricated geodesic domes whose structure is clad and joined onto a metal structure.

*“The Integratron is a circular plan, two-story, hemispherical umbrella dome structure, 43 feet in diameter and 33 feet tall. The Integratron is National Register of Historic Places eligible under Criterion C. The Integratron is a significant postwar example of both dome and glue-laminated architecture. Distinctly engineered, the *Integratron contains no metal whatsoever within its structure*, instead incorporating glue-laminated meridians compressed in place by a one-and-a-half-ton*

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concrete and a Micarta oculus custom-made for the structure by the Westinghouse Company. “

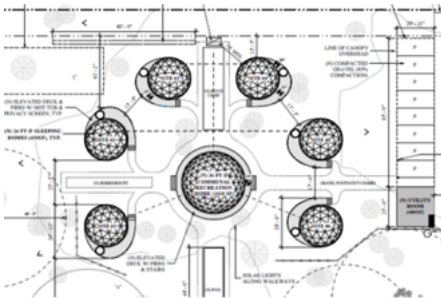
Source- <https://integratron.com/wp-content/uploads/2018/12/Integratron-National-Register-of-Historic-Places-Registration.pdf>

This eco dome project would be the equivalent to a hotel development consisting of a series of smaller modern towers imitating the general shape of the Eiffel Tower and then claiming “*is intended to preserve the natural beauty of Paris with its visitors.*” Development projects can insure that Historic and Rural Characters of an area are maintained by carefully considering the development’s size, scale, and massing. The size, scale and massing are critical elements for ensuring that the project is subordinate to the historic building/rural neighborhood, thus preserving the historic and rural character of the neighborhood..



Source- <https://dondarkson.artstation.com/projects/a9ggL>

View of the Integratron Property.



Source- [https://www.sbcounty.gov/uploads/LUS/Environmental/PROJ\\_2022\\_00019/Initial Study.pdf](https://www.sbcounty.gov/uploads/LUS/Environmental/PROJ_2022_00019/Initial Study.pdf)

Drawing of the proposed Eco Dome

### “Campground”

The Integratron is a circular plan, two-story, hemispherical umbrella dome structure, 43 feet in diameter and 33 feet tall.

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The project proposed six domes, 24 feet in diameter 14 ¼ feet tall and one from 36 feet and 20 feet tall. From the above images it is apparent that there are significant differences in the massing of the Integratron complex and the proposed Eco Dome “Campground”.

In this rural area of Landers the proposed project would be significantly different in character, massing, open space and character from the existing developments in this rural area with generous open space and low density. **The project and Negative Declaration fails to consider the rural character of the adjacent area and the proximity of the property to Integratron and Giant Rock.**

*“Homestead Valley endeavors to preserve its **rural character** while improving the critical infrastructure and essential services needed by the community.”*

*“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.”*Source [https://countywideplan.com/wp-content/uploads/sites/68/2020/07/13\\_Homestead\\_CAG\\_2020.pdf?x23421](https://countywideplan.com/wp-content/uploads/sites/68/2020/07/13_Homestead_CAG_2020.pdf?x23421)

The proximity of the proposed development to the *Integratron*, which is listed on the National Register of Historic Places, requires that any potential impacts to the *Integratron* be carefully studied. The Mitigated Negative Declaration does not sufficiently address any potential negative impacts or propose mitigation.

The inclusion of 6 hot tubs, decks, swimming pool, TVs and a dome whose skin only has a life cycle of 25 years does not make this project an “**eco-friendly and sustainable campground**”. There are no other “Glamping Resorts” with these types of amenities in the Rural Living residential zoning of the Morongo Basin. Approval of this project would create a legal precedent for the approval of additional “Conditional Use Permits” of similar Glamping resorts projects. SBC has not updated its zoning tables to mesh with the updated Countywide Plan. It is our position that Glamping Resorts should be only allowed in commercially zoned areas allowing resorts/hotels NOT Rural Zoning residential properties.

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We respectfully request the IS / MND for the Eco Dome Campground be ***denied***.

Thank you for your consideration.

A handwritten signature in black ink that reads "Steve Bardwell". The signature is written in a cursive, flowing style.

Steve Bardwell, President  
Morongo Basin Conservation Association