



November 1, 2023

Jim Morrissey, Planner
County of San Bernardino
Land Use Services Department
385 N. Arrowhead Avenue, 1st Floor
San Bernardino, CA 92415-0182

Sent by email Jim.Morrissey@lus.sbcounty.gov

Reference: Eco Dome Project-2022-00119 located on APN 0630-061038 at 57899 Linn Rd, Landers, CA.

Dear Mr. Morrissey,

MBCA advocates and educates for a healthy desert environment which nurtures wildlands and our communities' rural character, cultural abundance, and economic well-being; therefore, we must oppose the approval of a Conditional Use Permit (CUP), with a Mitigated Negative Declaration (MND) for the proposed Eco Dome camping project claiming less than significant impact.

The Community

The Homestead Valley residents defined their values in their Community Action Guide (CAG). The county considers these values important considerations in shaping the community's aspirations, focus and actions.

CAG: As a community we value

- **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.
- **Natural Environment.** Homestead Valley residents value the natural beauty that defines the desert, including magnificent landscapes, wildlife, beautiful sunrises, and sunsets, and living within nature.
- **Conservation and Preservation.** Homestead Valley residents see themselves as stewards of the environment and value the wise use of water, protection of natural resources, and the natural landscape

In recognition of these community values MBCA supports the concerns listed by the Homestead Valley Community Council in a letter dated November 21, 2022 opposing the approval of a CUP for the project based on

- the impacts on adjacent and neighboring properties,
- the dangers situated in a wash,
- the disruption of wildlife habitat, and
- the disintegration of local historical landmarks.

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MBCA supports the concerns listed via email by Nancy Karl, the Integratron, on October 25, 2023 detailing the

- noise issues damaging the Integratron business model built on quiet surroundings from the group activities within the Eco Dome and the generators used to augment the solar generation,
- the increased traffic and dust on the dirt roads,
- the campground development in a wildlife corridor and Joshua Tree habitat, and
- the ruin of the quiet enjoyment of the rural residential neighborhood.

The Integratron is listed as a National Historic Site and the reader is informed that its highly resonant sound chamber amplifies all sound coming from outside the building.

MBCA supports the concerns provided by the Morongo Basin Historical Society in a letter dated November 16, 2022.

- The historic Integratron and Reche Homestead with the oldest wells in the area still in use,
- The non-reference to CEQA §15064.5 Determining the Significance of Impacts to Archaeological and Historical Resources, and
- The high probability that earth moving during construction and increased long-term road and foot traffic would undoubtedly impact the flow of water through the wash, increasing the potential of water backing up towards the historic landmarks.

This letter writer attended the Save Our Deserts October 30th meeting in Landers organized to inform the community about when and how to comment on the Eco Dome camping project. The community concerns listed above were all mentioned. Many residents had not heard of the project until recently because notices were not sent out except to the closest residents. In addition many residents are not familiar with the CEQA process and the Initial Study is confusing to read and understand. (More on this shortly.) After realizing the community needed more time to learn and comment Justin Merino, Save Our Deserts Organizer, asked for an extension of the time to provide comments. His letter was sent 2 days before closing so the lack of an extension is not surprising. However, when considering the project confusions in the Initial Study/MND that are listed below more should be done to inform the public.

CEQA requires public agencies to “look before they leap” and consider the environmental consequences of their discretionary actions. **CEQA is intended to inform government decisionmakers and the public** about the potential environmental effects of proposed activities and to prevent significant, avoidable environmental damage. (Governor’s Office of Planning and Research)

Initial Study confusions

The writer of these comments takes credit for being confused and accepts confusion over her confusion.

The Initial Study Proposal:

Conditional Use Permit (CUP) to develop six (6) temporary sleeping domes, one (1) commercial recreational dome, and one (1) solar airport and utility room on a 2.5-acre parcel located at 57899 Linn Road in the county of San Bernardino.

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THE PROJECT DESCRIPTION

Summary

Request for a Conditional Use Permit (CUP) to develop six (6) temporary sleeping domes, one (1) communal recreational dome, and one (1) solar carport and utility room on a 2.5-acre parcel located at 57899 Linn Road Landers, CA 92285 in the County of San Bernardino. The Project consists of the following:

Accommodations/Amenities:

- *Six (6) stand-alone geodesic domes*

Support Buildings/Areas:

- *One (1) central communal dome with games, yoga, and a full kitchen*
- *Bocce Ball Court*
- *Horseshoe pit*

Infrastructure:

- *Parking Lot – 8-spaces*
- *EV Charging Stations with solar canopy*
- *Invertor/Electrical Room*
- *Rainwater Capture*
- *Backup Generator*
- *Refuse/Recycling*
- *Septic Tank*

Trails/Paths/Gardens:

- *Internal Paths/Walkways between buildings/site activities*
- *External Trails*
- *Gardens - 212,000 square feet*

Community Questions

Since there is no residence or office shown on the 2.5 acres site how will guest activities be regulated to preserve the neighborhood quiet, dark night skies, dust free air, wildlife?

- How many people will be staying in the 6 domes? Any pets allowed?
- Who oversees the use of the kitchen?
- Who regulates the bocce ball court, yoga area, horseshoe pit, games?
- Who regulates the noise from partying guests, sound systems (assumed) and the generators keeping the lights on?
- Who ensures the lights are dimmed and off per the lighting ordinance?
- Who monitors the infrastructure components 24/7 for breakdowns?
- Who responds to the need for emergency services, such as fire, injury, and illness?
- Since there is no permanent structure on the property, how do the 6 temporary structures comply with the RL zoning requirement for 1 residence?
- Oh, and who rescues a swimmer in the pool shown on the Site Plan but not listed among the amenities?

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- Oh, and who calls the Ambulance in Yucca Valley if a person in the hot tub has a problem. Hot tubs are assumed but not listed in the Amenities. (See below for where they are listed.)
- Oh, and who calls the Fire Department if sparks escape from the bar-b-que or fire pit when roasting marshmallows? See final comment on Figure 1.

Lots of questions – where are the answers?

Initial Study III. Air Quality - page 20.

Would the Project

- d) Result in other emissions such as those leading to odors adversely affecting a substantial number of people?

d) Operation and Maintenance: *The campground will be operated by a local property manager and will be open year-round to guests. The property manager will be readily available at all times by phone and located in close proximity in case physical presence is needed. The maximum number of guests is limited to six (6) people per site. Two (2) well-behaved pets on a leash per campsite will also be permitted. Additional daytime guests and onsite special events will only be permitted upon written request approval. Overall, odors during construction and operation are less than significant and do not exceed to local thresholds. Therefore, the impacts would be less than significant.*

--Under Air Quality/Odors we find out that the campground will be open year-round with a maximum capacity of 36 people and 12 well-behaved pets. Who certifies the pet behavior? Experience would indicate they will not be dogs because 12 dogs, known only to each other by relationship, will be curious, excited, and barky. Further, this 2.5-acres plot is in a wildlife linkage so there will be coyotes, rabbits, rodents and more (see below) for added visual and olfactory excitement. So, the *well-behaved pets* will possibly be pigs, iguanas, or maybe even parrots since a cage could substitute for a leash with birds.

--36 people without restraints in a remote camping area surrounded by wilderness. What could go wrong? Alcohol is allowed (unless forbidden under another Issue) and, based on the experience with STRs throughout the Morongo Basin (and worldwide) partying and noise will be measurable.

--If all the domes are filled to capacity will the 8-parking spaces provided be enough. Probably not since camping gear + 6 people would take a large van, not always on-hand. Also, that property manager will have to drive over when called to add physical presence. Possibly lots of cars clogging the interior space or on Linn Rd.

Will there be hot tubs and private decks?

Initial Study IV. Biological Resource Assessment

Section 1. Introduction

The proposed Project is a Recreational Development, Eco Dome Campground (Appendix A, Map 2). The Project involves the construction of six (6) stand-alone geodesic domes, each with one bedroom, one full bathroom, a private outdoor deck, and a hot tub (Appendix D, Plans). The six

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guest domes will be 24feet in diameter. The plan also includes one (1) central communal dome which will be about 36.9 feet in diameter. The domes will be constructed on and anchored to elevated wooden decks. **(The referenced Appendix A is not provided with the Project documents on the county Desert Environment website!)**

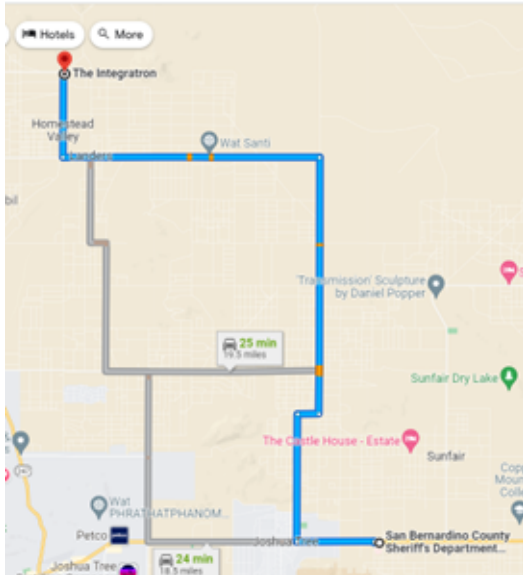


Figure 1: Google Maps showing distance from the Sheriff's station to the Integratron.

Who will be calling the property manager? Will the surrounding residents and the Integratron staff need to be on constant alert year-round? Or, will multiple cameras/speakers (not listed) be spying and listening?

Local help – the sheriff, emergency, and code enforcement - is no closer than Joshua Tree/Yucca Valley approximately 24 minutes away. See map.

The **Initial Study XV. Public Services** (page 38) checks the No Impact of Public Services (Fire and Police Protection).

Community residents and MBCA differ.

Initial Study I. Aesthetics

The CUP/MND analysis contends that the Eco Dome Project will have No Aesthetic Impact - the proposed Project would not substantially degrade the existing visual character of the site and its surroundings.

Figure 2: Proposed Eco dome in relation to its surroundings.



a) No Impact. The proposed Project is located within an area where most of the surrounding parcels are vacant, private, or government Bureau of Land Management (BLM) land. The nearest development is the dome of the Integratron, a popular tourist destination in the area, just west of the proposed project site. The proposed Project site is not adjacent to a scenic highway nor has any scenic resources onsite. Given the nature of the Project, there would be minimal obstruction to the surrounding parcels. Therefore, the project would have no impact.

To properly evaluate the Aesthetic element, it is necessary to have an accurate sense of place. The Landers Community Center sign reads **Landers Land of Endless Vistas**

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The sign is not new, the letters are showing the wear of age. The community residents know aesthetic and the Eco Dome does not qualify.

The Project is within the Basin and Range Province and for those living to the south or traveling to the Integratron, the view is wide open intact desert (Basin) with four isolated mountainous outcrops in view (Range). An area of endless vistas.

Initial Study III. Air Quality

Would the Project

c) Expose sensitive receptors to substantial pollutant concentrations?

We explored the Project's odor above. More important to acknowledge is the toxic dust, Particulate Matter PM10 and PM2.5, which blows in the wind from disturbed lands including the dirt roads and much of the site for the proposed project. See Project Site Figures 4 and 5 to see how fine the soil is. Particulate Matter is a criteria pollutant that is monitored by the Mojave Desert Air Quality Management District. Unfortunately, there are no MDAQMD ambient air monitors south of Lucerne Valley.

The soils at the site are described in the General Biological Resources, Section 3 under Existing Conditions, as Cajon-Calcio-Edalphy complex with no hydric soils. In the Cajon Series the hazard of soil blowing is high.¹

The National Park Service monitors air quality within parks.

Long-term exposures, such as those experienced by people living for many years in areas with high particle levels, have been associated with problems such as reduced lung function, the development of chronic bronchitis, and even premature death. Short-term exposures to particles (hours or days) can aggravate lung disease, causing asthma attacks and acute bronchitis, and may also increase susceptibility to respiratory infections. In people with heart disease, short-term exposures have been linked to heart attacks.²

Several community members at the October 30 meeting were concerned about their lung problems.

Initial Study VII Geology and Soils

Would the Project

b) Result in substantial soil erosion or the loss of topsoil?

¹ Soil Survey of San Bernardino County California, Mojave River Area. Pages 27-32. This soil survey is a publication of the National Cooperative Soil Survey, a joint effort of the United States Department of Agriculture and other Federal agencies. Major field work was completed in 1978.

² <https://www.nps.gov/subjects/air/humanhealth-pm.htm#:~:text=Short%2Dterm%20exposures%20to%20particles,been%20linked%20to%20heart%20attacks.>



b) Less than Significant Impact. No signs of flooding or erosion occur on the Project site. The risks associated with flooding and erosion will be evaluated and mitigated by the project design Civil Engineer. Therefore, less than significant impacts would occur.

Nancy Karl, Integratron, contradicts this assessment in her October 7, 2022 email to Mr. Morrissey. According to Nancy

FLASH FLOODS: The property is located within a significant flood wash - we know this because we own the properties adjacent and have dealt with the flash floods for decades. There are major tributaries of the Pipes Canyon Wash that run through the Integratron property and the proposed development's property (see attached maps). We've seen flash floods that were four feet deep and carried all of our patio furniture hundreds of feet, knocking down chain link fences and carrying it out into the wash where their development is proposed. The flash floods we've witnessed have shut down our business for months, flipped cars on our street (one woman perished trying to cross a flash flood on Belfield Blvd), and are absolutely life threatening. The water in the wash is carried directly out into the development's property on its way to Giant Rock lake bed.

Nancy also discusses wildlife in the area and the presence of the wildlife corridor.

Initial Study IV Biological Resources

d) 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?

d) No Impact. Due to the absence of sensitive biological species as described in the biological reports prepared by Mountainview Biological Consulting, the proposed Project would not 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, because there are no such corridors or nursery sites within or near the Project site. The subject site is located within a rural area and may serve as a wildlife movement corridor. Due to the subject parcel being directly bordered by BLM land to the north and east and vacant private property to the west, this region is unfragmented and generally wildlife can move freely across the terrain. Therefore, the Project should not prohibit any wildlife movement from occurring or cause any interruptions and no impacts would occur.

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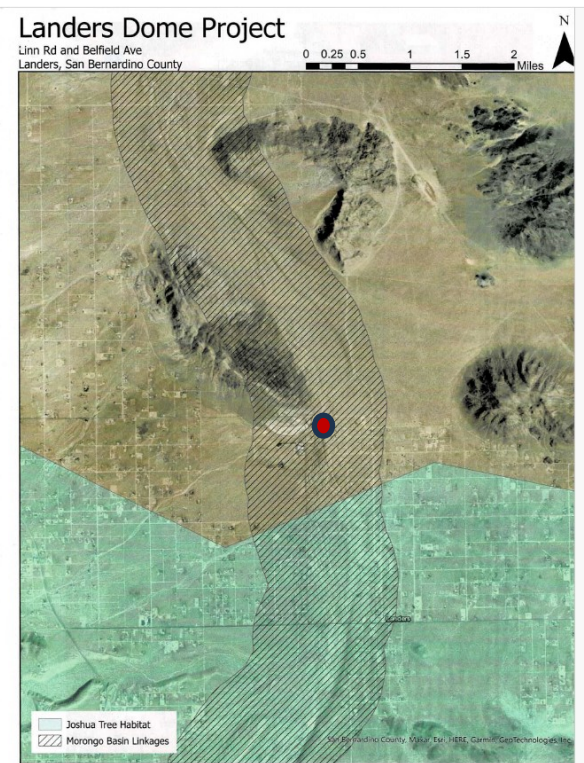
Essentially there is lots of room out there for animals to move around so there will be no problem. Not considered are those (un)leashed pets sniffing around. What about the 6 groups of 6 making noise and needing lights in the 7 domes and along the trails long after the Light Trespass Ordinance lights out of 11



PM.

Figure 3: Domes at night. Dome lights need a noisy generator to keep glowing after the sun sets.

Below are Nancy Karl's comments and the map she attached to visualize the relationship of the project to the wildlife corridor.



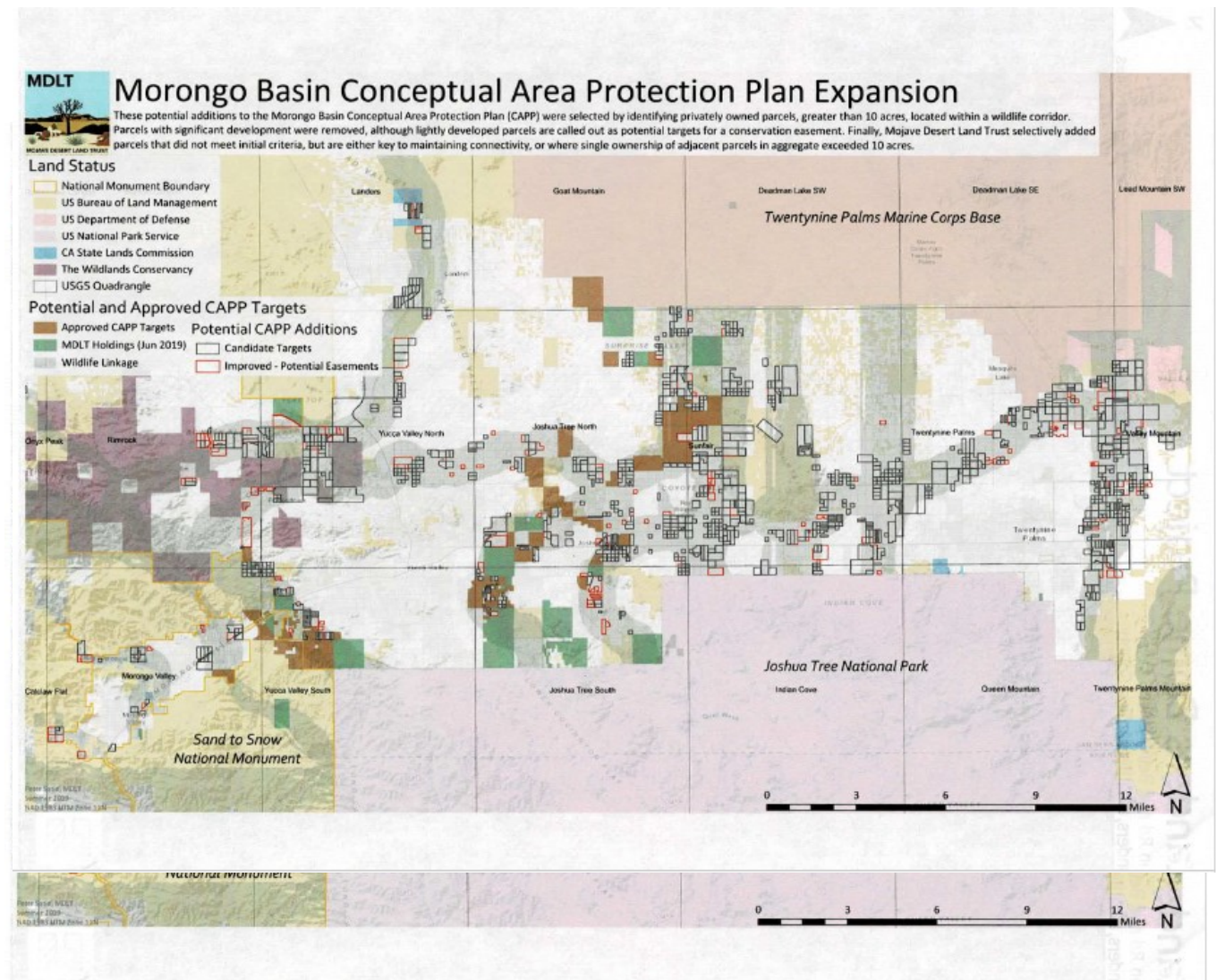
WILDLIFE: Additionally, our property, and the property of the proposed development, are located directly in the center of a major wildlife corridor (see attached maps) as designated and protected by the California Department of Fish & Wildlife. Being located within a wildlife corridor, we regularly see on our property Coyote, Bobcat, Fox, desert Tortoise, and the multitude of small critters and flora that they feed upon. With the location within the corridor, an Environmental Impact study should ABSOLUTELY be required due to the significant disturbance (scrapping) of their entire parcel.

Figure 4. Wildlife corridor with the approximate location of the Eco dome Project. The size of the red marker is not even approximate to the Project size but does show that the Project is smack in the center of the linkage which follows the drainages.

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WILDLIFE CORRIDOR: Attached are maps (Figures 4 and 5) that show the wildlife corridor where



protected species travel through our property and the proposed development's property. The second map shows the Conceptual Area Protection Plan for the Morongo Basin where the proposed development falls within proposed protection/acquisition targets for the Mojave Desert Land Trust.

Figure 5: Morongo Basin conceptual Area Protection Plan Expansion.

MBCA concurs with Nancy Karl's final statement.

We're concerned that the Planning Department would approve such a development in a residential area that would directly impact neighboring homes and businesses. Please consider, especially, the protected wildlife species that are currently active within their property.

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In addition, MBCA requests that the Initial Study be redone with a complete project description with an EIR to justify the evaluations more adequately to the public and the deciding decision makers.

Sincerely,

Pat Flanagan
For the MBCA Board.

Cc:
Supervisor Dawn Rowe
Nancy Karl
Justin Merino

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