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October 7, 2025

PROJ-2023-00061 Cactus Club Hotel, APNs- 0608-051-02, 03, and 04

Lead Agency: County of San Bernardino Land Use Services Department 385 N. Arrowhead Avenue, 1st Floor San Bernardino, CA 92415-0182

Oliver Mujica E-mail: Oliver.Mujica@lus.sbcounty.gov

cc: Dawn.Rowe@bos.sbcounty.gov

Dear Mr. Mujica,

The Morongo Basin Conservation Association is pleased to submit the following comments on the proposal of issuance a Mitigated Negative Declaration for the above project.

MBCA's mission encompasses advocacy for the economic well-being of our high desert communities and, while this project would serve that purpose, any economic benefits must be balanced with the environmental and social impacts such a significant development would have on the unincorporated desert community.

The project for which a Conditional Use Permit is being applied requires re-definition to enable the proper evaluation of its potential environmental impact. The Notice of Completion & Environmental Transmittal describes the project as: *...and a Conditional Use Permit for the development and operation of a twenty (20) room two-story hotel on Parcel 1 and **associated infrastructure***. However, the written description within the IS states:

*...Conditional Use Permit for the development and operation of a twenty (20) room two-story hotel on Parcel 1 and associated infrastructure. The hotel Project consists of a single-story hotel lobby building with a greeting area, office, guest laundry facility, and mechanical room. The guest rooms will be in separate buildings, consisting of a total of 20 rooms in three separate structures with a **total of 7,705** square feet. Additional structures include a **1,300** square foot coffee shop/cafe, **1,300** square foot restaurant, **3,600** square foot club room, **1,800** square foot wine bar, **2,550** square foot lobby/office/mechanical/laundry building, **3,500** square foot hotel restaurant, and **3,800** square foot spa.*

Hotel = 7,705 sf _____ Accessory Uses = 17,550 sf

Further, it is unclear if the project and the 'associated infrastructure' or 'amenities' will be open to the public. Will the many other uses: café, restaurant, club room, wine bar, hotel restaurant and spa be open to the public? If so, then the project should be evaluated as a significant commercial development before entitlement. If the amenities are to be used solely by the guests of the hotel, then it would appear the sf areas allocated to these uses is out of proportion to their intended customer base. (See below re: parking.)

The additional uses beyond the 20-room hotel are described as accessory, amenities uses or 'associated infrastructure'. Within the Development code, CHAPTER 84.01: ACCESSORY STRUCTURES AND USES, accessory uses are described as being '**subordinate to the primary use**'. With the cumulative area of the accessory uses being over twice the area of the hotel units the description of the project as a hotel requires revision. The project presented would appear to be closer to a Resort and the environmental analysis must be evaluated accordingly.

It appears the proposed project would trigger notification (from Development Code 84.01: ACCESSORY STRUCTURES AND USES) and the project description makes no mention of the following.

the Director shall be responsible for determining if a proposed accessory use meets the criteria in this Chapter. Before making a determination, the Director shall give notice to contiguous property owners in compliance with [§85.02.030](#)

Some issues of concern we believe have not been adequately addressed or require additional consideration are:

1. The request for the CUP should be clarified and revised to describe what appears to be a Resort development.
2. The scale of the development is out of character with the community. The development as designed would effectively form a wall along 29 Palms Highway obscuring views of, and towards the National Park to the south. The 5-acre parcel along would be densely developed with only a small portion at the eastern portion of the site remaining as open space. The lot coverage calculation requires verification to include impervious surfaces.
3. The project description proposes: '*Tentative Parcel Map (TTM) No. 20774 to combine three (3) existing parcels to create four (4) new parcels (Parcel 1, 5.28 acres; Parcel 2, 2.57 acres; Parcel 3, 2.56 acres; and Parcel 4, 2.24 acres)*'. The 'Exhibit of Project Location' does not include the residential parcels fronting on Cactus Dr. The exhibits do not illustrate the locations of the three parcels to be included within the TTM or the specific zoning designations of the parcels.
4. From the project description: "*The project site is located within a relatively undeveloped area of Joshua Tree. The site is surrounded by vacant land to the north, east, south, and west, with one rural residence to the southeast, and California Highway 62 to the north.*" However, there is a home directly to the south, and a community of homes to the south and west of the proposed development. This project could have a significant impact on the rural character of the area that must be fully disclosed. See above for need to provide notification of neighboring properties.

5. The math within the parking tabulation shown on the site plan does not add up! See above for need to accommodate parking for all the uses.
6. The development appears it will remove all existing native plants on site. The development would better fit the community and support the Goals of the Countywide vision if the design were to preserve and feature existing plants. To remove all the existing plantings only to replace with new landscaping requiring supplemental water is not appropriate for our warming and drying climate.
7. Potential traffic and **safety** issues for this development require further analysis. Access to and from 29 Palms Highway requires careful study and consideration of mitigation measures. Access to Mas O Menos, west of the development, already creates safety issues and these concerns must not be exacerbated with this Resort. The possibility of extending the frontage road to the stop light should be considered.

The analysis does not account for the potential traffic of all the proposed uses. The level of traffic generated by a Resort (see above) would differ from that for a hotel and has not been considered accordingly. The traffic study must account for the hotel, the club room, café, proposed restaurants, wine bar, and spa as well as the hotel.

8. The real potential for flooding of the development requires further study. The recent heavy rains, anticipated to become more severe as the climate continues to warm, must be accounted for.
9. A development of this scale may require utilizing a package wastewater treatment plant. The scope of work with multiple restaurants and hotel units may exceed the capability of utilizing a septic system.
10. The need for, and location for housing of the many employees that will staff this development, requires consideration within the approval process. The high desert community has a shortage of affordable rental housing. Workers will need to commute with subsequent impacts on traffic and generation of additional Vehicle Miles Traveled.
11. Traffic concerns require additional consideration on a cumulative scale. With the many proposed developments currently undergoing consideration throughout the Morongo Basin consideration of traffic impacts on an overall community scale is warranted. Developments currently being planned or are under or consideration at this time include, in addition to this proposal: The expansion of the Pioneertown Motel; the Landing in Landers; the Joshua Tree Resort in Downtown Joshua Tree, Ofland in 29 Palms and Lovemore Ranch in Joshua Tree.
12. The Countywide Plan adopted in 2020 is based upon an assumption of **limited** growth within the unincorporated east desert area. From the [Countywide Plan PEIR](#) (which was adopted as part of the final EIR):

3.4 INTENDED USES OF THE EIR (for the period 2016 to 2040)!

This is a Program EIR that examines the potential environmental impacts of the proposed Countywide Plan. This PEIR also addresses various actions by the County and others to adopt and implement the Countywide Plan. It is the intent of the PEIR to evaluate the environmental impacts of the proposed Project, thereby enabling the County of San Bernardino, other responsible agencies, and interested parties to make informed decisions.

Joshua Tree CPA	827 Population	238 housing units	53 employment	39,970 sf
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(8) **No growth** is projected in the East Desert region areas of Pioneertown CPA, areas **outside CPA boundaries** in the Twentynine Palms SOL, or unincorporated areas outside a CPA or SOL.

The development as proposed would be in contravention to the assumed projections on which the Countywide Plan was prepared and adopted. Its construction would add nearly 75% of the anticipated 39,970 sf of new commercial construction for the 24 year period the EIR covers. The additional employment is not paired with the needed additional housing. The lingering effect of the STR boom continues to be felt in the community.

We look forward to seeing these issues addressed within an amended environmental analysis.

As a point of information, the site plan published for soliciting comments on the proposed issuance of a Mitigated Negative Declaration is **not legible**. We believe the project should be re-circulated with a revised Initial Study with legible documents.

Thank you for your consideration.



Steve Bardwell, President
Morongo Basin Conservation Association