

From: [Olivia](#)
To: [Planning Commission Comments](#)
Subject: Flamingo 640
Date: Saturday, February 25, 2023 6:28:46 PM

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Hello,

Please don't let the flamingo 640 glampsite happen. We live out here for peace and the the beautiful desert and this campsite would ruin both of these and impact a lot of plants and animals. I live in Flamingo Heiaghts and all of my neighbors also agree that they really don't want this. Just leave the land alone!

Sent from my iPhone

From: melako.melvinako.com
To: [Planning Commission Comments](#)
Subject: Project # 2020-00191
Date: Saturday, February 25, 2023 6:59:19 PM

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Applicant: Ro Bot Land Company

Greetings,

From: Melvin Denny Ako/ Facebook/Linked-in, etc.references of 40 yrs. Resort experience.

We have been a permanent resident of Yucca Mesa for over 20 yrs. & very near the project proposed! Being in Global RESORTS Development, We are semi-retired & moved to get away from the city density. Unfortunately, we have seen this increase & want to instill a few concerns we all have. Having developments can be positive if planned & designed correctly to the locals & community.

Unfortunately, we have many concerns as to its design & merits.

CONCERNS:

1. The traffic is the BIGGEST issue! San Bernadino has not considered the very dangerous 247 hwy. to this development. Cal Trans & San Bernadino County should not allow this or any other large projects like this to take place until the Highway is widened or made to accommodate this project. The traffic from the previous event KOH is a testament to this. I don't think they will have Highway Patrol directing traffic 24/7 there. Nowhere on the plans show adequate turn offs & space for back up traffic or on-going traffic onto highway.
2. The design should be more in keeping with the area as many people want the land to retain its character. The place should have a local character with very low lighting so stars can be seen at night. The buildings, as you call them Glamping, should have a rural character, not like a sea of white tent roofs. Many people in the area don't want to view a mass of Orange County rubberstamped roofs.
3. The design should have a local flavor & not like a sea of travel trailers like in Joshua Tree.
4. Landscaping should be professionally done by persons in tune with local planting.

5. Outlined should be Jobs for local people qualified first & an HR professional to oversee this.

6. At least 3D colored rendering & model of the area should be required for government, public & all concerned.

7. I'm not against development because of working on mega projects world-wide but have seen what unplanned projects have led too!

8. Solar should be implemented especially under roof of the many cars that will be coming. Water is also the issue so engineering should be calculated into this as well for the environment. Risk Management studies should be made.

9. The community in the area should also benefit in some way continuously to support this on-going project.

10. From the moment a guest arrives if should show the care & design of the area.

11. The design is the utmost important concern & after viewing plans needs many adjustments to be the best for the area.

Respectfully,

MELVIN DENNY AKO

enclosed is my experience in the next e-mail.

Melvin Denny Ako

The Art in Architectural Design & Models

Tel: 760-365-3360 | **Mobile:** 714-272-1633

Website: <http://www.melvinako.com>

Facebook: <https://www.facebook.com/melvindennyako>

From: melako.melvinako.com
To: [Planning Commission Comments](#)
Subject: Melvin Ako 2020 Profile - Copy
Date: Saturday, February 25, 2023 7:18:10 PM
Attachments: [Melvin Ako 2020 Profile - Copy.doc](#)

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Reference to Project 2020-00191
Applicant: RoBot Land Company
Letter attached to Concerns on Project my references.



PROFILE

Melvin Denny Ako

(714) 272-1633 cell

Southern Calif. USA

melako@melvinako.com

www.melvinako.com (request for latest projects)

facebook-melvindennyako

SUMMARY: 35 yrs + experience.
Executive / Consultant- Strategy Development- Marketing
Mega Projects using 3- Dimensional Scale Models of Resorts, Theme
Parks, Master Planned Developments, Shopping Centers,
Commercial & High –end Residential. Risk management.

Highlights/Work: Atlantis Resorts/Bahamas (2) master plan scale models
Disney Au’Lani Resort/Hawaii (5) scale models
Disney Animal Kingdom Resort- 1000 rms.
Maravilla /Los Cabos “The Montage Resort” master plan
Crystal Cove, Newport Coast High-End Residences (35) + residences
Alec Gores-billionaire Residence- Landry Design (just sold for \$70mil.)
King of Morocco projects (2) scale models
Grand Wailea Maui Resort (4) scale models
Tahiti Condos (406)units. 2022

Responsibilities: Direct & manage billion dollar sized projects.
Market company’s goals towards achieving successful projects
Coordinate and prioritize demands of highly skilled team
of project managers, architects, designers, staff, contractors,
and outside vendors to achieve goals.
Research & analyze projects for planned uses & savings.
Skills in reading complex architectural plans, renderings, photographs.
Produce, direct & lead teams to completion of multiple projects.
Recognized skills for Sales & Marketing team concept ideas
Build effective teams with strong organizational skills.
Visual Concept Designer
Direct projects with directing Laser-Cutting/ 3D printing of projects.
Extensive travel experience local to global coordinating projects.

Experience:

2012 May 4th – to Present Melvin Denny Ako Company (owner) Accomplishments:

Produced & direct Disney's Animal Kingdom Resort for Walt Disney Vacation Club 1000rm. Resort marketing scale model
Increased interests & sales exhibits. Used for On-going planning, sales.
It was an overall success in showing potential people the size & scope of the project & increased sales of resort timeshares. Assembled plans by flying to site to photograph existing details & implement plans into a scale model using latest's technologies in laser & 3D printing.

Artfully produced Maravilla / Los Cabos Scale Model Master Plan of 2 miles Beach front coastline in Cabo San Lucas for company owned by former CEO of E-BAY
Increased sales of the project showing master planning, design amenities
Shipped to site sales office. Adding to master plan as it is developed by client. Show piece of current & future plans. Photos used for planning & Marketing. Sales has been very strong. Model is used daily.

2011 Sept.9th – May 3rd,2012 Walt Disney Imagineering.
Senior Dimensional Designer on employee contract
Various projects assigned:
Shanghai Disney, working on master plan scale model.
Produced design models of exterior architecture of Walt Disney Au'lani
Designed & built concept idea scale models of new GM TEST TRACK for Walt Disney World Orlando.
Show rides interpretation of story telling thru designing ride moving thru exhibit
Left employment on excellent terms & to be asked to, by contract to work outside for Walt Disney Company as consultant to produce Wild Animal Kingdom in my personal studio & Disney Au'Lani Resorts.

1995 – Sept. 8th, 2011 Owner, Melvin Denny Ako Inc. California, USA
Organize manage & produce Visual Concept Designs & Scale Models exterior & interior world-wide, marketing ideas for mega projects.

Managing multiple projects & staff. High-end Themed Resorts

- Organize projects from owners & Architects & turn them into 3d Visualizations by using Scale Models & Design for presentations.
- Coordinate sub-contractors, vendors & staff to meet stringent deadlines
- Produced scale model of 40,000 sq. ft. residence for billionaire Alec Gores.
On permanent display in Architects office as a perfect example. Sold \$70 Mil. in 2022.
- Produced 2 scale models of mega developments for the King of Morocco.
Personally accompanied displays for shipment to the King of Morocco.
Upon viewing, projects were approved.
- Produced 2 scale models of Mega Resort developments for ATLANTIS Resorts in Bahamas
Displays traveled to various shows around the world to promote the project.
On-going success in marketing the project before some phases were built.
- Directed & produced 5 scale models of Walt Disney's Au'lani Hotel
Shipped to various sales offices with outstanding results. Instant positive sales results & compliments on quality.
- Produced 7 scale models of Cabo Azul Resort displays for various sales offices. Shipped to various sales offices with outstanding sales results.
- Produced 3 scale models of Cancun Resorts displays. A Las Vegas project & shipped to various sales offices for showing proposed & new additions.
- Produced 2 scale models of Palm Canyon Resorts in Palm Springs
Produced display of condo units converted into timeshare sales with Improvements added
- Produced & delivered 2 existing scale models for "The DESCENDANTS"
Film by George Clooney Movie of resorts used as props in film
Extensive travel experience for owners, developers & architects towards research & photography bringing the project to delivery & reality on stringent deadlines

1982-1995- CEO/ ADM, Architectural Design Models, Inc.

- Honolulu, Hawaii USA. Lead a staff of people directing, managing & producing displays of scale models world-wide.
- Traveled extensively for pre-co-ordination & final delivery to clients.
- Excellent sales results world-wide. See list enclosed of Leading Hotels of the world.

1979-1982, WATG-Wimberly, Allison, Tong & Goo Architects.
Honolulu, Hawaii USA. Employed as Director of Presentations.
Worked under Gerald Allison (directing presentations for the
Company's promotion) & many other design activities.

1977-1978 Morganelli-Heumann & Associates, Los Angeles, California
Architects, Interior Designers, Store Planners. Worked under
Warner Heumann. Space Planning, Interior design, Retail Store
Planning, Designed Interiors & furnishings for Corp. Clients.
Built world headquarters interior space planning scale model
for Boise-Cascade, Idaho.
Published furniture awards for designing Contemporary Furniture.

Frank L. Hope & Assoc. San Diego, CA. USA Architects & Engineers
Started as Mech. Engineering Draftsman
Worked in Engineering Dept. & promoted to Architectural
Presentation Dept. Worked on San Diego Stadium, Coronado Hospital, etc.

Recognition Featured:

Architecture:Residential Drafting & Design textbook 2013- 2018
Goodham-Wilcox Publishers – published work.
Hospitality & Leisure Architecture-WATG published work
Continental Airlines In Flight Magazine. Profile, Sept 1989
Honolulu Advertiser Newspapers
Pacific Business News- Honolulu, Hawaii, USA
Honolulu Channel 4 News Commentary
Lecturer University of Hawaii School of Travel Industry &
Management
Designated Hosts to numerous Colleges- Golden West others
in Calif.
Lecturer - New School of Architecture, San Diego, CA. USA
Lecturer - Museum of Architecture, San Clemente, CA. USA
Florida Business Journal 2007, Jacksonville, Fl. USA
The San Francisco Examiner Newspaper Feb. 2007



Social & Health Status:

Married, good health, non-smoker, non- drinker, no drug or criminal record, never bankrupt, personally or professionally, no legal issues. Valid California Drivers License. USA Citizen.
Current USA passport. Born in Honolulu, Hawaii (Hawaiian/ Chinese)

Military Honorable Discharge US Army Reserve National Guard (Veteran)

Education Attended Art Center College of Design, Los Angeles, CA.

Travel Experience

WORK RELATED Global Travel to
All Hawaiian Islands, Beijing, Shanghai, Hong Kong, Taipei, Jakarta, Indonesia, Bali, Surabaya, Bandung, Guangdong, Malaysia, Tokyo Singapore, Bahamas, Paris, London, Morocco, Mexico, Baja California, Canada, & USA and many other places too numerous to mention.

PROJECTS - Partial List of project scale models that I produced in my studio

ATLANTIS HOTEL & RESORTS MASTER PLAN, Bahamas
ATLANTIS HOTELS Phase 3 & 4, Bahamas
Belle View Nagao Resort, Japan
Casa Palmero-Lodge at Pebble Beach, CA., USA
City of Kapolei Master plan, James Campbell Estate, Hawaii
Copper Wynd Resort, Fountain Hills, Az., USA
Covenant Hills (multiple) Residences, Ladera Ranch, CA.
Crystal Cove (multiple) Residences, Newport Beach, CA.
El Encanto Master Plan, Cabo San Jose, Baja Calif.
Embassy Suites-Kaanapali Beach Club, Maui, Hawaii, USA.
Fairmont -Kea Lani, Maui, Hawaii, USA
Emerald One Resort, Indonesia
Euro –Disney Hotel- Paris, France
Four Seasons- Aviara Masterplan, Carlsbad, CA. USA
Four Seasons- Aviara Timeshares, Carlsbad, CA. USA
Four Seasons- Wailea, Maui, Hawaii, USA
Four Seasons- Ko’olina, Oahu, Hawaii, USA
Four Seasons- Bangalore, India
Four Seasons- Jackson Hole, Wy. USA
Four Seasons- Troon, Scottsdale, AZ., USA
Grand Champions Resort, Palm Desert, CA. USA
Grand Champions Resort, Maui, Hawaii, USA
Grand Wailea Resort, Wailea, Maui, Hawaii, USA
Gores, Alec - Billionaire, 40,000 sq ft Residence, Beverly Hills, CA. USA
Hammock Beach Resort-Ginn, Palm Beach, FL. USA
Hilton Grand Vacations-Bay Club, Waikoloa, HI. USA
Hilton Grand Vacations- Waikoloa Village, HI. USA
Hilton Grand Vacations- Valdoro, Breckenridge, CO. USA
Hilton Hawaiian Village- Waikiki, HI. USA
Hilton –Flamingo Hotel- Masterplan, Las Vegas, NV. USA
Hilton-Kuilima Resort, Oahu, Hawaii, USA
Hyatt Grand- Bali, Indonesia
Hyatt Ocean Grand Resort, Huntington Beach, CA. USA
Hyatt Grand Champions- Palm Desert, CA. USA
Hyatt Guam, USA
Hyatt Kauai, Hawaii, USA

Hyatt Cheju- Seoul, Korea
Imperial Village at Batangas, Philippines
Kawela Bay Resort, Oahu, Hawaii, USA
Ladera Ranch, Covenant Hills, Residences OC, CA. USA
La Mamounia Hotel, Dubai, UAE.
Legoland Master Plan Theme Park, Carlsbad, CA. USA.
Lodge at Koele-Lanai Island, Hawaii, USA
Lost City, South Africa- Sol Kerzner
Marriott-Pelican Hill, Newport Coast, Ca. USA
Marriott-Loreto, Baja Sur, Mexico
Marblehead Master Plan, San Clemente, CA. USA
Manele Bay Hotel- Lanai Island, Hawaii, USA
Maravilla Master Plan Resort Cabo San Lucas owned by CEO of E-Bay
Moroccan Resorts Master Plan, King of Morocco
Ottoville Master Plan, American Samoa
Pacific Islands Club Saipan
Pacific Islands Club Guam
Pacific Islands Club Bali
Pacific Monarch Resorts- Palm Canyon, Palm Springs, CA. USA
Pacific Monarch Resorts- Cancun, Las Vegas, NV. USA
Pacific Monarch Resorts- Cabo Azul, Cabo San Jose, Baja California
Palace of the Golden Horses, Malaysia
Quincy Jones Residence, Beverly Hills, Ca. USA
Radical Bay Resort, Queensland, Australia
Rainforest Café-Walt Disney Wild Animal Park, Fl. USA
Ritz Carlton- Rancho Mirage, Ca. USA.
Ritz Carlton- Laguna Niguel, Ca. USA
Royal Lahaina Resort-Lahaina, Maui, Hawaii, USA
Shilla Hotel- Seoul, Korea
Shady Canyon Residences, Orange County, CA. USA
Saipan Grand Hotel, Saipan
St Regis-Monarch Beach Hotel, CA. USA
The Inn at Fords Colony, Williamsburg, VA. USA
Venetian Hotel Master Plan - Las Vegas, NV. USA
Waikoloa Beach Resort, Hawaii USA

Architectural Scale Models
Visual Concept Designs



email: melako@melvinako.com
www.melvinako.com

Walt Disney Aulani Resort, Ko Olina, Hawaii USA 841 rms
Walt Disney Wild Animal Kingdom Resort, Orlando, FL. 1000 rms.
Westin Maui Resort Hotel- Maui, Hawaii USA
Westin–Mission Hills, Rancho Mirage, CA. USA

Contact for more info.

From: [John longstrider](#)
To: [Planning Commission Comments](#)
Subject: 640 project
Date: Monday, February 27, 2023 7:39:18 AM

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Dear Sir or Madam,

I am a resident in the area that will be affected by this so-called Flamingo Heights 640 project. I am strongly against this plan that would destroy or desert as we know it. I won't go into the details as I am sure you are aware of them. I beg you to cancel this project and keep the zoning as it is.

Respectfully,

John Cava

From: [Mini Coop](#)
To: [Planning Commission Comments](#)
Subject: PROJ-2020-00191 Resort Camping
Date: Wednesday, March 1, 2023 11:16:41 AM

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To the developers in question,

Respectfully, leave the fu**ing land alone!

This land is home to endangered species and doesn't need anymore traffic nor ugly ass buildings.. not to fail to mention the light pollution this will contribute to... paving paradise to put up a parking lot? Talk about killing the magic that this desert beholds... developers please find a different place faw away from here to bring your tourists to. We don't want them nor your destruction that will span 640 acres!!! Like who the hell thinks this is a great idea?? Obviously no one that is from this area!!!!!! Quit ruining our environment and leave us alone. Thank you. Our water supply cannot support this not can our small roads. Plus a lot of people come here without a true respect for this area and we are sick of it.

Sincerely, no one wants you destroying land that was already stolen from native Americans. Talk about bad juju...

Love and light
God is watching.

From: [James Edwards](#)
To: [Planning Commission Comments](#)
Subject: 640 Glamping
Date: Wednesday, March 1, 2023 3:20:15 PM

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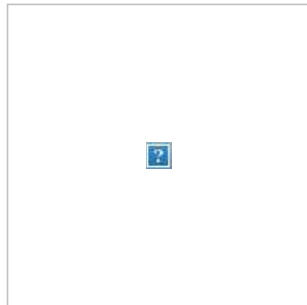
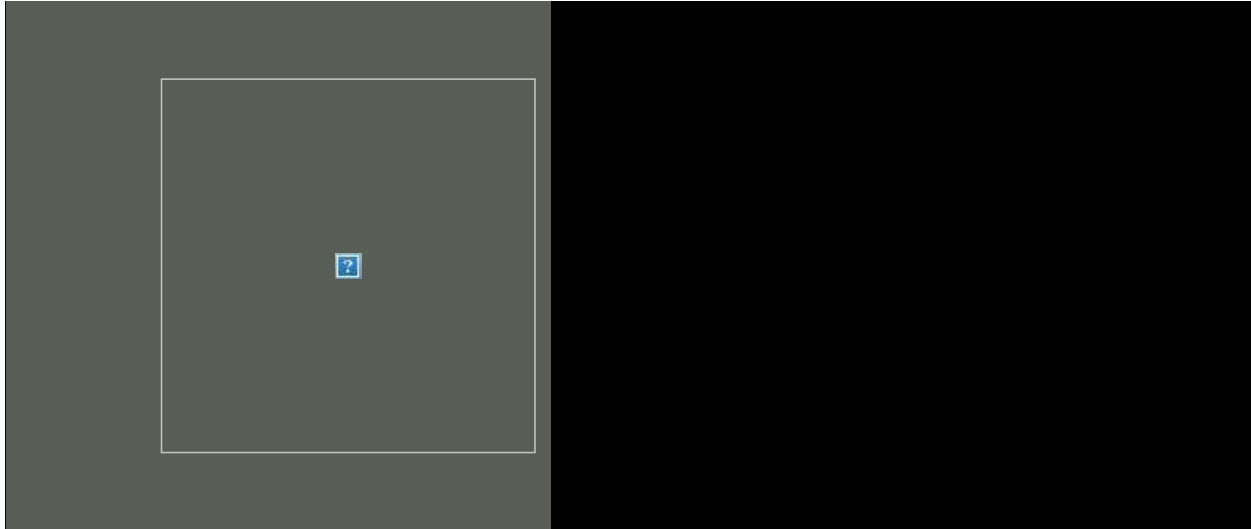
not a good fit for the proposed project
i do not want this to be authorized please hear me as no on this project

--

J. Edwards Fire Protection Inc.
Office 760 821 5099 Fax 760.418.5176

From: [MBCA News](#)
To: [Planning Commission Comments](#)
Subject: MBCA News
Date: Wednesday, March 1, 2023 3:23:06 PM

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Friend --

- **Flamingo 640 Glamping Project going before Planning Commission**
- **Wonder Inn Project update**
- **Spring is here and so are Invasive Plants!**
- **Rooftop Solar Update**
- **2023 Desert Wise Living Landscape Tour**

Flamingo 640 Glamping Project going before Planning Commission

We understand that the Glamorous-Camping (Glamping) project proposed for a 640-acre parcel in Flamingo Heights is to be on the March 9 agenda of the San Bernardino County Planning Commission. The hearing by the commission has been long-in-coming and after nearly a year of waiting, it is unclear if the scope or particulars of the project may have changed in the intervening time. MBCA has written this [letter](#) describing why we believe the mitigated negative declaration ([MND](#)) is inappropriate and that a focused Environmental Analysis is needed for this project. We support the Homestead Valley Communities Council in their [letter](#) calling

for the preparation of a focused EIR for this project.

MBCA believes the Initial Study (IS) upon which the MND was based is flawed for, among other reasons, the lack of acknowledgment that the property is within an Area of Critical Environmental Concern (ACEC); the cumulative impact of this project along with the other tourist focused developments approved or under review within the Morongo Basin (see below re: the Wonder Inn); and the lack of acknowledgement of the Goals and Aspirations of the Homestead Valley [Community Action Guide](#). An on-line petition in opposition to the project offering more information is available [here](#).

And as we discussed in our [annual meeting](#), where would the workers for this enterprise live?

At this hearing the commissioners will consider the recommendations of county Land Use Services for adoption of the California Environmental Quality Act (CEQA) [analysis](#) as a mitigated negative declaration (MND).

Plan to attend and make comments to the Planning Commission on Thursday, March 9, 2023 beginning at 9:00am. The agenda for the meeting has yet to be officially published and we encourage careful review of the staff report at the time of its publication (anticipated to be released Friday afternoon March 3) to see if the project design may have changed and to confirm the time of the meeting. [Here](#) is the page to find the agenda when posted.

Attend in-person at:

County Government Center
Covington Chambers
[385 N. Arrowhead Avenue, 1st Floor](#)
[San Bernardino, CA 92415](#)

Video conferencing facilities will be available to view the meeting to and make oral comments at the following location:

Bob Burke Government Center
[63665 Twentynine Palms Highway 1st floor](#)
[Joshua Tree, CA 92252](#)

Wonder Inn Project update

Meanwhile, at the eastern edge of the Morongo Basin, Land Use Services has prepared an Initial Study (IS) with a recommendation for a MND for the Wonder Inn. Detailed information about this 106-room (!!!) hotel/resort can be found at the website for [Stop Wonder Inn](#). Should this development be constructed it would be the largest hotel/motel in the Morongo Basin. MBCA presented multiple [comments](#) calling for the preparation of a focused EIR for this inappropriate development within the Wonder Valley community. Our comments questioned the adequacy and veracity of the tortoise report prepared for the developer and highlighted the observance of tortoise found on the properties directly adjacent to the project site.

We called attention to the presence on social media of advertisements for the subdivision of the remaining portion of the parcel into 5-acre home sites to be sold and developed as Short Term Rentals managed by the Wonder Inn, effectively expanding the scope of the project beyond the size specified within the IS!

The project would require re-zoning existing Rural Living-zoned portions of the land to Commercial zoning. There is currently no commercial use on the property and we believe the re-zoning would constitute 'spot-zoning' in opposition to the [Countywide Plan](#).

The time window for written comments was closed on February 22, 2023. However, continued vigilance is needed. The project would require review and approval by the Planning Commission before ultimately being voted on by the Board of Supervisors.

The cumulative effects of the dispersion of tourists expanding across the entire high desert by this project must be considered. The on-going climate emergency demands that careful analysis be taken of the carbon expended when commercial enterprises are evaluated over the expansive geography of the Morongo Basin.

And as we discussed in our [annual meeting](#), where would the workers for this enterprise live?

Spring is here and so are Invasive Plants!

With our welcome rain and anticipation of another potential 'super-bloom' of native wildflowers also comes an abundance of [Invasive plants](#)! These virulent plants are finding the recent wet environment perfect and we are seeing a bumper crop! Inform yourself of their appearance and take advantage of the moist soil to eradicate them before they go to seed and spread.

Rooftop Solar Update

With the recent passage of new Net Metering regulations, known as NEM 3, the rules for rooftop solar are scheduled to change significantly on April 14, 2023. The [Solar Rights Alliance](#) has prepared a detailed explanation of the changes and answered frequently asked questions about the new rules. If one is considering adding solar, time is short, but the window has not yet closed to benefit from the NEM2.0 rules. For those solar installations already in place, a battery system can be added without triggering compliance with NEM3. A carbon-free all-electric world is our future! If thinking of making the leap and installing solar, now could be the right time. It is important to work with a reputable solar contractor to assure that all the proper procedures and timing are followed.

2023 Desert Wise Living Landscape Tour

Please save the date - Sunday, April 23 - and mark your calendars for our [13th Annual Desert Wise Living Landscape Tour](#). We look forward to homeowners opening their homes and sharing their water wise native landscapes. Hope to see you there!

More information forthcoming!

Steve Bardwell

Your MBCA Board:

Steve Bardwell, President
David Fick, Vice President
Laraine Turk, Secretary
Cathy Zarakov, Treasurer
Pat Flanagan, Director

Brian Hammer, Director
Janet Johnston, Director
Sarah Kennington, Director
Arch McCulloch, Director
Stacy Doolittle, Director

MBCA News

<http://www.mbconservation.org/>

Morongo Basin Conservation Association · PO Box 24, Joshua Tree, CA 92252, United States

This email was sent to PlanningCommissionComments@lus.sbcounty.gov. To stop receiving emails, [click here](#).

You can also keep up with MBCA News on [Facebook](#).

Created with [NationBuilder](#), software for leaders.

From: [brandy.dyess](#)
To: [Planning Commission Comments](#)
Subject: NO to Flamingo Heights 640 Glamping Proposal
Date: Thursday, March 2, 2023 12:50:47 PM

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San Bernardino County Government Center
385 N. Arrowhead, First Floor
San Bernardino, CA 92415

To whom it may concern,

I am writing to voice my concern and say NO to the proposed Flamingo Heights Glamping site.

Sincerely,

Brandy Dyess
Landers resident

From: [ERIN](#)
To: [Planning Commission Comments](#)
Subject: PROJ-2020-00191 Resort Camping
Date: Thursday, March 2, 2023 6:41:08 PM

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To whom it may concern,
I have lived in this area for 52 years.
There has been an amazing amount of growth and progression over the years. Some good some bad.
I am not against growth if it is done in a fair and reasonable way.
I am against the proposed 640 project in flamingo heights due to many reasons.
It is not the place in our desert for this kind of project. Amongst some of those reasons but by all means not limited to, this area is zoned residential, it is not conducive to our water and sewer situation. Its not environmentally sound and flat out is not wanted!
Im confident the proper consideration of this proposal will be taken and the response of a denial will be handed down.
Thank you , Erin sargeant p.o. box 203 pioneertown ca.

Get [Outlook for Android](#)

From: [David Catching](#)
To: [Planning Commission Comments](#)
Subject: please NO
Date: Friday, March 3, 2023 7:54:24 AM

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San Bernardino County Government Center
385 N. Arrowhead, First Floor
San Bernardino, CA 92415

To whom it may concern,

I am writing to voice my concern and say NO to the proposed Flamingo Heights Glamping site.

best
david catching
59156 philippi lane
landers ca 92285

Sincerely,

From: [Lauren Stern](#)
To: [Planning Commission Comments](#)
Subject: Re: Project # PROJ-2020-00191 Assessor
Date: Friday, March 3, 2023 1:55:11 PM

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SB PLANNING COMMISSIONERS. Thank you for taking the time to read

Project # PROJ-2020-00191 Assessor

Name

Lauren Stern

e-mail

lauren.a.stern@gmail.com

Letter to Planning
Commissioners

Dear Chair Jonathan Weldy, Commissioner Matthew Slowik,
Vice Chair Michael Stoffel, Commissioner Melissa Demirci, and
Commissioner Kareem Gong,

I am writing to you as a concerned advocate of the desert.
Despite years of tirelessly advocating for the preservation of
rural living, its zoning, serene landscape, wildlife, traffic safety,
and advocating against the development of the Flamingo 640
project, I am concerned that the development is still moving
forward without addressing the points raised by the community
and without undergoing the thorough scrutiny of a full
Environmental Impact Report.

My concern about the project is greatly two-fold: traffic safety
and environmental impact. This development would pose a
significant traffic hazard along the narrow two lane HWY 247,
which is already the site of many fatal and critical accidents. The
highway cannot support increased constant traffic.

The project will also endanger wildlife in one of the most
beautiful wildlife corridors along Pipes Canyon Wash bordering
Sand to Snow National Monument, including threatened desert
tortoises, protected burrowing owls, coyotes, jackrabbits, and
more, all of which have been spotted in the area. It is also
concerning that the project plans to remove at least 34 Western
Joshua Trees, a protected species and highly threatened part of
California's natural heritage, in addition to Mojave Yuccas. I am
writing to demand a full Environmental Impact Report under
CEQA, which would include traffic studies, wildlife impact,
air/water quality, noise, and dark sky impacts amongst other
important issues. Because of the impact to our community,
safety, and way of life, a mitigated negative declaration report is
simply not sufficient for the scope of this proposed project.

This area does not need a private "resort" experience or "hotel"
in a rural zoned area that would add nothing to the community
except add danger on the roads, add unnecessary hazard in an
area already distinguished as a threat from wildfires, knowingly

disrupt and destroy the natural environment, pollute the area with noise and light and change the character of our community irreparably. If one of the listed "objectives" for this development is to relieve camping congestion in the National park, then a safe and small public campsite and trails would do much less damage, not a private resort experience out of the price range of the residents who live here, or campers who would otherwise camp in the national park.

I hope you read this with thought and concern, and do not leave those in your fellow SB community feeling dismissed.

Thank you.

If additional comments, enter here:

You can [edit this submission](#) and [view all your submissions](#) easily.

From: [Ashley Thomas](#)
To: [Planning Commission Comments](#)
Subject: Re: Project # PROJ-2020-00191 Assessor
Date: Friday, March 3, 2023 2:00:09 PM

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SB PLANNING COMMISSIONERS. Thank you for taking the time to read

Project # PROJ-2020-00191 Assessor

Name

Ashley Thomas

e-mail

ajthomas@mit.edu

Letter to Planning
Commissioners

Dear Chair Jonathan Weldy, Commissioner Matthew Slowik,
Vice Chair Michael Stoffel, Commissioner Melissa Demirci, and
Commissioner Kareem Gong,

I am writing to you as a concerned advocate of the desert.
Despite years of tirelessly advocating for the preservation of
rural living, its zoning, serene landscape, wildlife, traffic safety,
and advocating against the development of the Flamingo 640
project, I am concerned that the development is still moving
forward without addressing the points raised by the community
and without undergoing the thorough scrutiny of a full
Environmental Impact Report.

My concern about the project is greatly two-fold: traffic safety
and environmental impact. This development would pose a
significant traffic hazard along the narrow two lane HWY 247,
which is already the site of many fatal and critical accidents. The
highway cannot support increased constant traffic.

The project will also endanger wildlife in one of the most
beautiful wildlife corridors along Pipes Canyon Wash bordering
Sand to Snow National Monument, including threatened desert
tortoises, protected burrowing owls, coyotes, jackrabbits, and
more, all of which have been spotted in the area. It is also
concerning that the project plans to remove at least 34 Western
Joshua Trees, a protected species and highly threatened part of
California's natural heritage, in addition to Mojave Yuccas. I am
writing to demand a full Environmental Impact Report under
CEQA, which would include traffic studies, wildlife impact,
air/water quality, noise, and dark sky impacts amongst other
important issues. Because of the impact to our community,
safety, and way of life, a mitigated negative declaration report is
simply not sufficient for the scope of this proposed project.

This area does not need a private "resort" experience or "hotel"
in a rural zoned area that would add nothing to the community
except add danger on the roads, add unnecessary hazard in an
area already distinguished as a threat from wildfires, knowingly

disrupt and destroy the natural environment, pollute the area with noise and light and change the character of our community irreparably. If one of the listed "objectives" for this development is to relieve camping congestion in the National park, then a safe and small public campsite and trails would do much less damage, not a private resort experience out of the price range of the residents who live here, or campers who would otherwise camp in the national park.

I hope you read this with thought and concern, and do not leave those in your fellow SB community feeling dismissed.

Thank you.

If additional comments, enter here:

You can [edit this submission](#) and [view all your submissions](#) easily.

From: [Brook Pittinger](#)
To: [Planning Commission Comments](#)
Subject: Glamping Site in Landers
Date: Friday, March 3, 2023 2:28:45 PM

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I vehemently oppose the glamping/camping site in Landers CA. Please do not gentrify the desert anymore. This will effect friends that have lived in the area for years.

Thank you

Sent from my iPhone

Biggs, Lupe

From: Adam Wininger <adam.d.wininger@gmail.com>
Sent: Thursday, April 29, 2021 8:36 PM
To: Supervisor Rowe; Morrissey, Jim
Subject: Re: Rural Land -> Commercial // Flamingo Heights Development Project (#2020-00191)

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Dawn and Jim,

I'd like to clarify that the email I sent on April 24th (below) is not a public comment. I want to privately express my very serious concerns about the project but **I do not want the email posted anywhere online or in any public forum**. This is meant as a private note to you two, but not a public note.

Jim, I would also very much appreciate speaking with you privately regarding my concern for this project and similar hotel developments on rural-living land.

Thanks,
Adam

On Sat, Apr 24, 2021 at 1:53 PM Adam Wininger <adam.d.wininger@gmail.com> wrote:

Ref: PROJ - 2020 - 00191 // APN:0629-181-01

Jim/Dawn,

As a resident, I'd like to voice my opinion in firm opposition of this development, and I am very pro development in general and very pro-glamping.

Allowing people to convert rural land into what is essentially a hotel/resort sets an extremely dangerous precedent. I completely understand the need for more hospitality development in the area and the concern with illegal glamping and I know you guys are just trying to do your job and help the community and voters you are representing. But allowing commercial development on rural land will create a much bigger long term problem for residents than you are helping to solve in the short term. Thankfully, illegal glamping and rural-living glamping resorts are not our only two options as a community. The third option is glamping resorts on commercial land in commercial areas.

Commercial Land Available. There is plenty of vacant commercial land where this development should be allowed and even encouraged. Unfortunately for the glamping developers, they will have to pay commercial land prices instead of being able to develop commercial projects on much lower rural-living land prices. Commercial areas will continue their tremendous growth, residents will enjoy their peace and quiet, and the glamping developers will still see a handsome profit developing on commercial land (especially given the rates they are charging).

Glamping Resorts/Hotels are Hotels. Today, the line between hotels and camping are increasing blurred with the rise of "glamping". I am a big proponent of glamping but please understand that glamping resorts are much more similar to hotels than classic campgrounds. The only difference is that they use canvas tents, bubbles, airstreams, etc. instead of more traditional looking hotel rooms. They advertise themselves as hotels, raise money from investors as hotels, use hotel management software, provide hotel services, charge nightly rates that even surpass hotel rates, etc. They are calling it a "campground" as a low-effort attempt to exploit a loophole and get land on the cheap, when everyone

clearly understands that the spirit of the zoning laws and development plan allows for hotels in commercial areas, not rural-living areas. Operating a glamping hotel is undoubtedly a commercial use and I am a huge supporter of this project on commercially zoned land. And as a community, we have to understand that illegal glamping is a problem best solved by allowing glamping companies to develop resorts on commercial land - not by allowing glamping companies to build hotels in voter's backyards. These types of developments are coming to commercially zoned areas in Joshua Tree, especially given the rates they are able to charge, and we just have to be a little patient.

Implications/Precedent. Allowing commercial land use on rural land will set a very dangerous precedent and create serious long term problems in our community.

1. **Huge Amounts of Commercial Development in Residential Areas.** The minute it is allowed, developers are going to arrive in droves to develop bars, restaurants, hotels, glamping resorts, etc. on rural-living land. If you look at what glamping resorts are able to charge vs. the low cost of rural land in Joshua Tree, it is very easy to see how many developers will get the brilliant idea of building glamping resorts on inexpensive rural land in Joshua Tree. We live in rural-living and residential areas, and want to keep commercial uses, tourism, bars, restaurants, etc. to the designated commercial areas. This is part of the development plan and is a big reason we live where we do. If this project is allowed even with a long list of conditions of approval, we will see 10-15 more just like it shoot up.
2. **Loss of Development in Commercial Areas.** Why would developers want to develop on commercial land at all if rural land is much less expensive, often more beautiful/attractive land, quieter, etc.? Not only are you guys to see a huge increase in commercial activity in what were supposed to be quiet rural-living areas (where residents and voters actually live), but you will lose a ton of development that is coming to those commercial areas and will inadvertently be discouraging development in commercial areas. Developing in commercial areas is much more expensive so no investor/developer/entrepreneur in their right mind will develop in a commercial area, when they can buy inexpensive rural land in someone's backyard and build there.
3. **Commercial Land Prices vs. Rural Living Land Prices.** There is a reason that commercial land is priced significantly higher per acre than rural land. This is because you can build commercial developments on commercial land and make a lot of money off the land. Whereas rural-living land is intended for people to buy, build homes, and at most airbnb the property for some spare cash. Allowing this will raise the price of rural land because the new "highest and best use" of the land is a hotel or "glamping resort", and not a home. This will throw the local real estate market into a huge flux and cause a lot of problems for residents.
4. **Implications.** If this gets passed, I will be highly incentivized to purchase 5-6 separate parcels of rural-living land throughout the county and apply to get CUPs for glamping resorts through attempted use of the "campground" loophole. I will probably make a lot of money on this too. However, as a resident of Joshua Tree, I understand that this is terrible for the community in both the short run and the long run. I don't blame developers for trying this because they are acting in their own best interest, but it's your job as voted community leaders to set the rules/guidelines and encourage commercial development in commercial areas, not residential areas. How can you allow certain developers to build glamping developments on rural land and not others? If you approve this one, you will set the precedent that you will approve others and people will act in their own best interest to build glamping resorts all over residential areas. We are asking you to set really clear rules and send a really clear message that glamping resort developments and other commercial developments can happen and will even be encouraged on commercial land, but will not be allowed where residents live.

Airbnbs vs. Hotel. In a community meeting, I heard someone say "we already allow Airbnbs, what's the difference between this and a glamping hotel?". Airbnbs can only be rented to one person or group on a given night, whereas hotels can be rented to 5... 50... 100+ different people/groups on a given night. This is exactly why the airbnb ordinance that was recently passed has a restriction allowing for 1 listing per parcel of land.

Conclusion. I completely understand that you guys want to help us residents by encouraging legal, glamping developments and cracking down on illegal glamping. However, please understand that you are hurting us much more than helping us by allowing commercial developments/resorts on rural living land in our backyards. Thankfully, there is a very viable third option that makes everyone happy... please encourage legal glamping developments on commercial

land in commercial areas. If glamping developers really want to build and operate in Joshua Tree, they will pay the more expensive price for commercial land and build there. Autocamp is showing that it's more than possible to build a successful glamping resort on commercial land, and there will more developments to come on commercial land. But, in the meantime, please do not create a bigger problem for us than you are trying to solve.

Sincerely,
Adam

Biggs, Lupe

From: Jane Fawke <laragna.web@gmail.com>
Sent: Thursday, March 17, 2022 9:36 AM
To: Morrissey , Jim
Subject: Resort Campground Proj-2020-00191

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Sir,
Have you actually been out to this site and seen what an absolute blight this "Glamping site" would be on our community? I would love to know who among your team thinks this is a good idea. How these rubbishy tents will hold up in a 50 mph windstorm is anyone's guess.
If it actually ever became successful- very doubtful with all the air bnb's, the hideous airstream camp, the pioneer town motel, this monstrosity would only add extra traffic to the already overcrowded and dangerous 247.
Mmm, rubbishy tents in a cute little desert village, one grocery/gas station-the Hero's-Valero, the Mobil a bit farther up, I can see the mess now.
How you been to the Hero's -Valero when King of the Hammers is on?, I don't think so, it is an absolute awful zoo.
There comes a moment when SBC will have to wake up, & realize that all these pie in the sky projects are ruining our quality of life up here.
Not to mention the desecration of the creosote-joshua tree forest.
No, no, no.
No glamping site on the 247.
Thank you for your attention.

Jane "Spider" Fawke
Certified CA Master Naturalist.
Certified CA Climate Steward.
Conejo Open Space Conservation Agency Park Ranger. (Retired).

From: [Peter Broderick](#)
To: [Morrissey, Jim](#)
Cc: [Brendan Cummings](#)
Subject: Center for Biological Diversity Comments on Resort Camping - Conditional Use Permit (Project No. PROJ-2020-00191)
Date: Thursday, April 21, 2022 3:06:33 PM
Attachments: [image001.png](#)
[2022-04-21 CBD Comments Resort Camping IS MND.pdf](#)

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Good afternoon Mr. Morrissey,

Please find attached comments of the Center for Biological Diversity on **Resort Camping - Conditional Use Permit (Project No. PROJ-2020-00191) Initial Study and Mitigated Negative Declaration**. The references for the letter are available for download at the following link: https://centerforbiologicaldiversity.org/SharePoint/Personal/pbroderick_biologicaldiversity_org/EkUxn7_HwFtBipv-00bIPdEBDTCQKT0mEzgJUTiFbJ9ECA?e=pNgfSd. Please include the letter and references in the County's file for the project.

I'd appreciate confirmation that you've received the letter and references.

Thanks very much,

Peter J. Broderick

Attorney
Urban Wildlands Program
Center for Biological Diversity
(503) 283-5474 x421



April 21, 2022

Sent via email (with attachments by electronic file transfer)

Jim Morrissey,
Contract Planner
909-387-4234
County of San Bernardino
Land Use Services Department - Planning Division
385 North Arrowhead Avenue, First Floor
San Bernardino, CA 92415-0187

Re: Center for Biological Diversity Comments on Resort Camping - Conditional Use Permit (Project No. PROJ-2020-00191) Initial Study and Mitigated Negative Declaration

Dear Mr. Morrissey:

These comments are submitted on behalf of the Center for Biological Diversity (the “Center”) regarding the Resort Camping - Conditional Use Permit (Project No. PROJ-2020-00191) (“Project”). These comments supplement our previous comments (dated April 26, 2021) on an earlier iteration of the Project. The Center has reviewed the Initial Study and Mitigated Negative Declaration (“IS/MND”) and associated environmental review documents closely and is concerned that the County of San Bernardino (“County”) has failed to adequately disclose, analyze, and mitigate the Project’s significant environmental impacts as required under the California Environmental Quality Act, Public Resources Code section 21000 et seq. (“CEQA”) and 14 California Code of Regulations section 15000 et seq. (“CEQA Guidelines”). The Center urges the County to prepare and circulate an Environmental Impact Report (“EIR”) for the Project prior to taking any further action on the Project application.

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 68,000 members and online activists throughout California and the United States. The Center has worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life for people in San Bernardino County.

I. The County Must Prepare an EIR for the Project.

CEQA was enacted for the state to “take all action necessary to protect, rehabilitate, and enhance the environmental quality of the state” and to “[e]nsure that the long-term protection of

the environment . . . shall be the guiding criterion in public decisions.” (Public Res. Code § 21001.) The CEQA Guidelines state that “CEQA was intended to be interpreted in such a manner as to afford the fullest possible protection to the environment within the reasonable scope of the statutory language,” and that “[t]he purpose of CEQA is . . . to compel government at all levels to make decisions with environmental consequences in mind.” (CEQA Guidelines § 15003.) CEQA is an information document and, as such, “requires full environmental disclosure.” (*Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 89.)

Only when “there is no substantial evidence in light of the whole record before the public agency that the project . . . may have a significant effect on the environment” may an agency prepare a negative declaration or mitigated negative declaration instead of an EIR. (Public Res. Code § 21064.5; *see also id.* §§ 21064, 21080(c).) A mitigated negative declaration, in particular, is prepared “when the initial study has identified potentially significant effects on the environment, but . . . revisions in the project plans or proposals . . . would avoid the effects or mitigate the effects to a point where clearly no significant effect on the environment would occur” and there is no substantial evidence the project may have a significant effect on the environment. (*Id.* § 21064.5.) If there is substantial evidence that a project may have a significant effect on the environment, an agency must prepare an EIR. (*Id.* § 21080(d).)

If an agency is presented with so much as “a fair argument that a project may have a significant effect on the environment, the lead agency shall prepare an EIR even though it may also be presented with other substantial evidence that the project will not have a significant effect.” (CEQA Guidelines § 15064(f)(1); *see also No Oil, Inc. v. Los Angeles* (1974) 13 Cal.3d 68, 75.)

The CEQA Guidelines provide guidance for determining if a project’s effects are significant. Such a determination “calls for careful judgment on the part of the public agency involved, based to the extent possible on scientific and factual data” and a “consider[ation of] the views held by members of the public in all areas affected.” (*Id.* § 15064(b)-(c).) The lead agency must consider both direct and indirect physical changes in the environment caused by the project. (*Id.* § 15064(d).) Direct changes include dust, noise, and traffic, and indirect changes include, for example, population growth and a resulting increase in air pollution, so long as the changes are reasonably foreseeable. (*Id.*)

CEQA also requires consideration of cumulative impacts. An EIR is required “if the cumulative impact may be significant and the project’s incremental effect, though individually limited, is cumulatively considerable . . . when viewed in connection with the effects of past projects, the effects of other current project, and the effects of probable future projects.” (*Id.* § 15064(h)(1).) Cumulatively considerable environmental effects require a mandatory finding of significance. (*Id.* § 15065(a)(3).)

CEQA also has a substantive mandate and requires effective mitigation. “[P]ublic agencies should not approve projects as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects.” (Public Res. Code § 21002.) CEQA requires mitigation measures to be “fully enforceable through permit conditions, agreements, or other measures.” (*See id.* §

21081.6(b); CEQA Guidelines § 15126.4(a)(2).) “Formulation of mitigation measures should not be deferred until some future time.” (CEQA Guidelines § 15126.4(a)(1)(B).)

The Project’s impacts on traffic, public safety, noise, the night sky, hydrology and flood risk, fire risk, air quality and greenhouse emissions, sensitive species and numerous other factors are readily apparent given the type, location and scale of the project. Any one of these factors alone is sufficient to warrant preparation of an EIR. As a biodiversity protection organization, however, the Center focuses its comments here primarily on impacts to biological resources.

II. The IS/MND’s Analysis and Mitigation of the Project’s Significant Biological Impacts, Including Sensitive Species, Is Inadequate.

Impacts to biological resources, including habitat, natural communities, and plant and animal species, are some of the most important effects of a project which must be analyzed and mitigated. This is apparent in the CEQA Guidelines, which mandate preparation of an EIR for any project that “has the potential to substantially degrade the quality of the environment; substantially reduce the habitat of fish or wildlife species . . . [or] substantially reduce the number or restrict the range of an endangered, rare or threatened species.” (CEQA Guidelines § 15065.) Furthermore, an agency must analyze the impacts of projects that would “have a substantial adverse effect, either directly or through habitat modifications, on any species identified as candidate, sensitive, or special status species,” or “interfere substantially with the movement of any native resident or migratory fish or wildlife species.” (CEQA Guidelines, App. G, § IV.) Moreover, the California Supreme Court has found that a “potential substantial impact to endangered, rare or threatened species is *per se* significant.” (*Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova* (2007) 40 Cal. 4th 412, 449 (“*Vineyard*”), citing CEQA Guidelines § 15065(a)(1).) This project would have such impacts on *at least* two listed species, the western Joshua tree and the desert tortoise.

a. Western Joshua Tree

The western Joshua tree is currently a candidate species for permanent listing under the California Endangered Species Act (“CESA”). (Center for Biological Diversity 2019.) Increasing development, climate change, increasing drought and wildfires, invasive species that adversely affect fire dynamics, and other threats have led to ongoing reductions in western Joshua trees and western Joshua tree habitat range-wide. Protecting western Joshua trees and their habitat from continued destruction and habitat loss is therefore of utmost importance to the persistence of the species in California. However, western Joshua tree habitat is shrinking within the County at an alarming rate due to increasing development. While western Joshua trees currently persist in the less-developed areas of the County, they are absent from the more developed areas as well as the agricultural lands in the region, making the Project site all the more valuable.

The western Joshua tree occurs on the Project site and would be harmed by development. The Project site is high quality Joshua tree woodland habitat with, according to the Project’s own Protected Plant Preservation Plan (“PPPP”) over 2,000 western Joshua trees (PPPP at p. 8.). Based on the map prepared by Fomotor Engineering for the proponent which overlays the

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development footprint on a map of Joshua tree locations on the parcel (IS/MND at p. 6), it appears that approximately 200 western Joshua trees will need to be removed to make way for the various roads, pathways, parking lots, buildings, tent sites and other elements of the development proposal. Given the California Fish and Game Commission has previously found that grading within 40 feet of a large western Joshua tree required mitigation (*see* 14 C.C.R. 749.10(a)(2)(A)(1)), and the fact that Project grading will likely not be limited to just the precise footprint of these structures, dozens, perhaps hundreds, of additional Joshua trees are likely to be harmed as well. We do not see how this impact could possibly be deemed less than significant.

Moreover, notwithstanding the fact that the project will likely impact upwards of 200 western Joshua trees, the MND proclaims that only 43 Joshua trees “will be directly affected by the project as currently designed.” (IS/MND at p. 23.) This is nonsense. Even if it were the case that only 43 Joshua trees will be removed (killed or transplanted), numerous other trees will be directly affected by the grading and other construction activity planned for the Project site. Importantly, CESA prohibits the take of any listed species “or any *part* or product thereof”. (Fish and Game Code § 2080.) Given the roots of a Joshua tree are undeniably *part* of the species and extend dozens of feet beyond the canopy of an individual tree, and grading, trenching or encroachment within the root zone of a tree will inevitably damage and kill some of those roots, such impacts must be quantified, described, minimized and mitigated, and ultimately covered by any 2081 take permit. Neither the IS/MND nor the PPPP address these likely significant impacts in the slightest. The failure to do so not only renders the IS/MND inadequate and unlawful in violation of CEQA, but any such unpermitted activity by the developer would constitute felony violations of CESA. (*See* Fish and Game Code §§ 2080, 12008.1 [setting forth \$25-50,000 fine for each violation of take prohibition and 1-year in jail].) Because the IS/MND does not acknowledge the full extent of the Project’s impacts to western Joshua tree it does not, and cannot, conclude that these impacts are not significant.

What’s more, the IS/MND fails to acknowledge any potentially significant direct or indirect impacts associated with the destruction or adverse modification of the western Joshua tree’s *habitat*. Development, climate change, and increasing wildfire occurrences exacerbated by drought and invasive species negatively impact western Joshua trees and their habitat (DeFalco et al. 2010; Harrower and Gilbert 2018). Climate change represents the single greatest threat to the continued existence of western Joshua trees. Even under the most optimistic climate scenarios, western Joshua trees will be eliminated from significant portions of their range by the end of the century; under warming scenarios consistent with current domestic and global emissions trajectories, the species will likely be close to being functionally extinct in the wild in California by century’s end. (Dole et al. 2003; Cole et al. 2011; Sweet et al. 2019.) Studies indicate that the species’ range is contracting at lower elevations, recruitment is limited, and mortality is increasing, all of which would likely reflect a population already starting to decline due to recent warming. Even greater changes are projected to occur over the coming decades.

The IS/MND does not acknowledge significant impacts to Joshua trees associated with the reduction in western Joshua tree habitat and habitat connectivity. Maintaining successful habitat connectivity nearby is particularly important to western Joshua trees: for successful reproduction and recruitment, Joshua trees require the presence of their obligate pollinator, rodents to disperse and cache seeds and nurse plants to shelter emerging seedlings. Interference

with these obligate pollinators through project construction and operation will reduce habitat connectivity necessary for sustainable Joshua tree recruitment onsite. Moreover, construction on the Project site will result not just in the loss of Joshua trees and their pollinators and dispersers from the site itself, but will further fragment habitat, potentially resulting in significant adverse impacts to remnant Joshua tree woodland in nearby areas if pollinator or disperser populations are reduced. None of these impacts are analyzed in the IS/MND.¹

Additionally, the IS/MND's proposed mitigation for impacts to western Joshua tree is inadequate and fails to meet the requirements of CEQA. As an initial matter, the mitigation measures must be included in a Mitigation Monitoring and Reporting Program ("MMRP") so that they are memorialized as binding, enforceable measures. (*See* Public Res. Code § 21081.6 [requiring adoption of MMRP for mitigated negative declarations].) The County has not provided any draft MMRP to the public, and no draft MMRP is available on the County's website for the project (which links project and environmental review documents).² Without an MMRP, which provides the final, definitive list of mitigation measures under CEQA for a project, the Center and the public cannot provide adequate comments on the proposed mitigation. The County should circulate a MMRP with an EIR it prepares for the Project. The PPPP couches the "Measures to mitigate impacts to Joshua trees" as "Recommendations." (PPPP at 9.) This violates CEQA's requirement that the lead agency adopt adequate, effective, and enforceable mitigation measures *before* a project is approved or carried out.

What's more, by simply deferring to any future determination by CDFW on a "take" permit to satisfy its obligation to mitigate the Project's impacts under CEQA, the IS/MND improperly defers the specifics of the mitigation. The CEQA Guidelines prohibit agencies from deferring the formulation of mitigation measures to after project approval except in certain, strictly limited circumstances. (CEQA Guidelines § 15126.4(a)(1)(B).) An agency may develop the specifics of mitigation after project approval only "when it is impractical or infeasible to include those details during the project's environmental review." (*Id.*) That is, "practical considerations" must "prevent[] the formulation of mitigations measures at the usual time in the planning process." (*POET, LLC v. State Air Res. Bd.* (2013) 218 Cal.App.4th 681, 736.) Unless those considerations are "readily apparent," the lead agency must explain an agency's decision to defer finalizing the specifics of mitigation. (*Preserve Wild Santee v. City of Santee* (2012) 210 Cal.App.4th 260, 281.) Here, the County failed to justify deferring mitigation to a later date post-approval.

¹ Additionally, the IS/MND makes no attempt to disclose or discuss the *cumulative* impact to western Joshua trees and Joshua tree woodland habitat from the Project. The CEQA Guidelines define cumulative impacts as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." (CEQA Guidelines § 15355.) The individual effects may be changes resulting from a single project or more than one project. (*Id.* § 15355(a).) Cumulative impacts may result from individually minor but collectively significant projects taking place over a period of time. (*Id.* § 15355(b).) The cumulative impact from several projects is the change in the environment that results from the incremental effect of the project when added to other past, present, and probable future projects. (*Id.* §§ 15065(a)(3), 15130(b)(1)(A), 15355(b).) Considering the Project's cumulative effect on the loss of western Joshua tree and Joshua tree woodland habitat is especially important in San Bernardino County, where numerous other projects currently being proposed and in the recent past have destroyed western Joshua tree habitat. These cumulative pressures from development present a significant threat to the species' habitat.

² See <http://cms.sbcounty.gov/lus/Planning/Environmental/Desert.aspx> (accessed April 21, 2022).

b. Desert Tortoise

The IS/MND utterly fails to address the desert tortoise, which almost certainly occurs on the Project site. This species is protected as threatened under both the federal and state endangered species acts. It is currently a candidate for uplisting to endangered status under CESA.³ A survey of the Project site was carried out in 2006 in relation to a previous development proposal that ultimately failed due, at least in part, to unmitigable environmental impacts. That survey found multiple live tortoise on the parcel. (Larue 2006.) Critically, the area where the footprint of the current Project is proposed *is in the very area* determined to have the highest density tortoise occurrence on the overall parcel. As noted in the 2006 survey report, “a majority of the tortoise sign was observed in Area 1, which comprises the upland, plateau area between Highway 247 and Pipes Wash. Eighty-six percent (86%) of the tortoises, 96% of the burrows, 96% of the fresh scat, 98% of the older scat, and 100% of the tracks found occurred within Area 1.” The report correctly notes that development in this occupied habitat “would be considered significant under CEQA.” (Larue 2006 at p. 16.)

More recently, various residents living near the project site have documented tortoise on or adjacent to the project site. As one example among many, this desert tortoise was photographed on near La Brisa road, which marks the southern boundary of the project site:⁴



Notably, the April 2020 biological report *makes no mention* of the 2006 surveys or other information documenting tortoise presence on the Project site. Instead, it relies only on field surveys made over 3 days during an historic drought to summarily conclude that no tortoise are on site. If the healthy population that undisputedly occupied the project site in 2006 has indeed died off, a thorough survey would likely have found shell, bones or other signs of their former presence on the site. The fact that no live tortoise were observed above ground in 2020 in drought conditions that were the worst in a millennium is not surprising; the IS/MND’s conclusion that there are no desert tortoise onsite is not supported by the evidence. On the

³ See <https://fgc.ca.gov/CESA#adt> (Accessed April 21, 2022).

⁴ Our understanding is that information on this sighting was submitted to the County by the residents who photographed it. It has also been submitted to CDFW.

contrary, there is substantial evidence of a “fair argument” of significant impacts to desert tortoise on the site.⁵

The IS/MND failed to provide an accurate baseline for its analysis of impacts to the desert tortoise, electing instead to mischaracterize or downplay the importance of the onsite habitat. This failure undermined the documents entire analysis of impacts to the species. Given that several residents have provided photographic evidence of tortoise on or adjacent to project site to the County and/or CDFW, the County cannot lawfully proceed with adopting the Project without requiring additional tortoise surveys carried out under conditions where any tortoise that use the Project site would be reasonably expected to be found.

c. Other Species

The IS/MND fails to provide adequate baseline information and description of the environmental setting for, and potential impacts to, other of rare plants, animals, and communities. In addition to the western Joshua tree and the desert tortoise, several other species status species have been found on the project site, including Cooper’s hawk, golden eagle, burrowing owl, short-eared owl, Vaux's swift, LeConte’s thrasher, and loggerhead shrike. Impacts to any of these species are potentially significant, but have not been adequately analyzed. For example, the burrowing owl, a species of increasing conservation concern, is relatively rare in the Morongo Basin, but was found to occur on the Project site. Harm to even a small number of burrowing owls by the Project would still represent a significant impact to the regional population. Moreover, all owl species receive special protection under the Fish and Game Code, with destruction of their nests explicitly prohibited. (Fish and Game Code § 3503.5) Given that the Project includes, among other things, a heliport, impacts would not just be from the loss of eggs, nests and habitat from construction of the project, but from operation of the Project itself.

d. Habitat Connectivity

While direct harm to Joshua trees, desert tortoise, burrowing owls and other special status species would be significant wherever they occur, the Project is located in a particularly sensitive area that serves as a regionally significant wildlife corridor. This significance, both broadly and specific to the parcel at issue, has long been widely recognized, including in the South Coast Missing Linkages report (South Coast Wildlands 2008) and the subsequent Morongo Basin Conservation Priorities Report (Sonoran Institute 2012). The habitat linkages documented in these reports have been recognized and utilized by state and federal agencies in their planning activities, including by Caltrans and CDFW.

More recently, a CDFW-approved Conceptual Area Protection Plan (“CAPP”) prioritized the parcel for acquisition given its ecological importance and its proximity to protected federal and private conservation lands. Moreover, as noted in the 2006 biological report, “Pipes Wash is an extremely significant resource to both plants and animals occurring in the region.” The report

⁵ See (Zimmerman 2014) (news article interviewing same tortoise expert who carried out 2006 survey on Project site noting that inactive tortoises have not left their burrows in a year given drought conditions; *see also* (Williams 2022) (scientific article documenting megadrought in southwest); (Duda 1999).

noted the Project site's importance given the "proximity of this portion of Pipes Wash to the San Bernardino Mountains provides a travel corridor to birds and mammals, alike," and emphasized that the "regional significance of this wash to plants and animals cannot be over-emphasized." Under CEQA, an EIR is required if a project might "interfere substantially with the movement of any native resident or migratory fish or wildlife species." (Guidelines, App. G, § IV.) The Project as proposed, undoubtedly would have such impacts.

As the above examples demonstrate, given the presence of multiple significance factors, the County cannot lawfully issue a CUP for the Project absent the preparation of an EIR. We are confident that a reviewing court would find approval of the Project as proposed absent an EIR to be an abuse of discretion and not supported by substantial evidence.

III. Additional Considerations

In addition CEQA, the Project must also comply with the federal Endangered Species Act ("ESA"), CESA, various other provisions of the Fish and Game Code, the Alquist-Priolo Earthquake Fault Zoning Act, and other federal, state and local requirements. These requirements raise the following issues, among others:

- No killing, trimming or removal of western Joshua trees may occur absent authorization from CDFW pursuant to CESA. Given the lack of a regional NCCP, the Project proponent must seek an individual 2081 permit from CDFW. Such permits require take to be "fully mitigated". This should be in the form of protection and preservation of western Joshua trees in other areas at a suitable mitigation ratio. Given the Joshua tree woodland habitat onsite is a recognized Sensitive Natural Community, and such high-quality woodland comprises only a small portion of the larger range of the western Joshua tree, a higher level of mitigation is warranted to offset the Project's significant impacts. A 5:1 mitigation ratio is likely appropriate here and is consistent with mitigation required by CDFW for projects affecting important desert tortoise habitat. With over 200 Joshua trees likely affected by the Project, and based upon mitigation costs set by CDFW and the California Fish and Game Commission for other projects in western Joshua tree habitat, we would expect the need for significant mitigation (in the form of off-site conservation, or contribution to a mitigation fund) in order to fully mitigate the take of this protected species.
- No killing, harming, harassing, or moving of desert tortoises may occur absent authorization from CDFW pursuant to CESA and from the U.S. Fish and Wildlife Service ("USFWS") pursuant to the federal ESA. Such permits would also require substantial offsite mitigation. Because a take authorization from USFWS is itself a federal action, environmental review in the form of an Environmental Impact Statement (EIS) or Environmental Assessment (EA) under the National Environmental Policy Act (NEPA) would also be required before such take could be authorized.

- Given 2020 was a severe drought year, required biological surveys for tortoise, rare plants and other sensitive species performed then were unlikely to provide accurate presence/absence or abundance information. Such surveys must be carried out in the appropriate time of year and under suitable climate conditions. As such, we do not see how an adequate draft CEQA document can be prepared prior to late 2023 (assuming abatement of the current drought by winter 2022-2023 allows meaningful surveys in spring 2023).
- Any encroachment of the project into Pipes Wash would require a Streambed Alteration Agreement pursuant to Fish and Game Code §§ 1600 et seq.
- The Project parcel is within a known fault zone, with the western edge of the parcel previously deemed unsuitable for habitable structures. While the building footprint of the current Project appears to be mostly east of the area of surface rupture from the 1992 Landers quake, a 2007 report on the site notes that a full geologic evaluation of the entire site was not conducted and that “slope stability will need to be addressed for the portion of the site proposed for development along Pipes Wash.” (Fault Hazard Evaluation 2008.) It appears that the bulk of the lodging in the current Project is perched in this area of questionable stability above Pipes Wash. Any efforts to stabilize these slopes would themselves require a Streambed Alteration Agreement.
- Importantly, take authorization for western Joshua trees and/or desert tortoise *prior* to the commencement of any geological surveys that involve trenching or drilling. Consequently, since such information is critical to inform a proper EIR, the developer may need to seek limited take authorization from FWS and CDFW *before* initiating the larger EIR for the whole project so as to be able to carry out studies that would inform the actual EIR. Consequently, further environmental review of the Project by the County should be put on hold until the proponent acquires the take authorizations required from FWS and CDFW that are a prerequisite to ground-disturbing activities related to necessary geologic evaluation activities.

IV. CONCLUSION

Thank you for the opportunity to submit comments on the IS/MND for the Project. We urge the County not to approve the Project without first preparing an EIR and complying with CEQA. The EIR should, among other things, address and evaluate the potentially significant impacts described in this letter.

Given the possibility that the Center will be required to pursue legal remedies in order to ensure that the County complies with its legal obligations, including those arising under CEQA, we respectfully remind the County of its statutory duty to maintain and preserve all documents and communications that may constitute part of the “administrative record” of this proceeding. (§ 21167.6(e); *see Golden Door Properties, LLC v. Superior Court* (2020) 53 Cal.App.5th 733.) The administrative record encompasses any and all documents and communications that relate to any and all actions taken by the County with respect to the Project, and includes “pretty much

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everything that ever came near a proposed [project] or [] the agency's compliance with CEQA" (*County of Orange v. Superior Court* (2003) 113 Cal.App.4th 1, 8.) The administrative record further includes all correspondence, emails, and text messages sent to or received by the County's representatives or employees, that relate to the Project, including any correspondence, emails, and text messages sent between the County's representatives or employees and the Applicant's representatives or employees. Maintenance and preservation of the administrative record requires that, *inter alia*, the County (1) suspend all data destruction policies; and (2) preserve all relevant hardware unless an exact replica of each file is made.

Please include this letter and all references in your project file for the Project. Please also include the Center on your notice list for all future updates, notices, and documents related to the Project and do not hesitate to contact me with any questions at the number or email listed below.

Sincerely,



Peter J. Broderick
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ATTACHED REFERENCES
(provided via electronic fileshare)

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State of California – Natural Resources Agency
 DEPARTMENT OF FISH AND WILDLIFE
 Inland Deserts Region
 3602 Inland Empire Boulevard, Suite C-220
 Ontario, CA 91764
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



April 18, 2022
Sent via email

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

Subject: Initial Study and Mitigated Negative Declaration
 Resort Camping Proj-2020-00191
 State Clearinghouse No. 2022030476

Dr. Mr. Morrissey,

The California Department of Fish and Wildlife (CDFW) received an Initial Study/ Mitigated Negative Declaration (ISMND) from the County of San Bernardino (County) for the Resort Camping Proj-2020-00191 (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.¹

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources. CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

ASSEMBLY BILL (AB) 819

Assembly Bill (AB) 819 was signed into law by Governor Gavin Newsom on July 16, 2021, and became effective January 1, 2022. AB 819 requires lead agencies to submit certain environmental documents and notices electronically to the State Clearing House (SCH) at Office of Planning and Research (OPR). Thus, as of January 1, 2022, lead agencies must take the following actions to comply with CEQA:

- File on CEQAnet – Draft Environmental Impact Reports (DEIR), proposed Negative Declarations (ND), proposed Mitigated Negative Declarations (MND) must be filed electronically on CEQAnet (<https://ceqanet.opr.ca.gov/>) – as opposed to submitting hard copies.
- Post on Agency website – Draft, proposed, and final environmental documents – including DEIRs, EIRs, NDs, MNDs – as well as any Notice of Preparation (NOP), Notice of Determination (NOD), Notice of Completion, or Notice of Scoping Meetings must be posted on the lead agency's website if it has one. Also, Notices of Availability (NOAs) and hearings related to the DEIR or ND are required to be posted on the lead agency's website, in addition to prior methods of giving notice.
- File and Post with County – NODs must be filed electronically with the county clerk if electronic filings are offered by the county. There is an option to post NODs either in the county clerk's office or on the county clerk's website for a period of 30 days. Additionally, NOPs and NOAs will need to be posted on the county clerk's website and physically, by hard copy, in the county clerk's office.
- Option to email NOPs – If an EIR is required, any NOP may be emailed, rather than mailed, to each entity requiring personal notice – the responsible agency, any public agency with jurisdiction over natural resources affected by the project, and OPR.
- State Agency Filings – State lead agencies are required to file NODs and NOEs electronically on CEQAnet and no longer need to submit hard copies. The filed notice must be available for public inspection on the OPR website for not less than 12 months.
- Public Agency Notice of Completion – Public agencies must file notices of completion on CEQAnet, rather than mailing a paper copy.

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PROJECT DESCRIPTION SUMMARY

The Project site is in the City of Landers, San Bernadino County, California; Latitude 34.215050 N and Longitude -116.430806 W. The Project site is bounded on the west by Old Woman Springs Road, on the north by Luna Vista Road, on the east by Sage Avenue, and on the south by La Brisa Drive. The Project proposes the development of 25 acres for a destination resort that includes: a campground, a restaurant, a bar, a retail store, trails, gardens, a sewage disposal area, and recreation buildings on Assessor's Parcel Number (APN) 0629-181-01-0000, which totals approximately 640 acres.

Timeframe: Unavailable

COMMENTS AND RECOMMENDATIONS

CDFW offers the mitigation measures presented below along with comments and recommendations to assist the County in adequately mitigating the Project's potentially significant impacts on western Joshua tree (*Yucca brevifolia*), desert tortoise (*Gopherus agassizii*), nesting birds, burrowing owl (*Athene cunicularia*), special-status plants, and Fish and Game Code section 1602 resources. CDFW requests that the County adopts the mitigation measures listed below and also found in Attachment 1 (Mitigation Monitoring and Reporting Program).

Assessment of Biological Resources

Western Joshua Tree (*Yucca brevifolia*)

As a Candidate for Threatened California Endangered Species Act (CESA)-listed species, CDFW is concerned with the Project's potential impacts to hundreds of western Joshua trees (WJT).

Based on Figure 6 "Joshua Tree Locations" of the Biological Resource Assessment (BRA), CDFW estimates the presence of over 200 hundred WJT on the mere 25 acres surveyed of APN 0629-181-01-0000, which totals 640 acres. The number of WJT is likely to exceed those depicted on Figure 6, since the survey to quantify WJT involved a walkthrough of only 25 acres versus focused surveys on the entirety of APN 0629-181-01-0000 (640 acres). CDFW understands that only 25 acres are proposed for development; however, when analyzing impacts to WJT, the entire population on the Project site should be considered to properly calculate demographics and estimate the quality of WJT habitat on-site. CDFW recommends that a final MND (termed hereafter as 'final MND') quantifies WJT presence on the entirety of APN 0629-181-01-0000 through focused surveys. The WJT survey results should be included in the final MND and should identify and provide: a) the GPS coordinates and accompanying map of each WJT within the Project area; b) the age class of each WJT; c) the number of clonal WJT associated with each parent plant and the methodology used to make this

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determination; d) a unique numbering system for each WJT, and e) geo-referenced, representative photos of parent trees, clones, and general distribution of WJT across the Project site. Furthermore, the final MND should include: 1) an impact analysis assessing potential Project impacts to WJT within a 186-foot buffer zone of WJT (Vander Wall et al. 2006), 2) implementing a 300-foot buffer around WJT not scheduled for removal to avoid impacts to WJT, and 3) a mitigation strategy for Project impacts to WJT individuals, WJT seedbank, and indirect impacts to WJT. Indirect impacts to WJT include destruction of WJT's obligate pollinating moth (yucca moth; *Tegeticula synthetica*), while it is dormant in the soil or while it is in its flight phase, which would impact the ability of WJT to sexually recruit new individuals (Sweet et al. 2019). Destruction or modification of WJT habitat in the Project area could also disrupt the seed dispersal behavior of rodents, which is the primary way that WJT seeds are buried at a soil depth suitable for successful germination (Waitman et al. 2012). Destruction or modification of WJT habitat in the Project area could also eliminate nurse plants that are critical for WJT seedling survival (Brittingham and Walker 2000).

CDFW requests the final MND 1) adequately identify and disclose the Project's impacts (i.e., direct, indirect, and cumulative) to WJT as noted above, 2) propose mitigation to offset those impacts to WJT, and 3) demonstrate that impacts to WJT are less than significant and, for the purposes of CESA permitting, are fully mitigated. Further, CDFW recommends the following revisions to biological (BIO) mitigation measures (MM) one (MM BIO-1), MM BIO-7, and MM BIO-8, pertaining to WJT (edits are in ~~strikethrough~~ and **bold**):

MM BIO-1

Joshua trees shall be protected to comply with the County of San Bernardino Development Code Chapter 88.01.050 through transplantation and stockpiling, and implementation of protective measures as recommended in the Protected Plant Preservation Plan prepared in October 2021 for the proposed Project. Additionally, prior to the implementation of the recommended measures outlined in the Protected Plant Preservation Plan, **and prior to "take" of any western Joshua tree (WJT; a Candidate for listing as threatened under the California Endangered Species Act (CESA)) an CESA Incidental Take Permit (ITP) (Individual Take Permit) shall be obtained from the California Department of Fish and Wildlife (CDFW) for any Joshua Tree on-site to be removed from its current position as deemed applicable by the CDFW. A Habitat Assessment Plan will be prepared at the direction of CDFW. The approved Plan will serve as the Basis of the final Protected Plant Preservation Plan for use by the County. California Fish and Game Code section 86 defines "take" as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill". Take of any CESA-listed species is prohibited except as authorized by state law (Fish and Game Code, §§ 2080 & 2085). Permanent protection and perpetual management of compensatory habitat is necessary and required pursuant to CESA to fully mitigate Project-related impacts of the taking of CESA-listed species. CDFW recommends permanent protection of WJT through**

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establishment of a conservation easement, development of a long-term management plan, and securing funding sufficient to implement management plan tasks in perpetuity. These tasks should be completed or financial security must be provided before starting any Project activities. In order to execute an ITP, CDFW requires documentation of CEQA compliance. CDFW requires the CEQA document have a State Clearing House number, show proof of filing fees, and proof that the document has been circulated.

MM BIO-7

To meet the requirements of the Plant Protection and Management of the County Development Code:

1. The applicant shall employ a qualified biologist (desert native plant specialist) to tag ~~those trees~~ **western Joshua tree (WJT)** that will ~~eventually be approved by CDFW for relocation~~ **be translocated.**
2. Transplantation ~~shall will~~ occur **only after a CDFW-executed CESA-ITP is obtained** in late fall or winter when tree metabolism is at its lowest. A watering regimen will be developed and a monitoring program implemented for the transplanted trees. Evidence of such program and on-going maintenance shall be provided to County Planning and evaluated for acceptability.
3. For other Joshua trees present on-site, but not within an area requiring their removal and transplantation, the applicant shall implement a tree protection plan that would include an assessment of the health of the trees, then determine how to protect them. ~~Protection of trees, where needed, may be accomplished by either creating an earthen berm around each tree or group of trees or by surrounding trees with a fenced enclosure.~~ **The tree protection plan Evidence of such action shall be provided to the County Planning and evaluated for acceptability and should consider requirements of the CESA ITP.**

During construction activities the following measures shall be employed:

4. All trees that might be indirectly impacted because they are located within the construction zone (adjacent to or near campsites, internal road, or buildings) shall be surrounded by construction fencing (e.g. orange fencing), **if in compliance with the CESA ITP.** Other avoidance measures tailored to the Project Site may be identified ~~during consultation with CDFW via~~ during in the ~~CESA ITP application process.~~
5. The project biologist shall conduct a worker education class designed to ensure that all workers on site understand the natural history of Joshua trees and the distance that must be maintained between a construction activity and a tree. The construction contractor shall be responsible for ensuring that each new

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construction employee that enters the site completes the worker education class. The construction contractor shall maintain a log for inspection by the project biologist to ensure that all workers are trained. Evidence of such action shall be provided to County Planning and evaluated for acceptability. **The CESA ITP is likely to include requirements for the worker education class.**

6. During long-term operation of the campground, the property owner shall have a qualified biologist on call for the following tasks **and tasks should comply with all measures in the CESA ITP:**
 - a. Conduct a worker education class for all new employees.
 - b. Provide educational pamphlets to all visitors.
 - c. Maintain earthen berms or fences and posted notices, and cleanup (if trash or debris are in the vicinity).
 - d. Once each year, conduct a (tree census) to **assess** the health of Joshua trees that have been transplanted and those that are located in proximity to the campground such that they may be indirectly impacted by camping activities.
 - e. Develop and implement a watering plan that provides water to trees twice annually, or as necessary to maintain Joshua trees.
 - f. Develop and maintain a nursery for Joshua trees to be used to replace trees that do not survive transplanting, or to replace dying trees due to climate change.
 - g. Provide mitigation monitoring and reporting to CDFW on the health of the Joshua trees. Frequency of monitoring and reporting shall be established through consultation with CDFW through the ITP application process.
 - h. Evidence of such action shall be provided to County Planning and evaluated for acceptability.

~~7. The applicant shall contribute to a CDFW Western Joshua Tree Mitigation Fund at such time as it is established by CDFW. The applicant's contribution is expected to be on a per acre basis and will be determined through the Incidental Take Permit process that will be determined in negotiation with CDFW. The submittal of an ITP application for the proposed Project will be submitted on the assumption that the Western Joshua tree will be listed as a threatened or endangered species by the State of California.~~

MM BIO-8

~~Any construction that r~~**Removal of any western Joshua tree** protected yuccas shall be conducted in accordance with the requirements of **the CESA ITP and the San Bernardino County ordinance**. All **western Joshua tree** protected yuccas to be removed shall be flagged and transplanted to an undisturbed area prior to construction per the requirements of State regulation and County ordinance.

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Nesting Birds

CDFW appreciates the incorporation of MM BIO-3, which considers nesting bird pre-construction surveys. However, CDFW is concerned that MM BIO-3 considers the start of bird nesting season as February 1 when hummingbirds may nest year-round and some species of raptors (e.g. owls, hawks, etc.) may commence nesting activities in January. Furthermore, MM BIO-3 defers guidelines for addressing active nests, establishing buffers, ongoing monitoring, establishment of avoidance and minimization measures, and reporting to a Nesting Bird Plan (NBP), which CDFW is not required to be signatory to. Thus, CDFW offers the following revisions to MM BIO-3 (edits are in ~~strikethrough~~ and **bold**):

MM BIO-3

All Project activities on-site shall be conducted outside of the nesting bird season to the maximum extent feasible. Bird nesting season generally extends from ~~February 1 through September 15~~ **for raptors** in southern California and ~~specifically, February 1 April 15 through August 31~~ **September 1** for migratory passerine birds. ~~In general, Projects should be constructed outside of this time to avoid impacts to nesting birds.~~ **If Project activities begin during the non-nesting season (non-nesting season is typically from September 16 through December 31), a pre-construction survey shall be performed by a qualified biologist to verify the absence of nesting birds. A qualified biologist shall conduct the pre-activity survey within the Project area (including access routes) and a 300- foot buffer surrounding the Project area, no more than two hours prior to initiating Project activities.**

If Project ~~activities~~ cannot begin ~~constructed~~ outside of ~~the bird~~ nesting season, the project site shall be surveyed for nesting birds by a qualified avian biologist within three (3) days prior to initiating ~~the construction~~ **Project activities. Pre-construction nesting bird surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified avian biologist will make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If active nests containing eggs or young are found during the pre-construction nesting bird surveys, a qualified biologist shall establish an appropriate nest buffer to be marked on the ground. Nest buffers are species-specific and shall be at least 100 feet for passerines and 300 feet for raptors. A smaller or larger buffer may be determined by the qualified biologist familiar with the nesting phenology of the nesting species and based on nest and buffer monitoring results. Established buffers shall remain on site until a qualified biologist determines the young have fledged or the nest is no longer active. Active nests and adequacy of the established buffer distance shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance.** ~~If active nests are found during the pre-construction nesting bird surveys, a Nesting Bird~~

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~~Plan (NBP) will be prepared and implemented. At a minimum, the NBP will include guidelines for addressing active nests, establishing buffers, monitoring, and reporting. The NBP will include a copy of maps showing the location of all nests and an appropriate buffer zone around each nest sufficient to protect the nest from direct and indirect impact. The size and location of all buffer zones, if required, shall be determined by the biologist, and shall be based on the nesting species, its sensitivity to disturbance, and expected types of disturbance. The nests and buffer zones shall be field checked weekly by a qualified biological monitor. The approved buffer zone shall be marked in the field with construction fencing, within which no vegetation clearing or ground disturbance shall commence until the qualified biologist has determined the young birds have successfully fledged.~~

Burrowing Owl (*Athene cunicularia*)

According to the BRA, on “March 19, 20 and 26, 2020, Jericho biologist Shay Lawrey conducted a jurisdictional waters delineation (JD), WJT census, and focused desert tortoise, burrowing owl, and Le Conte’s thrasher surveys”. The ISMND also states that during the site assessment, the surveyors examined natural and non-natural substrates for burrows to determine size, shape, and aspect for suitability for burrowing owl and to see if any burrowing owl individuals or sign (molted feathers, cast pellets, prey remains, and owl whitewash) were present. The ISMND then concludes that since no burrowing owl individuals or sign were observed, burrowing owl was absent from the Project area.

CDFW exclusively recommends the 2012 Staff Report on Burrowing Owl Mitigation (California Department of Fish and Wildlife, 2012) for any project that is surveying and evaluating impacts to burrowing owls, as well as developing and implementing avoidance, minimization, and mitigation measures. However, because the BRA does not provide a description of the protocol or include survey results used to determine presence/absence of burrowing owl, CDFW is concerned that the survey for burrowing owl may not have been performed according to the 2012 Staff Report on Burrowing Owl Mitigation, which requires a habitat assessment according to Appendix C: Habitat Assessment and Reporting Details and four survey visits during the burrowing owl breeding season (generally from February 1 to August 31). Absent these details, and supporting documentation, it is unclear whether the Project’s impacts to burrowing owl have been adequately identified, disclosed, or mitigated.

In MM BIO-9 below, CDFW recommends that a habitat assessment be conducted prior to the start of Project activities as outlined in Appendix C of the Staff Report on Burrowing Owl Mitigation. Please note that habitat assessments dated more than one year prior to the construction date are considered outdated and should be updated.

If the habitat assessment determines suitable habitat for burrowing owl, protocol surveys should be conducted prior to commencement of Project activities. Surveys should be consistent with the Staff Report on Burrowing Owl Mitigation. If burrowing owls are identified on the site, the applicant should contact CDFW and conduct an

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impact assessment, in accordance with Staff Report on Burrowing Owl Mitigation prior to commencing Project activities, to assist in the development of avoidance, minimization, and mitigation measures. Depending on the level of impacts, CDFW would likely recommend permanent conservation, enhancement, and management of existing, occupied burrowing owl habitat and measures to minimize impacts to burrowing owls on the Project site.

The ISMND includes MM BIO-4, which requires pre-construction surveys for desert tortoise and burrowing owl at least 30 days prior to new ground disturbance. Meanwhile, CDFW recommends pre-construction surveys for burrowing owl no less than 14 days prior to the initiation of any Project activities in accordance with the Staff Report on Burrowing Owl Mitigation. Further, MM BIO-4 does not consider desert tortoise or burrowing specific survey protocols. CDFW recommends the County revise MM BIO-4 (edits are in ~~strike through~~ and **bold**) and adopt MM BIO-9 (Burrowing Owl) and MM BIO-10 (Desert Tortoise), as per below:

MM BIO-4

Preconstruction surveys for **Burrowing Owl BUOW** and Desert Tortoise shall be conducted ~~at least 30 days prior to new ground disturbance and documentation indicating such a survey has occurred is to be provided to the County~~ **according to MM BIO-9 and MM BIO-10, respectively.**

MM BIO-9

Prior to grading or any other ground-disturbing activity, a qualified biologist shall conduct a habitat assessment for burrowing owls to determine if suitable burrowing owl habitat is present in and adjacent to the Project site. Surveys shall be conducted consistent with the procedures outlined in the California Department of Fish and Wildlife (CDFW) 2012 Staff Report on Burrowing Owl Mitigation (California Department of Fish and Wildlife, 2012).

If there is suitable habitat for burrowing owl, then focused breeding season surveys as described in the Staff Report on Burrowing Owl Mitigation shall be conducted by a qualified biologist. If presence of burrowing owl is determined, the applicant shall contact CDFW and conduct an impact assessment in accordance with Staff Report on Burrowing Owl Mitigation prior to commencing project activities to determine appropriate mitigation, including the acquisition and conservation of occupied replacement habitat at no less than a 2:1 ratio.

No less than 14 days prior to ground-disturbing activities, a qualified biologist shall conduct pre-construction surveys. If no burrowing owl(s) are observed on site during the pre-construction clearance survey, a letter shall be prepared by the qualified biologist documenting the results of the survey. The letter shall be submitted to CDFW and the County prior to issuance of any grading permits, and

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no further action is required. If burrowing owl(s) are observed on site during the pre-construction clearance survey, areas occupied by burrowing owls shall be avoided. No ground-disturbing activities shall be permitted within 500 meters of an occupied burrow. A smaller buffer may be established if the qualified biologist determines a reduced buffer would not adversely affect the burrowing owl(s).

If burrowing owls cannot be avoided by the proposed Project, then a qualified biologist shall prepare and submit a passive relocation program in accordance with Appendix E (i.e., Example Components for Burrowing Owl Artificial Burrow and Exclusion Plans) of the 2012 Staff Report on Burrowing Owl Mitigation to CDFW for review/approval prior to the commencement of Project activities. Burrow exclusion involves the installation of one-way doors in burrow openings during the nonbreeding season to temporarily or permanently exclude burrowing owls and to close burrows after verifying through site monitoring and scoping that the burrows are empty. Existing or artificial burrows situated less than 75 meters from the Project site are the ideal scenario for successful passive relocation. Additional factors for successful passive relocation are included in the CDFW 2012 Staff Report on Burrowing Owl Mitigation. Prior to passive relocation, suitable replacement burrows site(s) shall be provided at a ratio of no less than 2:1 and permanent conservation and management of burrowing owl habitat such that the habitat acreage, number of burrows and burrowing owl impacts are replaced consistent with the Staff Report on Burrowing Owl Mitigation including its Appendix A within designated adjacent conserved lands identified through coordination with CDFW and the County. A qualified biologist shall confirm the natural or artificial burrows on the conservation lands are suitable for use by the owls. Monitoring and management of the replacement burrow site(s) shall be conducted, and a reporting plan shall be prepared. The objective shall be to manage the replacement burrow sites for the benefit of burrowing owls (e.g., minimizing weed cover), with the specific goal of maintaining the functionality of the burrows for a minimum of 2 years. When a qualified biologist determines that burrowing owls are no longer occupying the Project site and passive relocation is complete, Project activities may begin. A final letter report shall be prepared by the qualified biologist documenting the results of the passive relocation. The letter shall be submitted to CDFW prior to the start of Project activities.

Desert Tortoise (*Gopherus agassizii*)

The ISMND concludes that desert tortoise is absent from the Project site, but surveys for desert tortoise were conducted in accordance with the protocols described in the U.S. Fish and Wildlife's: 2009 "Desert Tortoise (Mojave Population) Field Manual: (*Gopherus agassizii*)", 2010 "Pre-Project Field Survey Protocol for Potential Desert Tortoise Habitats," and the August 31, 2017 survey protocol update, "Preparing for Any Action That May Occur Within the Range of The Mojave Desert Tortoise (*Gopherus agassizii*)", and not according to the U.S. Fish and Wildlife Service 2019 desert tortoise

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survey methodology, which CDFW recommends. The U.S. Fish and Wildlife Service 2019 desert tortoise survey methodology requires surveys for desert tortoise be carried out during the desert tortoise active season (typically April to May or September to October), while the BRA indicates that surveys for desert tortoise were conducted in March, outside of the active season. To address potential impacts to desert tortoise, CDFW recommends MM BIO-10 below:

MM BIO-10

During the desert tortoise active season (April to May or September to October) pre-construction surveys for Desert Tortoise shall be conducted no more than 48 hours prior to initiation of Project activities and after any pause in Project activities lasting 30 days or more. Desert tortoise pre-construction surveys shall be conducted in accordance with the U.S. Fish and Wildlife Service 2019 desert tortoise survey methodology. The survey shall utilize perpendicular survey routes and 100-percent visual coverage for desert tortoise and their sign. Results of the survey shall be submitted to CDFW prior to start of Project activities. If the survey confirms desert tortoise absence, the CDFW-approved biologist shall ensure desert tortoise do not enter the Project area. If the survey confirms presence of desert tortoise, the Project proponent shall submit to CDFW for review and approval a desert tortoise specific avoidance plan detailing the protective avoidance measures to be implemented to ensure complete avoidance of take to desert tortoise. If complete avoidance of desert tortoise cannot be achieved, CDFW recommends the Project proponent not undertake Project activities and Project activities be postponed until appropriate authorization (i.e., CESA ITP under Fish and Game Code section 2081) is obtained.

Sensitive Plants

CDFW considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a state ranking (S) of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. CDFW considers all associations with S1-S3 to be highly imperiled. Taking this into consideration, the BRA Appendix B: Plant Species Observed, identifies a diversity of plant species present, including beavertail cactus (*Opuntia basilaris*; S3) and the BRA's Appendix A: Sensitive Species Potential to Occur, identifies sensitive species with the potential to occur on-site, including San Bernardino milk-vetch (*Astragalus bernardinus*; S3). CDFW is concerned that although a focused botanical survey of the Project's property was said to be conducted in April, several special-status plant species (i.e., rare, sensitive, vulnerable, imperiled, CESA-listed) may have been overlooked, because only *one* survey was conducted when botanical field survey visits should be spaced throughout the growing season to accurately determine what plants exist in the Project area. This usually involves multiple visits to the Project area (e.g., in early, mid, and late spring) to capture the floristic diversity at a level necessary to determine if special-status plants are present and using reference

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sites (nearby accessible occurrences of the plants). CDFW is unclear whether reference sites were used, but reference sites should be utilized to determine whether special-status plants with the potential to occur on-site are identifiable at the times of year the botanical field surveys take place and to obtain a visual image of the special-status plants, associated habitat, and associated natural communities. All in all, CDFW does not consider the ISMND's botanical survey adequate to identify all special-status plant present on-site.

MM BIO-6 provides mitigation for sensitive plants in the form of translocation, but MM BIO-6 ignores that the BRA recommends conducting pre-construction springtime surveys for nine special-status plant species that have a moderate potential to occur in the Project area (e.g., San Bernardino milk-vetch). Please note that CDFW does not recommend transplantation of established native plants given the low survival rate of transplants. As such, CDFW is concerned that the approach is not appropriate for mitigation. To adequately offset impacts to special-status plants, CDFW recommends the County conduct botanical field surveys prior to starting Project activities. If any special-status plants are identified, the Project shall fully avoid special-status plants with an appropriate buffer. If complete avoidance cannot be achieved, Permittee should purchase mitigation credits from a mitigation bank or acquire and conserve lands in perpetuity with the target resources. As such, CDFW recommends that the County revise MM BIO-6 and condition the measure to include the following (edits are in **bold** and ~~strikethrough~~):

MM BIO-6

Prior to Project implementation, and during the appropriate season, the County shall conduct botanical field surveys following the Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018). The surveys shall be conducted by a CDFW-approved botanist(s) experienced in conducting floristic botanical field surveys, knowledgeable of plant taxonomy and plant community ecology and classification, familiar with the plants of the area, including special-status and locally significant plants, and familiar with the appropriate state and federal statutes related to plants and plant collecting. The botanical field surveys shall be conducted at the appropriate time of year when plants will both be evident and identifiable (usually, during flowering or fruiting) and, in a manner, which maximizes the likelihood of locating special-status plants and sensitive natural communities that may be present. Botanical field surveys shall be conducted floristic in nature, meaning that every plant taxon that occurs in the Project area is identified to the taxonomic level necessary to determine rarity and listing status.

If any species-status plants are identified, ~~the proposed Project shall be designed to~~ fully avoid sensitive and/or protected desert plants with an appropriate buffer established by the botanist and marked in the field (i.e., fencing or flagging) as

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per local regulations. If **any special-status species** ~~the protected desert plants~~ cannot be avoided, a relocation plan is required for approval by the County of San Bernardino and **the County shall mitigate the loss of the plant(s) through the purchase of mitigation credits from a CDFW-approved bank, or the acquisition and in perpetuity conservation of land approved by CDFW at a minimum 3:1 (replacement-to-impact) ratio. Note that a higher ratio may be warranted if the proposed mitigation lands are located far from the Project site (i.e., within a separate watershed). If the Project has the potential to impact a CESA-listed species, the County should apply for a CESA ITP with CDFW.**

Lake and Streambed Alteration Notification

CDFW disagrees with the JD, which identifies Fish and Game Code section 1602 resources only within the immediate vicinity of Pipes Wash (Wash). The JD does not consider the bed or bank of the Wash as subject to Fish and Game Code section 1602. After looking at the engineering plans on Figure 3: Site Plans, CDFWS believes that the Project boundary extends into the bank of the Wash. Please note that the bank and bed of the Wash is subject to Fish and Game Code section 1602. CDFW recommends that the County adopt MM BIO-11 below to either obtain written correspondence from CDFW stating that notification under section 1602 of the Fish and Game Code is not required for the Project, *or*, if notification under section 1602 of the Fish and Game Code is required for the Project, to obtain a CDFW executed Lake and Streambed Alteration Agreement:

MM BIO- 11

Prior to construction and issuance of any grading permit, the Project applicant should obtain written correspondence from the California Department of Fish and Wildlife (CDFW) stating that notification under section 1602 of the Fish and Game Code is not required for the Project, *or* the Project applicant should obtain a CDFW-executed Lake and Streambed Alteration Agreement, authorizing impacts to Fish and Game Code section 1602 resources associated with the Project.

Trespass and Degradation of Habitat

Outside of MM BIO-7 above, the ISMND lacks details regarding deterring human entry or activities in adjacent sensitive habitat, including Fish and Game Code section 1602 resources. CDFW recommends the County conditions the installation and maintenance of barriers to separate the Project from adjacent habitat and implements methods to monitor and preclude access to adjacent habitat. Habitat degradation due to unauthorized trespass, littering, and vandalism should be thoroughly analyzed and disclosed in the final MND.

The Project proposes the use of a septic system that will connect sewer lines from each proposed building to the septic system. The septic system will function as a sewage disposal leach field and a qualified professional will certify that the system functions

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properly, meets code, and has the capacity required for the proposed Project. However, the ISMND does not consider the potential for leaching of sewage into biological resources. CDFW recommends that potential leaching of sewage/wastewater into Fish and Game section 1602 resources and adjacent sensitive habitat be analyzed in the final ISMND.

ENVIRONMENTAL DATA

CEQA requires that information developed in Environmental Impact Reports and Negative Declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).). Accordingly, please report any special-status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDDB_FieldSurveyForm.pdf. The completed form can be mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov. The types of information reported to CNDDDB can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

CDFW requests that the County include in the final MND the suggested mitigation measures (Attachment 1) offered by CDFW to avoid, minimize, and mitigate Project impacts on California fish and wildlife resources.

CDFW appreciates the opportunity to comment on the ISMND for the Resort Camping Proj-2020-00191 (SCH No. 2022030476) and hopes our comments will assist the County in identifying, avoiding, minimizing, and mitigating Project impacts on fish and wildlife resources.

If you should have any questions pertaining to the comments provided in this letter, please contact Corina Jimenez, Environmental Scientist at Corina.Jimenez@wildlife.ca.gov.

ATTACHMENTS

Attachment 1: MMRP for CDFW-Proposed Mitigation Measures

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Sincerely,

DocuSigned by:



Alisa Ellsworth

Environmental Program Manager

ec: Office of Planning and Research, State Clearinghouse, Sacramento
state.clearinghouse@opr.ca.gov.

REFERENCES

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ATTACHMENT 1: MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

PURPOSE OF THE MMRP

The purpose of the MMRP is to ensure compliance with mitigation measures during project implementation. Mitigation measures must be implemented within the time periods indicated in the table below.

TABLE OF MITIGATION MEASURES

The following items are identified for each mitigation measure: Mitigation Measure, Implementation Schedule, and Responsible Party. The Mitigation Measure column summarizes the mitigation requirements. The Implementation Schedule column shows the date or phase when each mitigation measure will be implemented. The Responsible Party column identifies the person or agency that is primarily responsible for implementing the mitigation measure.

Mitigation Measure	Implementation Schedule	Responsible Party
<p>BIO-1</p> <p>Joshua trees shall be protected to comply with the County of San Bernardino Development Code Chapter 88.01.050 through transplantation and stockpiling, and implementation of protective measures as recommended in the Protected Plant Preservation Plan prepared in October 2021 for the proposed Project. Additionally, prior to the implementation of the recommended measures outlined in the Protected Plant Preservation Plan, and prior to “take” of any western Joshua tree (WJT; a Candidate for listing as threatened under the California Endangered Species Act (CESA)) a CESA Incidental Take Permit (ITP) shall be obtained from the California Department of Fish and Wildlife (CDFW). California Fish and Game Code section 86 defines “take” as “hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill”. Take of any CESA-listed species is prohibited except as authorized by state law (Fish and Game Code, §§ 2080 & 2085). Permanent protection and perpetual management of compensatory habitat is necessary and required pursuant to CESA to fully mitigate Project-related impacts of the taking of CESA-listed species. CDFW recommends permanent protection of</p>	<p>Prior to commencing ground- or vegetation-disturbing activities</p>	<p>Project Proponent</p>

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<p>WJT through establishment of a conservation easement, development of a long-term management plan, and securing funding sufficient to implement management plan tasks in perpetuity. These tasks should be completed or financial security must be provided before starting any Project activities. In order to execute an ITP, CDFW requires documentation of CEQA compliance. CDFW requires the CEQA document have a State Clearing House number, show proof of filing fees, and proof that the document has been circulated.</p>		
<p>BIO-3</p> <p>All Project activities on-site shall be conducted outside of the nesting bird season to the maximum extent feasible. Bird nesting season generally extends from January 1 through September 15 for raptors in southern California and February 1 through September 1 for passerine birds. If Project activities begin during the non-nesting season (non-nesting season is typically from September 16 through December 31), a pre-construction survey shall be performed by a qualified biologist to verify the absence of nesting birds. A qualified biologist shall conduct the pre-activity survey within the Project area (including access routes) and a 300- foot buffer surrounding the Project area, no more than two hours prior to initiating Project activities.</p> <p>If Project activities cannot begin outside of the bird nesting season, the project site shall be surveyed for nesting birds by a qualified avian biologist within three (3) days prior to initiating Project activities. Pre-construction nesting bird surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified avian biologist will make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If active nests containing eggs or young are found during the pre-construction nesting bird surveys, a qualified biologist shall establish an appropriate nest buffer to be marked on the ground. Nest buffers are species-specific and shall be at least 100 feet for passerines and 300 feet for raptors. A smaller or</p>	<p>Prior to commencing ground- or vegetation-disturbing activities</p>	<p>Project Proponent</p>

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<p>larger buffer may be determined by the qualified biologist familiar with the nesting phenology of the nesting species and based on nest and buffer monitoring results. Established buffers shall remain on site until a qualified biologist determines the young have fledged or the nest is no longer active. Active nests and adequacy of the established buffer distance shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance.</p>		
<p>BIO-4 Preconstruction surveys for Burrowing Owl and Desert Tortoise shall be conducted according to MM BIO-9 and MM BIO-10, respectively.</p>	<p>Prior to commencing ground- or vegetation-disturbing activities</p>	<p>Project Proponent</p>
<p>BIO-6 Prior to Project implementation, and during the appropriate season, the County shall conduct botanical field surveys following the Protocols for Surveying and Evaluating Impacts to Special-Status Native Plant Populations and Sensitive Natural Communities (CDFW 2018). The surveys shall be conducted by a CDFW-approved botanist(s) experienced in conducting floristic botanical field surveys, knowledgeable of plant taxonomy and plant community ecology and classification, familiar with the plants of the area, including special-status and locally significant plants, and familiar with the appropriate state and federal statutes related to plants and plant collecting. The botanical field surveys shall be conducted at the appropriate time of year when plants will both be evident and identifiable (usually, during flowering or fruiting) and, in a manner, which maximizes the likelihood of locating special-status plants and sensitive natural communities that may be present. Botanical field surveys shall be conducted floristic in nature, meaning that every plant taxon that occurs in the Project area is identified to the taxonomic level</p>	<p>Prior to commencing ground- or vegetation-disturbing activities</p>	<p>Project Proponent</p>

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<p>necessary to determine rarity and listing status.</p> <p>If any species-status plants are identified, the proposed Project shall fully avoid sensitive and/or protected desert plants with an appropriate buffer established by the botanist and marked in the field (i.e., fencing or flagging). If any special-status species cannot be avoided, a relocation plan is required for approval by the County of San Bernardino and the County shall mitigate the loss of the plant(s) through the purchase of mitigation credits from a CDFW-approved bank, or the acquisition and in perpetuity conservation of land approved by CDFW at a minimum 3:1 (replacement-to-impact) ratio. Note that a higher ratio may be warranted if the proposed mitigation lands are located far from the Project site (i.e., within a separate watershed). If the Project has the potential to impact a CESA-listed species, the County should apply for a CESA ITP with CDFW.</p>		
<p>BIO-7</p> <p>To meet the requirements of the Plant Protection and Management of the County Development Code:</p> <ol style="list-style-type: none"> 1. The applicant shall employ a qualified biologist (desert native plant specialist) to tag western Joshua tree (WJT) that will be translocated. 2. Transplantation shall occur only after a CDFW-executed CESA-ITP is obtained in late fall or winter when tree metabolism is at its lowest. A watering regimen will be developed and a monitoring program implemented for the transplanted trees. Evidence of such program and on-going maintenance shall be provided to County Planning and evaluated for acceptability. 3. For other Joshua trees present on-site, but not within an area requiring their removal and transplantation, the applicant shall implement a tree protection plan that would include an assessment of the health of the trees, then 	<p>Prior to commencing ground- or vegetation-disturbing activities</p>	<p>Project Proponent</p>

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<p>determine how to protect them. The tree protection plan shall be provided to the County Planning and evaluated for acceptability and should consider requirements of the CESA ITP.</p> <p>During construction activities the following measures shall be employed:</p> <ol style="list-style-type: none">4. All trees that might be indirectly impacted because they are located within the construction zone (adjacent to or near campsites, internal road, or buildings) shall be surrounded by construction fencing (e.g. orange fencing), if in compliance with the CESA ITP. Other avoidance measures tailored to the Project Site may be identified in the CESA ITP.5. The project biologist shall conduct a worker education class designed to ensure that all workers on site understand the natural history of Joshua trees and the distance that must be maintained between a construction activity and a tree. The construction contractor shall be responsible for ensuring that each new construction employee that enters the site completes the worker education class. The construction contractor shall maintain a log for inspection by the project biologist to ensure that all workers are trained. Evidence of such action shall be provided to County Planning and evaluated for acceptability. The CESA ITP is likely to include requirements for the worker education class.6. During long-term operation of the campground, the property owner shall have a qualified biologist on call for the following tasks and tasks should comply with all measures in the CESA ITP:<ol style="list-style-type: none">a. Conduct a worker education class for all new employees.b. Provide educational pamphlets to all visitors.		
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<ul style="list-style-type: none"> c. Maintain earthen berms or fences and posted notices, and cleanup (if trash or debris are in the vicinity). d. Once each year, conduct a tree census to assess the health of Joshua trees that have been transplanted and those that are located in proximity to the campground such that they may be indirectly impacted by camping activities. e. Develop and implement a watering plan that provides water to trees twice annually, or as necessary to maintain Joshua trees. f. Develop and maintain a nursery for Joshua trees to be used to replace trees that do not survive transplanting, or to replace dying trees due to climate change. g. Provide mitigation monitoring and reporting to CDFW on the health of the Joshua trees. Frequency of monitoring and reporting shall be established through consultation with CDFG through the ITP application process. h. Evidence of such action shall be provided to County Planning and evaluated for acceptability. 		
<p>BIO-8</p> <p>Removal of any western Joshua tree shall be conducted in accordance with the requirements of the CESA ITP and the San Bernardino County ordinance. All western Joshua tree to be removed shall be flagged and transplanted to an undisturbed area prior to construction per the requirements of State regulation and County ordinance.</p>	<p>Prior to commencing ground- or vegetation-disturbing activities</p>	<p>Project Proponent</p>
<p>BIO-9</p> <p>Prior to grading or any other ground-disturbing activity, a qualified biologist shall conduct a habitat assessment for burrowing owls to determine if suitable burrowing owl habitat is present in and</p>	<p>Prior to commencing ground- or vegetation-disturbing activities</p>	<p>Project Proponent</p>

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<p>adjacent to the Project site. Surveys shall be conducted consistent with the procedures outlined in the California Department of Fish and Wildlife (CDFW) 2012 Staff Report on Burrowing Owl Mitigation (California Department of Fish and Wildlife, 2012).</p> <p>If there is suitable habitat for burrowing owl, then focused breeding season surveys as described in the Staff Report on Burrowing Owl Mitigation shall be conducted by a qualified biologist. If presence of burrowing owl is determined, the applicant shall contact CDFW and conduct an impact assessment in accordance with Staff Report on Burrowing Owl Mitigation prior to commencing project activities to determine appropriate mitigation, including the acquisition and conservation of occupied replacement habitat at no less than a 2:1 ratio.</p> <p>No less than 14 days prior to ground-disturbing activities, a qualified biologist shall conduct pre-construction surveys. If no burrowing owl(s) are observed on site during the pre-construction clearance survey, a letter shall be prepared by the qualified biologist documenting the results of the survey. The letter shall be submitted to CDFW and the County prior to issuance of any grading permits, and no further action is required. If burrowing owl(s) are observed on site during the pre-construction clearance survey, areas occupied by burrowing owls shall be avoided. No ground-disturbing activities shall be permitted within 500 meters of an occupied burrow. A smaller buffer may be established if the qualified biologist determines a reduced buffer would not adversely affect the burrowing owl(s).</p> <p>If burrowing owls cannot be avoided by the proposed Project, then a qualified biologist shall prepare and submit a passive relocation program in accordance with Appendix E (i.e., Example Components for Burrowing Owl Artificial Burrow and Exclusion Plans) of the 2012 Staff Report on Burrowing Owl Mitigation to CDFW for review/approval prior to the commencement of Project activities. Burrow exclusion involves the installation of one-way doors in burrow openings during the nonbreeding season to</p>		
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<p>temporarily or permanently exclude burrowing owls and to close burrows after verifying through site monitoring and scoping that the burrows are empty. Existing or artificial burrows situated less than 75 meters from the Project site are the ideal scenario for successful passive relocation. Additional factors for successful passive relocation are included in the CDFW 2012 Staff Report on Burrowing Owl Mitigation. Prior to passive relocation, suitable replacement burrows site(s) shall be provided at a ratio of no less than 2:1 and permanent conservation and management of burrowing owl habitat such that the habitat acreage, number of burrows and burrowing owl impacts are replaced consistent with the Staff Report on Burrowing Owl Mitigation including its Appendix A within designated adjacent conserved lands identified through coordination with CDFW and the County. A qualified biologist shall confirm the natural or artificial burrows on the conservation lands are suitable for use by the owls. Monitoring and management of the replacement burrow site(s) shall be conducted, and a reporting plan shall be prepared. The objective shall be to manage the replacement burrow sites for the benefit of burrowing owls (e.g., minimizing weed cover), with the specific goal of maintaining the functionality of the burrows for a minimum of 2 years. When a qualified biologist determines that burrowing owls are no longer occupying the Project site and passive relocation is complete, Project activities may begin. A final letter report shall be prepared by the qualified biologist documenting the results of the passive relocation. The letter shall be submitted to CDFW prior to the start of Project activities.</p>		
<p>BIO-10</p> <p>During the desert tortoise active season (April to May or September to October) pre-construction surveys for Desert Tortoise shall be conducted no more than 48 hours prior to initiation of Project activities and after any pause in Project activities lasting 30 days or more. Desert tortoise pre-construction surveys shall be conducted in accordance with the U.S. Fish and Wildlife Service 2019 desert tortoise survey</p>	<p>Prior to commencing ground- or vegetation-disturbing activities</p>	<p>Project Proponent</p>

Jim Morrissey, Contract Planner
 County of San Bernardino
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<p>methodology. The survey shall utilize perpendicular survey routes and 100-percent visual coverage for desert tortoise and their sign. Results of the survey shall be submitted to CDFW prior to start of Project activities. If the survey confirms desert tortoise absence, the CDFW-approved biologist shall ensure desert tortoise do not enter the Project area. If the survey confirms presence of desert tortoise, the Project proponent shall submit to CDFW for review and approval a desert tortoise specific avoidance plan detailing the protective avoidance measures to be implemented to ensure complete avoidance of take to desert tortoise. If complete avoidance of desert tortoise cannot be achieved, CDFW recommends the Project proponent not undertake Project activities and Project activities be postponed until appropriate authorization (i.e., CESA ITP under Fish and Game Code section 2081) is obtained.</p>		
<p>BIO-11</p> <p>Prior to construction and issuance of any grading permit, the Project applicant should obtain written correspondence from the California Department of Fish and Wildlife (CDFW) stating that notification under section 1602 of the Fish and Game Code is not required for the Project, <i>or</i> the Project applicant should obtain a CDFW-executed Lake and Streambed Alteration Agreement, authorizing impacts to Fish and Game Code section 1602 resources associated with the Project.</p>	<p>Prior to commencing ground- or vegetation-disturbing activities</p>	<p>Project Proponent</p>

Biggs, Lupe

From: Kerrie Aley <6102ka@gmail.com>
Sent: Thursday, April 21, 2022 1:57 AM
To: Morrissey , Jim; Supervisor Rowe
Subject: Resort Camping Proj-2020-00191
Attachments: Aley-Resort Camping Proj-2020-00191-2.pdf

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Please find attached my comments pertaining to the Robott Resort Camping Project.

Regards, Kerrie Aley

April 20 2022

County of San Bernardino-Land Use Services Department
Jim Morrissey, Contract Planner

Copies- Jim.Morrissey@lus.sbcounty.gov , Supervisor.Rowe@bos.sbcounty.gov

Resort Camping- Proj-2020-00191

Project Description: *CONDITIONAL USE PERMIT TO ESTABLISH A **DESTINATION RESORT CONSISTING OF TENT CAMPING (GLAMPING)** WITH SUPPORT FACILITIES, NONE OF WHICH ARE TO BE OPEN TO THE PUBLIC, INCLUDING RESTAURANT/BAR, RECEPTION AREA/STORE, TRAILS AND PATHS, RECREATION BUILDINGS, AND HELIPAD ON A 25-ACRE PORTION OF A 640-ACRE PARCEL; APN: 0629-181-01; 3RD SUPERVISORIAL DISTRICT; PROJECT NUMBER: PROJ-2020- 00191.*

Draft Initial Environmental Study/Mitigated Negative Declaration

I am requesting that the Draft Initial Study/Mitigated Negative Declaration be rejected for the following reasons:

1. The project descriptions in the consultant analysis are substantially different from the Draft Initial Environmental Study and therefore the Mitigated Negative Declaration is insufficient and invalid.

Jericho Systems Biological and Paleontological Assessment Report describe the project as either

*“RoBott Land Company plans to develop **tent camping** on the Project site. Additionally, there is interest in putting on **music festivals as special events in addition to the camping proposal.**”*

*“The study is part of the environmental review process for the proposed RoBott Land **Glamping Hotel Project**, which entails primarily the development of a **camping resort** on the property.”*

MD Acoustics describes the project as

*“a destination **“glamping” resort** with Temporary Parking Area – approximately 90.5 acres and a Amphitheater with Lawn Seating”*

*“In addition, the project also includes a request to hold **music festivals** with up to 25,000 attendees over one or more weekends during the year. A Temporary Parking area has been identified on the Conceptual Site Plan consisting of approximately 90.5 acres. In addition, temporary restroom facilities would also be available for festival attendees.”*

Integrated Engineering Group (IEG) describes the project both as a

“**camp site** located within the County of San Bernardino. The proposed project includes 75 campsites with ancillary land uses for on-site visitors use only. “

“The proposed project includes **20 clamping lofts, 20 teepee sites and 35 glamping sites.** “

Even **SBC Land Use Services** description of the project has fluctuated. SBC has called the project a tent camping (Glamping), a campground and resort camping.

“Destination Resort consisting of Tent Camping (Glamping) with support facilities”

“Project Site as a campground consisting of the uses identified”

“Project Title: Resort Camping”

2. The site plans used by the consultant analysis are substantially different from the Draft Initial Environmental Study. See below-Attachment 1. In addition the Site Plan shown in the Draft Initial Environmental Study/Mitigated Negative Declaration is blurred/un-readable.
3. SBC’s project description is inadequate and fails to clearly define the design of the structures, the construction of the fire pits or the Helipad.

What is the total occupancy of the glamping, camping destination resort? Where is the parking plan and calculation?

Are the 1230 sq ft “Camping Lofts”, 850 sq ft “Chalets” or “Camping Tents” temporary or permanent structures? Some glamping sites have temporary seasonal structures like “Under Canvas” <https://www.undercanvas.com>. Reference Under Canvas Project EIR https://www.troutdaleoregon.gov/sites/default/files/fileattachments/public_works/page/966/ite_land_use_list_10th_edition.pdf

It seems to me that the Environmental Impact would be affected by the design of the structures. If they are permanent, are they camping tent cabins or resort hotel rooms?

Are the fire pits fueled by gas or wood?

What is the intended use of the Helipad? Will the helicopter be used for guest tours of the area or as transportation for guest camping or those people attending special events? What will be the flight path of the helicopters?

While the project claims that the “Support Facilities” will “not be open to the public” or “guest only” -the oversized restaurant/bar/art barn, workshop, reception area/store, yoga deck, pool/patio, Helipad all are clearly designed for hundreds of “guests” whose use will not be dependent on outdoor recreation or camping ,but rather as an event space.

Does “not open to the public” or “guest only” permit this development the right to sell tickets to an event and then use these facilities for people other than the “campers”? Can campers invite guests to the facility?

The large square footage of the bar (5,500 sq ft) and the restaurant (10,108 sq ft) clearly show that the intended use is not ancillary to 75 “camping” spaces. The footprint of the bar and restaurant are large for even commercial public facing food and beverage establishments.

What is the purpose of 17,600 square feet of public space?- 7200 sq ft of “workshops”, 5,000 sq ft of “art barn”, a 2400 sq ft “yoga deck” or 3,000 sq ft of Pool Patio? Who exactly is allowed to use these facilities? How will the usage be enforced? If Special Events are allowed will the terms be spelled determined as part of the Conditional Use Permit approval? How will this impact the Environmental analysis?

The project description should clearly align with and show how the project’s “Support Buildings” meet the Rural Living Conditional Use zoning definition of a campground use. § 810.01.050 Definitions,

(e) **CAMP** or **CAMPGROUND**. (See Land Use Tables.) A site used or intended for use for temporary occupancy by campers traveling by automobiles or otherwise, which may include individual campsites, but where utility hookups for recreational vehicles are typically not provided. See also **RECREATIONAL VEHICLE PARK**. Other types of camping facilities regulated by this Development Code include the following.

(1) **CAMP, ORGANIZED**. A site with program and facilities established for the primary purpose of providing an outdoor group living experience with social, spiritual, educational, or recreational objectives normally for five days or more during one or more seasons of the year.

(A) These camps are located on a permanent site and have a well-defined program of organized supervised activities in which campers are required to participate. There is present at the camp a qualified program director and a staff adequate to carry out the daily program activities, which are mainly out of doors.

(B) An establishment that rents or leases facilities on an individual family or group basis for the principal purpose of sporting or other unorganized recreational activities are not considered an organized camp.

4. The Trip Generation Analysis and Vehicle Miles Traveled Analysis is biased and uses the incorrect Trip Generation factors which substantially underestimates the peak hour vehicle traffic impacts.

The traffic consultant's site plan show a 90.5 acre "temporary parking" area, commercial serving sized- support, restaurant, bar, "support building"/event facilities and a large music amphitheater yet the traffic analysis was calculated using very low trip generation rates applicable for a traditional campground rather than a "Resort" or "Entertainment Venue."

A 90.5 acre "temporary parking" area (assuming 150 cars parked per acre) on 90.5 acres would amount to 13,575 cars yet IEG makes no consideration in their analysis of how these cars would impact traffic.

5. Instead of providing an objective analysis of the project's traffic impact, Integrated Engineering Group met its objective to "demonstrate that the proposed land use and intensity" was "exempt" from a full Vehicle Miles Traveled or a Traffic Impact Study.

"June 15 2021

*Integrated Engineering Group (IEG) is pleased to submit this VMT Assessment Memorandum (memo) for the proposed camp site located within the County of San Bernardino. The proposed project includes 75 campsites with ancillary land uses for on-site visitors use only. **The objective of this memo is to demonstrate that the proposed land use intensity qualifies the project to be exempt from preparing a full VMT analysis consistent with the guidelines set by the County of San Bernardino Transportation Traffic Study Guidelines dated July 9, 2019.***

August 3 2020

Integrated Engineering Group (IEG)

*"The proposed project includes 20 clamping lofts, 20 teepee sites and 35 glamping sites. **The objective of this memo is to demonstrate that the proposed land use and intensity qualify the project to be exempt from the requirement of preparing a traffic impact study (TIS) consistent with the guidelines set by the County of San Bernardino Transportation Traffic Study Guidelines dated July 9, 2019.**"*

Here is the IEG Trip Generation calculation using a Campground trip generation rate.

PROJECT TRIP GENERATION

The Trip generation is a measure or forecast of the number of trips that begin or end at the Project site. The traffic generated is a function of the extent and type of development proposed for the site. These trips will result in some traffic increases on the streets where they occur. Project vehicular traffic generation characteristics are estimated based on established rates, contained in the *ITE Trip Generation Manual*, published by the Institute of Transportation Engineers (ITE). The proposed Project ITE average trip generation rates and trip calculations summary are presented in **Tables 1 and 2** respectively.

**Table 1
Project Trip Generation Rate**

Land Use ¹	Units ²	ITE LU Code	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Campground/Recreational Vehicle Ground	OC	416	0.08	0.13	0.21	0.18	0.09	0.27	-

¹ Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Tenth Edition (2017).
² OC = Occupied Campsite

**Table 2
Project Trip Generation**

Land Use ¹	Intensity	Units ²	AM Peak Hour			PM Peak Hour			Daily
			In	Out	Total	In	Out	Total	
Campground/Recreational Vehicle Ground	75	OC	6	10	16	13	7	20	-
TOTAL			6	10	16	13	7	20	-

¹ Trip Generation Source: Institute of Transportation Engineers (ITE), Trip Generation Manual, Tenth Edition (2017).
² OC = Occupied Campsite

Table 2 summarizes the trip generation based on the proposed land use intensity associated with the Project. As shown on **Table 2**, the proposed project is anticipated to generate a total of 16 AM peak hour trips and 20 PM peak hour trips.

Here are the actual Trip Generation Factors that should have been considered. The most appropriate Trip Generation Factor may be a Resort Hotel with some additional factors included for large events.

930	Fast Casual Restaurant	1,000 SF GFA	14.13		
93	Quality Restaurant	1,000 SF GFA	7.80		
932	High-Turnover (Sit-Down) Restaurant	1,000 SF GFA	→	9.77	9.80

LOGGING			
31	Hotel	Rooms	0.60
31	All Suites Hotel	Rooms	→ 0.36 0.17
31	Business Hotel	Rooms	0.32
32	Motel	Rooms	0.38
33	Resort Hotel	Rooms	0.41
RECREATIONAL			
41	Public Park	Acres	0.11
41	Campground / Recreation Vehicle Park	Acres	0.98
42	Marina	Berths	0.21
43	Golf Course	Acres	0.28
43	Miniature Golf Course	Holes	0.33

6. The traffic analysis makes no rational attempt to estimate the development's probable usage and peak traffic impact per hour. In my opinion given the size of the "Support Facilities" the development could easily exceed both SBC and CalTrans significant environmental impact level of 100 additional trips per peak hour.

Given that the access to this facility is adjacent to Highway 247-It is likely that the project vehicle trip impact could be mitigated with additional traffic control, however the main point should be made that this type of commercial use traffic is not compatible with Rural Living Zoning and that the intended use is not a "Campground".

What is being proposed is clearly a resort and event center (not a low impact traditional "campground") and neither the report or mitigation should not be approved.

A NOP/Negative Declaration/Environmental Impact Report representative of the actual project must be prepared to determine any mitigated and unmitigated project impacts.

I am requesting that the Conditional Use Permit be denied for the following reasons.

1. The proposed project contains elements that are not allowed by the zoning code for Residential Rural Living RL- Conditional Use Permit for a Camp, Campground, Campground Organized.

The Draft Initial Study / Mitigated Negative Declaration (IS/MND) "Project Title" calls the project "Resort Camping" and as such the project should be denied under SBC Ordinance [§ 82.02.030 Allowed Land Uses and Planning Permit Requirements](#).

2. Approval of this project (which clearly contains uses specific to Commercial zoning) on Residential Rural Living property would be spot zoning and set a precedence for other similar facilities in residential areas.

These commercial uses are as follows-

Commercial entertainment - Outdoor

Fitness/health facility

Sports or entertainment assembly

Restaurant, café, coffee shop, Bar

Lodging - Hotel or motel , Resort

Event Center

3. San Bernardino County's current use of Administrative Permits and Conditional Use permits CUP (for Short Term Rentals, Glamping, Camping and Alternative Structure STRs) may be in conflict with CA State law..

The County does not have a complete General Plan as it has approved a Land Use Plan but not the Housing Plan. The Housing Plan is expired. It is not known whether a SBC General Plan Extension has been filed with the California Office of Planning and Research.

SBC has not updated its zoning to comply with its new Land Use Element. As such they are allowing two sets of zoning, the current and what will be allowed with the newly approved Land Use Plan. SBC has failed to develop standards of guidance for the issuance of Administrative Permits and Conditional Use Permits for “Glamping Resorts”and Alternative Structures.

Consideration of a CUP is a discretionary act. A CUP application tendered by a project proponent is considered at a public hearing and, if approved, is generally subject to a number of pertinent conditions permits. California Case law has established certain fundamental requirements for CUPs.

“Local governments must have a complete and valid general plan before they can issue conditional use permits (Resource Defense Fund v. County Santa Cruz (1982) 133 Cal.App.3d 800 and Neighborhood Action Group v. County of Calaveras (1984) 156Cal.App.3d 1176).”

“The authority to consider conditional use permits, delegated to planning commissions or other administrative bodies by elected officials, must include standards of guidance. These standards of guidance are provided to ensure that the delegation of discretion to an administrative agency is not unbridled and,thus, not invalid. The doctrine of the need of an ascertainable standard to guide an administrative body applies where the legislative body of a city attempts to delegate its law-making functions (Stoddard v. Edelman (1970) 4 Cal.App.3d 544).

The project definition fails to describe whether the “Camping” Lofts, Chalet or Tent are temporary or permanent. I do not see how SBC can approve a project or grant a “Conditional Use Permit” for either temporary or permanent lodging structure when they have no building or safety standards to base either the Environmental Impact, mitigation, Zoning/Conditional Use compatibility or even approve the design of the facility.

The Draft Initial Environmental Study/Mitigated Negative Declaration clearly shows that neither the Project Applicant, SBC Land Use Services or the project’s consultants can accurately describe the development or the intended use of this project—Therefore any approval of a Conditional Use Permit for this project would be subjective and legally invalid.

Regards, Kerrie Aley
Pipes Canyon

Biggs, Lupe

From: Chuck Bell <chuckb193@outlook.com>
Sent: Monday, April 18, 2022 1:43 PM
To: Morrissey, Jim
Subject: FW: Resort Camping Project Number PROJ-2020-00191

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Comments: Resort Camping Project Number PROJ-2020-00191 off Hwy 247 - Mitigated Negative Declaration.

From: Chuck Bell – Pres. - Lucerne Valley Economic Development Association (LVEDA) chuckb193@outlook.com 760 964 3118

We are part of a coalition of communities from Lucerne Valley east to Homestead Valley dealing with similar, rural land-use issues that affect all of us. One of our concerns is the amount of land-uses allowed in RL Zoning that are totally inconsistent with the basic intent of said ‘rural’ zoning. Our Lucerne Valley Community Plan contains a significant amount of RL - and its allowed uses would be detrimental to our land-use integrity, infrastructure and rural environment.

This from the project description:

*Summary: RoBott Land Company (Project Applicant) is requesting approval of a Conditional Use Permit to develop approximately 25 acres of a 640-acre parcel (Project Site) located at 2107 Old Woman Springs Road. The parcel is described as Assessor’s Parcel No. 0629-181-01 and has a **Countywide Plan designation of Rural Living (RL) and a zoning designation of Homestead Valley Rural Living (HV/RL-5).***

This from the Air Quality section.

*..is a campground that includes 20 camping lofts, 20 chalets, and 35 camping tents. The Project Site consists of approximately 290 acres of developable land. If the Project Site were to be developed for residential uses, 70 acres would account for street improvements and 230 acres would be designated for houses. **The Rural Living zoning district allows for a maximum density of 1 unit per 2.5 acres. Therefore, approximately 82 units could be built on the Project Site,***

The impact analyses of air quality, etc. etc. seem to be based on 2.5 acre parcels – not 5 acre parcels as the zoning seems to be. **If so** – it is all skewed in favor of the project. 5 acre residential parcel buildouts would have much less impact on the property than 2.5 acre parcels. So if the project vs. ‘residential’ comparisons are based on 2.5 acre parcels – it makes the project look more consistent with typical 2.5 acre residential impacts than the less dense 5 acre parcels – which seems to be the zoning.

So: Is there a difference between a ‘Countywide Plan designation of RL’ – and a zoning designation of ‘Homestead Valley Rural Living HVRL-5’? Is one is a density of 2.5 and the other 5? Which is it? If it’s 5 – that’s very low residential density which makes this project’s concentrated land-use intrusion even more intrusive, inconsistent and environmentally significant.

This is a glitch in the county system. RL is for residential land-uses. A campground – especially one like this - doesn’t and shouldn’t be a legal use in it. It makes no difference if it is a reservation only. It is a commercial project. It should only be allowed in a desert ‘commercial zone’.

Under CEQA it's valid to compare a project's impacts vs. what worst case could occur if as an alternative it got built out with the allowed residential units. But this one is not fair nor valid since 'commercial' (which is what this is) is a totally different animal than typical RL.

The report mentions fugitive dust during construction – but just relies on MDAQMD's fugitive dust rule which is never enforced. Nor is the County's rule in the Dev. Code which is very restrictive – neither of them real mitigation. The air quality mitigation needs to be specific – amount of grading allowed at a time immediately followed with water application – no grading/land clearing during windy days – continued stabilization until developed with facilities or paving – etc. "Best practices" don't work for desert land clearing/grading. Unless the ground is saturated with water – dirt (more than just PM 10 and 2.5) will blow off into downwind receptors and other properties.

Under CDFW's current restrictions during the Endangered Species Act review – Joshua trees probably can't be removed nor even transplanted. Can the applicant even get a 'take permit'? The 'mitigation' listed in the MND and the ability to move them may not reflect the reality of the situation.

The BLM ACEC is for cultural/historic resources and BLM needs to be directly consulted if not already. Just because only one tribe (so far) has responded to requests for comments – it doesn't negate the importance of these resources which must be on the property or nearby. If this area is rich enough in said resources to be designated an ACEC – more attention should be placed on specific impacts and the overall open-space environment associated with ACECs.

Noise generated by the campground – even without the amphitheater – will be significantly greater than from typical residential. It needs specific

mitigation – not just ‘compliance with the County’s Noise Element to the General Plan’. These campsites bring in urban-oriented populations with their boom boxes, etc. - more than just a nuisance to surrounding residential. There should be a set hour when radios, etc. get shut off – other noise restrictions, etc.

The traffic analysis is lame. 25 vehicles in and out in the AM and same for the PM are totally underestimated – and definitely more concentrated than typical residential traffic. The campers will be coming and going at all hours, visiting sites around the region – shopping – etc. A Right/Left turn pocket into the driveway should be required. It isn’t just about the ADT (Average Daily Traffic) from the project – but existing conditions - line of site on 247 from the driveway – the curve heading into Pipes Wash canyon - the posted speed on the highway (55?) – vehicles going a lot faster than that – some a lot slower - safety issues associated with the driving habits and ages of current local residents - etc.

THIS IS A COMMERCIAL PROJECT IN RESIDENTIAL ZONING. The IS/MND shines on what the project will do to the community’s custom/culture/land-use character - how inconsistent it is with the current community plan. 300 visitors – 75 campsites – 100 parking spaces – plus the long list of all the appurtenant facilities - all concentrated on 25 acres – doesn’t fit there. LUS should recommend denial. At the very least – this project needs a focused EIR.

Biggs, Lupe

From: Susan Betouliere <susan.betouliere@gmail.com>
Sent: Monday, April 18, 2022 1:48 PM
To: Morrissey, Jim
Subject: April 21st deadline --Comment for APN 0629-181-01, PROJ -2020-00191

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Dear Mr. Morrissey,

My husband Paul and I purchased a homestead cabin on 10 acres in 2007. We exit Hwy 247 (Old Woman Springs Rd) at La Brisa to drive to our property on Breezy Lane, Yucca Valley. Therefore we are in very close proximity to the proposed Flamingo 640 "Glamping" Project
PROJ-2020-00191, APN 0629-181-01

This photo was taken directly in front of our home. We are in plain view of the 640 acre parcel to the north of us.

(By the way did you notice that we do have desert tortoises in this neighborhood?)

We only learned about this ill conceived project a month ago, so I have not had the opportunity to study and **delve into it fully. I will speak to what I can.**

The RoBott Land Co. applicant claims “There are no desert tortoise occurrences documented on site or directly adjacent to it....Desert Tortoise are therefore currently absent from the Project Site”. **We find this statement to be careless, dismissive and suspicious! How was their study conducted? What time of year?**

The tortoise hibernate November to March and can spend 95% of their time in their burrows, (up to 30 feet underground)!

The Circle Mountain Biological Consultants performed a Focused Survey for Desert Tortoise and Western Burrowing Owl and General Biological Resource Assessment between September 18 and October 4, 2006 **on the same 640 acre site APN 0629-181-01. They spent 151 hours on the survey and found 7 tortoises, 29 burrows,**

109 fresh scat, 42 older scat, and two sets of tracks. They noted that “a majority of the tortoise sign was observed in Area 1, which comprises the upland, plateau area between Hwy 247 and Pipes Wash.” This is also the area of the proposed glamping development! **Since the tortoise is designated as a Threatened species by both the U.S. Fish and wildlife Service and California Fish and Game Commission, such impacts would be considered significant under CEQA.** Development of the property could result in the loss of occupied habitat and potential injury or death to animals occurring on the site, which would constitute “take” under State (CESA) and federal endangered species acts (FESA). Both the CDFG and USFWS must authorize incidental take, since both state and federal governments list the tortoise as threatened.

The Historical/Archaeological Resources Survey Report submitted to S.B County Planning Dept. prepared by CRM Tech April 9, 2020 states “the presence of the isolated artifacts demonstrates some sensitivity for **potentially buried prehistoric cultural remains** within the project area”. That said, if the project is approved will archeological monitoring be enforced?

The same Survey Report states, “The area is **susceptible to wildfires** during the dry season.” **Under no circumstances should large 700 square foot fire pits be allowed in this dangerous high wind area! Our lives and homes are threatened.** The developers from Beverly Hills have been

careless in their research and oblivious to the wind events in Pipes Canyon. Fires spread fast as we witnessed during the 2006 Sawtooth Fire. There is also an issue of the fire pits smoke drifting to the neighbors constantly.

We are grateful for this ideal location because of the constant breezes and fresh air!

Traffic safety is a real concern on Hwy 247 (OWS Rd.). There are already many collisions and reckless, speeding drivers. The addition of 300 visitors and 50 employees (and possibly 25,000 music festival attendees) entering and exiting on a hazardous unlit road is reckless and dangerous for all of us. We need a thorough **Traffic Impact Study**, more lanes the entire length of the highway and traffic lights. Bottom line--- the development should not be allowed.

The current zoning Homestead Valley Rural Living (HV/RL-5) is what draws us to love being here. It is peaceful and serene day and night.

If the Conditional Use Permit is granted it will change our neighborhood forever! This is the wrong location as it will also bring **noise and light pollution**.

There is no way that 300 vacationing visitors, possible concert venues and a helicopter will not be heard from surrounding neighborhoods.

Noise carries easily across the canyon as we have witnessed from neighbors occasional partying, loud talking and barking dogs.

Our night skies are currently perfect for comet & star gazing. It would be devastating to lose that. We need the Counties help in preserving the dark night sky.

The amount of light needed for a large development with hundreds of guests, plus ambient light from lodging units, party lights, headlights, etc. will ruin this experience of dark skies for all of us forever! We already see glaring headlights from the north coming directly into our home. Can you imagine adding cars from 75 campsites coming and going?

The Draft study done by the applicant is inadequate, deficient and downplays very important subjects.

At the very least a **thorough and unbiased Environmental Impact study must be conducted** and the voices of the community need to be listened to.

We along with many others in our community oppose this project. As a Rural Living community we don't want a development to add more

danger to our roads, cause a fire hazard, light and noise pollution, obstruct our views, and harm the precious natural environment.

Sincerely,
Susan and Paul Betouliere

Biggs, Lupe

From: Ariane Bicho <ariane.bicho@gmail.com>
Sent: Thursday, April 21, 2022 4:27 PM
To: Morrissey, Jim
Subject: Comments: Project # PROJ-2020-00191; Assessor Parcel Number (APN) 0629-181-01

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Jim Morrissey

jim.morrissey@lus.sbcounty.gov

Project # PROJ-2020-00191

Assessor Parcel Number (APN) 0629-181-01

Please accept this as my comments upon Project # PROJ-2020-00191, Assessor Parcel Number (APN) 0629-181-01, proposed for Flamingo Heights, on Highway 247.

I am submitting these comments as a concerned citizen and Flamingo Heights homeowner situated two miles north of the site. I am very concerned about the irreversible consequences this project will bring on the environment, quality of life and on the peaceful existence of the community. The community has already been damaged by the massive development of vacation rentals, especially since COVID, and I've noticed a dangerous reservoir of resentment growing and festering between locals and visitors and it is shattering the trust and confidence that members of the community have in our elected and appointed officials and in each other. With this in mind, **I respectfully request that the County proceed with a full Environmental Impact Report before proceeding.**

We already have **traffic problems on the Highway 247 scenic corridor**. Since I joined the community five years ago, the traffic along that road has noticeably increased and the accidents, many fatal, have also increased. **I am afraid to drive on 247 but have no choice as it is my only option.** I think that hazardous traffic transgressions rounding the curves going into and out of Pipes Wash will further increase with the addition of 200-300 guests every weekend, which means more accidents and danger to our community and to visitors to the region. How would this be prevented?

In the case of the "glamping" project, **development of this parcel would forever remove its ecological value.** This parcel is an important connectivity link between San Bernardino Mountains/Sand to Snow National Monument, Bighorn Mountain Wilderness, Marine Corps base, and Joshua Tree National Park.

Parcel is in a priority conservation area, and land trusts are ready to offer fair market value for the property, protecting it in perpetuity. This project would block the entire width of this important wildlife connectivity corridor between the San Bernardino Mountains, Joshua Tree National Park, and the central Mojave. The state of California is planning for preservation of 30 percent of the state's lands and waters by 2030. This critical corridor should be part of that process.

Habitat destruction: This is important habitat for many species, including desert tortoise (state endangered), western Joshua tree (state threatened), western burrowing owl (California Species of Special Concern), migratory birds (protected under the migratory bird treaty act) and other wildlife, including desert kit fox, mountain lion. Creosote rings and Mojave yucca clonal rings are present as well, some of them potentially thousands of years old. While the Initial Report suggests relocating Joshua Trees and mature mesquites, we know that most of these species generally die after relocation, and so an entire forest will be lost. Also, the Desert Tortoise is not absent from the site according to neighbors who have seen them. On page 27, the Initial Study claims that the project won't contribute to habitat fragmentation because permanent structures would not physically block wildlife migration. But building and human

presence on the rim of the wash may very well dissuade wildlife species from migrating through Pipes Canyon if those species are wary of any contact with humans. Examples could include desert bighorn sheep and mountain lion. **I believe fuller discussion is needed.**

Noise pollution, light pollution, and air pollution are already harming our fragile ecosystem and this project would only accelerate those devastating effects. In the Initial Study, the county says that new light pollution and glare from the glamping site will not constitute a significant impact because the project will abide by the recently revised light trespass ordinance in San Bernardino County. It is my understanding that the point of the light trespass ordinance was to establish basic minimum standards to prevent glare and light trespass, leading not only to darker skies but also increased public safety. This makes sense in places where existing lighting is present, but it does not mean new construction in a formerly dark area will not introduce a new source of light where none existed before. In this case, **compliance with a law is NOT the equivalent to no impact.** I can assure you that it will have a significant impact on keeping the sky dark, which is one of the natural assets that draw so many to the region. Furthermore, the 12 feet in height for pole lighting does not guarantee compliance with the light trespass ordinance. The light sources will still be visible from neighboring properties, and (dangerously) from the highway.

Fire pits included in the proposal prompt the question: will operations include onsite staff who can restrict fire pit use during burning bans, high-wind events, or periods of high particulate matter counts? If not, who will be responsible for fire safety, and for environmental and public safety in general?

I would ask that the county confirm in writing that the owner/developer will not be allowed to develop the music festival venue with helipad described in the project documents, or the bar and restaurant also described. I appreciate that verbal assurances were conveyed to my community leaders from contract staff, but that change needs to be made formal and permanent. It looks like only the amphitheater has been dropped from the project at this point.

How do you plan on addressing the above and other community concerns? What avenue of recourse does the community who would be negatively affected by this have? How much more can the community take before it implodes? At the very least, don't let business interests skip steps that have been designed to protect our community.

Thank you,
Ariane Bicho

Biggs, Lupe

From: Nancy Brock <ncbrock1@hotmail.com>
Sent: Wednesday, April 20, 2022 4:08 PM
To: Morrissey , Jim
Subject: Resort Camping-Conditional Use Permit PROJ-2020-00191

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Mr. Morrissey,

Please do not approve this project. It is very harmful to the local wildlife and the local residents. The increased traffic, water use, wildlife corridor disruption is a disaster for this little rural community. Not to mention a proposed helipad and amphitheater!

Hwy 247 is already a very dangerous road. Just look at all the memorial crosses on the sides of the road. There is constant large truck traffic on it, and the glamping will greatly increase the danger of the road.

The wildlife is already struggling due to the drought and increased human habitation. This wildlife corridor needs to be preserved, not destroyed.

Thank you for your assistance.

Nancy Brock

Biggs, Lupe

From: John Calvert <johnm@fastmail.net>
Sent: Tuesday, April 19, 2022 11:50 AM
To: Morrissey, Jim
Subject: Project # PROJ-2020-00191 Assessor Parcel Number (APN) 0629-181-01

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

I am writing to add my concern and opposition in regards to PROJ-2020-00191 on parcel 0629-181-01.

This project is a major disaster for the environment and our local community. **This draft mitigated Negative Declaration is poorly done and insufficient, and the county needs to conduct a full Environmental Impact Report to address the deficiencies on a project such as this has major impact to the area and environment.**

The draft study suggests the project will have a less than significant impact on scenic vistas, scenic resources within a state scenic highway, and the existing character of public views of the site and its surroundings. Justification for this conclusion is that the built components of the project will be dispersed and less than 35 feet in height. County claims that positioning of the new buildings along the rim of Pipes Canyon Wash will not block views of the wash I would suggest that being up to code and compliant with zoning ordinances does NOT mean there's no significant visual impact. This project would block the entire width of an important wildlife connectivity corridor between the San Bernardino Mountains, Joshua Tree National Park, and the central Mojave. Conservation groups have expressed interest in paying fair market value for the land and managing it for conservation. The state of California is planning for preservation of 30 percent of the state's lands and waters by 2030. This critical corridor should be part of that process. On page 27, the Initial Study claims that the project won't contribute to habitat fragmentation because permanent structures would not physically block wildlife migration. But building and human presence on the rim of the wash may very well dissuade wildlife species from migrating through Pipes Canyon if those species are wary of any contact with humans. Examples could include desert bighorn sheep and mountain lion. Fuller discussion is needed. **This draft mitigated Negative Declaration is poorly done and insufficient, and the county needs to conduct a full Environmental Impact Report to address the deficiencies.**

There are hundreds of western Joshua trees on the developable section of the property. Joshua trees are a state protected species being considered for listing as threatened under the California Endangered Species Act.

Joshua trees may still be listed by the California Fish and Game Commission in June. The county suggests that as Joshua trees and other desert plants will be avoided or relocated, there's no significant impact. Joshua trees generally die after relocation, as do mature mesquites. Relocating a creosote ring might work technically but destroys the prehistoric value of the plant.

that there will be no impact to forestland because the trees will be moved elsewhere is pretty laughable. There are potential creosote clonal rings in excess of 4,000 years old on the site. Yucca clonal rings of similar age may exist. **This draft mitigated Negative Declaration is poorly done and insufficient, and the county needs to conduct a full Environmental Impact Report to address the deficiencies.**

The property is rich in wildlife:

The claim that there is no evidence of desert tortoises on the property is false and they have been observed on the property, 2006 study by leading tortoise experts found seven adult desert tortoises on the developable section of the property. The proponents' recent study finding no tortoises is methodologically suspect. Also observed are desert foxes, mountain lions quail rattlesnakes ground squirrel to name but a few.

The Study claims "LeConte's thrasher was neither observed nor detected on-site during the avian auditory and visual survey. Therefore, LeConte's thrasher is currently absent from the project site." However, community scientists have documented multiple observations of LeConte's thrasher within a mile of the site in the last three years. Though not a strong flier they do fly.

This draft mitigated Negative Declaration is poorly done and insufficient, and the county needs to conduct a full Environmental Impact Report to address the deficiencies.

Traffic management: HWY 247 has seen a major increase in traffic on this busy and dangerous highway yet no mention is made of the dangers to traffic on the highway having to negotiate potential glampers turning on and off HWY 247 as well as the increase in traffic from customers going to and from the site. A full traffic survey should be conducted with Caltrans being involved and the question of whether the highway is able to sustain the impact of increased traffic in the area should be fully addressed again **this draft mitigated Negative Declaration is poorly done and insufficient, and the county needs to conduct a full Environmental Impact Report to address the deficiencies.**

A helicopter landing pad is proposed again there is insufficient data on the effect on the environment noise pollution dust control and access. I am not an expert but as far as I know the FAA needs to be involved in this discussion. **This draft mitigated Negative Declaration is poorly done and insufficient, and the county needs to conduct a full Environmental Impact Report to address the deficiencies.**

Other issues that seem to be glossed over but are not limited to are:

Management of the water and effects on the aquifer. **This draft mitigated Negative Declaration is poorly done and insufficient, and the county needs to conduct a full Environmental Impact Report to address the deficiencies.**

Fire management from the use of open fire pits and the response time of the fire department with the closest station being on Yucca Mesa around 6 miles away, fire department cut back mean there is no longer a station in Landers. Concentrating campfires in this area upwind of most of the Morongo Basin also means a new source of particulate matter pollution, a serious concern in the Basin during both winter months and the peak of fire season. **This draft mitigated Negative Declaration is poorly done and insufficient, and the county needs to conduct a full Environmental Impact Report to address the deficiencies.**

Waste management and its control with 400 sites available this is a considerable amount waste to control both human and discarded trash. Pipes Canyon is a natural break in the mountains through which high winds from the west are often funneled. Placing a campsite for hundreds of people at the mouth of Pipes Canyon means that any campfires lit during high wind events could easily spread eastward, threatening habitat and people's homes. High winds also imply that trash discarded by careless campers will be distributed throughout the Landers area, an unsightly inconvenience to residents and a threat to local wildlife. **This draft mitigated Negative Declaration is poorly done and insufficient, and the county needs to conduct a full Environmental Impact Report to address the deficiencies.**

Light pollution and control **This draft mitigated Negative Declaration is poorly done and insufficient, and the county needs to conduct a full Environmental Impact Report to address the deficiencies.**

Noise pollution and control **This draft mitigated Negative Declaration is poorly done and insufficient, and the county needs to conduct a full Environmental Impact Report to address the deficiencies.**

The impact of the deterioration in the quality life of the residents in the area

All these issues are not satisfactorily addressed by the proposer or the county and **This draft mitigated Negative Declaration is poorly done and insufficient, and the county needs to conduct a full Environmental Impact Report to address the deficiencies.**

A housing project on this site was denied permit due to a nearby earthquake fault. Though Flamingo 640 would be a much smaller development than that previous proposal, the plan still incorporates structures (camping "lofts," as well as other guest amenities) that could pose a hazard during a quake.

The Morongo Basin needs additional camping capacity and preference should be given to sites that are closer to the park, are preferably on land that is previously degraded, and which are more readily accessible by highways capable of bearing the increased traffic. Additionally, we favor development of campgrounds that are economically accessible to more people so that families with less disposable income have a way to visit the high desert. Flamingo 640 meets none of these criteria. Instead, it would convert valuable conservation land surrounded by low-density rural zoning into a traffic-choked playground for the more-affluent.

Thank you for your time
John Calvert

Biggs, Lupe

From: John longstrider <longstrider06@gmail.com>
Sent: Thursday, April 21, 2022 9:35 AM
To: Morrissey , Jim
Subject: Flamingo 640

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Dear Sir,

I am writing this to let you know of my opposition to the Glam Camping project off of 247 in Flamingo Heights, Flamingo 640. This project represents everything us locals are against. Destruction of night sky, habitat, and all the rest I am sure you know. I feel this will just be the beginning of our desert's destruction. There is already a project for a hotel/resort in Wonder valley.

I am happy to discuss this in more depth if you desire. Places stop this project now!

Respectfully,
John Cava

From: [Peter Broderick](#)
To: [Morrissey, Jim](#)
Cc: [Brendan Cummings](#)
Subject: Center for Biological Diversity Comments on Resort Camping - Conditional Use Permit (Project No. PROJ-2020-00191)
Date: Thursday, April 21, 2022 3:06:33 PM
Attachments: [image001.png](#)
[2022-04-21 CBD Comments Resort Camping IS MND.pdf](#)

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Good afternoon Mr. Morrissey,

Please find attached comments of the Center for Biological Diversity on **Resort Camping - Conditional Use Permit (Project No. PROJ-2020-00191) Initial Study and Mitigated Negative Declaration**. The references for the letter are available for download at the following link: https://centerforbiologicaldiversity.org/centerforbiologicaldiversityorg/EkUxn7_HwFtBipv-00bIPdEBDTCQKT0mEzgJUTiFbJ9ECA?e=pNgfSd. Please include the letter and references in the County's file for the project.

I'd appreciate confirmation that you've received the letter and references.

Thanks very much,

Peter J. Broderick

Attorney
Urban Wildlands Program
Center for Biological Diversity
(503) 283-5474 x421

Biggs, Lupe

From: Brenda Cooper <windy_coop@yahoo.com>
Sent: Monday, April 18, 2022 4:17 PM
To: Morrissey, Jim
Subject: PROJ-2020-00191

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Dear Mr. Morrissey,

On behalf of myself and my entire family we would like to to strongly consider NOT granting a conditional use permit for the above listed project. We owned the property almost directly across the proposed project for the last 60 plus years and have lived on the property for the past 32 years. We currently have two houses on our five acres. Our neighborhood has always been a safe and quiet place to live and an excellent area to raise our children and grandchildren. This particular project would drastically change our quiet neighborhood to one that would have multiple out of town visitors who usually believe that nobody lives in these more remote desert areas and they are free to do whatever they may please. It would also cause additional traffic issues (i.e. accidents, speeding etc.) on an already dangerous highway (Hwy. 247). It would increase the noise level for our neighborhood as well as effect our night sky viewing. The fact that they are proposing to have a bar included in the project presents the problem of more drunk drivers on Hwy 247 as well as other issues that come along with individuals who may be intoxicated. Currently it takes our understaffed sheriff department a long time to respond to incidents in our area and this would put an extra burden on them as well. I am sure there are also environmental issues that this would effect as well.

Please consider the families, roadways and environment this project would effect before approving it.

We, as well as our neighbors are strongly opposed to this project.

Thank you for your time.

Mary Kelley,
Mary Brenda Cooper
Bryce H. Cooper Jr.

Biggs, Lupe

From: G. DaPonte <gldprod@yahoo.com>
Sent: Thursday, April 21, 2022 2:53 PM
To: Morrissey, Jim
Subject: PUBIC COMMENT RE: PROJECT NUMBER: PROJ-2020-00191 ASSESSOR PARCEL NO: 0629-181-01

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hello,

By now, I'm sure you're well aware of the extensive issues surrounding this proposed Resort Camping Project Number PROJ-2020-00191 or commonly known as the "HWY 247 Glamping Project" -

That said, I'll reiterate some of the MANY concerns about the very problematic areas with this "project".

Proper traffic study: Not Done

HWY 247 is extremely dangerous, heavy truck traffic, numerous fatal accidents etc. The additional traffic that would be generated this project has not NOT been adequately addressed. I'm sure your office has been made aware of the dangers that increased traffic flow at this site poses - apparently the developers have downplayed this aspect asserting that patrons would remain put at the site - not continuously leaving and entering to visit local attractions - we all know this won't be the case. The developers claims as to the traffic flow at this site are simply a convenient fabrication on their part - the traffic to and from their site will be much higher than they assert - A FULL TRAFFIC STUDY NEEDS TO BE DONE BEFORE ANY PROGRESS OF THIS PROJECT OCCURS.

Proper environmental impact study: Not Done

Animal habitat studies thus far are insufficient - apparently conducted by the developers in winter when less wildlife is present. Anyone who lives nearby can tell you about the prevalence of wildlife at the proposed location. The studies submitted by the developer claiming "no critical habitat" directly contradicts the COUNTY'S OWN prior studies of this area?????!!!

A PROPER ENVIRONMENTAL IMPACT REPORT MUST BE DONE.

Then there's the direct backtracking of the 2009 County zoning agreement protecting Rural Living Zones in this area of 247, restricting driveway access to 247... This proposed project is BLATANTLY outside of the already agreed upon "commercial corridor" along this part of Hwy 247. A ZONING CHANGE FROM RL TO COMMERCIAL IS NOT APPROPRIATE for this location, given the county's prior zoning agreement. This project belongs in an area that already has commercial zoning, not in a rural neighborhood.

There are SO many issues with this "project" - Helipad? Huge fire pits in a fire prone zone???, Excessive lighting/Drak sky disruption, This specific area is subject to flooding... The developers stated intention to use the site for music festivals with 25,000 attendees... This is a rural living zone not a zone for massive festivals. Crazy.

I could go ON and ON...

But in conclusion, I will tell you that I've not encountered ONE SINGLE LOCAL RESIDENT who is in favor of this project - This includes numerous in-person discussions, local online discussion groups, in person community meetings etc. Supervisor Rowe has been at these meetings and seen for herself that 100% of residents oppose this "project".

Once more:

NOT ONE SINGLE PERSON, who lives in this area, is in favor of this project. NOT ONE.

I would appreciate a response indicating that my comments have been received and actually read.

Thank You.
G. DaPonte
Yucca Mesa CA 92284

Biggs, Lupe

From: Carla Davis <carlaj1@mac.com>
Sent: Wednesday, April 6, 2022 10:26 AM
To: Morrissey , Jim; Supervisor Rowe
Cc: Warrick, Chris - LUS
Subject: Fwd: Amended Comment concerning PROJ 2020-00191, Parcel 0629-181-01, Pipes Wash Glamping Project aka Flamingo Project 640

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

We have discovered through the grapevine that a new report has been issued regarding the above described matter. As residents in Flamingo Heights, we had requested notification of new reports and/or decisions about this project. See email thread below. You did not do this directly. Please forward notifications and timelines for comments as now exist directly to us. Also please provide any new documents concerning this. We are unsure as to what, if any, the legal effect of lack of notice. But it sure makes it look like the County is unconcerned with hearing from residents effected by this project.

Carla Davis
David McKean
760-288-6290
833 Wamego Trail
Yucca Valley 92284

Begin forwarded message:

From: Carla Davis <carlaj1@mac.com>
Subject: Fwd: Amended Comment concerning PROJ 2020-00191, Parcel 0629-181-01, Pipes Wash Glamping Project aka Flamingo Project 640
Date: April 23, 2021 at 10:00:45 AM PDT
To: jim.morrissey@lus.sbcounty.gov
Cc: Supervisor.Rowe@bos.sbcounty.gov

We have studied the documents Mr. Roth submitted with his application for the CUP. They seem to be a product of templates used in the environmental consulting business. This was disappointing considering the huge impact this development would have on zoning, the residents, and indeed, the land itself. We remain convinced more neutral experts in each field would have much more to add to the developer's findings in re environmental impact.

We are very, very concerned about traffic. Mr. Roth's traffic expert indicated no analysis was needed, by simply doing the math. These folks have no idea the amount of semi-track traffic there is on OWS Road, or how many residents live out here using the road, or RV'er's traveling between JT and the Eastern Sierra. A traffic analysis is very necessary prior to any County approvals.

The amount of input with reference to traffic concerns from the community should be enough to inform the County it is on notice as to this important safety issue.

Additionally, we have made calls to the California Regional Water Quality Control Board to ascertain their interest in the project's plan for sewage disposal. We couldn't find much info in the developer's submissions regarding sewage disposal and effect on the groundwater. Maybe this is a matter of course that the project would be required to obtain a permit from the Colorado Basin Water Board. Please let the community know what is required in this regard. We will continue our efforts to contact this agency. It is very important for the community to understand this part of the issue. We do not want to end up like Yucca Valley, unregulated septic causing us all to either drink very bad water or spend a great deal of money for sewers in a rural living area. Water, ground water is our most important resource. Questions must be addressed regarding the project's impact on groundwater.

Finally, please add us to the list of persons to be informed as to any decisions the County comes to in regard to this worrisome project.

Thank you.

Carla Davis
833 Wamego Trail

Begin forwarded message:

From: Carla Davis <carlai1@mac.com>
Subject: Comment concerning PROJ 2020-00191, Parcel 0629-181-01, Pipes Wash Glamping Project aka Flamingo Project 640
Date: April 18, 2021 at 3:41:30 PM PDT
To: jim.morrissey@lus.sbcounty.gov
Cc: Supervisor.Rowe@bos.sbcounty.gov

This is to let you know that I oppose the granting of any conditional use permit or variance for this project to move forward. This project will negatively impact the landscape, the infrastructure, and community in the surrounding area. The project is the equivalent of a housing subdivision, providing 75 structures, septic, and parking spaces for tourists that may well come and go but remain the total number of approx. and at the very least 150 persons on this land. The plan also includes a private restaurant, bar, store, pool, offices, workshops, and all the attendant infrastructure such facilities/amenities require. I also note that the plan includes an area for a private heliport. I cannot even imagine the impact such a thing would have on the surrounding land and residents.

I am very concerned about traffic on OWS Road (to say nothing about helicopter traffic!). Traffic going to and from the project will be turning on a blind curve with semi trucks going North and South at all times of the day and night. At night, I can see from my house in Flamingo Heights a parade of cars traveling home after work. This traffic will be encumbered with 75 and more persons traveling to and from and making turns into and out of the glamping facility. There would be no amount of changes to this two lane highway to make it safe to accommodate the added vehicles. This does not even speak to the addition of exhaust fumes in the area.

I am also concerned about the impact of a minimum of 150 persons in a concentrated area using septic for sewage removal and the impact on groundwater.

Without environmental studies concerning the impact of this many people living in this close proximity in an area designated as rural living, I fear permanent residents who have chosen to live in a rural area will be left with denigration and not a thing to improve quality of life.

As an interested person and local resident in Flamingo Heights, I am requesting that the County hold a public hearing to review the impact of such a development. Please provide me with notice of any scheduled hearing in this regard.

I am also requesting a copy of the project owner's application for the variance and/or conditional use permit, and any supporting evidence the project submitted in support of this significant change.

Please consider this project and its impact on local resident carefully. It is a very private facility with so much elitist amenities, but its impact on the land and residents will be very public.

Thank you for your kind attention to this matter.

Carla Davis
833 Wamego Trail
92284

Biggs, Lupe

From: Carla Davis <carlaj1@mac.com>
Sent: Friday, April 8, 2022 3:34 PM
To: Morrissey, Jim
Cc: Warrick, Chris - LUS; Supervisor Rowe; safety.programs@dot.ca.gov
Subject: Comments regarding Resort Camping, Proj-2020-00191 Initial Study/Draft Mitigated Negative Declaration (IS/MND)

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April 8, 2022

TO: Jim Morrissey, Contract Planner

Chris Warrick, Planning Supervisor

Dawn Rowe, County Board of Supervisors #3

FROM: Carla Davis

760-288-6290

833 Wamego Trail

Yucca Valley, CA 92284

RE: Comments regarding Resort Camping, Proj-2020-00191 Initial Study/Draft Mitigated Negative Declaration (IS/MND)

This is to provide the County with comments regarding the above referenced matter. I am most concerned with the transportation portion of the IS/MND. The Planning department agreed with the project's engineer that the project is exempt from performing a Traffic Impact Study (TIS), because, among other criteria, the project is not located within 300 feet of an

impacted intersection and the project does not create safety concerns. The County's adoption of the project engineer's opinion as to the project's exemption from performing a TIS is in total disregard of this community's safety.

First, and most importantly, the County's Traffic Study Guidelines, dated July 9, 2029, specifically indicate that the Traffic Division determines if a TIS is required NOT the project's engineer. No reference is made to such a determination so I am assuming there is none. Further, the County's Traffic Division also should be allowed to reserve rights to require an applicant do additional analysis based on, among other issues, proximity to major roadways, such as SR247.

There is reference in the IS/MND, the Traffic Division issued a letter dated August 19, 2021, that approval is recommended based on the VMT Assessment Memorandum dated June 15, 2021. Once again, the VMT memo Traffic reviewed and upon which they based their approval was written by the project's engineer.

It is curious to note that the Traffic Divisions' guidelines indicate that projects do not have to perform a VMT assessment if it generates less than 110 daily trips (the resort estimates 200 trips daily) which corresponds to typical development potentials one of which is 12 hotel rooms. This project has 75 "hotel rooms". The Planning Department failed to note this hotel stuff and the project's daily trip number in their analysis as to VMT assessment exemptions.

Traffic drafted their opinion based upon the project's say-so. Planning based their opinion on the project's say-so. Everybody stayed in their respective offices and no one without an economic interest has even looked at the intersection of this project with SR247 and the dangerous conditions created by that nexus.

Please provide digital copies of the August 19, 2021, Traffic Division letter and the project's June 15, 2021 VMT memo.

Our community has had, in the past, meetings with Caltrans as to that agency's work on SR247 and the safety issues created by that roadway. Caltrans should also be consulted in regard to

what traffic impact this project would create on SR247, pursuant to SB 743, review of land use projects' potential impact to the State highway system, addressed through Caltrans LD-IGR program. In Caltrans Transportation Impact Study Guide, dated May 20, 2020, page 5, states in part:

“Beyond or in addition to the use of the VMT metric, determining how the State Highway System may otherwise be affected by a land use project may still be necessary at times, particularly as it relates to the safety of the traveling public.”

This project presents with one of those times. SR247 has become a short cut for semi-trucks traveling between I-10 and I-15. Anecdotally, coming home to Flamingo Heights from Yucca Valley this last Monday, I counted no less than 15 tractor trailer trucks. Last month, a double trailer semi-truck passed us at the approximate proposed entrance to the project, then passed a large RV in front of the turn lane by the Dollar General. Heavy trucking in-a-hurry has increased exponentially on the SR247 in the past several years, as well as RV'ers traversing from the Sierras to Joshua Tree and other locales. I cannot imagine the dangers presented by adding 200 daily right and left turns onto SR247 from the glamping resort. Someone is going to get hurt or worse and that would be on the County at this point. This is just my impression and my worry. A neutral, third party traffic impact study must be performed in detail before this project can be green lighted.

Biggs, Lupe

From: Kepi <kepi6@yahoo.com>
Sent: Thursday, April 21, 2022 12:26 PM
To: Morrissey , Jim
Subject: Conditional Use Permit PROJ-2020-001911

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Mr. Morrissey,
Please stop this "Glamping Resort" dubbed Flamingo 640. It is not good for the local residents, the environment or the desert wildlife. Why must our beautiful desert be exploited by big business who don't care about the land, who only see a big profit to be made. Similar to all of the "weed farms" that we have to deal with in our area. Please leave our desert alone before there is no more desert to enjoy.
Thank you for your consideration,
Debbie Cava
Landers resident of 36 years

Biggs, Lupe

From: Demerle <danielle.demerle@gmail.com>
Sent: Thursday, April 21, 2022 10:33 PM
To: Morrissey, Jim
Subject: Flamingo 640

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

To: Jim Morrissey

I'm writing as a concerned neighbor in opposition to the "Flamingo 640" glamping (and possible festival) development proposal Project #PROJ-2020-00191, APN [0629-181-01](#). Our family of 4 lives about a mile west of the site. We purchased our property 5 years ago, and cherish the peace, quiet, and natural habitat that the land offers. Both of our children are enrolled at Landers Elementary School, and meet the school bus at La Brisa and 247, the South corner of the land proposed for development. I have many concerns, and hope you will take those mentioned here to heart in your considerations for allowing this project to proceed without a thorough environment impact report.

First off, the traffic on 247/Old Woman Springs Road has gotten much worse in the last 5 years with the influx of new residents and tourists who are less than respectful. People from the city often follow with about 1 car distance and pass illegally, putting lives in danger. Imagining a site with parking for 350 people who will likely not know the roads, it's bound to cause problems on 247. If traffic were to back up, it could easily cause accidents in the blind curves, with emergency response having no fast way in. I saw in the paperwork that the petitioners were asking to NOT do research on the impact to transportation in the area, and this just seems nuts. On top of that, the idea of any large festival in the area seems so absurd, out of place, and downright dangerous considering the road infrastructure. It's also likely that residents in my area who only have 1 road accessing the neighborhood (La Brisa, West of 247) would find it nearly impossible to enter and/or exit the road.

Next, this is largely a rural residential area, and allowing this development would completely change the fabric of our community. I have no desire for or tolerance of noise pollution due to party or festival music, road and rumble strip noise, or helicopters that would likely be flying low over our home en route to/from Los Angeles. Allowing our neighborhood to be turned into a playground for wealthy city-folk who want to come wear their desert costumes and trip out for an Instagram weekend would be a slap in the face to the working people who moved here for a quiet, affordable place to raise a family and/or retire in peace.

Last but not least, the environmental concerns beyond noise and light pollution are not to be dismissed. Water supply, sewage management, additional trash being blown by the winds that often pick up - I find it hard to believe that these things would be treated properly. Thinking of all of the animals that would be displaced and disturbed, as well as the plants and Joshua Trees - it's not worth it to let developers, who picked up this parcel for the low price of \$350k, exploit the land and people for their profit. At the very least - **please require a thorough EIR to show respect to the community - historically low and middle class families - who deserve nothing less.**

I'd much rather see this area used for affordable long-term rental housing (which we are in dire need of in the area) or, for nothing more than wilderness. **As of last week another parcel of 519 acres which touches the southwest corner of the Flamingo 640 parcel has been put on the market, with marketing suggesting use cases similar to what's proposed for Flamingo 640. Please do the right thing and set a precedent so that developers and investors do not feel that they can easily come in and permanently destroy and alter these lands and the flora and fauna that reside here.** Once it's gone, it's gone forever.

Please do not hesitate to contact me for more information or my personal perspective.

Danielle Demerlé

Sent from my iPhone

Biggs, Lupe

From: DEREK GIRLING <dcgirling@verizon.net>
Sent: Tuesday, April 19, 2022 1:14 PM
To: Morrissey , Jim
Subject: Re: PROJ-2020-00191

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Jim, this is directly from the SB County website as to what constitutes a camp ground.

RECREATION EDUCATION & PUBLIC ASSEMBLY

Campgrounds

A site used or intended for use for temporary occupancy by campers traveling by automobiles or otherwise, which may include individual campsites, but where utility hookups for recreational vehicles are typically not provided. See also "Recreational Vehicle Park." Other types of camping facilities regulated by this Development Code include the following. (1) Camp, Organized. A site with program and facilities established for the primary purpose of providing an outdoor group living experience with social, spiritual, educational, or recreational objectives normally for five days or more during one or more seasons of the year. (A) These camps are located on a permanent site and have a well-defined program of organized supervised activities in which campers are required to participate. There is present at the camp a qualified program director and a staff adequate to carry out the daily program activities, which are mainly out of doors. (B) An establishment that rents or leases facilities on an individual family or group basis for the principal purpose of sporting or other unorganized recreational activities are not considered an organized camp. (2) Camp, Public. A site used or intended to be used, let or rented for camping purposes by two or more camping parties in trailers, tents or other movable or temporary dwellings.

Is this definition what you will hold the developer to for consideration of the CUP?

Thanks,
Derek Girling

Sent from my iPhone
Please excuse typos!

On Apr 19, 2022, at 11:33 AM, Morrissey , Jim <Jim.Morrissey@lus.sbcounty.gov> wrote:

Good Morning;

Here is my e-mail address. Just reply to me.

Jim Morrissey

Planner

Land Use Services Department

Phone: 909-387- 4234

Fax: 909-387-3223

385 N. Arrowhead Avenue, 1st Floor

San Bernardino, CA 92415-0187



Our job is to create a county in which those who reside and invest can prosper and achieve well-being.

www.SBCounty.gov

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Biggs, Lupe

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Biggs, Lupe

From: Konkani Coco Devi <speechdevi@gmail.com>
Sent: Wednesday, April 20, 2022 10:56 AM
To: Morrissey , Jim
Subject: FLAMINGO 640

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Jim Morrissey,

I am writing on behalf of the unincorporated community of Flamingo Heights. The Flamingo 640 project is sure to have a negative impact on the environment, beauty, safety and tranquility of the community. The proposed "glamping" project is not an asset and neighbors do not want this blight in their backyards. We no longer want businesses in residential zoned areas particularly when these entities are corporations with only monetary investments and no personal connection to the land.

Please consider and honor our wishes.

Konkani Devi

Biggs, Lupe

From: PAUL DOVE <pauldove@mac.com>
Sent: Wednesday, April 20, 2022 10:38 PM
To: Morrissey, Jim
Subject: Flamingo 640

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Mr Morrissey,

I am writing you again to express my concern regarding Project # PROJ-2020-00191, Assessor Parcel Number (APN) 0629-181-01, also known as Flamingo 640. If you read no further, do understand that I am demanding a complete, unbiased, and diligent **Environmental Impact Report be conducted.**

I trust that you will complete the due diligence to thoroughly consider the negative impact this project will have on the environment, the community, and the future of the desert as we now know it.

I am deeply concerned to learn that this project is being moved forward without a complete and diligent **Environmental Impact Report.** The Draft study that has been made available contained unsubstantiated claims clearly with the goal of trying to pass this project through backchannels without the support or consultation with the surrounding community and with blatant disregard of the local ecological environment.

The proposed development will have a disastrous effect this project will have on our lands and beyond, effects that will be irreversible. I am writing to urge you, at the very least, to persuade the county to require a **thorough and unbiased Environmental Impact Report before this project moves along any further. Truthfully, the project should be completely abandoned, but, should it proceed, a full EIR needs to be conducted.**

As you are aware, the Mojave Desert Land Trust and the Center for Biological Diversity have both deemed this a wildlife corridor, and this ridiculous project that clearly has zero regard for the environment would block the entire width of an important wildlife connectivity corridor between the San Bernardino Mountains, Joshua Tree National Park, and the central Mojave.

Again, clearly, this project has no invested interest in the local habitat and environment as demonstrated by the following: on page 27, the Initial Study claims that the project won't contribute to habitat fragmentation because permanent structures would not physically block wildlife migration. However, the extensive presence of humans camping and recreating on the land will dissuade wildlife species from migrating through Pipes Canyon as these species, such as

bighorn sheep, the mountain lions, and others, are wary of any contact with humans. **Clearly, an unbiased and complete EIR (Environmental Impact Report) needs to take place.**

Additionally, there are hundreds of western Joshua trees (*Yucca brevifolia*) on the proposed site of the development. Joshua trees are a state-protected species being considered for listing as Threatened under the California Endangered Species Act. At this time, the County cannot issue a permit to take (by removal or transplanting any individual) western Joshua trees.

The suggestion that any harm could be avoided by relocating the trees is extremely misleading as Joshua trees generally die after relocation, as do mature mesquites.

The initial study also lists other false claims including "There are no desert tortoise occurrences documented on-site or directly adjacent to it...Desert Tortoise are therefore currently absent from the Project Site". However, a 2006 study by leading tortoise experts found seven adult desert tortoises on the developable section of the property. Neighbors of the proposed site can provide evidence and have pictures of tortoises within the vicinity of the proposed development.

Additional environmental hazards include the following:

- the original study claims "LeConte's thrasher was neither observed nor detected on-site during the avian auditory and visual survey. Therefore, LeConte's thrasher is currently absent from the project site." However, community scientists have documented multiple observations of LeConte's thrasher within a mile of the site in the last three years.
- Other wildlife species using the site include burrowing owls, coyotes, migratory bird species, badger, desert kit fox, Gambel's quail, and Bendire's thrasher

Additional negative ramifications:

LIGHT POLLUTION

- Dark skies: new construction in a formerly dark area will introduce a new source of light where none existed before. Simple compliance with the law is NOT equivalent to no impact. The light sources will still be visible from neighboring properties, and (dangerously) from the highway.

TRAFFIC SAFETY

- Route 247 is a dangerous high-speed highway. Adding a destination which hundreds of vehicles will be entering and exiting on a particularly hazardous stretch of the road is potentially disastrous. First responder response times can be lengthy. Safety would require adding an additional lane and even a vehicle-controlled stoplight. A Traffic Impact Study is not only warranted but necessary and failing to do so is unacceptable. I demand you do a traffic report.

NO AMENITIES OPEN TO THE PUBLIC

- According to the Notice of Availability sent out to neighbors, Glamping "destination resort" with support facilities, none of which are to be open to the public, including restaurants/bar, reception area/store, trails and paths, recreation buildings, and a helipad on a 25-acre portion of a 640-acre parcel

- The county needs to confirm, in writing, that the owner will not be allowed to develop the music festival venue with the helipad, the bar, and the restaurant described in the project documents, We appreciate the verbal assurances from contract staff, but that change needs to be made formal and permanent.

FIRE SAFETY

- Winds get up to 20mph and upwards of 100mph in this proposed area. Placing a campsite for hundreds of people at the mouth of Pipes Canyon means that any campfires lit during high wind events could easily spread eastward, threatening habitat and people's homes. High winds also imply that trash discarded by careless campers will be distributed throughout the Landers area, an unsightly inconvenience to residents and a threat to local wildlife.

- Concentrating campfires in this area upwind of most of the Morongo Basin also means a new source of particulate matter pollution, a serious concern in the Basin during both winter months and the peak of fire season.

WATER

- Proponents' plans suggest that wastewater will be directed to a leach field on the property, north of the resort. A stormwater retention basin will be sited immediately east of the sewage disposal leach field. What volume of wastewater is projected to be disposed of via this leach field (considering perhaps 200-300 guests in a typical weekend in season)? Are hydrology studies available that ensure this large addition of wastewater won't infiltrate into neighbors' wells (there are at least 61 domestic wells within a few miles downstream) or the aquifer serving Bighorn Desert View Water Agency? Would stormwater capture from the project's hardened surfaces accentuate this percolation of sewage?

- Water use: the Initial study says that the project would consume 18,150 gallons of potable water per day, a bit more than 20 acre-feet per year. The study compares this to an estimate of 14,568 gallons per day were the site to be developed to its maximal footprint for residential use at 82 units. The failure of attempts to develop residences on the land due to seismic hazards is not mentioned, nor is the fact that not developing the land instead of developing the resort would consume zero gallons per day.

SEISMIC ACTIVITY

- A housing project on this site was denied permit due to a nearby earthquake fault. Though Flamingo 640 would be a much smaller development than that previous proposal, the plan still incorporates structures (camping "lofts," as well as other guest amenities) that could pose a

hazard during a quake, and which may disqualify the project from obtaining a Conditional Use Permit.

There is much more to be said about the lack of thorough consideration of how Flamingo 640 would negatively impact the community, the desert ecosystem, and environment. Essentially, the developers want to convert valuable conservation land surrounded by low-density rural zoning into a traffic-choked playground for the more affluent.

I demand the issues I have pointed out be addressed and again, will not be satisfied until a thorough and unbiased Environmental Impact report is conducted.

As a Rural Living community, we do not need a private "resort" experience or "hotel" in a rural zoned area that would do nothing to our community except add danger on the roads, add unnecessary hazards in an area already distinguished as a threat from wildfires, knowingly disrupt and destroy the natural environment, pollute the area with noise and light and change the character of our community irreparably. If one of the listed "objectives" for this development is to relieve camping congestion in the National park, then a safe and small public campsite and trails would do much less damage, not a private resort experience out of the price range of the residents who live here, or campers who would otherwise camp in the national park.

Sincerely,
Paul Dove
Resident, Landers
1025 Singletree
Landers, CA 92285

Biggs, Lupe

From: Laura Emerick <lauraemerick@ymail.com>
Sent: Wednesday, April 20, 2022 9:17 AM
To: Morrissey , Jim; Morrissey , Jim
Subject: Flamingo 640 Proposal, Conditional Use Permit PROJ-2020-00191

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

To: San Bernardino County Supervisors, Jim Morrissey
Re: Flamingo 640 Proposal, Conditional Use Permit PROJ-2020-00191
Date: Wed., April 20, 2022

Dear San Bernardino County Supervisors,
The Glamping Gold Rush is on! Investors from all over the world are willing to pay cash to get a piece of the Morongo Basin, to scrape and build something that they can quickly re-sell to other investors.

Like so many current profiteering projects, PROJ-2020-00191 is not concerned with traffic impacts on State Route 247, law enforcement's ability to put more officers on this road, or where their imagined employees will live and how far their commute will be (further impacting increased use of State Route 247).

The current conditions of the Morongo Basin's vehicular infrastructure and lack of affordable rental housing are CENTRAL to every investor's imagined business plan. Investors can ask, but it's YOU, the COUNTY SUPERVISORS who will determine both the future economy and ecology of the Morongo Basin.

What will the Morongo Basin be like in 50, 100 or 1,000 years? Will there be enough water for a residential human population? Will the scraped parcels become forever-dust parcels? To what degree will the future economy be tied to the health of this Mojave desert?

Please make decisions that carefully plan for growth, that ensure an adequate and safe water supply for today's current population numbers, that fund and build good roads and public transportation options, that identify or build housing for proposed employees. The tourists are coming! The retirees are coming! But who is going to scrub those toilets, make those beds or repair that leaky faucet? Countless investor proposals are going to make matters only worse - until the County improves the Morongo Basin's infrastructure and housing availability.

From Pioneertown to Wonder Valley, this area up for sale to the highest bidder. How much damage should one investor group be able sell off to the next investor group?

Laura Emerick
Morongo Basin Resident

Biggs, Lupe

From: Michael Endo <contact@michaelendo.com>
Sent: Monday, April 18, 2022 1:36 PM
To: Morrissey, Jim
Subject: STOP Project # PROJ-2020-00191, Assessor Parcel Number (APN) 0629-181-01

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Mr. Morrissey,

Thank you for taking the time to read through the numerous emails I am certain you are receiving about this proposed "Glamping" site in Flamingo Heights. I am distressed to hear that this project may be moving forward without a proper Environmental Impact Report and against the wishes of a majority of the community. None of my neighbors are excited about this project and are deeply concerned about the impact this site will have on the quality of life of the people and animals who live here. There are numerous endangered or threatened species that reside in the proposed site and the scale of this project would deeply impact everyone's quality of life.

Below are list of some of the concerns I have about this project:

Increased traffic on a highway and resulting air quality issues and the proposal under reports how many vehicles will be entering and leaving the site daily The proposal includes a helipad, which, again, will dramatically affect air quality and though both emissions and the dust and debris helicopters kick-up. There have been verbal assurances that the music venue, restaurant, and helipad would be excluded, but they remain in the proposal or the exclusions are not formally in the document.

Light pollution

Noise pollution

Water use and waste water disposal

Flamingo 640 would convert valuable conservation land and the surrounding low-density housing into a traffic and noise choked amusement for affluent visitors to our desert. There is no added benefit to our community. Any jobs this project may create will be fleeting during construction and then scant once it is running. It is a project spearheaded by a company that exists outside of this community looking to cash-in on the recent increased interest in the desert. We are a rural community that doesn't need a resort or a private hotel. We need projects that will relieve congestion at our already fantastic attractions, not create more congestion. Simple camp grounds, open to all, are more cost effective and offer community benefit.

Thank you again for taking the time to consider the concerns raised in this email.

Warm regards,

Michael

Resident of Yucca Mesa (unincorporated Yucca Valley) just south of the proposed project.

Michael Endo

contact@michaelendo.com

<https://gcc02.safelinks.protection.outlook.com/?url=http%3A%2F%2Fwww.michaelendo.com%2F&data=04%7C01%7Cjim.morrissey%40lus.sbcounty.gov%7Cdee64ca8b00c465b0ee208da217afeed%7C31399e536a>

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Eo7%2BPIr8jKqtDZxUMikF%2FrSjqNA7yzD895Unx3k%3D&reserved=0)

@ofotherspaces
@highdesertobservatory

Biggs, Lupe

From: Emily Endo <enachison@gmail.com>
Sent: Wednesday, April 20, 2022 7:19 AM
To: Morrissey, Jim
Subject: Project # PROJ-2020-00191, Assessor Parcel Number (APN) 0629-181-01

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Jim Morrissey,

I am deeply disheartened to find that this project is being moved forward without a proper and diligent Environmental Impact Report. After reading through the Draft study, I was shocked by the outright flimsy and dishonest work done to hastily try to pass this project through backchannels without the support or consultation with the surrounding community and with blatant disregard of the local ecological environment. I write here to impress upon you the disastrous effect this project will have on our lands as proposed, and hope that my voice along with the others of our community will manage to at the very least persuade the county to require a thorough and unbiased Environmental Impact Report before this project moves along any further. This project should be abandoned but if proceeds I DEMAND a full Environmental Impact Report (EIR).

The proposed project would block the entire width of an important wildlife connectivity corridor between the San Bernardino Mountains, Joshua Tree National Park, and the central Mojave. The Mojave Desert Land Trust and the Center for Biological Diversity have both deemed this an important wildlife corridor. On page 27, the Initial Study claims that the project won't contribute to habitat fragmentation because permanent structures would not physically block wildlife migration. But building and human presence on the rim of the wash may very well dissuade wildlife species from migrating through Pipes Canyon if those species are wary of any contact with humans. Additionally, there are hundreds of western Joshua trees (*Yucca brevifolia*) on the developable section of the property. A plan to relocate the Joshua trees has been mentioned, however, Joshua trees generally die after relocation, as do mature mesquites.

There are potential creosote clonal rings in excess of 4,000 years old on the site. *Yucca* clonal rings of similar age may exist. A 2006 study by leading tortoise experts found seven adult desert tortoises on the developable section of the property. The proponents' recent study finding no tortoises is methodologically suspect. The Initial study claims "There are no desert tortoise occurrences documented on site or directly adjacent to it...Desert Tortoise are therefore currently absent from the Project Site" Neighbors of the site have evidence to the contrary. Study claims "LeConte's thrasher was neither observed nor detected on-site during the avian auditory and visual survey. Therefore, LeConte's thrasher is currently absent from the project site." However, community scientists have documented multiple observations of LeConte's thrasher within a mile of the site in the last three years. Though they're not strong fliers, they do so on occasion, and it's hard to imagine a local population not taking advantage of a square mile of habitat.

In addition to a detrimental environmental impact this project will also have a negative visual impact on scenic vistas and light pollution. The report's specifications on night lighting is half assed and not specific enough. The light sources from the property will still be visible from neighboring properties, and (dangerously) from the highway.

There has also been no discussion of noise levels after 10 pm is included in the initial study. Unless the operators intend to enact and enforce a 10 pm curfew policy, this should be discussed in an environmental

assessment. Noise from traffic on Old Woman Springs road would be appreciably lower during night-time “party” hours than the 50.6dBA cited during daytime hours. The Helipad is nowhere discussed in the noise section.

Traffic safety is another concern. Route 247 is a dangerous high-speed highway. Adding a destination which hundreds of vehicles will be entering and exiting on a particularly hazardous stretch of the road is a bad idea. First responder response times can be lengthy. Safety would require adding an additional lane and even a vehicle-controlled stoplight. A traffic study is warranted. Additional traffic on a high-speed two lane cannot be treated with this level of disregard. In the last five years there have been more than a dozen accidents in the stretch of highway between Aberdeen and Reche that were serious enough to have had first responder involvement. Adding more than 100 cars exiting and entering the highway here during busy hours will prove dangerous, especially given drivers who pick up speed once they emerge from Pipes Canyon south of the project. A thorough traffic study, dedicated turn lanes, and perhaps a stop light should be considered if the project goes forward. The likelihood of extra costs to the county for first responders should be assessed. I demand you do a traffic report.

There has also been an inadequate analysis of fire safety in the report. Winds get up to 20mph and upwards of 100mph in this proposed area. Pipes Canyon is a natural break in the mountains through which high winds from the west are often funneled. Placing a campsite for hundreds of people at the mouth of Pipes Canyon means that any campfires lit during high wind events could easily spread eastward, threatening habitat and people’s homes. High winds also imply that trash discarded by careless campers will be distributed throughout the Landers area, an unsightly inconvenience to residents and a threat to local wildlife. Concentrating campfires in this area upwind of most of the Morongo Basin also means a new source of particulate matter pollution, a serious concern in the Basin during both winter months and the peak of fire season. The emissions of particulate matter and other pollutants from fire pits should be discussed in more detail; rather than simply assigning those emissions to a total category claimed to be at 0.0 tons per year of emissions.

The proponents’ plans suggest that wastewater will be directed to a leach field on the property, north of the resort. A stormwater retention basin will be sited immediately east of the sewage disposal leach field. What volume of wastewater is projected to be disposed of via this leach field (considering perhaps 200-300 guests in a typical weekend in season)? Are hydrology studies available that ensure this large addition of wastewater won’t infiltrate into neighbors’ wells (there are at least 61 domestic wells within a few miles downstream) or the aquifer serving Bighorn Desert View Water Agency? Would stormwater capture from the project’s hardened surfaces accentuate this percolation of sewage? The Initial study says that the project would consume 18,150 gallons of potable water per day, a bit more than 20 acre-feet per year. The study compares this to an estimate of 14,568 gallons per day were the site to be developed to its maximal footprint for residential use at 82 units. The failure of attempts to develop residences on the land due to seismic hazards is not mentioned, nor is the fact that not developing the land instead of developing the resort would consume zero gallons per day.

A housing project on this site was denied permit due to a nearby earthquake fault. Though Flamingo 640 would be a much smaller development than that previous proposal, the plan still incorporates structures (camping “lofts,” as well as other guest amenities) that could pose a hazard during a quake, and which may disqualify the project from obtaining a Conditional Use Permit.

The Morongo Basin needs additional camping capacity. However, preference should be given to sites that are closer to the park, are preferably on land that is previously degraded, and which are more readily accessible by highways capable of bearing the increased traffic. Additionally, as a community member, I prefer the development of campgrounds that are more economically accessible to more potential visitors, so that families with less disposable income have a way to visit the high desert.

In conclusion, Flamingo 640 it would convert valuable conservation land surrounded by low-density rural zoning into a traffic-choked playground for the more-affluent. I hope to see these comments addressed and

again, will not be satisfied until a thorough and unbiased Environmental Impact report is conducted. As a Rural Living community, we do not need a private "resort" experience or "hotel" in a rural zoned area that would do nothing to our community except add danger on the roads, add unnecessary hazard in an area already distinguished as a threat from wildfires, knowingly disrupt and destroy the natural environment, pollute the area with noise and light and change the character of our community irreparably. If one of the listed "objectives" for this development is to relieve camping congestion in the National park, then a safe and small public campsite and trails would do much less damage, not a private resort experience out of the price range of the residents who live here, or campers who would otherwise camp in the national park.

Sincerely,

Emily Endo Nachison

Biggs, Lupe

From: Sharon Fain <sharonifain@gmail.com>
Sent: Thursday, April 21, 2022 11:18 PM
To: Morrissey, Jim
Cc: Supervisor Rowe; COB - Internet E-Mail
Subject: 2107 Old Woman Springs MND Comments

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As someone with experience doing CEQA, I find the ISMND lacking on many issues, including:

- 1) Page 12: "County of Jurupa Valley" is a city in Riverside County and is not in the County of San Bernardino.
- 2) As case study has to show and based on recent court rulings, analysis of offsite noise impacts are required under CEQA. Onsite analysis of noise impacts would be considered reverse CEQA and not appropriate for this study. Noise analysis must include offsite receptors. The project site abuts a noisy highway and the sensitive receptors are not necessarily located along the highway. The sole noise that was measured was taken right next to a busy highway.
- 3) ISMNDs are expected to characterize existing noise levels and this study does not do that.
- 4) Page 56 of the IS/MND: Does not address offsite noise impacts due to the use of operational facilities by aircraft. Air traffic would be increased by operation of the proposed project.
- 5) Page 21: "Traffic along the subject roadways would need to double in average daily traffic volumes to see a 3 dBA increase in noise level." This is incorrect. The daily traffic does not need to double to see a 3 dBA increase. Traffic doubling at point in the day would increase noise by 3 dBA.

Traffic Impact on ISMND

1) Page 61: The traffic analysis relies on plan consistency with the County of San Bernardino Transportation Traffic Study Guidelines. To qualify as exempt the project must not generate 100 or more trips without consideration of passby trips during any peak hour. Project provides accommodation for up to 75 campsites including 20 structures that are 1000-2000 sq ft each, 35 sites that are 220 sq ft each, and 20 sites that are 850 sq ft each. In addition to the accommodations there is a 2288 sq ft retail store, a 3,000 sq ft pool, 7,200 sq ft of workshop space, 5,500 sq ft art barn, 10,108 sq ft restaurant, 5500 sq ft bar, 25,000 sq ft storage area, 2,400 sq ft yoga deck, onsite sewage treatment and a 212 sq ft garden. It is anticipated that there will be 300 visitors when fully booked. It is estimated that the project will require an additional 50 employees.

Analysis does not adequately demonstrate why there would not be more than 100 trips during a peak hour.

2) Page 61, Question C: Northbound traffic on the 247 coming up from Pipes Canyon has two significant curves with traffic that is often of speeds of 80 mph or greater and many semi trucks passing by. There is no turnout or protected pocket on the site plan where the driveways are located. The highway is not designed to handle that many people turning left or right to turn onto the project site.

Air Quality on ISMND

1) Page 15: Analysis states that "subject to a CUP, the proposed project would be consistent with the zoning" and therefore consistent consistent with the County-wide plan and AQMP. The proposed project includes significant

restaurant and retail uses which is inconsistent with the underlying zoning and not an approved use. Although the argument could be used that these are accessory uses, the significance and depth of the commercial uses clearly illustrate that the campsites are the accessory uses to the significant activity. Therefore it is not consistent with the general plan or underlying zoning and therefore AQMP.

2) Page 17: City Park is a completely inconsistent land use due to the significant commercial use onsite. Analysis is not valid.

3) Page 18: As noted previously, flawed traffic analysis.

4) Page 19: Analysis references 2015 OEHHA guidelines for health risk assessment. As you know this guidance radically changed TAC emission estimates during construction. However, analysis does not use these guidelines. There is no TAC analysis because the ISMND states PM emissions do not exceed regional thresholds. As any air district knows, construction emissions no longer need to exceed regional thresholds to result in a significant cancer risk. Therefore, ISMND does not address TAC impacts during construction.

5) Page 20: Odor analysis does not address 58,000 sq ft sewage treatment area.

Biggs, Lupe

From: Sharon Fain <sharonifain@gmail.com>
Sent: Thursday, April 21, 2022 11:47 PM
To: Morrissey, Jim
Cc: Supervisor Rowe; COB - Internet E-Mail
Subject: Re: 2107 Old Woman Springs MND Comments

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It is unclear from any of the documents what the grading impacts will be on the Joshua Trees. A recent Incidental Take Permit by Northrop Grumman had a 93 foot radius study area around each Joshua Tree. The Plant Protection Plan does not illustrate consistency with state standards. It is not clear which of the 43 or so Joshua Trees will actually be removed. Unclear if consistent with CESA regulations. Please illustrate proposed takes.

As a nearby sensitive receptor, the ISMND is concerning.

On Thu, Apr 21, 2022 at 11:17 PM Sharon Fain <sharonifain@gmail.com> wrote:

As someone with experience doing CEQA, I find the ISMND lacking on many issues, including:

- 1) Page 12: "County of Jurupa Valley" is a city in Riverside County and is not in the County of San Bernardino.
- 2) As case study has to show and based on recent court rulings, analysis of offsite noise impacts are required under CEQA. Onsite analysis of noise impacts would be considered reverse CEQA and not appropriate for this study. Noise analysis must include offsite receptors. The project site abuts a noisy highway and the sensitive receptors are not necessarily located along the highway. The sole noise that was measured was taken right next to a busy highway.
- 3) ISMNDs are expected to characterize existing noise levels and this study does not do that.
- 4) Page 56 of the IS/MND: Does not address offsite noise impacts due to the use of operational facilities by aircraft. Air traffic would be increased by operation of the proposed project.
- 5) Page 21: "Traffic along the subject roadways would need to double in average daily traffic volumes to see a 3 dBA increase in noise level." This is incorrect. The daily traffic does not need to double to see a 3 dBA increase. Traffic doubling at point in the day would increase noise by 3 dBA.

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- 2) Page 17: City Park is a completely inconsistent land use due to the significant commercial use onsite. Analysis is not valid.
- 3) Page 18: As noted previously, flawed traffic analysis.
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- 5) Page 20: Odor analysis does not address 58,000 sq ft sewage treatment area.

Biggs, Lupe

From: idavid <idavid@idavidgraficks.com>
Sent: Wednesday, April 20, 2022 4:34 PM
To: Morrissey, Jim
Subject: Project # PROJ-2020-00191

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April 20th, 2022

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

Dear Planner Jim Morrissey,

This 640 Glamping project would be against the Homestead Community Plan if there was one still existing. It's now a baseless County "Community Action Plan" and now you're seeing REAL Community Action.

Please listen to the locals in their knowledgeable comments. If the California Western Joshua Tree Petition for Threatened Status gets approved for permanent status - this becomes a much more difficult project. How serious can we take the considerations of the proponent Robott Land Company, Inc (can there be a more ridiculous name?) when they threaten 25,000 music event attendees and/or a needless Helipad?

This project is also against current zoning by the County and already in a Wildlife corridor which the County seemed oblivious when zoning decades ago.

The 700 sq. foot fire pits seem to be a dangerous fantasy for the Flamingo Heights Community. This project site is distant enough from Joshua Tree National Park to not meet the JTNP's public visitor needs and seems to be a self-contained Glamping Resort that caters to elites and brings little to the local community besides traffic problems.

Besides the Joshua Tree concerns, it seems the desert tortoise survey is the typical Developer "NOPE, no tortoises here" when the locals can attest to tortoise sightings aplenty.

There'll be plenty more when this project gets to the real planning stage.
Thanks for your consideration,

David Fick
Joshua Tree
VP of Morongo Basin Conservation Association.

Biggs, Lupe

From: mike giblin <mgiblin1024@gmail.com>
Sent: Wednesday, April 20, 2022 9:39 PM
To: Morrissey, Jim
Subject: PROJ-2020-00191 Assessor Parcel Number (APN) 0629-181-01

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Mr. Morrissey,

As a homeowner in Flamingo Heights I have serious concerns about the destructive impact that Proj-2020-00191, APN 0629-181-01 (Robott Land Company) would have on the environment and quality of life for the neighboring residents.

- **TRAFFIC:** The section of Old Woman Springs Road (OWS) between Yucca Valley and Landers already suffers from excessive traffic. In the past 10 years the number of cars and commercial trucks has dramatically increased, resulting in safety, noise, and air quality problems. It is now common to see vehicles traveling at least 10 MPH over the 55 MPH speed limit and passing on double yellow lines if the car ahead of them isn't speeding as well. There have been numerous serious accidents, including several fatalities, on this section of road caused by drunk/impaired drivers and people driving excessively fast. Cars driving over the rumble strips on the center and edges of the road can be heard by residents that live nearly a mile away. Exhaust fumes can be smelled hundreds of meters away from the road. Building a large-scale camping facility in our neighborhood will substantially increase the traffic on OWS and exacerbate the safety, noise, and air quality problems in the area.
- **WATER SCARCITY:** There is already a scarcity of water in the area served by Bighorn-Desert View Water Agency. With most of our water coming from the over-allocated Colorado river, we don't have many other viable and sustainable options for a water supply. Larger water districts, particularly in Los Angeles, Orange, and Riverside counties are able claim a larger share of the water from the diminishing supply of the Colorado river. This project will require a substantial amount of water for the restaurant and bar, as well as for showers and cooling tents. The project also includes a water intensive pool. Additional water will most likely also be needed for dust abatement. Allowing commercial development in this part of Flamingo Heights threatens the water supply for all of our residents.
- **HELIPAD:** Helicopters are extremely noisy and disrupt wildlife and nearby residents. Having a helipad on site, even if used only occasionally, is completely incompatible in a rural residential neighborhood.
- **WILDLIFE:** As a homeowner in this area, I can confirm that desert tortoises live in this general area of Flaming Heights east of Highway 247 and extending into Pipes Wash. Constructing roads, buildings, parking lots, and tent platforms will have a destructive impact on this already rare—and threatened—species. I have also seen Le Conte's thrashers close to the proposed project area. I question the validity and methodology of surveys used in the Initial Study that state no desert tortoise or Le Conte's thrasher are in this area.

Regards,

Mike Giblin
(760) 819-5530

Biggs, Lupe

From: DEREK GIRLING <dcgirling@verizon.net>
Sent: Tuesday, April 19, 2022 11:35 AM
To: Morrissey, Jim
Subject: Regarding Resort Camping - Conditional Use Permit PROJ-2020-00191

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Derek Girling

56363 La Brisa Drive
Yucca Valley, CA 92284
dcgirling@verizon.net

Regarding Resort Camping - Conditional Use Permit PROJ-2020-00191

I own a home within 300' of the proposed Resort Camping Conditional Use Permit requested by RoBott Land Company. I have owned my home since 2014.

Given that this development requires rezoning a residential RL 5 area when there are nearby commercially zoned parcels, the bar for approval should be exceptionally high.

I have several concerns that would challenge the wisdom of granting this permit to this developer.

Furthermore, this developer does not have a verifiable record of completing and operating any projects of this size, scope, or nature. A failure to complete the development and operate it per the CUP would result in an irreparable eyesore on a designated scenic highway.

Zoning – the parcel, as all parcels adjacent is currently zoned RL 5. The project would require rezoning the parcel. The county worked with the local community (Homestead Valley Community Counsel) several years ago and designated parcels adjacent to the highway and north of this parcel as suitable and agreeable for commercial rezoning. This undeveloped parcel was intentionally not included in the proposed commercial zone. The county should honor that commitment. This development would not provide any utility to local residents. Re-zoning to benefit a single investor group over the objections of virtually all nearby stakeholders would be extremely detrimental to the community.

Public Safety – the proposed development is on a highly trafficked 2 lane scenic corridor with substantial truck traffic between the 10 and 15 Interstate freeways. Hundreds of cars turning into and out of the

development each day would pose a safety concern as well as tax our already understaffed CHP, Sheriff, and Fire Department resources responding to increased incidents. Drivers unfamiliar with our local roads would be expected to arrive and leave throughout the day and night. This corridor is also an emergency evacuation route in the event of an earthquake or natural disaster. A comprehensive traffic study must be required to accurately assess risk.

Environmental Concerns including Wildlife Protections, Sewage Disposal, Noise, Light Trespass, Air Quality

Wildlife - on my property nearly adjacent to the parcel I have personally seen and in most cases have photographic evidence of resident tortoises, desert fox, bobcat, coyotes, Great Western Horned owls, as well as numerous species of both native and migratory birds. This directly contradicts assertions made in the documents submitted by the developer. The county itself has documented this parcel as critical desert tortoise habitat.

Sewage – there will be substantial amounts of sewage created daily by a development of this scope with hundreds of guests. In the wash below the proposed parcel is a recharge basin for the aquifer. A sewage failure here could result in raw sewage leaching into our groundwater.

Noise – given the number of guests, noise complaints would be inevitable. The development would need to have 24-hour security responsive to complaints from neighbors. Additionally, the noise from the construction would be substantial. The number of truckloads of concrete required to build out the building foundations, swimming pool, septic system, and fire pits would be considerable.

Light Trespass – although the plan calls for lighting compliant with county ordinance, the volume of cars coming in and out each night with their headlights on, campers with flashlights, and campers in the large chalets and lofts would be hard to control. Our light resource is an important component of this rural community.

Air Quality – the volume of cars each day as well as the above mentioned construction traffic will negatively affect our local air quality.

Other Options – if the developer is serious about their intentions to develop a resort camping experience near the National Park, they should be encouraged to seek out a more appropriate commercially-zoned parcel closer to the park and its services. We definitely could benefit from more regulated lodging for park visitors but this specific parcel is not a good option.

Conclusions - Due to the numerous inaccuracies in the documents RoBott Land Company submitted with their application including an inaccurate description of local zoning (RL 5 vs RL 2.5) used to illustrate relative densities of residential use versus commercial use, failure to address the BLM designation of the parcel as being part of an Area of

Critical Environmental Concern, conducting wildlife surveys during periods of hibernation for local species, and material changes as to the nature of the development (initial plans included a 25,000 seat amphitheater), the county should not rely on any documentation submitted by the developer and should instead rely on a **comprehensive CEQA environmental impact report**, traffic study, seismic study, etc.

Please feel free to contact me anytime with questions.

Sincerely,


Derek Girling



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[Adjust](#)

 IMG_3335

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Thursday • Jul 29, 2021 • 5:15 PM

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IMG_0630

Apple iPhone 12

HEVC

No lens information

4K • 3840 × 2160 • 322.9 MB

59.94 FPS

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Thursday • Aug 6, 2020 • 8:09 AM [Adjust](#)

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Apple iPhone 8 Plus

JPEG

Telephoto Camera — 56 mm *f*2.8
9 MP • 3024 × 3024 • 4.1 MB

ISO 20 | 84 mm | 0 ev | *f*2.8 | 1/453 s

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Sunday · Aug 15, 2021 · 1:17 AM

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RingVideo_6996267331684439669

No camera information

H.264

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1080p · 1920 × 1080 · 1.4 MB

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Friday • Sep 3, 2021 • 5:48 PM

[Adjust](#)

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Apple iPhone 12

HEIF

Wide Camera — 26 mm *f*1.6

12 MP • 4032 × 3024 • 863 KB

ISO 32

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 Look Up - Plant >

Sunday · Apr 23, 2017 · 12:43 PM Adjust

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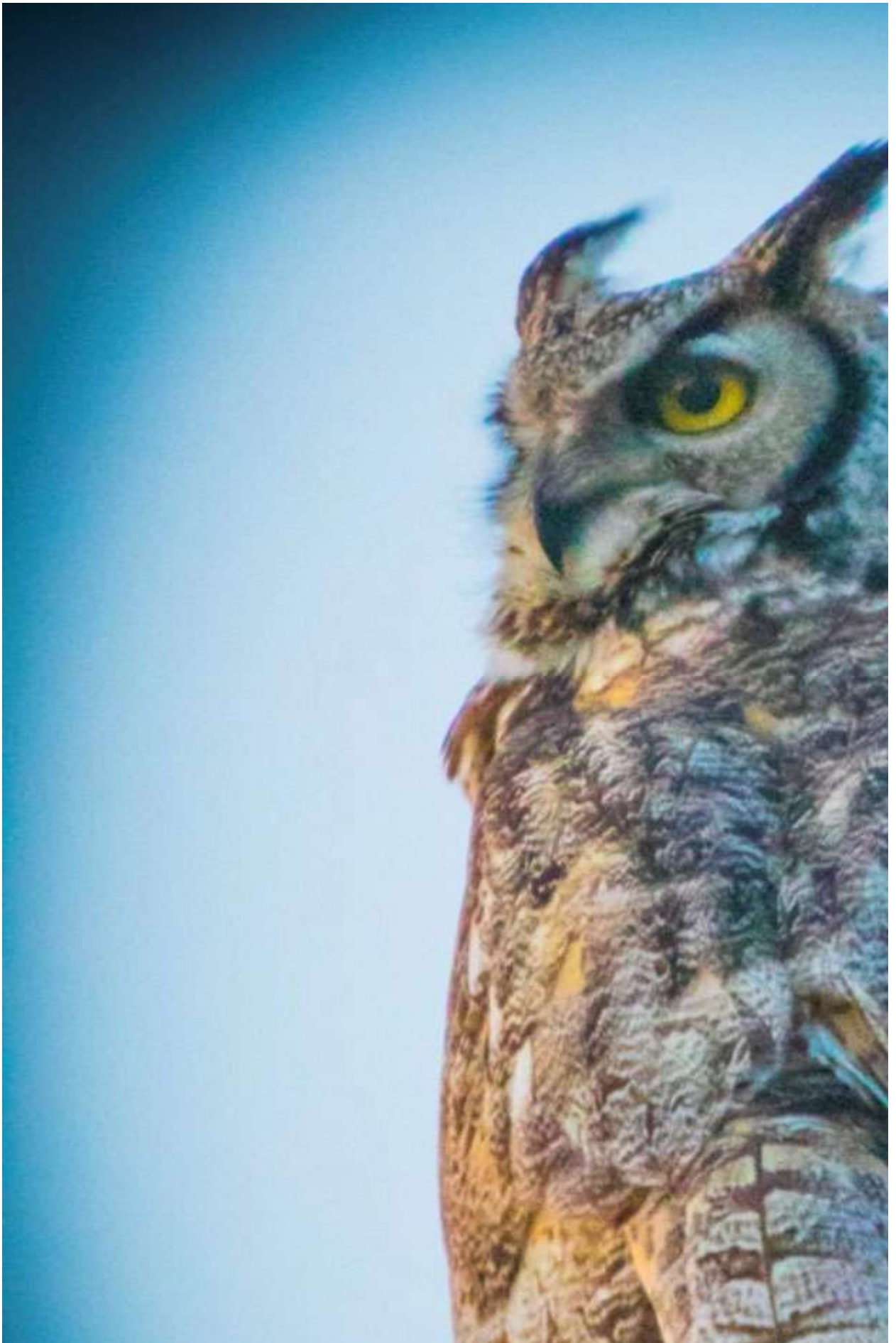
Apple iPhone 6s JPEG

Rear Camera — 29 mm f2.2
12 MP · 4032 × 3024 · 5.2 MB

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Sunday · Apr 2, 2017 · 5:18 PM

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Apple iPhone 6s

JPEG

Rear Camera — 29 mm *f*2.2
12 MP · 3024 × 4032 · 1.5 MB

ISO 25 | 146 mm | 0 ev | *f*2.2 | 1/400 s

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Biggs, Lupe

From: DEREK GIRLING <dcgirling@verizon.net>
Sent: Wednesday, April 20, 2022 1:38 PM
To: Morrissey , Jim
Subject: PROJ-2020-00191 Non conforming to County definition of Campground

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It appears that there is a conflict here. The chalets and lofts are not tents as proscribed by the county. Also, it has to be built to support specific group activities.

(B) An establishment that rents or leases facilities on an individual family or group basis for the principal purpose of sporting or other unorganized recreational activities are not considered an organized camp.

Doesn't this disqualify the request?

Approval of a Conditional Use Permit to establish a destination resort consisting of tent camping with support facilities that are not open to the public, including restaurant, bar, reception, store, trails and paths, and recreation buildings on a 640-acre parcel.

Accommodations: Up to 75 camp sites of three distinct types

- Camping Lofts – 1,230 square-feet (SF) each; 20 sites
- Camping Tents – 220 SF each; 35 sites
- Chalet – 850 SF each; 20 sites

Support Buildings/Areas

- Reception /Camp Store – 2,288 SF
- Restrooms – 1,120 SF each; 8 units
- Fire Pits – 700 SF each; 4 units
- Pool/Patio – 3,000 SF
- Workshops – 3,600 SF each; 2 units
- Art Barn – 5,500 SF
- Restaurant – 10,108 SF
- Agave Bar – 5,500 SF
- Helipad – 7,854 SF
- Storage Area: 25,275 SF
- Yoga Deck: 2,400 SF
- Retention area: 58,902 SF (subject to change)
- Sewage disposal area (e.g. septic system): 58,902 SF

Thanks,

Derek Girling

Biggs, Lupe

From: Louise Goffin <rodeo33rpm@gmail.com>
Sent: Tuesday, March 29, 2022 4:59 PM
To: Morrissey, Jim
Subject: Re: Flamingo Heights

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Mr. Morrissey,

I am writing to again follow up, as I have neither received an acknowledgment of my concerns nor, having expressed an interest in this matter, have I been notified of any public meetings or SB County's availability to hear the public's objections to *Resort Camping- Proj-202000191*.

Is this how things are usually handled?

It is my understanding that there is a period in which interested parties are notified and able to present the basis for which a full Environmental Impact Report is necessary. Given that the zoning here is both non-commercial and inappropriate to the environment in ways only a full EIR would highlight, I'm certain that Robott Land Co would want to know this before investing in building in an area that has protected wildlife among many other aspects that the Conditional Use Permit overlooks.

That being said, The County of San Bernadino has issued this permit, side-stepping a full EIR which is the exact reason there is a system for approving such enterprises. Without following the stringent guidelines set up to deter the very environmental impact that such a foot-in-the-door permit is veering towards, there can already be a negative impact on the environment by starting up this development.

The public deserves an adequate and full window to review the reports in-depth by people who are not the parties benefitting from the Flamingo Heights *Resort Camping- Proj-202000191*. It is unsatisfactory to have this conditional permit approved without the processes put in place to protect the non-commercial zoned lands.

If in fact Robott Land Company, Inc simply made a mistake and purchased the acreage before understanding the limitations of the area, I think it would be a service to the company to allow them the in-depth environmental information before they run the risk of greater investment with all the impact it will have and the potential lost revenue. There are much better sites for such a development, and I am not writing from the point of view that all progress is negative. I believe there are better sites where everybody wins, and where Robott Land Co. could work closely with people who understand the area and can assist in setting up an enterprise that'll serve both the community, the developer's business model, and show respect for the wilderness where it was designated uncommercial zoning for good reason.

I am proposing an extension of the public response time, given that many expressed an interest in the development of events with this proposal and were not notified. I only learned there was a meeting this

morning. Perhaps you might have informed me after the two letters I have written in addition to a phone conversation we had a year ago?

Thank you for taking the time to consider an extension.

I look forward to hearing from you.

Sincerely,

Louise Goffin
Flamingo Heights, CA

On Sat, Mar 19, 2022 at 1:04 PM Louise Goffin <rodeo33rpm@gmail.com> wrote:

Jim:

We meet again online.

As I wrote the last time this came up, I am part of a community that invested in my property to get away from noise and congestion. I have put up with developers in the city of Los Angeles for the last decade and I put down a hefty sum, raising the property values around me, to invest in rural living, without nightsky obstruction of lights or ambient sounds not of nature, without congestion of cars on an already perilously fast highway with tourists on OWS Highway.

I honestly do not understand your role.

Are your interests with "managing" the concerns of the residents and locals? Are you serving the developers agendas by fielding locals concerns so the developers can anticipate locals arguments and strategies?

No one, absolutely no one, who is local wants this.

This is all about outsiders screwing up the very thing we all treasure about living here.

I fully understand the developers thirst for this land to make money. Lands throughout the nation, not just California, have been lost to the big money of developers over the humble savings of locals.

You are in the position to stop this. I urge you to clearly understand: I am not one voice - locals DO NOT want this glamping site approved. If you don't care about the locals, and if you believe big business is good for the area, then please explain the nature of your role.

Since you are the point person to send protests to for San Bernadino County, where does it benefit the community to enable developers and ruin the very treasure that this wonderful area has to offer to people, residents who have invested their years and savings to sustaining and respecting the wildlife and quiet that flourishes in the absence of congestion and glamping sites?

I do hope you can relay back to the other county officials and the applicants that this site is unsuitable for their needs, as the locals will not have it.

I thank you for taking the time.

Yours sincerely,

Louise G
resident and homeowner
Cambria Ave
Flamingo Heights

On Apr 19, 2021, at 9:36 PM, Louise Goffin <rodeo33rpm@gmail.com> wrote:

Dear Jim,

I'm writing because I was going to close escrow on 1523 Cambria Ave in Yucca Valley tomorrow, and have delayed close of escrow since discovering plans to set up a glamping development just south of the property I'm purchasing. I, like many other residents, chose Flamingo Heights for its wildlife, quiet and desert sanctuary away from the noise of the city. I have concerns about air pollution and the fire hazard from the smoke from so many campsites. I have concerns about protected species and unsafe traffic conditions. And foremost, the intrusion on the value of the purchase I made by concert noise, not to mention helicopter noise pollution. These objections to the proposed project do not take into consideration what a long form detailed Environmental Impact Report would reveal.

I was not in town for the meeting today, however I wanted to voice my objections to this proposed development and would love to see the parcel south of OWS be protected so that there is no intrusion on the both the public lands and that private homeowners living in their dwellings are not subjected to those seeking only to turn the land into profit at the expense of the rich and diverse wildlife and ecosystem.

Thank you for considering my objections.

Sincerely,

Louise Goffin
310-740-5849

Biggs, Lupe

From: Louise Goffin <rodeo33rpm@gmail.com>
Sent: Tuesday, April 19, 2022 11:01 PM
To: Morrissey , Jim
Subject: PROJ-2020-00191 on parcel 0629-181-01
Attachments: Letter to Jim Morrissey 4-19-22 Flamingo640.docx

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Dear Jim,

Attached is my letter which adds detail to serious concerns and opposition to PROJ-2020-00191, on parcel 0629-181-01.

Sincerely,

Louise Goffin

Dear Mr. Morrissey,

I am writing to add more detail to my concerns and opposition to PROJ-2020-00191 on parcel 0629-181-01.

Given the incredible scope of this project and the irreversible potential harm it could bring to this area if approved, I strongly feel the County Board of Supervisors require a ***CEQA Environmental Impact Report*** and not approve Flamingo640's application for a ***Conditional Use Permit***.

Specifically, in light of the following, the existing report causes alarming concerns:

Zoning:

The Mitigated Negative Declaration states: "The parcel is described as Assessor's Parcel No. 0629-181-01 and has a Countywide Plan designation of Rural Living (RL) and a zoning designation of Homestead Valley Rural Living, yet the Resort/Campsite is a commercial project applying for a permit in a Rural Living Zone that is protected by the 2009 changes.

The Mitigated Negative Declaration is poorly and inadequately done, overlooking irreversible negative impact to the environment and rural surroundings. It has not fulfilled the qualifications for the protected HV/RL zoning. A comprehensive Environmental Impact Report under CEQA is necessary to reveal findings of significant impact on biological resources, traffic safety, noise and light nuisance to the surrounding Homestead Valley community. This inadequate MND glosses over such irreversible negative impact and feels like a shortcut grab for RBLC to sell the project to investors with a quick turnaround, less-costly study, and avoidance of reporting its real and actual impact on the environment. For the scope of this unquestionable *commercial* enterprise, a comprehensive Environmental Impact Report under CEQA should be required.

Further, San Bernadino's own website states:

"Land development applications, such as subdivisions and conditional use permits, undergo staff and Planning Commission review to assure conformance with adopted plans, regulations, and State law, including state and county environmental guidelines. Environmental impact reports (EIRs) may be required and mitigation programs are established and monitored."

With as much public outcry against the proposed Conditional Use Permit as there is and has been, on what basis can you not require a comprehensive EIR? It is my understanding that the primary role of Project Planner for Land Development is to protect the public interest in the fairness and integrity of land-use decisions. Public confidence in government depends on the integrity of its decisions, and the avoidance of bias and conflicts of interest is no doubt a factor in establishing that confidence. Given that Flamingo640 has irreversible environmental effects, *not* requiring a full EIR seems like there is bias to approve the Conditional Use Permit, in spite of its glaring flaws pointed out by the community directly affected; a community who cares about Wildlife Protection and the qualities of life they were assured of when they purchased real estate to live in Flamingo Heights and its neighboring communities. Approving this application by Flamingo640 will not only undoubtedly create danger and a long-lasting negative impact on endangered wildlife and traffic, but also set a precedent to other investors that SB County requirements can be pushed over without having to do a CEQA Environmental Impact Report for their projects. This invites additional pressure from outside the community to destroy the Countywide Plan designation of Rural Living (RL) when the RL Plan designation was put into place to be upheld.

Now, of course, you could give special privileges within the Rural Living (RL) zoning without changing the zoning. If you are asserting that this Conditional Use for a campground can be approved without changing the zoning from residential to commercial, then there needs to be a new application for the public to comment on with all the exemptions of residential zoning as part of the application.

The primary purposes of CEQA are to avoid, reduce, or prevent environmental damage, and foster an informed and transparent public decision-making process by providing information to decision-makers and the public concerning the environmental effects of projects either undertaken or approved by lead agencies.

It is crucial that applications such as Flamingo640 that serve outside investors don't become a routine matter of submitting inadequate reports with an intent to slide through environmental and zoning protections. Both residents and outside investors should have reason to respect the protections the County Board of Supervisors Staff and Planning Commission afford to local communities under their jurisdiction.

Amphitheater:

Others residents have relayed information received from you that the applicant has withdrawn the Amphitheater and Parking Component from the application. *If that is accurate, where can the public find the amended application for comments?*

Regarding Flamingo640's original plan's intention to hold concerts: Since any property owner can apply for a Temporary Special Event Permit of any size subject to conditions, then *any* entitlement conditions should specifically **prohibit** the property's use for any public event.

Impact on Residents:

We purchased our homes out of the city to live with the quiet of nature and the wildlife that is here. We have experienced the noise a single tractor can make operating within a mile. We experience violations of the Night Sky Ordinance and know how much one light can impact the ability to truly enjoy stargazing at night.

Noise and light pollution will undoubtedly be increased with the proposed project, when both are already things residents can and do complain about and have protections in place such as the Night Sky Ordinance, to ensure.

The proposed project will also create an intrusion, from the Glampsite's facilities and multiple vehicles, into the line-of-sight in the State Route 247 Scenic Corridor.

As for noise generated, the Noise Report poorly addresses the ongoing intrusion and nuisance of noise, both in the building process, and during its completion and operation. It attempts to measure decibels for a non-existent origin of sound. How can the decibel level be measured of something that doesn't exist? The Noise report is flawed.

Flamingo640's plan for a private helicopter for emergencies is yet another devastating intrusion on the rural zoning. If this is allowed without changing zoning, are we all allowed to build helipads on our properties? Once a helipad is there, the threat of vibration and noise disturbance is exponentially increased. It also creates the possibility of wealthy guests accessing the helipad for non-emergency use.

For light, noise and traffic nuisance and dangers alone, the single use parcel is not suitable for development. The presently-submitted report insufficiently addresses all of the above. The sought-after *Conditional Use Permit* should be rejected, and a full EIR required.

Community Concerns:

This project is driven by out-of-town investors. The disregard by the developers proposing to construct an undeniably commercial project outside the commercial corridor puts them at an advantage against other commercial investors who respect the appropriate zoning of their

venture. They are angling to get something for less and change the rules to suit the objectives of their investment. The possibility of benefit coming back to the community is disproportionate to the benefit to a single out-of-county investment company. Why should residents have to put up with having this next to our doorstep? The purchasers of this property did know the zoning when they bought the property. A previous project did not go through on the parcel. Any development of such a scope as this should understand the need to seek out a parcel that suits the size and environmental impact of their commercial venture. *Yet they are already selling it on their website without having approval as if they feel assured they will be able to do what they want.*

The property had an acquisition cost well below commercial market value because it was bought in a rural setting and now is seeking to turn a profit at the expense of irreversible impact to residents and a migration corridor for endangered wildlife. People in the community who invested in their properties did so because of its tranquil land in rural zoning, and to not be in a commercial area. They have a right to count on the protections of the Countywide Plan designation of Rural Living (RL) without allowing exceptions for dangerous firepits in high winds, noise, traffic congestion, and increased danger. An EIR should be required to produce findings for significant impacts to biological, cultural, visual resources, and traffic and highway safety, that are not determined in the less comprehensive MND.

The company who wants to build and sell Flamingo640 will likely have nothing to do with whomever buys and operates it. They will use the parcel to turn a profit from their development and go on to other things. The future of the wildlife corridor and the hundreds of Joshua Trees that they use to advertise "...spectacular wild landscape including hundreds of Joshua Trees..." all will be impacted by the decisions you make now... and forever. RoBott Land Company won't have any involvement in this area once they reach their investment goal of making a big sale. If San Bernadino County wants the property taxes by such a sale, the community is intent on conservation and environmental protection. Residents are resourceful and motivated to find ways to protect the land. RoBott Land Company should be required to do a full EIR if so motivated to turn this into profit. Perhaps it's a better choice for all concerned to move its project into a commercial zone instead of working against community concerns and objections to meet its goals.

Traffic:

Flamingo640's Trip Report does not address an accurate number of trips for the addition of 400 extra daily visitors to the proposed site, nor does it quantify other commercial elements (retail, restaurant, etc.) that are open to the public. Even for private guests, out of the 400 extra daily visitors, how often might they leave to visit other locations, restaurants and scenic sites? If it is a campsite, it is highly likely there will be multiple trips in and out, given that Hwy 62 and all its amenities is an approximate 12-minute drive away. Glam-Campers will be stocking up at Yucca

Valley grocery stores, gas stations, and visiting Joshua Tree's National Park. That's a lot of flow and congestion onto the two-lane arterial Old Woman Springs Road. It creates a danger and a nuisance when there are already too many traffic accidents. Extended blind spots and poor traffic visibility make it dangerous to pass obstructing vehicles and extreme caution is already needed when entering and exiting the normal flow of traffic on the 247. The potential for blockages and accidents on the winding, undivided route can cause backups to supply chain vehicles that rely on this one highway.

There is also the absence on the Trip Report of accounting for workers' vehicles. With the amount of development currently backlogged throughout the High Desert, the necessity for skilled construction labor from outside the area could also create congestion, adding more vehicles during just the building stage. Response times with law enforcement and ambulance services is already too high now with a much less populated stretch of the area than what will be with the proposed development.

Endangered Wildlife:

There is a known wildlife corridor within the property. We all have neighbors who have shown us photos of desert tortoises, desert foxes, and bobcats taken by motion-activated security cameras, all within 600 feet of the property that claims there are no endangered species nearby. Specifically, it is known that there are desert tortoises where it was wrongly declared that none were indicated in the proposal. The report is inaccurate and untrustworthy. A full comprehensive **CEQA Environmental Impact Report** should at the very least be a requirement to disclose whether endangered tortoises who spend part of their time underground, do in fact live on the property. The wildlife corridor is presently undisturbed and should remain protected.

Any development must be required to adhere to the county's regulations with respect to removal or relocation of any Joshua Trees, of which there are hundreds.

Intended Noise:

On page 2 of the Noise Assessment report, there is mention that the project owner would like to hold music festivals several times a year with as many as 25,000 attendees and specifically calls out the Hullabaloo Festival in Flagstaff as their example of the type of festival they'd like to have. The Hullabaloo Festival might see 25,000 people over the course of an entire weekend on a 2.5 acre park in a commercial zone off Route 66 in downtown Flagstaff, but it is entirely inappropriate, dangerous and not at all in the correct zoning to stage such an event in this remote and environmentally sensitive area, which the Flamingo640's sub-standard noise report overlooks. What one expects for noise and traffic in a city center of 70,000 people is not

comparable to what residents in a rural environmentally-sensitive area should have to contend with in Flamingo Heights. Additionally, as previously mentioned, the noise report fails to account for noise generated by a major source of significant nuisance noise and vibration – the proposed helipad.

Fire Risk:

There is a genuine threat to human life when 20-30 mph winds are not uncommon even during routine weather conditions and winds can at times reach up to 60 mph. Campfires and firepits are simply a terrible idea in a highly hazardous wildfire area. The project proposes four large fire pits, which could generate traveling embers and cause wildfires either on or off-site, or both. The project is immediately adjacent to San Bernardino County's FS-2 Fire Safety Overlay which underlines the area's susceptibility to wildfire. The addition of 400 campers daily increases the risk exponentially, and the resort-related growth in traffic would increase firefighters and emergency vehicle response times. Escape routes on the 247 – the sole artery that would get people out in a wildfire emergency – would be congested. People could be trapped and unable to get out of the area if the only highway in and out was blocked. Wildlife and Joshua Trees would also be destroyed in such a scenario, as would private properties. Water resources are historically low, contributing to the situation. Without question, it seems one of the conditions of this project should be that no wood or other solid fuel campfires be used in firepits or barbeques. There are clay logs, gas burning, smokeless and ember-less alternatives. Any campsite, private or commercial, should have an enforced no-smoking, no fire zone with a hefty penalty for violation.

Pollution

The number of vehicles for construction, guests, employees, and the service vehicles supporting the project would create additional dust and airborne emissions and chemicals that can travel to humans and wildlife, in a biologically-sensitive area. Numerous threatened and endangered species inhabit these lands and migrate through them. The Pipes Canyon Wash and its adjoining areas form a vital undeveloped migratory pathway, linking neighboring protected wilderness areas.

The proposed campsite will create several hundred pounds of solid human waste daily. The MND underestimates how much 400 guests a day would actually produce in waste. The number claimed doesn't add up to an average human's waste times 400. Septic systems would not be ideal for a project of this size and scope which includes a proposed restaurant and bar. A newly built sewer system should be mandatory. Residents utilize private septic systems and leech fields. There are no public sewer systems. Some residents rely on wells, utilizing ground water.

There needs to be a plan to deal with the regular draining of the chlorinated water from the proposed swimming pool. This water should not be allowed to drain directly into the desert and aquifer.

Evacuation Concerns In The Event of An Earthquake

The property is within one mile of the 1992 Landers earthquake, measuring 7.3, where property was destroyed. A 500,000 gallon water tank in Landers burst leaving the area without water for three days. The highway moved a full ten feet, leaving the main arterial route inaccessible to traffic. This project, as described in the case of wildfire, would, in the event of an earthquake, trap guests and employees from evacuating.

Are the property owners of the Glampsite required to pay hefty insurance fees to insure for loss of human life and infrastructure? Guests can check off “will not hold proprietors liable”, but what about nearby residents? Is San Bernadino County prepared to go on record that residents brought up these objections and yet still approved a shoddy MND that permitted the circumstances that could create such a nightmare?

Biological Protections

The wildlife corridor falls under The Bureau of Land Management’s mission to preserve specially-designated landscapes that include wilderness areas, wilderness study areas, and wild and scenic trails. The BLM was not cited as a Federal entity that needs to approve all claims are substantiated that’s on the submitted INITIAL STUDY/MITIGATED NEGATIVE DECLARATION. The declarations on the MND claiming the Project site does not fall within any designated critical habitat, and that no special status species were observed on site (during their survey) does not constitute an acceptable study.

In Conclusion,

It is inarguable that there is a need for housing and recreation locations for tourists visiting the area. Those who are seeking to protect wildlife and highway safety and maintain the tranquil rural conditions without destroying sight lines from the scenic highway, creating fire risk, pollution, and evacuation danger, do understand the need. Flamingo640 does not meet the minimal standards for preserving the unique landscape, and safety of the rural conditions consistent with the zoning property owners purchased. In order to minimize impacts to the environment and community and its wildlife, and allow the Planning Commission to live up to

its role protecting the public interest in the fairness and integrity of land-use decisions, the application for a Conditional Use Permit should be rejected and the developers should be required to do *CEQA Environmental Impact Report*.

The best outcome for all involved would be for RoBott Land Co. to seek out a better location where they can work with entities such as the Mojave Desert Land Trust, The Center for Biological Diversity, and National Parks Conservation Association, to create both a thriving business opportunity for Investors that addresses growing housing and recreation demand from tourists, but that works within a commercial zone that still provides access to witness wildlife, while not destroying it.

We urge you to not approve Flamingo640's application for a *Conditional Use Permit*.

Sincerely,

*Louise Goffin
1523 Cambria
Flamingo Heights, CA*

Biggs, Lupe

From: Lyndie Greenwood <lyndieloo@gmail.com>
Sent: Thursday, April 21, 2022 4:32 PM
To: Morrissey, Jim
Subject: Resort Camping Project Number PROJ-2020-00191

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To Jim Morrissey, Contract Planner,
In reference to Resort Camping Project Number PROJ-2020-00191

I am genuinely concerned about the water use of this facility. Three hundred new patrons at once, potentially nightly, could have a huge impact. And the impact would be unnessecary, as the project proposed is for a glamping site for tourists, rather than use by residents who have their homes in the area. The report says the proposed project would use 25% more water than if the area were fully developed with 82 units of housing. But 82 units of housing is not being planned in the area, and using it as a comparison is arbitrary and convenient.

The comparison of 82 homes is also used in the report to state that traffic would be impacted less by the proposed project than if rural living development were to move forward. This again, is inadequate argument for the reason I mentioned above.

I believe that an Environmental Impact Report should be required for this project to move forward because of the reasons I've mentioned above, and the reasons laid out in the letter sent to you by the HCVV.

Sincerely,

Lyndie Greenwood

Resident of Pipes Canyon

Biggs, Lupe

From: Peo Haggstrom <peo@ditchplanet.com>
Sent: Tuesday, April 19, 2022 12:01 PM
To: Morrissey, Jim
Subject: Project # PROJ-2020-00191, Assessor Parcel Number (APN) 0629-181-01

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Dear Mr. Morrissey,

We are writing to add our concerns and opposition in regards to PROJ-2020-00191 on parcel 0629-181-01.

We are saddened to hear that this project is being moved forward without a proper and diligent Environmental Impact Report.

The claims in the study that there will be no impact on the forestland because Joshua Trees will be moved elsewhere are not true. There are many environmental reports proving the opposite.

The claim that there are no desert tortoises on the parcel is also not true. Neighbors of the site have evidence to the contrary, there are many documenting pictures of this.

Also, who put together the study with these misleading claims about the environment out here? When was it made, who made it, and what was their expertise in this field?

Apart from this, we would like once again to forward our thoughts below about the project from last year.

We feel that this project is a major disaster for the environment and our local community.

Safety:

We already have problems with visitors from out of town doing reckless driving on 247. Accidents are frequent, and the police out here are overwhelmed, already trying to keep up with giving out speeding tickets. Adding 200-300 guests every weekend means more accidents and danger to our community. How would this be prevented?

Fire pits are a terrible idea with weekend guests who do not understand the high winds we face (up to 60 mph). Local residents understand this and are much more cautious. Fire spreads extremely fast in the desert.

Environmental concerns:

We moved out of the city to respect what is out here and nature.

The beauty of Joshua Tree, Landers, and Flamingo Heights is that we have beautiful stargazing nights. This project will bring light pollution, which would be devastating for the environment.

There will be noise, and weekend guests will likely not respect the peaceful quietness, which makes this place unique. We are not opposed to one-off events, but this will be an ongoing problem, every day and every weekend.

We also feel that the idea of a private helicopter pad is not great. The possibility of it being used for other things than just emergencies is there. Once again, noise and disturbance. Why is this necessary?

Joshua Trees will be removed, and they are many hundred years old. And if they are moved to another location, disruption is likely to kill them.

Community concerns:

This seems to be a project driven by out-of-town investors. The possibility of anything coming back to the community is very low. How will this benefit the local community and the residents here? Is there any pressure being put on the investors on how we residents will be compensated for everything we have to put up with to have this next to our doorstep?

Lastly

Please bear in mind that this project has irreversible environmental effects, and it is also sending a signal to other investors to push for similar projects, which could be even worse.

I hope you will do the right thing and stop this project from happening. We also hope for other projects in the future that instead could bring better infrastructure and benefit our community. We certainly don't mind tourists but... after all, the people who visit us come here for the beautiful nature and the peaceful quietness.

Lastly, we would like to be kept, as before, on the county's formal contact list for the project.

Our address is:

Peo & Brooke Haggstrom
564954 Cedarbird Road
CA 92284 Yucca Valley

Could you also be so kind and confirm that you received our comments?

Best

Peo & Brooke Haggstrom



Biggs, Lupe

From: Brian Hammer Sr <brian.g.hammer.sr@gmail.com>
Sent: Monday, April 25, 2022 9:15 AM
To: Morrissey , Jim
Cc: Rowe, Dawn; Supervisor Rutherford; Supervisor Cook; Supervisor Hagman; Supervisor Baca
Subject: Re: Project Notice (PROJ-2-22-00013) for a 1,932-Acre, 500 MW Utility-Scale Solar Facility in Lucerne Valley
Attachments: Sienna Solar project comments.pdf

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Good morning Mr Morrissey

Please find our comment letter regarding Sienna Solar Project Project Notice (PROJ-2-22-00013) attached in a PDF file. Thank you for your consideration.

Brian Hammer [et.al.](#)

April 25, 2022

Via e-mail (Jim.Morrissey@lus.sbcounty.gov)

Mr. Jim Morrissey
Contract Planner
San Bernardino County Land Use
Planning Dept.
385 N. Arrowhead Ave.
San Bernardino, CA 92415-0110

**Re: Project Notice (PROJ-2-22-00013) for a 1,932-Acre, 500 MW
Utility- Scale Solar Facility in Lucerne Valley**

Dear Mr. Morrissey:

According to 8Minute, the new Sienna Solar project (“Sienna 2”) is merely a relocation of the original Sienna Solar project (“Sienna 1”), so it is supposedly grandfathered in past Policy 4.10’s ban on new utility-scale projects in Lucerne Valley. Board of Supervisors Resolution No. 2019 -17 (which adopted Policy 4.10) states that utility-scale applications that had “been accepted as complete” may “be relocated to other sites under the same policies and regulations.” But Sienna 2 differs so much in size, scope and configuration from Sienna 1 that the former cannot not be considered as a relocation or the latter. In point of fact, Sienna 1 is a new project explicitly barred by Policy 4.10, which prohibits new utility-scale renewable energy projects in Lucerne Valley.

At 1,932 acres, Sienna 2 would be a lot bigger than Sienna 1. 8Minute’s attached figure shows a “Former Sienna Project” – meaning Sienna 1 – that, according to our calculations, comprises 1,390 acres. (And, as noted below, the project footprint of Sienna 2 is actually much bigger than 1,932 acres.)

Sienna 2 would have an output capacity of 500 MW, while Sienna 1 was planned to have an output of up to 450 MW.

The parcels making up Sienna 2 would also have a much different configuration than those comprising Sienna 1, and hence Sienna 2 would inflict more damage than Sienna 1 on the area’s human and natural communities. Sienna 1 centered on two main assemblages of connected and contiguous parcels, while Sienna 2’s parcels would be arrayed in a sprawling, roughly circular pattern that would effectively degrade a much larger area than would Sienna 1, which would include the large interstitial area encircled by Sienna 2’s parcels. Among other things, that interstitial area would have to

be crisscrossed with transmission lines and connecting roads, and the land within it would become effectively off-limits to human and natural communities. Hence the true project footprint of Sienna 2 is much larger than 1,932 acres.

If a project that was pending when Policy 4.10 was adopted could be moved to a different location, greatly increased in size and scope, while being completely reconfigured, and still be grandfathered in past Policy 4.10, that would allow developers to make end-runs around Policy 4.10. That would go against everything that the RECE stands for, which makes protection of communities and the environment its first priority. RECE RE Goal 4 (and Objective 4.1) calls for a “new era” of sustainable energy production that “will be compatible with the natural environment and the integrity of unincorporated communities.” The RECE’s preamble to Goal 4 emphasizes the negative effects that renewable energy development can have on “plant and animal species and their habitats, paleontological resources, artifacts and relics with cultural or historic significance, or critical natural resources such as groundwater.” The preamble also mentions that some desert soils are “particularly sensitive” and that there are local concerns “that dust from development may lead to health problems.”

Our Board of Supervisors adopted Policy 4.10 because it determined that utility-scale wasn’t compatible with Rural Living and Community Plan areas like Lucerne Valley. The only reason that grandfathering is allowed is because the Board of Supervisors didn’t want to take away rights of developers who had utility-scale projects under review at the time that Policy 4.10 was adopted. These rights pertain to the projects as described in their CUP applications.

Thanks for the opportunity to comment on the proposed project.

Very truly yours,

BRIAN HAMMER

Analyst and Adjunct Professor (owner of home in Lucerne Valley)

SUSAN HAMMER

(Owner of home in Lucerne Valley)

MORONGO BASIN CONSERVATION
ASSOCIATION

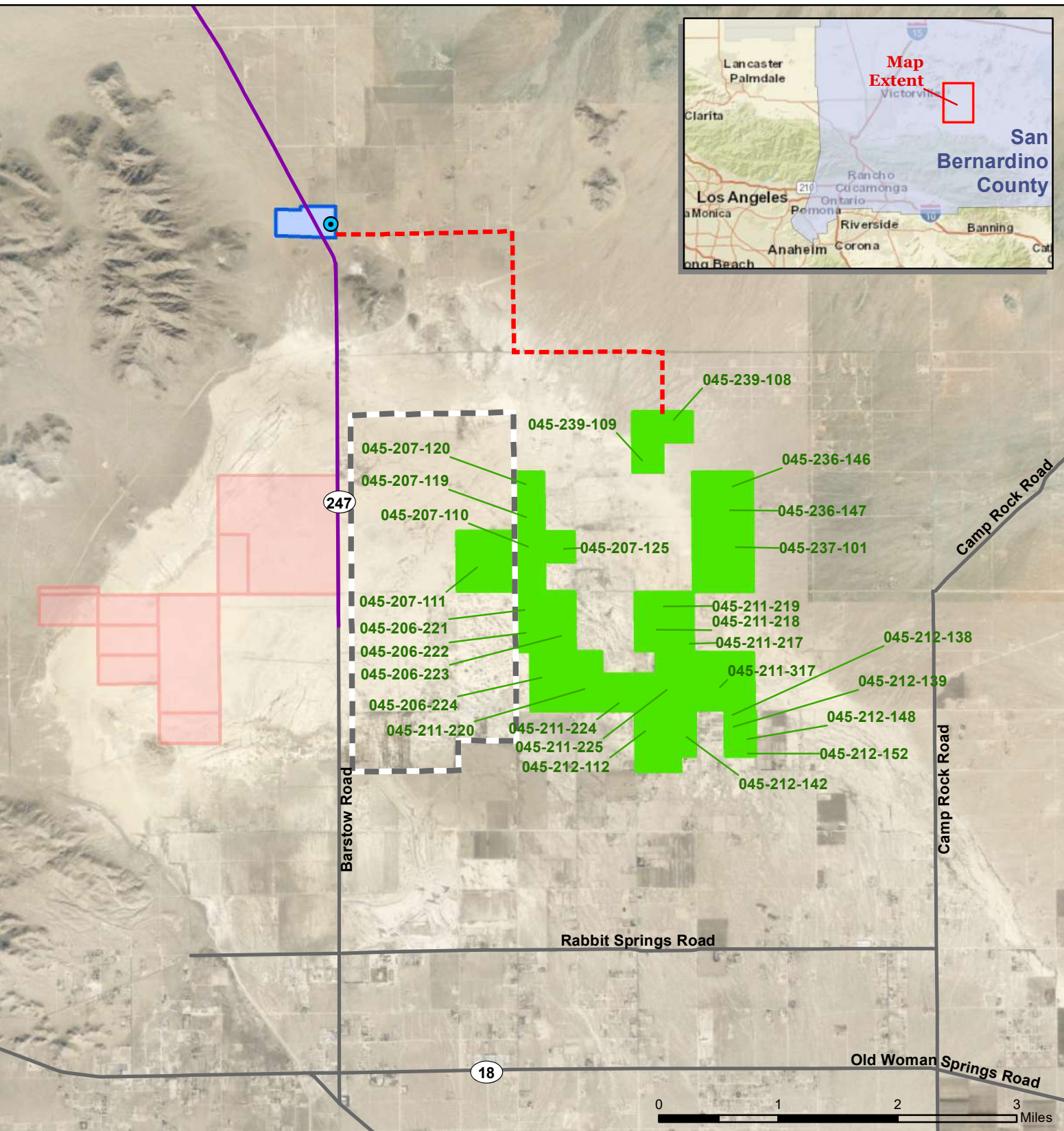
MOJAVE COMMUNITIES
CONSERVATION COLLABORATIVE

Steve Bardwell, President

Lorrie L. Steely, Founder








Attachment

cc: Board of Supervisors for
San Bernardino County



Sienna Solar Farm
San Bernardino County, CA



-  Point of Interconnection
-  Anticipated Gen-Tie Line Alignment
-  Proposed State Scenic Highway 247 Segment A
-  Approximate Location of Preferred Solar Development Area
-  Former Sienna Project
-  Current Sienna Project
-  Proposed Southern California Edison (SCE) Calcite Substation Location



Biggs, Lupe

From: James Hanley <jhaflame@aol.com>
Sent: Wednesday, April 20, 2022 4:28 PM
To: Morrissey, Jim
Subject: Fwd: Glamping Project

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-----Original Message-----

From: James Hanley <jhaflame@aol.com>
To: JimMorrissey@lus.sbcounty.gov <JimMorrissey@lus.sbcounty.gov>
Sent: Wed, Apr 20, 2022 4:04 pm
Subject: Glamping Project

Mr. Morrissey;

My name is Jim Hanley, I reside at 51568 Dundee Road, Johnson Valley, CA 92285. Phone # 760-364-4829

I have lived at this address for 22 years, and in the beginning traffic on Highway 247 was light to moderate. Through the years I have noticed a increase in the traffic, but still not bad. However in the last 2-3 years the traffic has increased to the point of when I attempt to enter the highway I have to use extreme caution. The reason for this is a curve in the road similar to the one by the proposed Glamping Site,. Many times when it looked okay to enter the highway I would pull out only to have to get over to the shoulder in a hurry because cars or trucks would come barreling around the curve. I can only foresee the same scenario taking place at the Glamping Site. Also the increased traffic from said site would only make the problem worse. I believe this potential nightmare has to be taken into consideration as Highway 247 has gotten extremely dangerous in the last 2-3 years. When the Johnson Valley residents gather at the Community Center sooner or later the conversation turns to how many very near misses have occurred to them. during the week on Highway 247.

Also the Glamping Project is proposed in a Rural Living Zone which is protected by changes that were made in 2009. Also the Mitigated Negative Declaration states there is no critical habitat for any species within 10 miles of the projected Glamping site. Until there is a thorough Environmental Impact Report to determine whether there are any species such as the Burrowing Owl, or Desert Tortoises living in the area there should be no mitigated Negative Declaration.

The area has Petroglyphs, ancient mill site, village artifacts there is a lot of historical, and cultural stuff that need to be taken into consideration.

There have been efforts by the Homestead Valley Community Council to have Highway 247 declared a Scenic Highway. They are very close to that happening and if and when that takes place the proposed Glamping Site would have a detrimental effect on the scenic view.

As a concerned resident of the high desert, and one who cares about the long term effects of what projects like this can do to environmentally sensitive areas. I urge you to please take time to conduct a very thorough study of the impact this project would have on the overall well being of any animal species that might be dwelling in the area. And the effect it would have on the traffic, and the well being of the residents that will be affected by a host of issues. Thank You for your consideration.

Respectfully;
Jim Hanley

Biggs, Lupe

From: Heidi Girling <Heidi.Girling@csulb.edu>
Sent: Tuesday, April 12, 2022 4:28 PM
To: Morrissey, Jim
Subject: Letter of Opposition to Resort Camping - Conditional Use Permit PROJ-2020-00191

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Mr. Jim Morrissey
Land Use Services
San Bernardino County

Re: Resort Camping - Conditional Use Permit PROJ-2020-00191

Dear Mr. Morrissey,

I am a homeowner in Flamingo Heights and need to share my very strong opposition about the possibility of a resort campground being built off Highway 247 near my home.

There are many reasons that this campground should not be approved. Here is my list of reasons:

1. Protected Joshua Trees
2. Protected Desert Tortoise, of which we have observed many on our property, which is very close to the proposed project.
3. The property is zoned as Rural Housing and the area does not allow for a large business such as this due the problems it will create:
 - a. Light pollution
 - b. Noise pollution from the guests, music, vehicles, and possible ATV usage that will impact the fragile desert eco-system and the quiet for which we purchased this home.
4. The increase in garbage, littering and fouling of the desert environment, which is already imperiled by illegal dumping that we frequently observe and have to clean up.
5. Increased need for water and sewage (which would require large leach fields, which may impact the Pipes Canyon Wash
6. Animal life is abundant in this area, which will be impacted by the large quantity of people, noise, light, etc. For example, we regularly see desert foxes, coyotes, mountain lions, bobcats, owls, desert tortoises, and many varieties of other birds.
7. Workers are in short supply in this area due to the lack of affordable housing. This would mean workers may commute from other areas increasing traffic, which leads to air, noise, and light pollution.
8. Highway 247 is already burdened with mass quantities of large truck haulers which have increased vehicular accidents in the area, noise, light, illegal garbage dumping, air pollution and more. Adding a campground of the planned volume would only increase traffic causing more greenhouse gases, which would impact the protected trees and animals.

The reasons stated above should require that a comprehensive Environmental Impact Report be completed before any further plans be made for this development. Mitigation measures would not suffice for fouling this beautiful, quiet land in Yucca Valley. Changing the zoning to commercial is unacceptable to our community in Flamingo Heights!

If you have further questions, please feel free to contact me at burkeyh@yahoo.com or 562-818-3545

In good health,
Heidi Girling, MPH, CHES
Preferred Pronouns (she/hers)
Coordinator of Office of Wellness and Health Promotion
CSULB Student Health Services
(562) 985-7182
heidi.girling@csulb.edu



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Biggs, Lupe

From: 5084517938@mms.att.net
Sent: Thursday, April 21, 2022 8:44 AM
To: Morrissey , Jim

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Biggs, Lupe

From: Rose Herrmann <rose.herrmann6@icloud.com>
Sent: Thursday, April 21, 2022 8:23 AM
To: Morrissey , Jim
Subject: The resort plan would absolutely devastate that beautiful conservation area

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The resort plan would absolutely devastate that beautiful conservation area and the campsites should be closer to the park on already degraded land. There are many species of wildlife there and it is a wildlife corridor which have been the subject of many scientific studies as well as photos by neighbors. The noise and pollution from the helicopter has NOT been addressed nor the septic pollution from all of the downstream neighbors to their wells. That area is near an earthquake fault line and there is a wind tunnel effect which would cause extreme wildfire hazards. Many of those animal and bird species are shy and would be driven away. It would be ABSOLUTELY HEARTBREAKING if that project was allowed. Rose Herrmann

Sent from my iPhone

Biggs, Lupe

From: Margaret Hoggan <mchoggan@icloud.com>
Sent: Thursday, April 21, 2022 3:09 PM
To: Morrissey, Jim
Subject: Resort Camping Project Number PROJECT-2020-00191

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Landers, California
April 21, 2022

Jim Morrissey, Contract Planner
San Bernardino County
Land Use Services Department - Planning Division

I am writing to voice my objection to a Negative Declaration implying that the Flamingo Heights Resort Camping "Glamping" Proposal should not require an Environmental Impact Report. It most certainly does need to be subjected to a careful, reasonable environmental impact assessment.

As a BLM volunteer specializing in wildlife, I am well aware of the wildlife in my Landers neighborhood and the nearby areas. We DO have Burrowing Owls and Desert Tortoises in this area, and the effects on these species and perhaps others must be investigated thoroughly.

The claim that this development will not have more adverse effects than the surrounding areas of residential use is either uninformed or dishonest. While the standard lot in my neighborhood is 5 acres, which was the standard size of the BLM land grants homesteaded in this area, there are also vacant parcels spacing these lots out even further. I have 5 vacant 5-acre parcels beside and behind my lot which reduce the environmental impact of my single family residential 5 acre holding substantially.

And what on earth are our county elected officials thinking of, allowing this development in the middle of a severe drought? This area's water supply is not assured under the current weather situation even for existing populations, and to allow dense development such as this project is totally irresponsible.

And lets not ignore air quality. In the 30 years this property has been in the ownership of my family, I have never seen worse air quality. The combination of the drought and vehicles used on dirt surfaces has created a dry dust covered land surface that can yield extreme levels of particulate pollution whenever winds occur. In the last two years, and especially after the recent "King of the Hammers" race, I have seen dust clouds that can totally obscure the view of the local mountains and sometimes even the nearby hills.

Why are commercial projects being allowed to invade residential areas? This is NOT a residential use. It WILL effect our environment negatively. It IS imperative that the county review the environmental impact of this project seriously.

Sincerely,
Margaret C. Hoggan



April 15, 2022

TO JIM MORRISSEY, Contract Planner

COMMENT PROJECT NUMBER: PROJ-2020-00191 ASSESSOR PARCEL NO: 0629-181-01

The Homestead Valley Community Council (HVCC) is a coalition of the community associations in the four unincorporated communities of Yucca Mesa, Flamingo Heights, Landers, and Johnson Valley.

On April 25, 2021, HVCC commented on the Project. Several items in that letter have evidently been overlooked or ignored in this Mitigated Negative Declaration (MND).

Item 1) ZONING: HVCC related in detail the County's 2009 change of zoning in Flamingo Heights, establishing a **Commercial Zone corridor along State Route 247** (Old Woman Springs Road). Deemed best located along the more northerly sections, it included existing businesses while limiting driveways and unmarked roads for traffic safety entering the highway.

The planned resort site entry road is to follow the path of an existing dirt road. No mention is made of turn lanes from the two-lane highway.

The plan touts recreational facilities on the site; Flamingo Heights residents' experience shows vacation renters seek out many other desert attractions, and will drive onto Hwy 247 to tour many nearby places.

Entering or leaving this road always risks traffic speeding or passing, a major motivation for approving the 2009 location of the Commercial Zone. A known trouble spot – the swooping curve south of the resort entry, leading to the steep downhill turn into Pipes Wash.

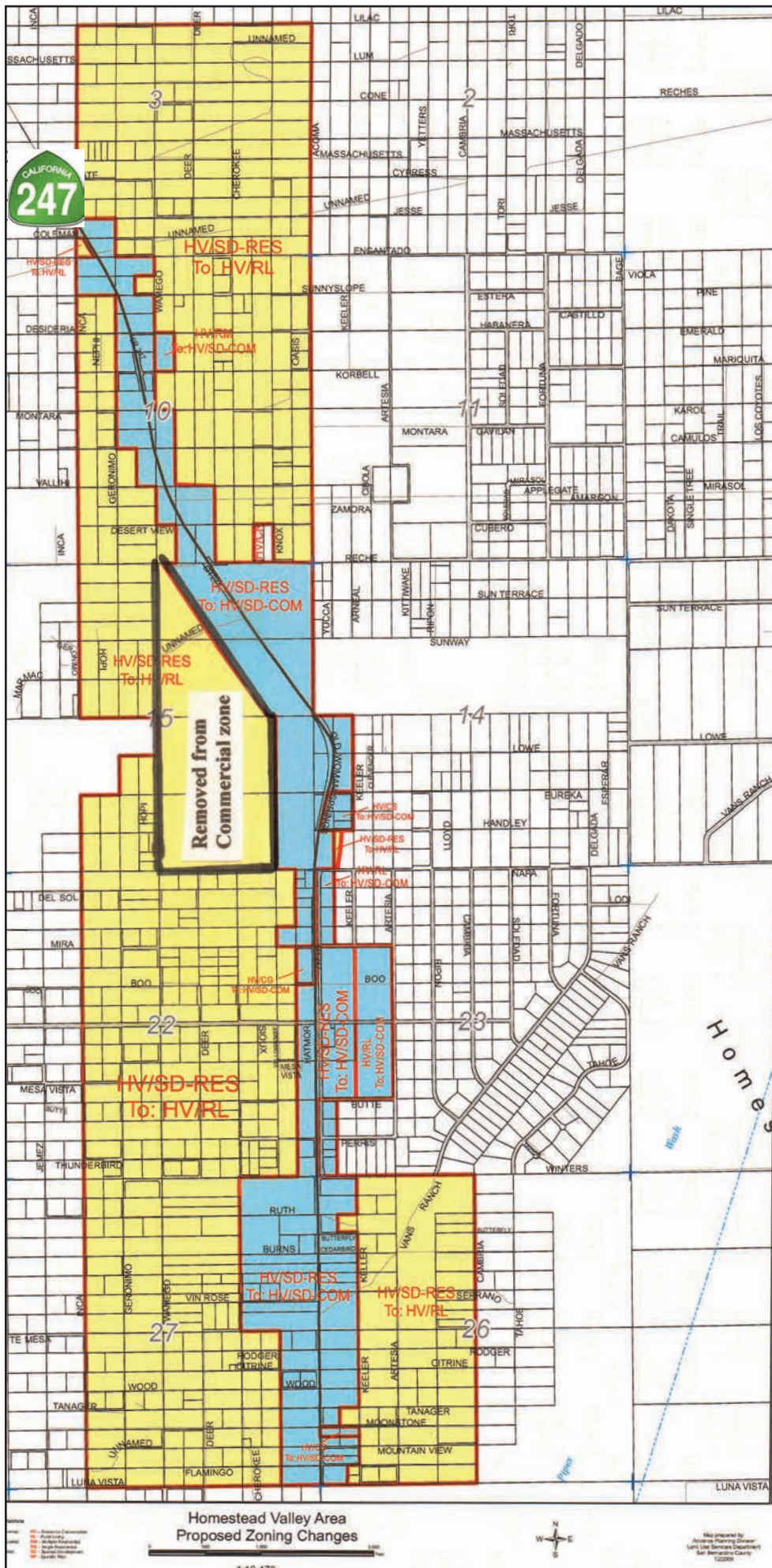
The Mitigated Negative Declaration states:

"The parcel is described as Assessor's Parcel No. 0629-181-01 and has a Countywide Plan designation of Rural Living (RL) and a zoning designation of Homestead Valley Rural Living"

In 2009, San Bernardino County proposed major zoning changes in the Homestead Valley community of Flamingo Heights.

A very long public process consolidated the Flamingo Heights Commercial Zone northwards. All the changes were made with public input to the County to protect and maintain the Rural Living Zones. SEE MAP Page 2 >>

By any criterion, this campsite is a commercial project applying for a permit in a Rural Living Zone protected by the 2009 changes. This cannot be mitigated. If it were a motel, it could not be permitted. Therefore, this Mitigated Negative Declaration does not adequately address the non-fulfill-



ment of the qualifications for the protected HV/RL zoning.

HVCC believes a more comprehensive Environmental Impact Report under CEQA will produce impact findings of significant impact, not only on biological resources but also on traffic safety.

What will be the cumulative affect? Would this set a precedent? Could all Rural Living Zones be so easily disrupted by such commercial projects?

<< FIGURE 1A
Detail of map showing zoning changes proposed by SB County in Flamingo Heights and approved by the community in 2009

FIGURE 1B
Page 3 >>
Detail of map showing resort campsite parcel does not lie in the Commercial Zone

FIGURE 2
Page 3 >>
Google map street view of curve in S.R. 247 near the resort camp public entry

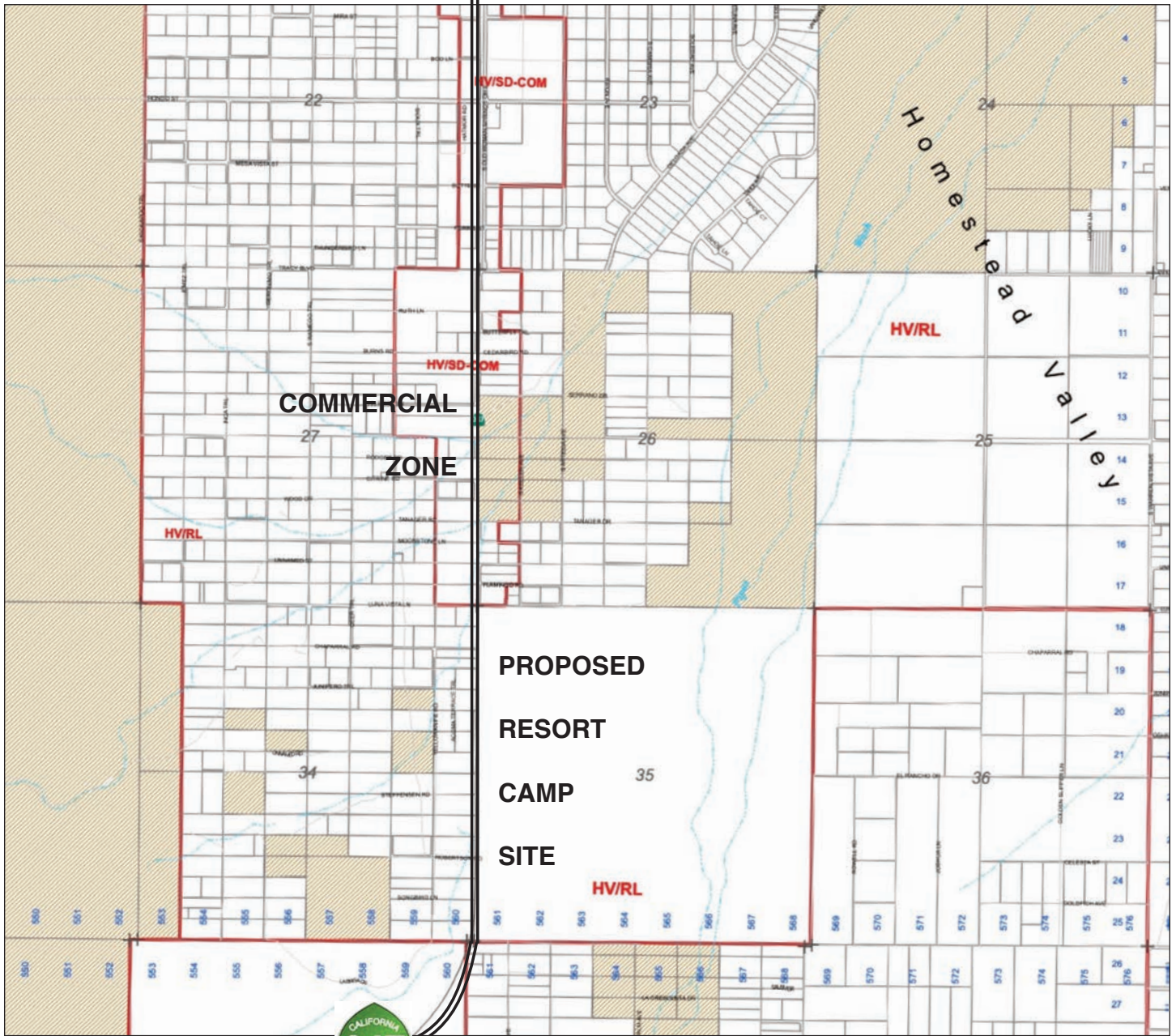


FIGURE 1B Parcel not in Commercial Zone



FIGURE 2 View south and Map of highway curve near entry

Item 2) S.R.247: HVCC is lead organization in the campaign to upgrade State Route 247 from a County Scenic Byway to a California Scenic Highway. The Scenic Corridor extends as far as the eye can see.

The scenic designation in Section 1 of the Visual Assessment accepted by Caltrans extends to Milepost 6.5 on the highway itself.

However, at that point the northbound traveler emerging out of Pipes Wash follows the northward curve of the road. The viewshed includes the entire panoramic vista proposed for this resort camping development, with a background of distant hills and mountains in Landers.



FIGURE 3 View northeast from S.R. 247 across the resort camp site, toward faraway hills in Landers. Even low-growing creosote bushes and other desert shrubs are visible at a long distance.

The Mitigated Negative Declaration argues, "The proposed Project would be required to maintain the maximum height limit of 35 feet, as is allowed within the Rural Living Zone. The placement of the camp sites generally along the westerly edge of the canyon would not obstruct the views of others toward the canyon..."

This declaration of "no significant impact" obstruction of views is beside the point. The site facilities may not constitute a visual obstruction, however they would rate as a significant visual intrusion in themselves.

HVCC argues that a more comprehensive Environmental Impact Report under CEQA, including a detailed description of the height and extent of any permanent facilities and the visibility of a large number of parked vehicles, will produce one or more findings of significant impact, not only on biological resources but a substantial adverse effect on a wide open scenic vista.

Item 3) BLM Protections

The MND has not addressed the HVCC comment concerning the Federal Bureau of Land Management ***Pipes Canyon Area of Critical Environmental Concern*** which includes the site of the proposed campground.

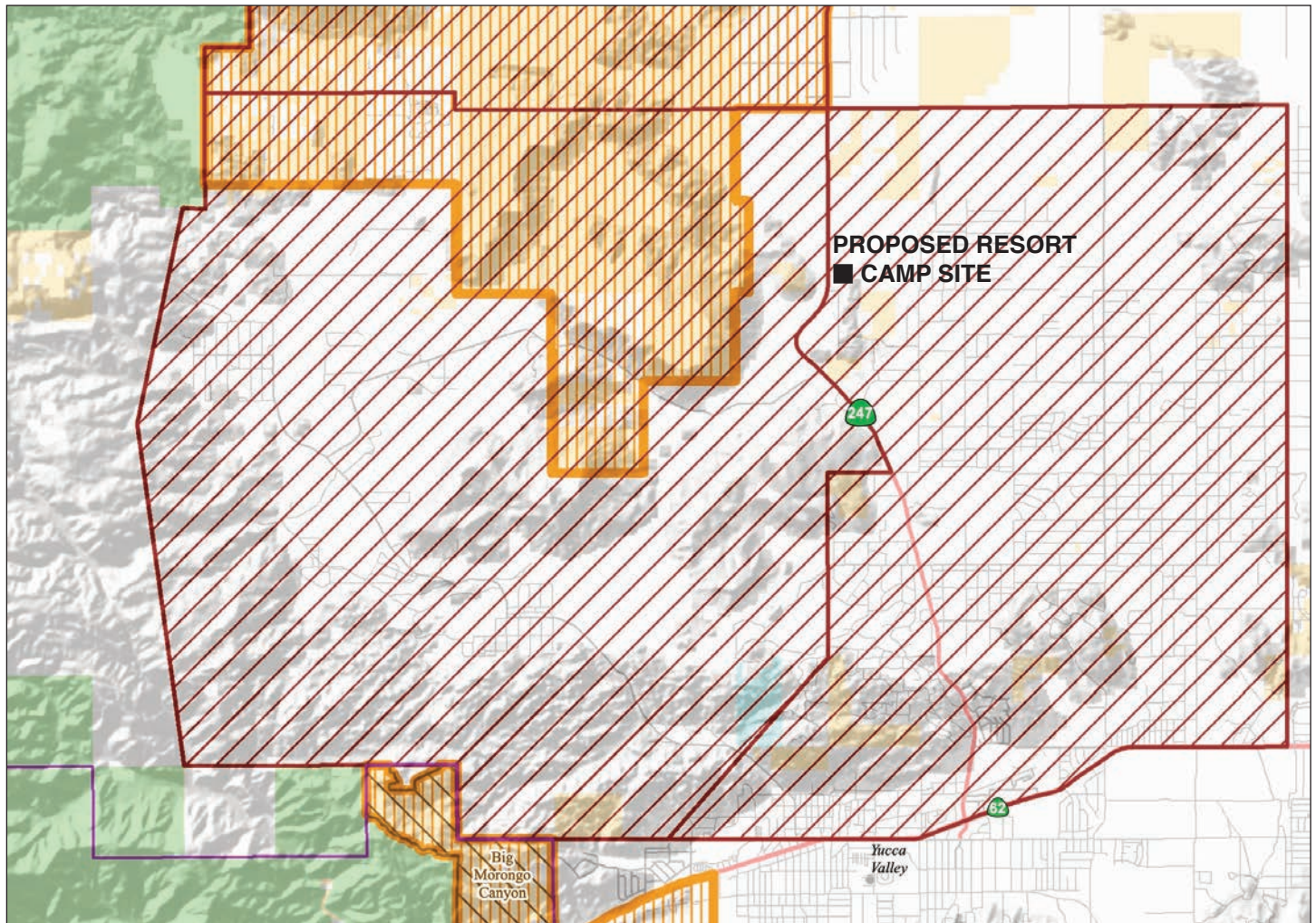


FIGURE 4 Dark red diagonal lines show much of the extent of the ACEC

The document fails to acknowledge the Bureau of Land Management interest. BLM has included a very wide area around the black lava buttes in their *Pipes Canyon ACEC*. It surrounds Pioneertown and Rimrock; its eastern area lies south of Landers and north of Yucca Valley. It includes the site of the proposed resort camp. The list of biological protections is long.

Considering Nationally Significant Cultural Values: The Pipes Canyon ACEC protects numerous prehistoric resources that meet criteria for inclusion in the National Register of Historic Places (NRHP).

It has the greatest concentration of known NRHP-eligible sites within the Barstow Field Office. Sites include petroglyphs, pictographs, rock shelters, and artifacts on trails, village sites, and milling sites.

HVCC argues that a comprehensive Environmental Impact Report under CEQA is needed, and will disclose one or more significant impacts on both biological and cultural values in the proposed resort camp site.

Item 4) Habitat This MND states "There is no USFWS-designated critical habitat for any species within 10 miles of the Project Site."

Mitigations preserving Joshua Trees may soon be subject only to existing State requirements.

The surveys reporting no federal Species of Special Concern (desert tortoises or burrowing owls) contradict the County's own Biotic Map! "Less than significant impact" is notoriously claimed for impact on species which have their dens below ground and/or rarely emerge during daylight hours.

Also, "ADDITIONAL APPROVAL REQUIRED BY OTHER PUBLIC AGENCIES Federal: None." seems to overlook the BLM again.

HVCC argues that County must require a more comprehensive Environmental Impact Report under CEQA, and that it will disclose one or more significant impacts on wildlife and vegetation habitat.

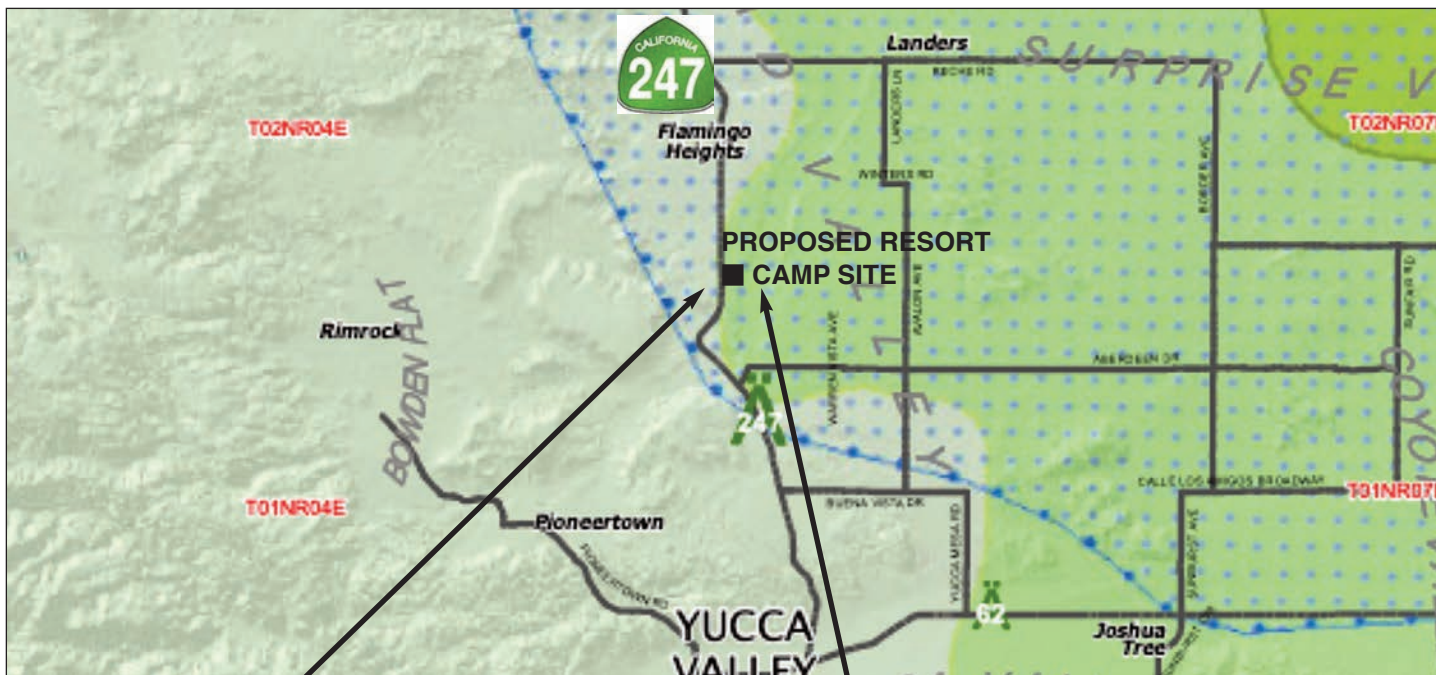
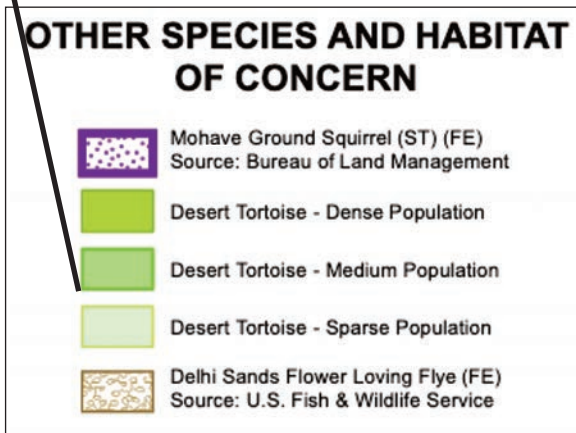
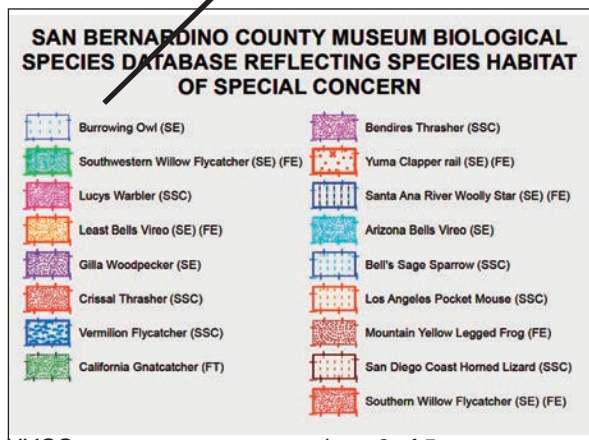


FIGURE 4 Details from County Biotic Resources Map





April 25, 2021

We repeat: Given the items listed here:

1. The 2009 County zoning agreement we entered into in good faith to protect Rural Living Zones and restrict driveway access to the highway, plus the willful disregard by the developer by proposing to site a commercial project outside the commercial corridor,
2. The intrusion of the Project facilities and multiple vehicles on the proposed commercial resort site into the line-of-sight in the State Route 247 Scenic Corridor,
3. The intrusion of this commercial resort site into the BLM ACEC,
4. The judgement call of "no critical habitat" at or near the site, despite County surveys to the contrary,

therefore the Homestead Valley Community Council opposes a Conditional Use Permit for this ill-conceived Project.

We urge San Bernardino County Land Use Services to adjudge this Mitigated Negative Declaration as inadequate and produce a more comprehensive Environmental Impact Report as required by CEQA.

Knowing the area well, we believe an EIR will disclose one or more significant impacts on biological, cultural and visual values as well as traffic safety.

FYI: at a recent HVCC meeting with a packed house, all comments opposed this project, and everyone voted against it.

Thank you for your attention,

Betty Munson, Secretary, HVCC

Biggs, Lupe

From: Michele Jaffe <michelejaffebooks@gmail.com>
Sent: Thursday, April 21, 2022 9:17 AM
To: Morrissey, Jim
Subject: Resort Camping Project Number PROJ-2020-00191 (ASSESSOR PARCEL NO: 0629-181-01)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Mr. Morrissey,

I live in one of the “scattered residential homes” to the south east of the proposed Resort Camping Project Number PROJ-2020-00191 (“glamping resort”) and I am writing to ask you to consider undertaking an Environmental Impact Review before allowing the project to proceed. Though the developers claim it is low density, 300 people will be a massive increase in this area, with a very real impact on a myriad of issues.

I am going to focus on only two, traffic and noise. There are major flaws in their studies on these issues evident even to a layperson which I note below and which render them less valid and begs for further analysis by experts.

Traffic: My driveway abuts 247 just after it dips into Pipes Canyon Wash. That is a low point between two rises, meaning that cars are either speeding down from Yucca Valley and interested in preserving their momentum as they go back up toward Flamingo Heights or they are zipping down from Flamingo Heights and not interested in stopping as they head back up toward Aberdeen and town. All of those circumstances—speed, unwillingness to stop, momentum—are exacerbated by the number of large trucks that share the road there with cars. Since late 2019 when I moved here, the amount of traffic has not only increased steadily but it has become faster and more aggressive. Turning in and out of my driveway has become a far more thrilling, if by thrilling you mean “likely to meet a bad end” experience. The influx of guests, particularly people who are not sure where they are going and/or are unfamiliar with driving on our unlit though beautifully maintained roads (thank you!), will put them and residents like me in real danger. I beseech the county to do a rigorous study of the traffic impact 300 guests who are not familiar with driving in the desert, or where they are going, could have on 247.

The developer’s argument that their project will have a substantially lower impact than if the parcel were developed in-line with its zoning involves the assumption that a community built there would use the maximum allowable density (one house per 2.5 acers) resulting in 82 homes: not only is that not likely, it is unlikely to happen all at once so the construction and traffic impacts would be dissipated over time and nothing of the kind is currently under consideration, making the comparison, like the premise itself, specious. In contrast, their proposal includes 75 rentable structures which would all be built and habitable at once and which they project could house 300 people a number likely to be equal to if not greater than the number of residents in the 82 not-yet-in-existence-or-projected-to-exist homes that might some time in the future be built there.

They use this specious calculation to substantiate several of their points:

They argue that the 82 homes would lead to 777 trips per day, which is nearly 9.5 trips per fictional home. That seems unlikely, especially for people who live here. I don’t know any regular residents who regularly drive back and forth from their house to town multiple times per day—there simply would not be time to do that and work/eat/sleep. Even assuming each fictional household had three adults who each drove round trip to and from home every day, that would only be 492 trips per day. Visitors to the park and the area are much more likely to make multiple round trips from the site to other locations around town; if there are 300 guests at the resort, even if they all drove two to a car, by the

developer's own metrics that would be 1,421 trips per day, nearly three times as many REAL trips as the number that MIGHT be generated were houses to be built. Clearly the houses would have a much lower impact on the area.

They use the same fictional 82 homes to argue that the water usage of the glamping resort would not be greater than other uses. As previously stated, this is a false metric and therefore not legitimately conclusive. And even their own numbers (14,568 for the residential homes vs. 18,150 for the glampsite, p.48) undercut their argument, showing the resort would use a substantially greater amount of water than even 82 fictional homes. That 3,582 gallons/day is the equivalent of 65 additional people per day using water. When it is remembered that the 82 homes *do not exist and have no chance of existing in the near term*, the far greater potential impact on the water table of the glamping resort is even more extreme: 18,150 gallons per day vs. 0.

By employing these comparisons as substantiation for the environment impact of their project, the developers are suggesting that there are just two options for this land: 75 "camps" for rich tourists that do not require rigorous permitting or 82 homes for long term residents that would have to be carefully constructed. As noted, this is not a fair comparison because it is not clear that 82 homes are the only other option for the land. And yet even in the developer's fictional comparison, it is clear that the 82 homes would offer less impact and greater long term benefits to the community than the proposed camp.

Noise: The noise impact study is flawed and inadequate:

- They did not use enough sensors, and failed to place those they did use in Pipes Canyon Wash (p.54).
- The comparison model used in the study is a park in Flagstaff Arizona, which is in the middle of a built up area where buildings act as sound mitigators to the rest of the neighborhood (Noise Impact Study, MD Acoustics, LLC, 2020).

Pipes Canyon Wash by contrast, is a natural amphitheater that channels *any* noise from above through the wash, amplifying it and spreading it. I know this first hand because I have a neighbor above me who holds raves that can be heard in Pioneertown, 6 miles away. Even low noises, occurring continuously, become loud and invasive. The addition of 300 tourists in a facility *specifically designed for people to interact outside* in the open air, will have a massive sound impact on the entire area that requires further assessment.

Perhaps because neither the developers nor the sound assessment team which is based in Maryland have much experience or understanding of the desert, they assumed that Pipes Canyon Wash was insignificant; that lapse in judgement points to deep and fundamental flaws in this study, and in their larger appreciation of the unique and difficult characteristics of this area. The failure of their noise assessment to adequately consider the way sound *actually* travels from above Pipes Canyon through the wash at best shows that the developers and their sound analysts have no comprehension of the true environment of the desert, and at worst suggests they do not care. Neither is a valid reason for them to be allowed to negatively impact it substantially.

Their arguments are not based on accurate comparisons (or substantiated by adequate study). Their statements of minimal impact are in fact contradicted by both their own data and actual on-the-ground experience. An Environmental Impact Report would offer a chance to resolve the contradictions, educate the developers, and offer transparency about the real impact of projects like this one on the land and the residents who will be most affected.

Glamping presents itself as a low impact tourist vehicle but it is really just an expensive way for developers to get as many people onto a property as possible without having to submit to many construction and permitting constraints. When the developers of this current project highlight that "CalEEMod does not have a Campground/Recreational Vehicle Park land use in its database. Therefore, the next closest land use available in CalEEMod, City Park, was utilized in the modeling," (p.17) in doing their assessment of the impact they make this slippery approach clear, as well as its benefit for them. There is no reasonable comparison between a city park and a glamping resort with a helipad. But in offering one in supposed good faith, the developers make the case for why their judgement and analysis should be subject to the greater scrutiny of an Environmental Impact Report at the very least.

Thank you for your consideration and your work on this.

Sincerely,

Dr. Michele Jaffe

55975 Drexel Road, Yucca Valley, CA 92284

Biggs, Lupe

From: Jon Delouz <eyedelouz@gmail.com>
Sent: Tuesday, April 19, 2022 7:56 PM
To: Morrissey , Jim
Subject: Jon Delouz_Landers Full Time Resident Please Read

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dearest Mr. Morrissey,

My wife and I are a couple of your peaceful constituents who wish to oppose the project known as "Flamingo 640".

The LANDERS area of the high desert has become a refuge for many artists like ourselves who have fled the urban areas of Los Angeles to find peace and respite from the chaos of developers trying to make a buck regardless of the destruction of important and peaceful places outside the city.

We are not opposed to people coming to enjoy the natural and beautiful environments of the high desert. We just want the endless flood of respective developers from changing landscape for short term gain.

Joshua tree and the surrounding areas is one of the last places in Southern California for people to enjoy nature and quiet. I ask that you please refuse the permission of developers to continue to destroy what is held sacred to the people who live here full-time as well as the visitors who seek refuge from the urban grind.

Highway 247 is a corridor that has seen an up-tick in traffic, accidents, and noise. On several occasions we have been in near accidents, especially in the disputed area where the developers are trying to develop this "glamping" encampment.

For the sake of current residence and future generations to enjoy this beautiful area, I plead with you to please deny the development of the project. The idea of a granting the very few well off to fly helicopters into the area and for the passerby to leave campfires unattended in the precious natural habitat that is home to frequent high winds is a scary thought. The area barely survived a catastrophic fire that blew through only a few years ago. There is also no need for any kind of a so-called emergency heli-transport in the area. This project serves to only disrupt the precious wildlife in the area including birds, desert tortoise, coyotes, as well as the decimation of protected Joshua trees.

Thank you for your time. I hope that you please truly consider what negative impact this project will cost.

Thank you,
Jon Delouz

Biggs, Lupe

From: Alice Jones <luckyalice@sbcglobal.net>
Sent: Wednesday, April 20, 2022 8:42 AM
To: Morrissey, Jim
Subject: Flamingo 640

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

My husband, Lee Scott, and I have owned a home here in Flamingo Heights for 12 years. We loved it so much here that we remodeled our original home and moved out here full time almost two years ago.

We love the peacefulness, quiet, and panoramic views. I feed the quail, cottontail, jackrabbits, doves and other birds and creatures three square meals a day and give them water. I love just sitting out on my patio watching them.

Old Woman Springs Road is a dangerous road due to people driving over the speed limit, being impatient and passing other cars. This project will add many more cars of people unfamiliar with the area and being on vacation I think they may ignore traffic rules as well.

Apparently there was a wildlife study done saying there were no tortoises there but I have seen pictures of tortoises that neighbors close to the property took. This study was done when tortoises were hibernating.

High winds here are common and we do not want another fire like the one that destroyed many acres in Pioneertown.

There will be firepits in this Project which may cause a fire.

This is a wildlife corridor as well. How can we best accommodate the wildlife? I know in Los Angeles they are building a bridge. What did this developer propose? Mojave Desert Land Trust has been buying property and protecting our wildlife.

They had proposed a concert venue I guess to be like a mini Coachella except that being in a residential area the neighbors would hear the music and have to deal with the traffic.

Camping is free on the Sand to Snow Monument. I understand Glamping is fancy camping and charging a lot for very little. Is it possible that these developers could choose a different location not in a residential neighborhood? Maybe they could go up to Johnson Valley where land is inexpensive.

We also are surrounded by earthquake faults. In the historic Landers earthquake there was so much destruction caused on OWS and I had a friend, Steve Arbayo, who had rented Count Basey's former home which was really damaged and very close to this project.

Flamingo 640 is a bad idea. It will impact the local residents with increased noise, traffic, water usage and interference with wildlife.

I moved here to live in a peaceful place and not next to a circus. I like circuses but at some point the clowns take off their makeup, animals are tended to and they move on to another venue. Please don't let the Flamingo 640 circus come to town.

Sincerely,

Deborah Alice Jones
1221 Kickapoo Trail
Yucca Valley, CA. 92284

Biggs, Lupe

From: Joy Bryson <joykins898@gmail.com>
Sent: Wednesday, April 6, 2022 1:00 PM
To: Morrissey , Jim
Subject: Fwd: Flamingo Heights Glamping Resort

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Did it forward here? Doesn't look like it. Will try again.

----- Forwarded message -----

From: Joy Bryson <joykins898@gmail.com>
Date: Wed, Apr 6, 2022, 12:27 PM
Subject: Flamingo Heights Glamping Resort
To: <JimMorrissey@lus.sbcounty.gov>

Re: Project# PROJ-2020-00191

APN# 0629-181-01

Protest this project. Can't find petition.

Lived here since 1989. There are tortoises, coyotes (this week), mountain lions and bobcats. Hwy 247 main route to town; only that I know of. Las Brisas one road from my house and directly across the highway. Trucking route for Wal-Mart couple times a week. Many others. Traffic like holiday weekends always. We are on San Andreas earthquake fault line. Feel Teutonic plates shifting daily. The Flamingo Heights Community Association residents against project. Happy to discuss if u need more info.

Joy Bryson; 55909 Robertson Rd. YV 92284

Joykins898@gmail.com

760-364-2451. Send Petition please. No computer printer. Thank u so much. 🙏

Biggs, Lupe

From: Sant Khalsa <santkhalsa.art@gmail.com>
Sent: Friday, April 15, 2022 9:13 AM
To: Morrissey, Jim
Subject: Comment: Project # PROJ-2020-00191 on Parcel # 0629-181-01

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Mr. Jim Morrissey,

I am writing for the second time to you in strong opposition to County Planning Project Number PROJ-2020-00191, Assessor Parcel No. 0629-181-01 Permit request for a destination glamping resort.

Before moving any further with this proposed project, there is a clear need for a full Environmental Impact Report. Only after this level of information is collected can County Planning and the Board of Supervisors make an informed decision.

It is my understanding that this parcel is zoned for Rural Living and therefore totally inappropriate for this development. It is a pristine wildlife corridor and habitat of protected and endangered desert tortoise, burrowing owls, Joshua trees, precious flora and fauna, and other natural resources.

There is evidence that other negative environmental impacts will occur if this is approved including increased traffic (producing public safety issues), air pollution (from car emissions and smoke from fires), noise pollution (voices and music are carried great distances in the desert), light pollution (in a region committed to a dark sky initiative), and increased water use and wastewater management.

There are other land parcels that are zoned within the region suitable for a glamping resort, therefore this proposal for a permit should be denied at this time until a full EIR is completed. It would be most appropriate that this parcel be given protections by the County, State or Federal Government or be purchased at fair market value by the Mojave Desert Land Trust or another conservation land trust or non-profit.

It is imperative that San Bernardino County require an Environmental Impact Report before making any decision regarding a permit that will negatively impact the fragile ecosystems at this site as well as the community as a whole.

Thank you for your attention.

Sincerely,
Sant Khalsa
Professor Emerita, CSU San Bernardino
3450 Polaris Avenue
Joshua Tree, CA 92252
Phone: 818-618-4474
Email: santkhalsa.art@gmail.com

Biggs, Lupe

From: Elizabeth Karman <elizabeth.karman@gmail.com>
Sent: Monday, April 18, 2022 3:20 PM
To: Morrissey, Jim
Subject: PROJ-2020-00191 Assessor Parcel Number (APN) 0629-181-01

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

The following are my comments for **the Flamingo 640 Glamping Project**.

I highly object to the building of this project.

I own the 77-1/2 acre property that touches this project's northeast corner, up on the hill

The impact on my home and my lifestyle will be completely altered if this project is built.

I agree with MBCA's assessment: This project is NOT in character with the communities surrounding it.

- The potential adverse effect on wildlife due to the proximity of the wildlife corridor and the destruction of the Joshua tree woodland habitat.
- The creation of adverse noise sources within an otherwise quiet area.
- The introduction of artificial light sources within a relatively dark area.
- The impact of additional traffic on Highway 247 (an already dangerous highway!).
- The use of campfires and their effect on air quality and the potential for wildfires.
- The inappropriate use of tents provided with heating and cooling that would utilize energy and water in an unrestricted manner.
- The potential for adverse effects on water wells within the area

In addition, the heliport greatly concerns me. This heliport could be used for emergency medical treatment and/ or it could be used to fly in the 300 guests, a few at a time to complete the luxury package so the guests can "get a feel for desert living? That's not desert living! I definitely will hear the helicopter's engines. This is not a satisfactory use of the property from a noise standpoint. This area is peaceful and quiet. Helicopters are not part of the package.

Another area of concern is the draw for motorcycles. We have had difficulties with rampant, noisy motorcycles before trespassing onto my property. Laws were put in place. I don't want to have to deal with this problem again as a result of this project.

This area, including a section of my property, is in the wildlife corridor. I have seen wildlife, coming across the wash and up my hill. Tortoises and snakes have meandered through my property along with wild birds. This project will cut that corridor off.

This project needs to be denied.

Elizabeth Karman
57120 Luna Vista Lane
Yucca Mesa

Biggs, Lupe

From: Kate <kathrynshearer@gmail.com>
Sent: Thursday, April 21, 2022 7:54 AM
To: Morrissey, Jim
Subject: Project # PROJ-2020-00191, Assessor Parcel Number (APN) 0629-181-01

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Mr Morrissey,

I am deeply disheartened to find that this project is being moved forward without a proper and diligent Environmental Impact Report. After reading through the Draft study, I was shocked by the outright flimsy and dishonest work done to hastily try to pass this project through backchannels without the support or consultation with the surrounding community and with blatant disregard of the local ecological environment. I write here to impress upon you the disastrous effect this project will have on our lands as proposed, and hope that my voice along with the others of our community will manage to at the very least persuade the county to require a thorough and unbiased Environmental Impact Report before this project moves along any further.

This project should be abandoned but if proceeds we DEMAND a full Environmental Impact Report (EIR); an EIR actually gives us a hook to get into court to block this gross development

ENVIRONMENTAL HAZARD

- Mojave Desert Land Trust and the Center for Biological Diversity have both deemed this a wildlife corridor
 - the project would block the entire width of an important wildlife connectivity corridor between the San Bernardino Mountains, Joshua Tree National Park, and the central Mojave
 - On page 27, the Initial Study claims that the project won't contribute to habitat fragmentation because permanent structures would not physically block wildlife migration. But building and human presence on the rim of the wash may very well dissuade wildlife species from migrating through Pipes Canyon if those species are wary of any contact with humans. Examples could include desert bighorn sheep and mountain lion. Fuller discussion is needed.
 - There are hundreds of western Joshua trees (*Yucca brevifolia*) on the developable section of the property. Joshua trees are a state protected species being considered for listing as Threatened under the California Endangered Species Act. At this time, the County cannot issue a permit to take (by removal or transplanting any individual) western Joshua trees.
 - Joshua trees may still be listed by the California Fish and Game Commission in June. The county suggests that as Joshua trees and other desert plants will be avoided or relocated, there's no significant impact. Joshua trees generally die after relocation, as do mature mesquites. Relocating a creosote ring might work technically but destroys the prehistoric value of the plant.
 - the contention on page 14 that there will be no impact to forestland because the trees will be moved elsewhere is pretty laughable
- There are potential creosote clonal rings in excess of 4,000 years old on the site. *Yucca* clonal rings of similar age may exist. A 2006 study by leading tortoise experts found seven adult desert tortoises on the developable section of the property. The proponents' recent study finding no tortoises is methodologically suspect.
- The Initial study claims "There are no desert tortoise occurrences documented on site or directly adjacent to it...Desert Tortoise are therefore currently absent from the Project Site" Neighbors of the site have evidence to the contrary. Worth mentioning in as many comments as possible. WE HAVE THOSE PICTURES.
 - Study claims "LeConte's thrasher was neither observed nor detected on-site during the avian auditory and

visual survey. Therefore, LeConte's thrasher is currently absent from the project site." However, community scientists have documented multiple observations of LeConte's thrasher within a mile of the site in the last three years. Though they're not strong fliers, they do so on occasion, and it's hard to imagine a local population not taking advantage of a square mile of habitat.

- Study also doesn't offer any details about the survey: how long was it? How many observers? What time of year? What were conditions?

- Other wildlife species using the site include burrowing owls, coyotes, migratory bird species, badger, desert kit fox, Gambel's quail, and Bendire's thrasher.

VISUAL IMPACT

- visual impact on scenic vistas

- If something is up to code and compliant with zoning ordinances it does NOT mean there's no significant visual impact

LIGHT POLLUTION

- the report's specifications on night lighting is half assed/not specific enough

- Dark skies: The county says that new light pollution and glare from the glamping site will not constitute a significant impact because the project will abide by the recently revised light trespass ordinance in San Bernardino County. As one of the authors of that ordinance (which I intend to point out in NPCA's comments) this is hogwash. The point of the light trespass ordinance was to establish basic minimum standards to prevent glare and light trespass, leading not only to darker skies but also increased public safety. While the ordinance *will* reduce the impact of existing lighting as it is phased in, it does *not* mean new construction in a formerly dark area will not introduce a new source of light where none existed before. Again, simple compliance with the law is NOT equivalent to no impact.

- Also, 12 feet in height for pole lighting does not guarantee compliance with the light trespass ordinance. The light sources will still be visible from neighboring properties, and (dangerously) from the highway.

AIR QUALITY

- Air quality impacts from visitor traffic are based in the initial study on an assumption of 20 vehicles per hour for a total of 200 vehicle trips. However, this assumes not only that visitors will arrive at times staggered throughout the day, rather than within a few hours on a Friday night (and similarly leaving on Sunday morning) but also that once arrived, visitors will not make multiple trips to Joshua Tree NP, to Pioneertown, to Coachella or even a few hundred yards up the road to La Copine. Given that the proponents expect a maximum visitorship of 300 and as many as 50 seasonal employees arriving at the site each day, 200 vehicles may be a conservative estimate.

- There is a number missing from the narrative on page 19 in the Air Quality section, in which the first paragraph ends "However, the distance to the proposed campground improvements are approximately (insert number) feet." This could be used to bolster the point that this document was prepared hurriedly and with no real attention to detail.

- The Helipad is mentioned in the beginning of the document (page 2) as taking up 7,854 square feet, but emissions from helicopters are not mentioned in the air quality section.

- Dust from construction, with wind, would be hazardous to the surrounding human community and wildlife

TRAFFIC SAFETY

- Route 247 is a dangerous high-speed highway. Adding a destination which hundreds of vehicles will be entering and exiting on a particularly hazardous stretch of the road is a bad idea. First responder response times can be lengthy. Safety would require adding an additional lane and even a vehicle-controlled stoplight. A traffic study is warranted.

- The Initial Study estimates the project would generate 16 morning peak hour trips and 20 evening peak hour trips. Justification for this assumption, which appears elsewhere in the study, is scant. Moreover, no discussion of seasonal and weekly patterns in additional traffic is included. This lack of information suggests that a traffic study is needed, but the study proposes exempting the developer from a Traffic Impact Study that would help answer exactly these questions.

- A similar point could be made regarding the exemption from a Vehicle Miles Traveled assessment as

described on page 64, given that that exemption is based on the assumption that fewer than 110 average daily trips will be generated as a result of the project.

- The importance of this cannot be overemphasized. Additional traffic on a high-speed two lane cannot be treated with this level of disregard.

- In the last five years there have been more than a dozen accidents in the stretch of highway between Aberdeen and Reche that were serious enough to have had first responder involvement. Adding more than 100 cars exiting and entering the highway here during busy hours will prove dangerous, especially given drivers who pick up speed once they emerge from Pipes Canyon south of the project. A thorough traffic study, dedicated turn lanes, and perhaps a stop light should be considered if the project goes forward. The likelihood of extra costs to the county for first responders should be assessed.

- I demand you do a traffic report.

NO AMENITIES OPEN TO THE PUBLIC

- According to the Notice of Availability sent out to neighbors, Glamping “destination resort” with support facilities, none of which are to be open to the public, including restaurants/bar, reception area/store, trails and paths, recreation buildings, and helipad on a 25-acre portion of a 640-acre parcel

- The county should confirm in writing that the owner will not be allowed to develop the music festival venue with helipad described in the project documents, or the bar and restaurant also described. We appreciate the verbal assurances from contract staff, but that change needs to be made formal and permanent.

- How does this project positively impact our community at all?

- Community members were given assurances that the music festival venue, helipad, restaurant and bar would be excluded from the project plan. Only the amphitheater has been dropped. The helipad is mentioned only once, in a description of the square footage of the physical plant. Similarly with the bar and restaurant, which would at the very least generate food waste that offers a potential subsidy to raven and other animals that may affect populations of sensitive species such as the desert tortoise.

FIRE SAFETY

- inadequate analysis of fire safety in the report

- Winds get up to 20mph and upwards of 100mph in this proposed area

- Pipes Canyon is a natural break in the mountains through which high winds from the west are often funneled. Placing a campsite for hundreds of people at the mouth of Pipes Canyon means that any campfires lit during high wind events could easily spread eastward, threatening habitat and people’s homes. High winds also imply that trash discarded by careless campers will be distributed throughout the Landers area, an unsightly inconvenience to residents and a threat to local wildlife.

- Concentrating campfires in this area upwind of most of the Morongo Basin also means a new source of particulate matter pollution, a serious concern in the Basin during both winter months and the peak of fire season.

- The emissions of particulate matter and other pollutants from fire pits should be discussed in more detail; rather than simply assigning those emissions to a total category claimed to be at 0.0 tons per year of emissions.

- Back of the envelope calculations: fireplaces and wood stoves emit as much as 50 grams of particulate matter 2.5 microns or smaller (PM25) per hour. The four firepits on site will almost certainly emit more than that because of larger fires and less efficient burning, but even taking 50 grams PM25 per hour each as an assumption, and assuming an average of four hours of fires each day, that’s 292 kilograms of PM25 emitted each year, a.k.a. .29 tons per year.

- Wood smoke can also include benzene, benzo(a)pyrene and dibenz(a,h)anthracene, carbon monoxide, formaldehyde, organic gases (including aldehyde gases and other respiratory irritants), nitrogen oxides, polycyclic aromatic hydrocarbons (PAHs), and dioxin. All of these are toxic. We deserve more than a dismissal of any need for analysis of their possible impact on downwinders.

- Odor: initial study claims that the nearest “sensitive receptors” (a.k.a. potentially affected residents) are 800 feet away from the site, that odors from campfire smoke will not be significant. This is worth challenging as subject to personal sensitivities. Smoke every weekend from four bonfires might affect quality of life on a consistent basis even several miles downwind.

NOISE LEVELS

- Noise: no discussion of noise levels after 10 pm is included in the initial study. Unless the operators intend to enact and enforce a 10 pm curfew policy, this should be discussed in an environmental assessment. Noise from traffic on Old Woman Springs road would be appreciably lower during night-time "party" hours than the 50.6dBA cited during daytime hours.
- The Helipad is nowhere discussed in the noise section.

WATER

- Proponents' plans suggest that wastewater will be directed to a leach field on the property, north of the resort. A stormwater retention basin will be sited immediately east of the sewage disposal leach field. What volume of wastewater is projected to be disposed of via this leach field (considering perhaps 200-300 guests in a typical weekend in season)? Are hydrology studies available that ensure this large addition of wastewater won't infiltrate into neighbors' wells (there are at least 61 domestic wells within a few miles downstream) or the aquifer serving Bighorn Desert View Water Agency? Would stormwater capture from the project's hardened surfaces accentuate this percolation of sewage?
- Water use: the Initial study says that the project would consume 18,150 gallons of potable water per day, a bit more than 20 acre-feet per year. The study compares this to an estimate of 14,568 gallons per day were the site to be developed to its maximal footprint for residential use at 82 units. The failure of attempts to develop residences on the land due to seismic hazards is not mentioned, nor is the fact that not developing the land instead of developing the resort would consume zero gallons per day.

SEISMIC ACTIVITY

- A housing project on this site was denied permit due to a nearby earthquake fault. Though Flamingo 640 would be a much smaller development than that previous proposal, the plan still incorporates structures (camping "lofts," as well as other guest amenities) that could pose a hazard during a quake, and which may disqualify the project from obtaining a Conditional Use Permit.

MORE ISSUES

- Would the proposed project be accessible for those with physical limitations? How would the proposed project utilize local labor and contractors to support the local community? How would the campground keep their guests from trespassing on adjacent properties?
- The Morongo Basin needs additional camping capacity. However, preference should be given to sites that are closer to the park, are preferably on land that is previously degraded, and which are more readily accessible by highways capable of bearing the increased traffic. Additionally, we favor development of campgrounds that are economically accessible to more potential visitors, so that families with less disposable income have a way to visit the high desert.

CLOSING POINTS

- Flamingo 640 it would convert valuable conservation land surrounded by low-density rural zoning into a traffic-choked playground for the more-affluent.
- I hope to see these comments addressed and again, will not be satisfied until a thorough and unbiased Environmental Impact report is conducted.
- As a Rural Living community, we do not need a private "resort" experience or "hotel" in a rural zoned area that would do nothing to our community except add danger on the roads, add unnecessary hazard in an area already distinguished as a threat from wildfires, knowingly disrupt and destroy the natural environment, pollute the area with noise and light and change the character of our community irreparably. If one of the listed "objectives" for this development is to relieve camping congestion in the National park, then a safe and small public campsite and trails would do much less damage, not a private resort experience out of the price range of the residents who live here, or campers who would otherwise camp in the national park.

Best, Kate



Biggs, Lupe

From: Keith Williams <Desertboy2376@outlook.com>
Sent: Friday, April 22, 2022 3:01 PM
To: Morrissey, Jim
Subject: FW: Resort Camping Facility (Project No. Proj-2020-00191)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Mr. Jim Morrissey, Contract Planner
County of San Bernardino
Land Use Services Department – Planning Division
385 North Arrowhead Avenue, First Floor
San Bernardino, CA 92415-0187

Dear Mr. Morrissey,

We received your NOTICE OF AVAILABILITY/NOTICE OF INTENT TO ADOPT AN INITIAL STUDY/MITIGATED NEGATIVE DECLARATION CONDITIONAL USE PERMIT FOR A RESORT CAMPING FACILITY (Project No. Proj-2020-0091) and I am deeply concerned and opposed to the development being proposed.

My family and I live west of Hwy 247 directly across from the proposed site on Yellowknife Road and the view from our home will overlook this 640 acre site.

We have enjoyed our beautiful home here for the last 28 years and we chose our remote location for the amazing vista views, peace, quiet and solitude along with the natural surrounding beauty of the unexplored and undeveloped desert in this area. We decided to purchase our property outside of the Yucca Valley town limits to achieve this goal. We have truly treasured our home over the years and we are extremely concerned that the proposed project would have a HUGE impact on our current living situation.

We have many, many concerns but the main concerns are environmental. We see wildlife constantly on a daily basis and that is part of the magic and beauty of our desert. This project would definitely have an impact on the wildlife.

Another issue is the traffic. Highway 247 is already a very dangerous route and we see automobile accidents on a regular basis in front of our house due to the bend that occurs coming out of Pipes Canyon heading north where the road turns and becomes straight. Many cars choose to pass as soon as they get to this part of the highway and it is a danger zone. In fact we regularly see the CHP parked directly in front of our home on Hwy 247 to radar/monitor traffic to help slow down traffic violators. The proposed site begins exactly where the highway becomes straight (the danger zone). The proposed increase in traffic will only worsen this condition that we see first hand on a regular basis.

Another issue is that this property isn't zoned for commercial use and there is a good reason for that. The local neighbors all agree that we live in a residential zone, **NOT A COMMERCIAL** zone.

We understand that past surveys have been done (performed during optimal times of year for the developer to display misguided information in their best interest), but this isn't solid proof of what actually happens in an ongoing situation year-round.

We are convinced that an accurate Environmental Impact Report should be mandatory and will produce findings for significant impacts to biological, cultural, visual resources, and traffic and highway safety, not determined in the less comprehensive Mitigated Negative Declaration that was provided to the public.

We hereby respectfully request that you consider the devastating impact that you are proposing on an entire community who just want to live peacefully without big city interference.

Kind regards,

Keith Williams
2376 Yellowknife Rd.
Yucca Valley, CA 92284 (Flamingo Heights)

Biggs, Lupe

From: Aidan Koch <aidanalexiskoch@mailbox.org>
Sent: Saturday, April 16, 2022 4:26 PM
To: Morrissey, Jim
Subject: Resort Camping Project Number PROJ-2020-00191

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Mr. Morrissey,

I am emailing in regard to PROJ-2020-00191. Based on the information offered by community members, historic land designation, and environmental impact, I believe that this project is inappropriate to continue with.

As a community member who commutes off 247, there are serious hazards associated with allowing a destination to be a direct turn off the highway. Considering the site can host up to 300 people at one time with 100 parking spaces, this feel immediately threatening to the safety of drivers on an already very dangerous road.

On top of that, the proposed extent of development including bars, "art barn", and helipad, in an area designated for rural living is not only deeply inconsiderate to the permanent and invested community, but obstructs the great potential for 247's scenic highway designation and status as a highlight of entry into the area from the North or exit from the South.

I also believe it is negligent to not conduct an Environmental Impact Report on this parcel as county maps document the area as habitat and sightings by community members who live in direct relation to the proposed site have seen the federally protected tortoises there. It is necessary then to survey the land at appropriate times for the wildlife (in regard to their behavior and seasonal patterns) to be registered and accounted for.

Thank you for your time,
Sincerely,
Aidan Koch of Landers

Biggs, Lupe

From: Bernard Leibov <bernard.leibov@gmail.com>
Sent: Wednesday, April 20, 2022 3:41 PM
To: Morrissey, Jim
Subject: Flamingo 640

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Jim Morrissey,

As a long time resident of the Morongo Valley, I am incredibly disheartened to find that this project is moving forward without a proper and diligent Environmental Impact Report. I write here to impress upon you the disastrous effect this project will have on our lands as proposed, and hope that my voice along with the others of our community will manage to at the very least persuade the county to require a thorough and unbiased Environmental Impact Report before this project moves along any further.

ENVIRONMENTAL HAZARD

Firstly, this project should be abandoned, but if you must continue this process, we DEMAND a full Environmental Impact Report (EIR). This project is an environmental hazard. Mojave Desert Land Trust and the Center for Biological Diversity have both deemed this area in question a wildlife corridor. On page 27, the Initial Study claims that the project won't contribute to habitat fragmentation because permanent structures would not physically block wildlife migration. But building and human presence on the rim of the wash may very well dissuade wildlife species such as bighorn sheep, bobcats, and mountain lions from migrating through Pipes Canyon if those species are wary of any contact with humans. There are hundreds of western Joshua trees (*Yucca brevifolia*) on the developable section of the property. Joshua trees are a state protected species being considered for listing as Threatened under the California Endangered Species Act. At this time, the County cannot issue a permit to take (by removal or transplanting any individual) western Joshua trees. The contention on page 14 that there will be no impact to forestland because the trees will be moved elsewhere is pretty laughable.

Joshua trees generally die after relocation, as do mature mesquites. Relocating a creosote ring destroys the prehistoric value of the plant. There are potential creosote clonal rings in excess of 4,000 years old on the site. *Yucca* clonal rings of similar age may exist.

A 2006 study by leading tortoise experts found seven adult desert tortoises on the developable section of the property. The proponents' recent study finding no tortoises is methodologically suspect. The Initial study claims "There are no desert tortoise occurrences documented on site or directly adjacent to it...Desert Tortoise are therefore currently absent from the Project Site." Neighbors near the site have evidence to the contrary.

The study claims "LeConte's thrasher was neither observed nor detected on-site during the avian auditory and visual survey. Therefore, LeConte's thrasher is currently absent from the project site." However, community scientists have documented multiple observations of LeConte's thrasher within a mile of the site in the last three years. Though they're not strong fliers, they do so on occasion, and it's hard to imagine a local population not taking advantage of a square mile of habitat. This information should be provided in a full Environmental Impact Report.

The study also doesn't offer any details about the survey: how long was it? How many observers? What time of year? What were the conditions?

Other wildlife species using the site include burrowing owls, coyotes, black-tailed jackrabbits, migratory bird species, badger, bobcats, desert kit fox, Gambel's quail, and Bendire's thrasher.

VISUAL IMPACT

The proposed project would have a severe visual impact on scenic vistas. The high desert is special and this project

would strip it of its many peaceful and visual wonders. Please keep in mind that just because something is up to code and compliant with zoning ordinances it does NOT mean there's no significant visual impact.

LIGHT POLLUTION

The proposed project would cause terrible light pollution. The county says that new light pollution and glare from the glamping site will not constitute a significant impact because the project will abide by the recently revised light trespass ordinance in San Bernardino County. The point of the light trespass ordinance was to establish basic minimum standards to prevent glare and light trespass, leading not only to darker skies but also increased public safety. While the ordinance *will* reduce the impact of existing lighting as it is phased in, it does *not* mean new construction in a formerly dark area will not introduce a new source of light where none existed before. Again, simple compliance with the law is NOT equivalent to no impact. Also, 12 feet in height for pole lighting does not guarantee compliance with the light trespass ordinance. The light sources will still be visible from neighboring properties, and (dangerously) from the highway.

AIR QUALITY

Air quality impacts from visitor traffic are based in the initial study on an assumption of 20 vehicles per hour for a total of 200 vehicle trips. However, this assumes not only that visitors will arrive at times staggered throughout the day, rather than within a few hours on a Friday night (and similarly leaving on Sunday morning) but also that once arrived, visitors will not make multiple trips to Joshua Tree NP, to Pioneertown, to Coachella or even a few hundred yards up the road to La Copine. Given that the proponents expect a maximum visitorship of 300 and as many as 50 seasonal employees arriving at the site each day, 200 vehicles may be a conservative estimate. There is a number missing from the narrative on page 19 in the Air Quality section, in which the first paragraph ends "However, the distance to the proposed campground improvements are approximately (insert number) feet." This could be used to bolster the point that this document was prepared hurriedly and with no real attention to detail. The Helipad is mentioned in the beginning of the document (page 2) as taking up 7,854 square feet, but emissions from helicopters are not mentioned in the air quality section. Dust from construction, with wind, would be hazardous to the surrounding human community and wildlife

TRAFFIC SAFETY

Route 247 is a dangerous high-speed highway. Adding a destination which hundreds of vehicles (primarily of tourists who are not used to driving on the 247) will be entering and exiting on a particularly hazardous stretch of the road is a bad idea. For all the trips listed in my previous section on Air Quality (JTNP, Pioneertown, etc.) there would be more traffic coming into these places too that also have roads with traffic incidents (e.g. Pipes Canyon Road). First responder response times can be lengthy. Safety would require adding an additional lane and even a vehicle-controlled stoplight. A traffic study is warranted.

In the last five years there have been more than a dozen accidents in the stretch of highway between Aberdeen and Reche that were serious enough to have had first responder involvement. Adding more than 100 cars exiting and entering the highway here during busy hours will prove dangerous, especially given drivers who pick up speed once they emerge from Pipes Canyon south of the project. A thorough traffic study, dedicated turn lanes, and perhaps a stop light should be considered if the project goes forward. The likelihood of extra costs to the county for first responders should be assessed. We demand you do a traffic report.

The importance of this cannot be overemphasized. Additional traffic on a high-speed two lane cannot be treated with this level of disregard.

NO AMENITIES OPEN TO THE PUBLIC

This site is being proposed without any concern or care for its surrounding community. According to the Notice of Availability sent out to neighbors, Glamping "destination resort" with support facilities, none of which are to be open to the public, including restaurants/bar, reception area/store, trails and paths, recreation buildings, and helipad on a 25-acre portion of a 640-acre parcel.

Furthermore, community members were given assurances that the music festival venue, helipad, restaurant and bar would be excluded from the project plan. Only the amphitheater has been dropped. The helipad is mentioned only once,

in a description of the square footage of the physical plant. Similarly with the bar and restaurant, which would at the very least generate food waste that offers a potential subsidy to raven and other animals that may affect populations of sensitive species such as the desert tortoise.

How does this project positively impact our community at all? There is obviously no consideration for the neighbors.

FIRE SAFETY

There is inadequate analysis of fire safety in the report. Winds get up to 20mph and upwards of 80mph in this proposed area. Pipes Canyon is a natural break in the mountains through which high winds from the west are often funneled. Placing a campsite for hundreds of people at the mouth of Pipes Canyon means that any campfires lit during high wind events could easily spread eastward, threatening habitat and people's homes. High winds also imply that trash discarded by careless campers will be distributed throughout the Landers area, an unsightly inconvenience to residents and a threat to local wildlife.

Concentrating campfires in this area upwind of most of the Morongo Basin also means a new source of particulate matter pollution, a serious concern in the Basin during both winter months and the peak of fire season.

The emissions of particulate matter and other pollutants from fire pits should be discussed in more detail; rather than simply assigning those emissions to a total category claimed to be at 0.0 tons per year of emissions.

Wood smoke can also include benzene, benzo(a)pyrene and dibenz(a,h)anthracene, carbon monoxide, formaldehyde, organic gases (including aldehyde gases and other respiratory irritants), nitrogen oxides, polycyclic aromatic hydrocarbons (PAHs), and dioxin. All of these are toxic. We deserve more than a dismissal of any need for analysis of their possible impact on downwinders.

Also, the initial study claims that the nearest "sensitive receptors" (a.k.a. potentially affected residents) are 800 feet away from the site, that odors from campfire smoke will not be significant. This is worth challenging as subject to personal sensitivities. Smoke every weekend from four bonfires might affect quality of life on a consistent basis even several miles downwind.

NOISE LEVELS

There is no discussion of noise levels after 10 pm in the initial study. Unless the operators intend to enact and enforce a 10 pm curfew policy, this should be discussed in an environmental assessment. Noise from traffic on Old Woman Springs road would be appreciably lower during night-time "party" hours than the 50.6dBA cited during daytime hours. The Helipad is nowhere discussed in the noise section.

WATER

Proponents' plans suggest that wastewater will be directed to a leach field on the property, north of the resort. A stormwater retention basin will be sited immediately east of the sewage disposal leach field. What volume of wastewater is projected to be disposed of via this leach field (considering perhaps 200-300 guests in a typical weekend in season)? Are hydrology studies available that ensure this large addition of wastewater won't infiltrate into neighbors' wells (there are at least 61 domestic wells within a few miles downstream) or the aquifer serving Bighorn Desert View Water Agency? Would stormwater capture from the project's hardened surfaces accentuate this percolation of sewage? Water use: the Initial study says that the project would consume 18,150 gallons of potable water per day, a bit more than 20 acre-feet per year. The study compares this to an estimate of 14,568 gallons per day were the site to be developed to its maximal footprint for residential use at 82 units. The failure of attempts to develop residences on the land due to seismic hazards is not mentioned, nor is the fact that not developing the land instead of developing the resort would consume zero gallons per day.

SEISMIC ACTIVITY

A housing project on this site was denied permit due to a nearby earthquake fault. Though Flamingo 640 would be a much smaller development than that previous proposal, the plan still incorporates structures (camping "lofts," as well as other guest amenities) that could pose a hazard during a quake, and which may disqualify the project from obtaining a Conditional Use Permit.

OTHER POINTS

Would the proposed project be accessible for those with physical limitations? How would the proposed project utilize local labor and contractors to support the local community? How would the campground keep their guests from trespassing on adjacent properties.

The Morongo Basin needs additional camping capacity. However, preference should be given to sites that are closer to the park, are preferably on land that is previously degraded, and which are more readily accessible by highways capable of bearing the increased traffic. Additionally, we favor development of campgrounds that are economically accessible to more potential visitors, so that families with less disposable income have a way to visit the high desert.

To close, Flamingo 640 meets none of these criteria. Instead, it would convert valuable conservation land surrounded by low-density rural zoning into a traffic-choked playground for the more-affluent. If you plan to build this site, build it somewhere else - closer to the 62 or the park if your concern is to house tourists coming from out of town.

I hope to see these comments addressed and again, will not be satisfied until a thorough and unbiased Environmental Impact report is conducted.

As a Rural Living community, we do not need a private "resort" experience or "hotel" in a rural zoned area that would do nothing to our community except add danger on the roads, add unnecessary hazard in an area already distinguished as a threat from wildfires, knowingly disrupt and destroy the natural environment, pollute the area with noise and light and change the character of our community irreparably. If one of the listed "objectives" for this development is to relieve camping congestion in the National park, then a safe and small public campsite and trails would do much less damage, not a private resort experience out of the price range of the residents who live here, or campers who would otherwise camp in the national park.

Thanks for your consideration

Bernard Leibov
Joshua Tree, CA

Biggs, Lupe

From: McCoy Mike <mikemccoy2@mac.com>
Sent: Friday, April 15, 2022 5:25 PM
To: Morrissey, Jim
Subject: Project # PROJ-2020-00191, Assessor Parcel Number (APN) 0629-181-01

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Hi Jim,

I'm a resident at 1213 Golden Slipper in Landers and wanted to express my support for the 'Glamoing' project. Multiple neighbors have mentioned a petition against the project citing some outlandish environmental impact claims including the placement of an endangered turtle in order to seise any further progress. The local economy is struggling as it is and some are against tourism. I, however, feel we need to do more to bring in businesses that will attract visitors.

Thank you for your ear.

Mike McCoy
323-229-8248

Biggs, Lupe

From: Melford, Deborah <Deborah.Melford@spx.com>
Sent: Wednesday, April 20, 2022 8:42 AM
To: Morrissey, Jim
Cc: Miafiga3@hotmail.com
Subject: RE: Project # PROJ-2020-00191, Assessor Parcel Number (APN) 0629-181-01

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Jim Morrissey,

I have been a resident of Flamingo Heights for 10 years. I own my home, I am a taxpayer.

I hope you have had time to thoughtfully read through all the emails you are receiving about this project. I am deeply disheartened to find that this project is being moved forward without a proper and diligent Environmental Impact Report. After reading through the Draft study, I was shocked by the outright flimsy and dishonest work done to hastily try to pass this project through backchannels without the support or consultation with the surrounding community and with blatant disregard of the local ecological environment. I write here to impress upon you the disastrous effect this project will have on our lands as proposed, and hope that my voice along with the others of our community will manage to at the very least persuade the county to require a thorough and unbiased Environmental Impact Report before this project moves along any further. I have personally walked through the proposed area as aforementioned. I have seen beautiful foxes, hares, tortoises, coyotes and all of the wonders of wildlife that will be affected by this project. All of the parts of the desert that we residents cherish, and welcome visitors to also cherish the desert and wildlife.

GENERAL POINTS:

- this project should be abandoned but if proceeds we **DEMAND a full Environmental Impact Report (EIR)**; an EIR actually gives us a hook to get into court to block this gross development
- after every instance of you pointing out insufficient information - or discussion of a topic, it would be good to include a sentence to the effect of "This information should be provided in a full Environmental Impact Report."

ENVIRONMENTAL HAZARD

- Mojave Desert Land Trust and the Center for Biological Diversity have both deemed this a wildlife corridor
- the project would block the entire width of an important wildlife connectivity corridor between the San Bernardino Mountains, Joshua Tree National Park, and the central Mojave
- On page 27, the Initial Study claims that the project won't contribute to habitat fragmentation because permanent structures would not physically block wildlife migration. But building and human presence on the rim of the wash may very well dissuade wildlife species from migrating through Pipes Canyon if those species are wary of any contact with humans. Examples could include desert bighorn sheep and mountain lion. Fuller discussion is needed.
- There are hundreds of western Joshua trees (*Yucca brevifolia*) on the developable section of the property. Joshua trees are a state protected species being considered for listing as Threatened under the California Endangered Species Act. At this time, the County cannot issue a permit to take (by removal or transplanting any individual) western Joshua trees.
- Joshua trees may still be listed by the California Fish and Game Commission in June. The county suggests that as Joshua trees and other desert plants will be avoided or relocated, there's no significant impact. Joshua trees generally die after relocation, as do mature mesquites. Relocating a creosote ring might work technically but destroys the prehistoric value of the plant.
- the contention on page 14 that there will be no impact to forestland because the trees will be moved elsewhere is pretty laughable
There are potential creosote clonal rings in excess of 4,000 years old on the site. Yucca clonal rings of similar age may exist. A 2006 study by leading tortoise experts found seven adult desert tortoises on the developable section of the property. The proponents' recent study finding no tortoises is methodologically suspect.
- The Initial study claims "There are no desert tortoise occurrences documented on site or directly adjacent to it...Desert Tortoise are therefore currently absent from the Project Site" Neighbors of the site have evidence to the contrary. Worth mentioning in as many comments as possible. WE HAVE THOSE PICTURES.
- Study claims "LeConte's thrasher was neither observed nor detected on-site during the avian auditory and visual survey. Therefore, LeConte's thrasher is currently absent from the project site." However, community scientists have documented multiple observations of LeConte's thrasher within a mile of the site in the last three years. Though they're not strong fliers, they do so on occasion, and it's hard to imagine a local population not taking advantage of a square mile of habitat.
- Study also doesn't offer any details about the survey: how long was it? How

many observers? What time of year? What were conditions?

- Other wildlife species using the site include burrowing owls, coyotes, migratory bird species, badger, desert kit fox, Gambel's quail, and Bendire's thrasher.

VISUAL IMPACT

- visual impact on scenic vistas
- If something is up to code and compliant with zoning ordinances it does NOT mean there's no significant visual impact

LIGHT POLLUTION

- the report's specifications on night lighting is half assed/not specific enough
- Dark skies: The county says that new light pollution and glare from the glamping site will not constitute a significant impact because the project will abide by the recently revised light trespass ordinance in San Bernardino County. As one of the authors of that ordinance (which I intend to point out in NPCA's comments) this is hogwash. The point of the light trespass ordinance was to establish basic minimum standards to prevent glare and light trespass, leading not only to darker skies but also increased public safety. While the ordinance *will* reduce the impact of existing lighting as it is phased in, it does *not* mean new construction in a formerly dark area will not introduce a new source of light where none existed before. Again, simple compliance with the law is NOT equivalent to no impact.
- Also, 12 feet in height for pole lighting does not guarantee compliance with the light trespass ordinance. The light sources will still be visible from neighboring properties, and (dangerously) from the highway.

AIR QUALITY

- Air quality impacts from visitor traffic are based in the initial study on an assumption of 20 vehicles per hour for a total of 200 vehicle trips. However, this assumes not only that visitors will arrive at times staggered throughout the day, rather than within a few hours on a Friday night (and similarly leaving on Sunday morning) but also that once arrived, visitors will not make multiple trips to Joshua Tree NP, to Pioneertown, to Coachella or even a few hundred yards up the road to La Copine. Given that the proponents expect a maximum visitorship of 300 and as many as 50 seasonal employees arriving at the site each day, 200 vehicles may be a conservative estimate.
- There is a number missing from the narrative on page 19 in the Air Quality section, in which the first paragraph ends "However, the distance to the proposed campground improvements are approximately (insert number) feet." This could be used to bolster the point that this document was prepared hurriedly and with

no real attention to detail.

- The Helipad is mentioned in the beginning of the document (page 2) as taking up 7,854 square feet, but emissions from helicopters are not mentioned in the air quality section.
- Dust from construction, with wind, would be hazardous to the surrounding human community and wildlife

TRAFFIC SAFETY

- Route 247 is a dangerous high-speed highway. Adding a destination which hundreds of vehicles will be entering and exiting on a particularly hazardous stretch of the road is a bad idea. First responder response times can be lengthy. Safety would require adding an additional lane and even a vehicle-controlled stoplight. A traffic study is warranted.
- The Initial Study estimates the project would generate 16 morning peak hour trips and 20 evening peak hour trips. Justification for this assumption, which appears elsewhere in the study, is scant. Moreover, no discussion of seasonal and weekly patterns in additional traffic is included. This lack of information suggests that a traffic study is needed, but the study proposes exempting the developer from a Traffic Impact Study that would help answer exactly these questions.
- A similar point could be made regarding the exemption from a Vehicle Miles Traveled assessment as described on page 64, given that that exemption is based on the assumption that fewer than 110 average daily trips will be generated as a result of the project.
- The importance of this cannot be overemphasized. Additional traffic on a high-speed two lane cannot be treated with this level of disregard.
- In the last five years there have been more than a dozen accidents in the stretch of highway between Aberdeen and Reche that were serious enough to have had first responder involvement. Adding more than 100 cars exiting and entering the highway here during busy hours will prove dangerous, especially given drivers who pick up speed once they emerge from Pipes Canyon south of the project. A thorough traffic study, dedicated turn lanes, and perhaps a stop light should be considered if the project goes forward. The likelihood of extra costs to the county for first responders should be assessed.
- I demand you do a traffic report. I myself commute to the low desert and have seen how many trucks are on the road and traffic building up, which frightens me how many accidents will occur from this project alone.

NO AMENITIES OPEN TO THE PUBLIC

- According to the Notice of Availability sent out to neighbors, Glamping “destination resort” with support facilities, none of which are to be open to the

public, including restaurants/bar, reception area/store, trails and paths, recreation buildings, and helipad on a 25-acre portion of a 640-acre parcel

- The county should confirm in writing that the owner will not be allowed to develop the music festival venue with helipad described in the project documents, or the bar and restaurant also described. We appreciate the verbal assurances from contract staff, but that change needs to be made formal and permanent.

- How does this project positively impact our community at all?

- Community members were given assurances that the music festival venue, helipad, restaurant and bar would be excluded from the project plan. Only the amphitheater has been dropped. The helipad is mentioned only once, in a description of the square footage of the physical plant. Similarly with the bar and restaurant, which would at the very least generate food waste that offers a potential subsidy to raven and other animals that may affect populations of sensitive species such as the desert tortoise.

FIRE SAFETY

- inadequate analysis of fire safety in the report

- Winds get up to 20mph and upwards of 100mph in this proposed area

- Pipes Canyon is a natural break in the mountains through which high winds from the west are often funneled. Placing a campsite for hundreds of people at the mouth of Pipes Canyon means that any campfires lit during high wind events could easily spread eastward, threatening habitat and people's homes. High winds also imply that trash discarded by careless campers will be distributed throughout the Landers area, an unsightly inconvenience to residents and a threat to local wildlife.

- Concentrating campfires in this area upwind of most of the Morongo Basin also means a new source of particulate matter pollution, a serious concern in the Basin during both winter months and the peak of fire season.

- The emissions of particulate matter and other pollutants from fire pits should be discussed in more detail; rather than simply assigning those emissions to a total category claimed to be at 0.0 tons per year of emissions.

- Back of the envelope calculations: fireplaces and wood stoves emit as much as 50 grams of particulate matter 2.5 microns or smaller (PM25) per hour. The four firepits on site will almost certainly emit more than that because of larger fires and less efficient burning, but even taking 50 grams PM25 per hour each as an assumption, and assuming an average of four hours of fires each day, that's 292 kilograms of PM25 emitted each year, a.k.a. .29 tons per year.

- Wood smoke can also include benzene, benzo(a)pyrene and dibenz(a,h)anthracene, carbon monoxide, formaldehyde, organic gases (including aldehyde gases and other respiratory irritants), nitrogen oxides,

polycyclic aromatic hydrocarbons (PAHs), and dioxin. All of these are toxic. We deserve more than a dismissal of any need for analysis of their possible impact on downwinders.

- Odor: initial study claims that the nearest “sensitive receptors” (a.k.a. potentially affected residents) are 800 feet away from the site, that odors from campfire smoke will not be significant. This is worth challenging as subject to personal sensitivities. Smoke every weekend from four bonfires might affect quality of life on a consistent basis even several miles downwind.

NOISE LEVELS

- Noise: no discussion of noise levels after 10 pm is included in the initial study. Unless the operators intend to enact and enforce a 10 pm curfew policy, this should be discussed in an environmental assessment. Noise from traffic on Old Woman Springs road would be appreciably lower during night-time “party” hours than the 50.6dBA cited during daytime hours.

-The Helipad is nowhere discussed in the noise section. Residents understand how sound carries very sharply through this valley.

WATER

- Proponents’ plans suggest that wastewater will be directed to a leach field on the property, north of the resort. A stormwater retention basin will be sited immediately east of the sewage disposal leach field. What volume of wastewater is projected to be disposed of via this leach field (considering perhaps 200-300 guests in a typical weekend in season)? Are hydrology studies available that ensure this large addition of wastewater won’t infiltrate into neighbors’ wells (there are at least 61 domestic wells within a few miles downstream) or the aquifer serving Bighorn Desert View Water Agency? Would stormwater capture from the project’s hardened surfaces accentuate this percolation of sewage?

- Water use: the Initial study says that the project would consume 18,150 gallons of potable water per day, a bit more than 20 acre-feet per year. The study compares this to an estimate of 14,568 gallons per day were the site to be developed to its maximal footprint for residential use at 82 units. The failure of attempts to develop residences on the land due to seismic hazards is not mentioned, nor is the fact that not developing the land instead of developing the resort would consume zero gallons per day.

SEISMIC ACTIVITY

- A housing project on this site was denied permit due to a nearby earthquake fault. Though Flamingo 640 would be a much smaller development than that previous proposal, the plan still incorporates structures (camping “lofts,” as well

as other guest amenities) that could pose a hazard during a quake, and which may disqualify the project from obtaining a Conditional Use Permit.

MORE TALKING POINTS

- Would the proposed project be accessible for those with physical limitations? How would the proposed project utilize local labor and contractors to support the local community? How would the campground keep their guests from trespassing on adjacent properties?
- The Morongo Basin needs additional camping capacity. However, preference should be given to sites that are closer to the park, are preferably on land that is previously degraded, and which are more readily accessible by highways capable of bearing the increased traffic. Additionally, we favor development of campgrounds that are economically accessible to more potential visitors, so that families with less disposable income have a way to visit the high desert.

CLOSING POINTS

- Flamingo 640 it would convert valuable conservation land surrounded by low-density rural zoning into a traffic-choked playground for the more-affluent.
- I hope to see these comments addressed and again, will not be satisfied until a thorough and unbiased Environmental Impact report is conducted.
- As a Rural Living community, we do not need a private "resort" experience or "hotel" in a rural zoned area that would do nothing to our community except add danger on the roads, add unnecessary hazard in an area already distinguished as a threat from wildfires, knowingly disrupt and destroy the natural environment, pollute the area with noise and light and change the character of our community irreparably. If one of the listed "objectives" for this development is to relieve camping congestion in the National park, then a safe and small public campsite and trails would do much less damage, not a private resort experience out of the price range of the residents who live here, or campers who would otherwise camp in the national park

Sir, I hope our local residents can be heard in this project moving forward.

Sincerely,

Deborah Melford

771 Cherokee Trail Yucca Valley CA 92284 646-621-4623

Biggs, Lupe

From: Melissa Spurr <melissa.spurr@gmail.com>
Sent: Thursday, April 21, 2022 11:46 AM
To: Morrissey, Jim
Subject: Concern About Flamingo 640
Attachments: Letter of Concern PROJ-2020-00191.docx

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Mr. Morrissey,

I wanted to express opposition to PROJ-2020-00191 on parcel 0629-181-01.

Given the vast scope of this project and the irreversible potential harm it could bring to this area if approved, I strongly feel the County Board of Supervisors require a *CEQA Environmental Impact Report* and not approve Flamingo640's application for a *Conditional Use Permit*.

Specifically, considering the following, the existing report causes alarming concerns:

With as much public opposition to the proposed Conditional Use Permit as there is and has been, on what basis can you not require a comprehensive EIR? It is my understanding that the primary role of Project Planner for Land Development is to protect the public interest in the fairness and integrity of land-use decisions. Public confidence in government depends on the integrity of its decisions, and the avoidance of bias and conflicts of interest is no doubt a factor in establishing that confidence. Given that Flamingo640 has irreversible environmental effects, *not* requiring a full EIR seems like there is bias to approve the Conditional Use Permit, in spite of its glaring flaws pointed out by the community directly affected; a community who cares about Wildlife Protection and the qualities of life they were assured of when they purchased real estate to live in Flamingo Heights and its neighboring communities. Approving this application by Flamingo640 will not only undoubtedly create danger and a long-lasting negative impact on endangered wildlife and traffic, but also set a precedent to other investors that SB County requirements can be pushed over without having to do a CEQA Environmental Impact Report for their projects. This invites additional pressure from outside the community to destroy the Countywide Plan designation of Rural Living (RL) when the RL Plan designation was put into place to be upheld.

Now, of course, you could give special privileges within the Rural Living (RL) zoning without changing the zoning. If you are asserting that this Conditional Use for a campground can be approved without changing the zoning from residential to commercial, then there needs to be a new application for the public to comment on with all the exemptions of residential zoning as part of the application.

The primary purposes of CEQA are to avoid, reduce, or prevent environmental damage, and foster an informed and transparent public decision-making process by providing information to decision-makers and the public concerning the environmental effects of projects either undertaken or approved by lead agencies.

It is crucial that applications such as Flamingo640 that serve outside investors don't become a routine matter of submitting inadequate reports with an intent to slide through environmental and zoning protections. Both

residents and outside investors should have reason to respect the protections the County Board of Supervisors Staff and Planning Commission afford to local communities under their jurisdiction.

Amphitheater:

Other residents have relayed information received from you that the applicant has withdrawn the Amphitheater and Parking Component from the application. *If that is accurate, where can the public find the amended application for comments?*

Regarding Flamingo640's original plan's intention to hold concerts: Since any property owner can apply for a Temporary Special Event Permit of any size subject to conditions, then *any* entitlement conditions should specifically **prohibit** the property's use for any public event.

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Noise and light pollution will undoubtedly be increased with the proposed project, when both are already things residents can complain about and have protections, such as the Night Sky Ordinance, to ensure.

The proposed project will also create an intrusion of the Glampsite's facilities and multiple vehicles into the line-of-sight in the State Route 247 Scenic Corridor.

As for noise generated, the Noise Report poorly addresses the ongoing intrusion and nuisance of noise, both in the building process, and during its completion and operation. It attempts to measure decibels for a non-existent origin of sound. How can the decibel level be measured of something that doesn't exist? The Noise report is flawed.

Flamingo640's plan for a private helicopter for emergencies is yet another devastating intrusion on the rural zoning. If this is allowed without changing zoning, are we all allowed to build helipads on our properties? Once a helipad is there, the threat of vibration and noise disturbance is exponentially increased. It also creates the possibility of wealthy guests accessing the helipad for non-emergency use.

For light, noise and traffic nuisance and dangers alone, the single use parcel is not suitable for development. The presently-submitted report insufficiently addresses all of the above. The sought-after *Conditional Use Permit* should be rejected, and a full EIR required.

Community Concerns:

This project is driven by out-of-town investors. The disregard by the developers proposing to construct an undeniably commercial project outside the commercial corridor puts them at an advantage against other commercial investors who respect the appropriate zoning of their venture. They are angling to get something for less and change the rules to suit the objectives of their investment. The possibility of benefit coming back to the community is disproportionate to the benefit to a single out-of-county investment company. Why should residents have to put up with having this next to our doorstep? The purchasers of this property did know the zoning when they bought the property. A previous project did not go through on the parcel. Any development of such a scope as this should understand the need to seek out a parcel that suits the size and environmental impact of their commercial venture. *Yet they are already selling it on their website without having approval as if they feel assured they will be able to do what they want.*

Traffic:

Flamingo640's Trip Report cannot be viewed as realistic as it doesn't address an accurate number of trips for the addition of 400 extra daily visitors to the proposed site, nor does it quantify other commercial elements (retail, restaurant, etc.) already needed when entering and exiting the normal flow of traffic on the 247. The potential for blockages and accidents on the winding, undivided route can cause backups to supply chain vehicles that rely on this one highway.

Anyone familiar with perilous highway 247 entry and exit problems this development would create will take issue with the current impact report. Additionally, hwy 247 is an arterial trucking route, connecting Yucca Valley with Barstow / Victorville. The additional burden in traffic, wait times, congestion is bad for County of San Bernardino commercial interests and residents alike.

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There is a known wildlife corridor within the property. I have neighbors who have shown me photos of desert tortoises, desert foxes, and bobcats taken by motion-activated security cameras, all within 600 feet of the property that claims there are no endangered species nearby. Specifically, it is known that there are desert tortoises where it was wrongly declared that none were indicated in the proposal. The report is inaccurate and untrustworthy. A full comprehensive *CEQA Environmental Impact Report* should at the very least be a requirement to disclose whether endangered tortoises who spend part of their time underground, do in fact live on the property. The wildlife corridor is presently undisturbed and should remain protected.

Any development must be required to adhere to the county's regulations with respect to removal or relocation of any Joshua Trees, of which there are hundreds.

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Joshua Tree

Biggs, Lupe

From: rmloui <rmloui@gmail.com>
Sent: Friday, April 22, 2022 4:10 PM
To: Morrissey, Jim
Subject: Subject: Project # PROJ-2020-00191, Assessor Parcel Number (APN) 0629-181-01

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Jim Morrissey,

I hope you are taking the time to read through all the emails you are receiving about this project. As an adjacent property owner to the site, I am incredibly disheartened to find that this project is moving forward without a proper and diligent Environmental Impact Report. After reading through the Draft study, I was shocked by the outright dishonest work done to hastily try to pass this project through backchannels without the support or consultation with the surrounding community and with blatant disregard of the local ecological environment. I write here to impress upon you the disastrous effect this project will have on our lands as proposed, and hope that my voice along with the others of our community will manage to at the very least persuade the county to require a thorough and unbiased Environmental Impact Report before this project moves along any further.

ENVIRONMENTAL HAZARD

Firstly, this project should be abandoned, but if you must continue this process, we DEMAND a full Environmental Impact Report (EIR). This project is an environmental hazard. Mojave Desert Land Trust and the Center for Biological Diversity have both deemed this area in question a wildlife corridor. On page 27, the Initial Study claims that the project won't contribute to habitat fragmentation because permanent structures would not physically block wildlife migration. But building and human presence on the rim of the wash may very well dissuade wildlife species such as bighorn sheep, bobcats, and mountain lions from migrating through Pipes Canyon if those species are wary of any contact with humans.

There are hundreds of western Joshua trees (*Yucca brevifolia*) on the developable section of the property. Joshua trees are a state protected species being considered for listing as Threatened under the California Endangered Species Act. At this time, the County cannot issue a permit to take (by removal or transplanting any individual) western Joshua trees. The contention on page 14 that there will be no impact to forestland because the trees will be moved elsewhere is pretty laughable.

Joshua trees generally die after relocation, as do mature mesquites. Relocating a creosote ring destroys the prehistoric value of the plant. There are potential creosote clonal rings in excess of 4,000 years old on the site. Yucca clonal rings of similar age may exist.

A 2006 study by leading tortoise experts found seven adult desert tortoises on the developable section of the property. The proponents' recent study finding no tortoises is methodologically suspect. The Initial study claims "There are no desert tortoise occurrences documented on site or directly adjacent to it...Desert Tortoise are therefore currently absent from the Project Site." Neighbors near the site have evidence to the contrary.

The study claims "LeConte's thrasher was neither observed nor detected on-site during the avian auditory and visual survey. Therefore, LeConte's thrasher is currently absent from the project site." However, community

scientists have documented multiple observations of LeConte's thrasher within a mile of the site in the last three years. Though they're not strong fliers, they do so on occasion, and it's hard to imagine a local population not taking advantage of a square mile of habitat. This information should be provided in a full Environmental Impact Report.

The study also doesn't offer any details about the survey: how long was it? How many observers? What time of year? What were the conditions?

Other wildlife species using the site include burrowing owls, coyotes, black-tailed jackrabbits, migratory bird species, badger, bobcats, desert kit fox, Gambel's quail, and Bendire's thrasher.

VISUAL IMPACT

The proposed project would have a severe visual impact on scenic vistas. The high desert is special and this project would strip it of its many peaceful and visual wonders. Please keep in mind that just because something is up to code and compliant with zoning ordinances it does NOT mean there's no significant visual impact.

LIGHT POLLUTION

The proposed project would cause terrible light pollution. The report's specifications on night lighting is not specific enough and my neighbors and I do not want this to affect our dark night skies. The county says that new light pollution and glare from the glamping site will not constitute a significant impact because the project will abide by the recently revised light trespass ordinance in San Bernardino County. The point of the light trespass ordinance was to establish basic minimum standards to prevent glare and light trespass, leading not only to darker skies but also increased public safety. While the ordinance *will* reduce the impact of existing lighting as it is phased in, it does *not* mean new construction in a formerly dark area will not introduce a new source of light where none existed before. Again, simple compliance with the law is NOT equivalent to no impact. Also, 12 feet in height for pole lighting does not guarantee compliance with the light trespass ordinance. The light sources will still be visible from neighboring properties, and (dangerously) from the highway.

AIR QUALITY

Air quality impacts from visitor traffic are based in the initial study on an assumption of 20 vehicles per hour for a total of 200 vehicle trips. However, this assumes not only that visitors will arrive at times staggered throughout the day, rather than within a few hours on a Friday night (and similarly leaving on Sunday morning) but also that once arrived, visitors will not make multiple trips to Joshua Tree NP, to Pioneertown, to Coachella or even a few hundred yards up the road to La Copine. Given that the proponents expect a maximum visitorship of 300 and as many as 50 seasonal employees arriving at the site each day, 200 vehicles may be a conservative estimate. There is a number missing from the narrative on page 19 in the Air Quality section, in which the first paragraph ends "However, the distance to the proposed campground improvements are approximately (insert number) feet." This could be used to bolster the point that this document was prepared hurriedly and with no real attention to detail. The Helipad is mentioned in the beginning of the document (page 2) as taking up 7,854 square feet, but emissions from helicopters are not mentioned in the air quality section. Dust from construction, with wind, would be hazardous to the surrounding human community and wildlife

TRAFFIC SAFETY

Route 247 is a dangerous high-speed highway. Adding a destination in which hundreds of vehicles (primarily of tourists who are not used to driving on the 247) will be entering and exiting on a particularly hazardous stretch of the road is a bad idea. For all the trips listed in my previous section on Air Quality (JTNP,

Pioneertown, etc.) there would be more traffic coming into these places too that also have roads with traffic incidents (e.g. Pipes Canyon Road). First responder response times can be lengthy. Safety would require adding an additional lane and even a vehicle-controlled stoplight. A traffic study is warranted.

In the last five years there have been more than a dozen accidents in the stretch of highway between Aberdeen and Reche that were serious enough to have had first responder involvement. Adding more than 100 cars exiting and entering the highway here during busy hours will prove dangerous, especially given drivers who pick up speed once they emerge from Pipes Canyon south of the project. A thorough traffic study, dedicated turn lanes, and perhaps a stop light should be considered if the project goes forward. The likelihood of extra costs to the county for first responders should be assessed. We demand you do a traffic report.

The importance of this cannot be overemphasized. Additional traffic on a high-speed two lane cannot be treated with this level of disregard.

NO AMENITIES OPEN TO THE PUBLIC

This site is being proposed without any concern or care for its surrounding community. According to the Notice of Availability sent out to neighbors, Glamping "destination resort" with support facilities, none of which are to be open to the public, including restaurants/bar, reception area/store, trails and paths, recreation buildings, and helipad on a 25-acre portion of a 640-acre parcel.

Furthermore, community members were given assurances that the music festival venue, helipad, restaurant and bar would be excluded from the project plan. Only the amphitheater has been dropped. The helipad is mentioned only once, in a description of the square footage of the physical plant. Similarly with the bar and restaurant, which would at the very least generate food waste that offers a potential subsidy to ravens and other animals that may affect populations of sensitive species such as the desert tortoise.

How does this project positively impact our community at all? There is obviously no consideration for the neighbors.

FIRE SAFETY

There is inadequate analysis of fire safety in the report. Winds get up to 20mph and upwards of 80mph in this proposed area. Pipes Canyon is a natural break in the mountains through which high winds from the west are often funneled. Placing a campsite for hundreds of people at the mouth of Pipes Canyon means that any campfires lit during high wind events could easily spread eastward, threatening habitat and people's homes. High winds also imply that trash discarded by careless campers will be distributed throughout the Landers area, an unsightly inconvenience to residents and a threat to local wildlife.

Concentrating campfires in this area upwind of most of the Morongo Basin also means a new source of particulate matter pollution, a serious concern in the Basin during both winter months and the peak of fire season.

The emissions of particulate matter and other pollutants from fire pits should be discussed in more detail; rather than simply assigning those emissions to a total category claimed to be at 0.0 tons per year of emissions.

Wood smoke can also include benzene, benzo(a)pyrene and dibenz(a,h)anthracene, carbon monoxide, formaldehyde, organic gases (including aldehyde gases and other respiratory irritants), nitrogen oxides, polycyclic aromatic hydrocarbons (PAHs), and dioxin. All of these are toxic. We deserve more than a dismissal of any need for analysis of their possible impact on downwinders.

Also, the initial study claims that the nearest "sensitive receptors" (a.k.a. potentially affected residents) are 800 feet away from the site, that odors from campfire smoke will not be significant. This is worth challenging as subject to personal sensitivities. Smoke every weekend from four bonfires might affect quality of life on a consistent basis even several miles downwind.

NOISE LEVELS

There is no discussion of noise levels after 10 pm in the initial study. Unless the operators intend to enact and enforce a 10 pm curfew policy, this should be discussed in an environmental assessment. Noise from traffic on Old Woman Springs road would be appreciably lower during night-time "party" hours than the 50.6dBA cited during daytime hours.

The Helipad is nowhere discussed in the noise section.

WATER

Proponents' plans suggest that wastewater will be directed to a leach field on the property, north of the resort. A stormwater retention basin will be sited immediately east of the sewage disposal leach field. What volume of wastewater is projected to be disposed of via this leach field (considering perhaps 200-300 guests in a typical weekend in season)? Are hydrology studies available that ensure this large addition of wastewater won't infiltrate into neighbors' wells (there are at least 61 domestic wells within a few miles downstream) or the aquifer serving Bighorn Desert View Water Agency? Would stormwater capture from the project's hardened surfaces accentuate this percolation of sewage?

Water use: the Initial study says that the project would consume 18,150 gallons of potable water per day, a bit more than 20 acre-feet per year. The study compares this to an estimate of 14,568 gallons per day were the site to be developed to its maximal footprint for residential use at 82 units. The failure of attempts to develop residences on the land due to seismic hazards is not mentioned, nor is the fact that not developing the land instead of developing the resort would consume zero gallons per day.

SEISMIC ACTIVITY

A housing project on this site was denied permit due to a nearby earthquake fault. Though Flamingo 640 would be a much smaller development than that previous proposal, the plan still incorporates structures (camping "lofts," as well as other guest amenities) that could pose a hazard during a quake, and which may disqualify the project from obtaining a Conditional Use Permit.

OTHER POINTS

Would the proposed project be accessible for those with physical limitations? How would the proposed project utilize local labor and contractors to support the local community? How would the campground keep their guests from trespassing on adjacent properties.

The Morongo Basin needs additional camping capacity. However, preference should be given to sites that are closer to the park, are preferably on land that is previously degraded, and which are more readily accessible by highways capable of bearing the increased traffic. Additionally, we favor development of campgrounds that are economically accessible to more potential visitors, so that families with less disposable income have a way to visit the high desert.

To close, Flamingo 640 meets none of these criteria. Instead, it would convert valuable conservation land surrounded by low-density rural zoning into a traffic-choked playground for the more-affluent. If you plan to build this site, build it somewhere else - closer to the 62 or the park if your concern is to house tourists coming from out of town.

I hope to see these comments addressed and again, will not be satisfied until a thorough and unbiased Environmental Impact report is conducted.

As a Rural Living community, we do not need a private "resort" experience or "hotel" in a rural zoned area that would do nothing to our community except add danger on the roads, add unnecessary hazard in an area already distinguished as a threat from wildfires, knowingly disrupt and destroy the natural environment, pollute the area with noise and light and change the character of our community irreparably. If one of the listed "objectives" for this development is to relieve camping congestion in the National park, then a safe and small public campsite and trails would do much less damage, not a private resort experience out of the price range of the residents who live here, or campers who would otherwise camp in the national park.

Jim, I hope you read this with thought and concern, and do not leave those in your fellow SB community feeling dismissed.

Best regards,
Rachel Loui

Biggs, Lupe

From: Susy Boyd <Susy@mdlt.org>
Sent: Wednesday, April 20, 2022 5:55 PM
To: Morrissey, Jim
Subject: MDLT Comment Letter for Proposed Flamingo 640: PROJ-2020-00191
Attachments: FINAL Resort Campground.pdf

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Mr. Morrissey,

On behalf of our Executive Directors Cody Hanford and Kelly Herbinson, please find Mojave Desert Land Trust's Comment Letter on the Flamingo 640 Project attached here. Thank you for the opportunity to comment.

Best,
Susy Boyd



Susy Boyd

Public Policy Coordinator

Cell [Preferred]: 650.720.0384 | Office: 760.366.5440 X241

Email: susy@mdlt.org

P.O. Box 1544 | 60124 29 Palms Hwy | Joshua Tree, CA 92252

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April 20, 2022

jim.morrissey@lus.sbcounty.gov

RE: Proposed Flamingo 640, PROJ-2020-00191 Assessor Parcel Number (APN) 0629-181-01

Dear Mr. Morrissey,

Thank you for providing opportunity to comment on the proposed Flamingo 640 Project. Mojave Desert Land Trust was founded in 2006 as a nonprofit 501(c)3 desert conservation organization headquartered in Joshua Tree, CA. MDLT acquires, restores, and protects biologically and culturally important lands throughout a 26-million-acre service area in the California deserts. To date, we have conserved more than 120,000 acres of land in national park units, national monuments, wilderness areas, wildlife corridors and other areas of importance to conservation.

Flamingo 640 is a destination glamping resort under consideration for a conditional use permit by your department. The proposed project is located southeast of the intersection of Highway 247 and Moonstone Road.

Support Buildings/Areas:

- Reception /Camp Store – 2,288 SF
- Restrooms – 1,120 SF each; 8 units
- Fire Pits –700 SF each; 4 units
- Pool/Patio – 3,000 SF
- Workshops – 3,600 SF each; 2 units
- Art Barn – 5,500 SF
- Restaurant – 10,108 SF
- Agave Bar – 5,500 SF
- Helipad – 7,854 SF
- Storage Area: 25,275 SF
- Yoga Deck: 2,400 SF
- Retention area: 58,902 SF (subject to change)
- Sewage disposal area (e.g. septic system): 58,902 SF (subject to change)

Trails/Paths/Gardens:

- Gardens – 212,000 SF • Internal Paths/Walkways between buildings.

Accommodations

The accommodations are described as 75 campsites, but a more detailed description of them is shared in the County's Environmental Checklist Form. Many of the "campsite" types exceed the individual square footage of local residences.

Up to 75 camp sites of three distinct types:

- Camping Lofts – 1,230 square-feet (SF) each; 20 sites
- Camping Tents – 220 SF each; 35 sites
- Chalet – 850 SF each; 20 sit

The resort proposal aims to be constructed on a 25-acre footprint within a 640-acre parcel with the listed support facilities. It should be noted that the proposal with luxury accommodations and extensive support buildings is substantially more than a traditionally characterized 75-site camping facility, and more closely aligns with a small, new community.

- One of our primary concerns with this project is its profound impact on wildlife connectivity. The proposed project is located within a regionally important habitat linkage which includes both the wash and most of the upland areas. The project expands across the entire width of a critical wildlife corridor that enjoins 29 Palms Marine Corps Base, Joshua Tree National Park, and the Sand to Snow National Monument. Connectivity between these areas is critical to the long-term viability and genetic diversity of the area's plant and animal populations. This linkage is part of a system of linkages identified in a widely circulated 2012 report, Morongo Basin Conservation Priorities Report: A Strategy for Preserving Conservation Values. Additionally, a recent Caltrans study of wildlife movement in linkages that encompasses the proposed project identified the need for a wildlife overcrossing at Highway 62, further underlining the importance of these connectivity corridors.
- Preservation of this habitat linkage is also in line with national priorities. Secretary of the Interior Deb Haaland launched a new national initiative in April 2022 making wildlife migration corridors and habitat connectivity a top conservation priority. The Department of Interior will focus on conservation and restoration of wildlife corridors and habitat connectivity to maintain healthy species populations and ecosystems, as habitats and migration routes are impacted by

climate change and fragmented by roads, fences, energy development and other man-made barriers.

- The Conceptual Area Conservation Plan [CAPP] was developed to identify lands of importance to the plant and animal populations of the Morongo Basin. The California Department of Fish and Wildlife has identified the proposed project area as CAPP-approved owing to its importance in maintenance of a habitat linkage. There are active efforts to preserve the habitat linkage as part of the CAPP effort. The Mojave Desert Land Trust manages thousands of acres within the linkage.
- Both the state and federal 30X30 efforts are emphasizing the need for more – not less – wildlife connectivity as a means of addressing climate change and protecting biodiversity. This project takes us further away from achieving 30X30 goals at both the state and federal level.
- The proposed project would impact the state and federally listed desert tortoise. The project area is habitat for the desert tortoise and a 2006 study documented their presence in the project area. “Seven tortoises, 29 burrows, 109 fresh scat, 42 older scat, and 2 sets of tracks were observed and recorded during the survey.” Signs of desert tortoise presence were found between Highway 247 and Pipes Canyon Wash.
- The proposed project would impact western Joshua tree woodland, a candidate species for listing under the California Endangered Species Act. There are numerous western Joshua trees on the developable section of the parcel. Under CEQA Guidelines Section 15065(a)(1), a lead agency shall find that a project may have a significant effect on the environment where there is substantial evidence that the project has the potential to (1) substantially reduce the habitat of a fish or wildlife species; (2) cause a fish or wildlife population to drop below self-sustaining levels; or (3) substantially reduce the number or restrict the range of an endangered, rare, or threatened species. CESA also applies to the potential creosote clonal rings greater than 4000 years in age on the proposal site.

In addition to the impacts to species and their habitat, including habitat linkages, the proposed project has the potential to affect the aesthetic resources of the area, including the scenic values of Highway 247, and it could impact the surrounding rural communities with light, noise, traffic, among other factors.

We believe the multiple concerns we have raised meet the threshold for a mandatory finding of significance, and taken together with other potential impacts, necessitate the preparation of an Environmental Impact Report for the proposed project.

We urge the County to carefully consider all the land use and environmental issues associated with this project in its review process.

Thank you for the opportunity to provide our comments.



Cody Hanford
Kelly Herbinson
Joint Executive Directors
Mojave Desert Land Trust

Biggs, Lupe

From: Derek Monypeny <dmonypeny@hotmail.com>
Sent: Wednesday, April 13, 2022 8:27 PM
To: Morrissey, Jim
Subject: Public comment regarding Project # PROJ-2020-00191

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Mr. Morrissey -

I am a resident of Yucca Valley. I have lived here since 2018. I am writing to express my deep and sincere concern regarding Project # PROJ-2020-00191, the proposed "glamping" site in Flamingo Heights.

This project would block the entire width of an important wildlife connectivity corridor between the San Bernardino Mountains, Joshua Tree National Park, and the central Mojave. Conservation groups have expressed interest in paying fair market value for the land and managing it for conservation. The state of California is planning for preservation of 30 percent of the state's lands and waters by 2030. This critical corridor should be part of that process.

There are hundreds of western Joshua trees on the developable section of the property. Joshua trees are a state protected species being considered for listing as Threatened under the California Endangered Species Act. There are potential creosote clonal rings in excess of 4,000 years old on the site. Yucca clonal rings of similar age may exist. A 2006 study by leading tortoise experts found seven adult desert tortoises on the developable section of the property. The proponents' recent study finding no tortoises is methodologically suspect.

Other wildlife species using the site include burrowing owls, LeConte's thrasher, migratory bird species, badger, desert kit fox, Gambel's quail, and Bendire's thrasher.

Route 247 is a dangerous high-speed highway. Adding a destination which hundreds of vehicles will be entering and exiting on a particularly hazardous stretch of the road is a bad idea. First responder response times can be lengthy. Safety would require adding an additional land and even a vehicle-controlled stoplight. A traffic study is warranted.

The county should confirm in writing that the owner will not be allowed to develop the music festival venue with helipad described in the project documents, or the bar and restaurant also described. We appreciate the verbal assurances from contract staff, but that change needs to be made formal and permanent.

Would the proposed project be accessible for those with physical limitations? How would the proposed project utilize local labor and contractors to support the local community? How would the campground keep their guests from trespassing on adjacent properties?

Pipes Canyon is a natural break in the mountains through which high winds from the west are often funneled. Placing a campsite for hundreds of people at the mouth of Pipes Canyon means that any campfires lit during high wind events could easily spread eastward, threatening habitat and people's homes. High winds also imply that trash discarded by careless campers will be distributed throughout the Landers area, an unsightly inconvenience to residents and a threat to local wildlife.

Concentrating campfires in this area upwind of most of the Morongo Basin also means a new source of particulate matter pollution, a serious concern in the Basin during both winter months and the peak of fire season.

Proponents' plans suggest that wastewater will be directed to a leach field on the property, north of the resort. A stormwater retention basin will be sited immediately east of the sewage disposal leach field. What volume of wastewater is projected to be disposed of via this leach field (considering perhaps 200-300 guests in a typical weekend in season)? Are hydrology studies available that ensure this large addition of wastewater won't infiltrate into neighbors' wells (there are at least 61 domestic wells within a few miles downstream) or the aquifer serving Bighorn Desert View Water Agency? Would stormwater capture from the project's hardened surfaces accentuate this percolation of sewage?

A housing project on this site was denied permit due to a nearby earthquake fault. Though Flamingo 640 would be a much smaller development than that previous proposal, the plan still incorporates structures (camping "lofts," as well as other guest amenities) that could pose a hazard during a quake, and which may disqualify the project from obtaining a Conditional Use Permit.

Will the entire facility be available for rent to one party for special events? Will concerts or festivals be planned here? How many helicopter landings/departures are envisioned per month? Studies of potential noise levels should be undertaken. Lighting sufficient for hundreds of guests, plus ambient light from lodging units, fires, visitor headlights, party lights, and other sources of illumination are likely to pose a substantial addition to light trespass in this relatively dark area, posing threats to safety, wildlife, and quiet enjoyment by neighbors.

The Morongo Basin needs additional camping capacity. However, preference should be given to sites that are closer to the park, are preferably on land that is previously degraded, and which are more readily accessible by highways capable of bearing the increased traffic. Additionally, we favor development of campgrounds that are economically accessible to more potential visitors, so that families with less disposable income have a way to visit the high desert. Flamingo 640 meets none of these criteria. Instead, it would convert valuable conservation land surrounded by low-density rural zoning into a traffic-choked playground for the more-affluent.

Thank you for the opportunity to share these comments with you.

Sincerely,

Derek Monypeny
Yucca Valley, CA

Biggs, Lupe

From: Steve Bardwell <steve@infinityranch.net>
Sent: Wednesday, April 20, 2022 7:41 PM
To: Morrissey , Jim
Subject: Comments re: PROJ-2020-00191 - Flamingo 640
Attachments: Flamingo 640 MBCA 4-20-22.pdf

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Hello Mr. Morrissey,

Please find attached, our comments regarding the Mitigated Environmental Impact determination for the above project.

Thank you for your consideration.

Steve Bardwell
president, MBCA
www.mbconservation.org
steve@infinityranch.net



April 20, 2022

Jim Morrissey, Contract Planner
County of San Bernardino
Via email to Jim.Morrissey@lus.sbcounty.gov

Re: PROJ-2020-00191 Draft Initial Study/ Mitigated Negative Declaration Flamingo 640
Assessor Parcel Number: 0629-181-01

Dear Mr. Morrissey:

The Morongo Basin Conservation Association (MBCA) respectfully rejects the findings of the Draft Initial Study/ Mitigated Negative Declaration. We contend, given the potential for serious environmental impacts, this project warrants the preparation of a complete Environmental Impact Report (EIR).

The Draft Initial Study/ Mitigated Negative Declaration is wholly inadequate in addressing these and other issues:

1. **The potential adverse effect on wildlife and habitat fragmentation due to human presence in the proximity of wildlife corridors.** Given the transient nature of many desert animals an extended study would be required to provide an adequate analysis.
2. **The destruction on Joshua tree woodland habitat.** Joshua trees are currently a state protected species being considered for listing as Threatened under the California Endangered Species Act. Relocation of Joshua Trees almost always ends with the death of the transplanted tree. The large undisturbed creosote and Joshua Tree area is actively sequestering carbon. The underground caliche is storing carbon from the Ice Ages which will be released when disturbed. Any potential destruction of habitat should be carefully studied and weighed and evaluated with the ongoing, cumulative loss of habitat.
3. **Destruction of creosote clonal rings more than 4,000 years old on the proposed site.** Clonal rings are irreplaceable environmental treasures and deserve complete protection. The proposal to relocate creosotes by its very nature destroys the clonal rings. The root system of creosote bush consists of a shallow taproot and several 10-foot secondary roots. This extended root structure makes successful relocation difficult if not impossible.
4. **The creation of adverse noise sources within an otherwise quiet area.** The desert environment is exceedingly quiet; ambient noise levels of less than 20 dB are typical. Noise, particularly during nighttime hours, travels great distances in

the desert. Without a scientific analysis of onsite conditions any consideration of noise impacts for this project is incomplete.

5. **The impact of additional traffic on Highway 247 (SR 247).** SR-247 is already a dangerous highway. The additional traffic created by this project would potentially add to existing vehicle safety concerns, demand for public services (fire, ambulance, law enforcement etc.) and hasten current pavement deterioration. Given other development proposals within the Morongo Basin area, the cumulative impacts of this development must be evaluated.
6. **Significant impacts on scenic vistas.** After many years of study, documentation, and the application process SR 247, is currently pending a designation as a Scenic Highway by the State of California. Under California Department of Transportation rules while a highway is undergoing this process it is protected as if it is already a designated a State Scenic Route. A full study of the potential impact is required.
7. **The introduction of artificial light sources within a relatively dark area.** MBCA and others have recently worked with the County of San Bernardino to codify the "Dark Skies Ordinance." A lack of a detailed analysis of the potential light trespass of this project in the Mitigated Negative Declaration leaves addressing this concern incomplete.
8. **Air quality issues** related to, vehicle traffic, helicopter traffic, use of campfires, and the potential for wildfires initiated from the site are not fully addressed (or addressed at all) in the Mitigated Negative Declaration.
9. **The carbon footprint of energy use of tents** that are provided with heating and cooling should be addressed in the Environmental Impact Report.
10. **The potential for adverse effects on water wells within the area.** Due to over-pumping, groundwater levels have historically declined in this region. This has required the importation of State Water Project water via the Morongo Basin Pipeline. The proposed project may impinge upon natural drainage. An Environmental Impact Report is required to analyze the water demands and potential impacts of the proposed site on the health of the region's groundwater supplies and potential adverse effects on drainages and blue-line watercourses.
11. **Impacts on local affordable housing stocks.** Staff for the proposed site will require housing, probably local housing. There is significant documentation by MBCA and others of an acute affordable housing shortage in the region due to recent housing conversion to short term rentals. This issue should be addressed within an Environmental Impact Report.

In addition to the above, MBCA seriously questions the compatibility of this project with the stated goals of the Homestead Valley Community Action Guide.

Post Office Box 24, Joshua Tree CA 92252 – www.mbconservation.org

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

A complete well-prepared Environmental Impact Report is required to fully address these significant concerns. (Note, there are additional issues not listed here that also deserve complete study) Short of preparation of this requested EIR, it is impossible to fully weigh the potential impacts to the region.

In conclusion, MBCA requests that the Mitigated Negative Declaration for PROJ-2020-00191 be rejected as inadequate to address the concerns above. We respectfully request that the applicant be instructed to perform a thorough and complete Environmental Impact Report.

Sincerely,

A handwritten signature in black ink that reads "Steve Bardwell". The signature is written in a cursive style with a large, stylized "S" and "B".

Steve Bardwell, president
Morongo Basin Conservation Association
www.mbconservation.org

Post Office Box 24, Joshua Tree CA 92252 – www.mbconservation.org

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

Biggs, Lupe

From: K Murphy <knmurp@jy@gmail.com>
Sent: Wednesday, April 20, 2022 12:57 PM
To: Morrissey, Jim
Subject: Resort Camping — Conditional Use Permit PROJ-2020-00191.

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As a Yucca Valley local who grew up in 29 Palms, this project has no place in this area.

OWS is a very dangerous road and getting worse by the day. Between the speeders and slow big rigs, I can't imagine people pulling in and out on that road where it would be. There's too much impact that would negatively affect our rural lifestyle, open desert and wildlife.

Don't let big outside money ruin it for us. We cherish our open spaces, native desert and clear skies. Put this place in Wonder Valley...it's close to the park entrance...and away from here. That tract of land needs to stay zoned for rural residential.

Thank you for your consideration.

Keri Murphy
8183 Emerson Ave
Yucca Valley, CA 92284

Biggs, Lupe

From: Chris Clarke <cclarke@npca.org>
Sent: Thursday, April 21, 2022 12:45 PM
To: Morrissey, Jim
Subject: Comments on Flamingo 640, Project# PROJ-2020-00191 Assessor Parcel Number: 0629-181-01
Attachments: NPCA comments on Flamingo 640.pdf

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Jim Morrissey, Contract Planner Thursday, April 21, 2022
County of San Bernardino
Re: Project# PROJ-2020-00191
Assessor Parcel Number: 0629-181-01

Mr. Morrissey:

Please accept the comments of the National Parks Conservation Association on the so-called "Flamingo 640" resort proposed to be built on APN 0629-181-01, at the southeast corner of Old Woman Springs Road and Luna Vista in Landers. I can be reached at the below contact info if you have any questions.



Chris Clarke
Ruth Hammett Associate Director, California Desert Program
National Parks Conservation Association
(760) 600-0038 | cclarke@npca.org | [Twitter](#) | [Facebook](#)
#LandBack



Jim Morrissey, Contract Planner
County of San Bernardino
Jim.Morrissey@lus.sbcounty.gov

Thursday, April 21, 2022

Re: Project# PROJ-2020-00191

Assessor Parcel Number: 0629-181-01

Mr. Morrissey:

Please accept the comments of the National Parks Conservation Association on the so-called "Flamingo 640" resort proposed to be built on APN 0629-181-01, at the southeast corner of Old Woman Springs Road and Luna Vista in Landers.

Attached are our comments dated April 26, 2021 on this project. Our concerns as delineated in those comments remain for the most part unresolved, except as noted in these updated comments. I note that despite my request on that date to be added to the County's contact list for this project, that NPCA only received notice of the availability of the Draft Mitigated Negative Declaration and Initial Study via neighbors. I reiterate the request to be added to your distribution list for updates and documents at

Chris Clarke, NPCA
61325 29 Palms Highway, Suite D
Joshua Tree, CA 92252
cclarke@npca.org

We appreciate further confirmation in the Initial Study that the amphitheater is no longer part of the proposed project. However, significant unresolved questions are insufficiently addressed in the Initial Study that we feel call for analysis in a full Environmental Impact Report under the California Environmental Quality Act.

Our concerns include but are not limited to the following issues:

Visual resource impacts

The draft study suggests the project will have a less than significant impact on scenic vistas, scenic resources within a state scenic highway, and the existing character of public views of the site and its surroundings. Justification for this conclusion is that the built components of the project will be compliant with local building code, in that they will be dispersed and no more than 35 feet in height. However, being up to code in no way equates to having no significant visual impact. The Initial Study further claims that positioning of the new buildings along the rim of Pipes Canyon Wash will not block views of the wash. But visual resource impact is not limited to obstruction of views of Pipes Canyon Wash. The permanent structures will intrude into views of the natural surroundings, and thus merit further analysis in an EIR.

Wildlife impacts

On page 27, the Initial Study claims that the project won't contribute to habitat fragmentation because permanent structures would not physically block wildlife migration. But building and human presence on the rim of the wash may very well dissuade wildlife species from migrating through Pipes Canyon if those species are wary of any contact with humans. Examples of such sensitive wildlife species include desert bighorn sheep and mountain lion, both protected under state law. Fuller analysis is needed in an EIR.

The county suggests that as Joshua trees and other desert plants will be avoided or relocated, there's no significant impact. Joshua trees generally die after relocation, as do mature mesquites. The Western Joshua tree is a candidate species for protection under the California Endangered Species Act, and may gain permanent protection from the California Fish and Game Commission in June 2022. Impacts from relocation of the trees need to be examined in a full EIR.

On page 14, the Initial Study contends that there will be no impact to forestland because the Joshua trees will be relocated. We don't quite know how to respond to this, and assume it is an inadvertently undeleted fragment from a very early draft of the Initial Study, as it is clearly an argument that has not been vetted or thought through. It is certainly not an effective argument for no impact. Relocation of Joshua trees and other native desert plants is properly assessed in a full EIR.

The Initial study claims "There are no desert tortoise occurrences documented on site or directly adjacent to it...Desert Tortoise are therefore currently absent from the Project Site." Recent sightings of desert tortoise, a state Threatened species being considered for Endangered status by the California Fish and Game Commission, have been documented on and adjacent to the property. Those sightings have been recorded in the California Natural Diversity Database. Desert tortoises are also protected by the US Endangered Species Act. The near-certainty

of the need for state and federal take permits for tortoises should be by itself sufficient justification to escalate this project's assessment to a full EIR.

Study claims "LeConte's thrasher was neither observed nor detected on-site during the avian auditory and visual survey. Therefore, LeConte's thrasher is currently absent from the project site." However, community scientists using eBird have documented multiple observations of LeConte's thrasher near the site in the last three years.

[September 25, 2021 34.232, -116.397](#)

[April 15, 2020 34.236, -116.428](#) (multiple observers)

[April 16, 2020 34.24089, -116.40685](#)

[April 8, 2019, Pipes Canyon Wash east of Van's Ranch Road](#)

Given that eBird observers constitute an expert but sporadic source of documented observations, it is exceedingly unlikely that LeConte's thrasher sightings in the vicinity do not indicate likely presence on the square mile of habitat at issue here. . Further, the Initial Study offers no details about the survey: how long was the study period? How many observers? What time of year? What were the weather conditions? Were raptors present at the time? The lack of sighting of extant tortoises does not inspire confidence that a reclusive species such as LeConte's thrasher was censused using adequate observation techniques. This again underscores the need for a full EIR for this project.

Light trespass and dark skies

The Initial Study says that new light pollution and glare from the glamping site will not constitute a significant impact because the project will abide by the recently revised light trespass ordinance in San Bernardino County. NPCA, as one of the parties contributing to the drafting and passage of the County's updated light trespass ordinance, is in an especially qualified position to point out the flaw in this argument. The point of the light trespass ordinance was to establish basic minimum standards to prevent glare and light trespass, leading not only to darker skies but also increased public safety. The ordinance will only serve to reduce the impact of existing lighting as it is phased in, and to mitigate the light pollution effects of new construction. The ordinance does *not* guarantee that new construction in a formerly dark area will not introduce a new source of light where none existed before. Simple compliance with the law is not equivalent to no impact.

Further: 12 feet in height for pole lighting does not guarantee compliance with the light trespass ordinance. The light sources will still be visible from neighboring properties, and (dangerously) from the highway, especially in the curved section of roadway between the property and the north edge of Pipes Canyon, where the

light sources at 12 feet will constitute a source of glare directly ahead of northbound drivers. A traffic study is needed to assess this risk, along with risk from additional traffic the resort would promote.

Traffic

The Initial Study estimates the project would generate 16 morning peak hour trips and 20 evening peak hour trips. Justification for this assumption, which appears elsewhere in the study, is scant. Moreover, no discussion of seasonal and weekly patterns in additional traffic is included. This lack of information suggests that a traffic study is needed, but the study proposes exempting the developer from a Traffic Impact Study that would help answer exactly these questions.

A similar point could be made regarding the exemption from a Vehicle Miles Traveled assessment as described on page 64, given that that exemption is based on the assumption that fewer than 110 average daily trips will be generated as a result of the project.

The importance of this cannot be overemphasized. Additional traffic on a high-speed two lane cannot be treated with this level of disregard. Again, a traffic study conducted as part of a full EIR is needed to fully examine the potential impact of increased traffic along this busy, dangerous stretch of highway.

Air quality

Air quality impacts from visitor traffic are based, in the initial study, on an assumption of 20 vehicles per hour for a total of 200 vehicle trips. This seems to conflict with the assumption for vehicle miles traveled of 110 trips in an average day. More problematically, the 20 vehicles per hour figure assumes not only that visitors will arrive at times staggered throughout the day, rather than within a few hours on a Friday night (and similarly leaving on Sunday morning) but also that once arrived, visitors will not make multiple trips to Joshua Tree National Park, to Pioneertown, to Coachella or even a few hundred yards up the road to the nearest restaurants, gas stations, and convenience stores. Given that the proponents expect a maximum visitorship of 300 and as many as 50 seasonal employees arriving at the site each day, 200 vehicles may be a conservative estimate.

There is a number missing from the narrative on page 19 in the Air Quality section, in which the first paragraph ends “However, the distance to the proposed campground improvements are approximately (insert number) feet.” This further suggests that this document was prepared hurriedly, without sufficient attention to detail.

The Helipad is mentioned in the beginning of the document (page 2) as taking up 7,854 square feet, but emissions from helicopters are not mentioned in the air quality section – or in any other part of the Initial Study.

The emissions of particulate matter and other pollutants from fire pits should be discussed in more detail rather than simply assigning those emissions to a total category claimed to be at 0.0 tons per year of emissions. According to the US Environmental Protection Agency, fireplaces and wood stoves emit as much as 50 grams of particulate matter 2.5 microns or smaller (PM25) per hour. The four firepits on site will almost certainly emit more than a fireplace or woodstove because of larger fires and less efficient burning. Still, even taking 50 grams PM25 per hour each as an assumption, and assuming an average of four hours of fires each day, the four firepits could conceivably emit 292 kilograms of PM25 each year, a.k.a. .29 tons per year.

Wood smoke can also include benzene, benzo(a)pyrene and dibenz(a,h)anthracene, carbon monoxide, formaldehyde, organic gases (including aldehyde gases and other respiratory irritants), nitrogen oxides, polycyclic aromatic hydrocarbons (PAHs), and dioxin. All of these are toxic. Some are carcinogenic. The population downwind includes elderly, disabled, and/or immunocompromised people, as well as people who lack adequate access to either preventive or urgent health care. Their concerns and the impact of these firepits on their health, as well as basic fire safety in a wind concentration corridor, should be addressed in a full EIR.

The Initial Study claims that the nearest “sensitive receptors” (a.k.a. potentially affected residents) for odor concerns are 800 feet away from the site, and thus that odors from campfire smoke will not be significant. This is not an objective statement. The impacts of odor are subject to personal sensitivities. Smoke every weekend from four bonfires might affect quality of life on a consistent basis even several miles downwind. Ambient smoke often forces desert residents to use air conditioning instead of evaporative cooling, incurring substantial additional energy costs over a short time. This should be addressed in an full EIR.

Noise

No discussion of noise levels after 10 pm is included in the Initial Study. Unless the operators intend to enact and enforce a 10 pm curfew policy, this should be discussed in an environmental assessment. Noise from traffic on Old Woman Springs road would be appreciably lower during night-time “party” hours than the 50.6dBA cited during daytime hours.

Again, the Helipad is nowhere discussed in the noise section.

Thank you for the opportunity to comment on this proposal. NPCA looks forward to taking part in the CEQA process on this flawed proposal.

A handwritten signature in cursive script that reads "Chris Clarke".

Chris Clarke
Ruth Hammett Associate Director
California Desert Program
National Parks Conservation Association
(760) 600-0038
cclarke@npca.org



Jim Morrissey, Contract Planner
April 26, 2021

Monday,

County of San Bernardino

Jim.Morrissey@lus.sbcounty.gov

Re: Project# PROJ-2020-00191

Assessor Parcel Number: 0629-181-01

Mr. Morrissey:

Please accept the comments of the National Parks Conservation Association on the so-called “Flamingo 640” resort proposed to be built on APN 0629-181-01, at the southeast corner of Old Woman Springs Road and Luna Vista in Landers. I request that you add me to your contact list for updates and announcements regarding this project at:

Chris Clarke, NPCA
61325 29 Palms Highway, Suite D
Joshua Tree, CA 92252
cclarke@npca.org

NPCA is the only independent, nonpartisan membership organization devoted exclusively to advocacy on behalf of the National Parks System. Its mission is to protect and enhance America's National Park System for present and future generations. NPCA's California Desert Program works to preserve the integrity of the desert's national parks and monuments, as well as adjacent protected lands.

We have serious concerns about the appropriateness of the Flamingo 640 project for the site in question.

National parks do not exist in a vacuum. In order to survive into the next century and beyond, parks require connectivity with lands outside their boundaries to reduce or eliminate the effects of isolation from similar habitat. My colleagues at groups such as Mojave Desert Land Trust (MDLT), the Morongo Basin Conservation Association and others have taken pains to detail important wildlife connectivity corridors for the Morongo Basin area. Attached below is a map of those corridors created in 2018 by MDLT. As you will no doubt recognize, the parcel for which this resort development is proposed not only lies entirely within an important corridor linking Sand To Snow National Monument and San Bernardino

National Forest to the Rodman and Ord mountains area, but would substantially constrict that corridor, even with the limited plan of development offered your department.

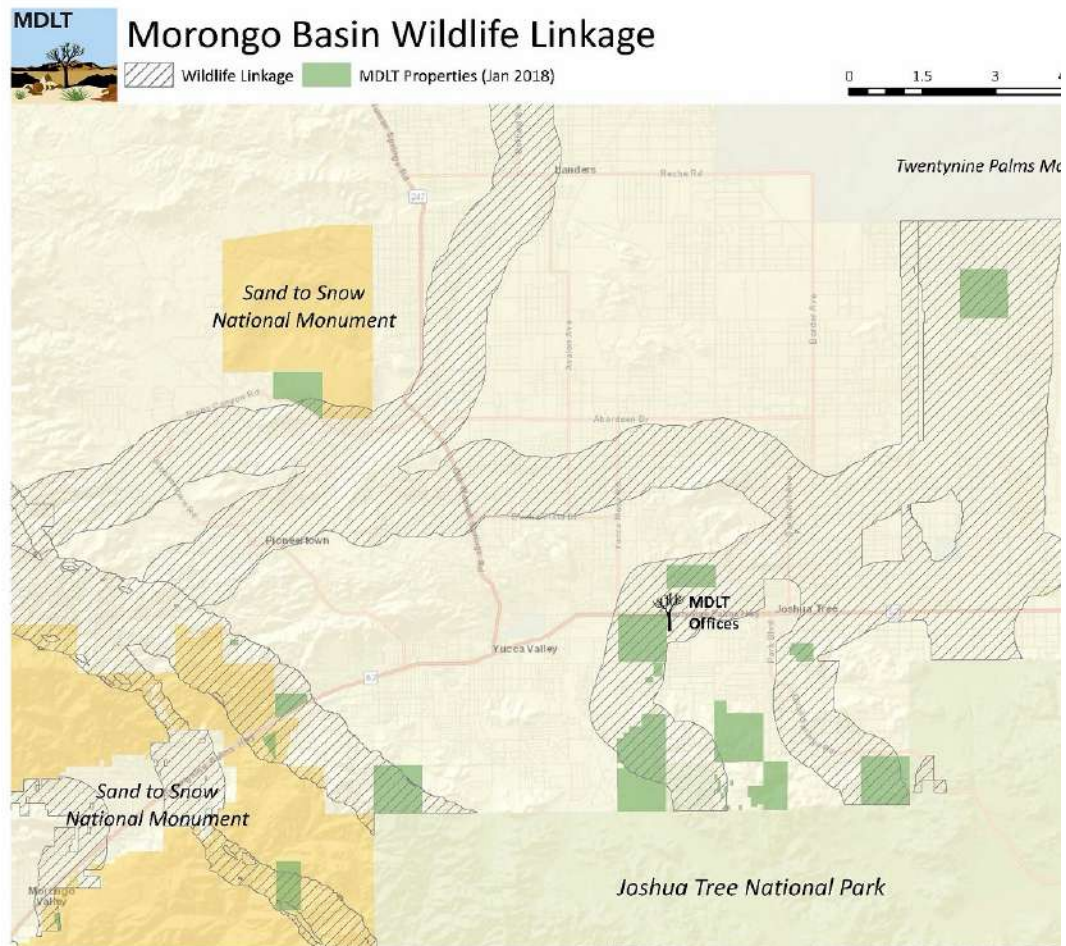


Figure 1. Wildlife linkages in the western Morongo Basin. Map courtesy MDLT

It is our understanding that MDLT has expressed a willingness to pay fair market value for this land. We wholeheartedly support this resolution as most compatible with long-term land management and sustainable development.

Before launching into the list of issues we have with this development as described, we have two fundamental concerns we wish to express.

First, a Conditional Use Permit for a development of this scope, on land that is this crucial for wildlife habitat connectivity, and which contains habitat for at least two state-listed species, absolutely requires being subjected to a full Environmental Impact Report rather than a Negative Declaration.

Second, while we trust in good faith the assurances by County staff that the proponent no longer intends to pursue the proposed uses of the property that are most incompatible with the current RL (Rural Living) zoning, such as a music festival grounds, and bar and restaurant, and a helipad for non-emergency use, we also recognize that such verbal assurances only go so far. A written record that those uses are no longer on the table would go a long way to restoring trust with the members of the community most likely to be affected by this development.

Our other concerns include:

Habitat destruction: This is important habitat for many species, including desert tortoise (state endangered), western Joshua tree (state threatened), western burrowing owl (California Species of Special Concern), migratory birds (protected under the migratory bird treaty act) and other wildlife, including desert kit fox, mountain lion. Creosote rings and Mojave yucca clonal rings are present as well, some of them potentially thousands of years old. Though proponents' biological resources assessment claims no desert tortoises are to be found on the site, we are skeptical about their reported numbers and look forward to independent verification of the species' presence (or absence.) It is worth noting that the "DanMark survey" of this same property, performed in 2006 by Circle Mountain Biological Consultants, found seven tortoises in precisely the part of the parcel slated for development, with few to none on the remainder of the parcel. It is true that 15 years have elapsed since 2006. It is also true that conditions on site, including proximity to high-speed traffic, prevalence of Upper Respiratory Distress Syndrome, and multiyear droughts are substantially the same in 2021 as they were in 2006.

Parcel is an important connectivity link and in a priority conservation area.

Fire pits included in the proposal prompt the question: will operations include onsite staff who can restrict or prohibit fire pit use during burning bans, high-wind events, or periods of high particulate matter counts? If not, who will be responsible for fire safety, and for environmental and public safety in general?

Wastewater: Plans suggest that wastewater will be directed to a leach field on the property, north of the resort. A stormwater retention basin will be sited immediately east of the sewage disposal leach field. What volume of wastewater is projected to be disposed of via this leach field (considering perhaps 200-250 guests in a typical weekend in season)? Are hydrology studies available that ensure this large addition of wastewater won't infiltrate into neighbors' wells (there are at least 61 domestic wells within a few miles downstream) or the aquifer serving Bighorn Desert View Water Agency?

Would stormwater capture from the project's hardened surfaces accentuate this percolation of sewage?

Water supply: We understand that Bighorn Desert View Water Agency is willing in theory to annex the parcel to its service district, pending the LAFCO process. What might be the cumulative development impacts of extending BDV's water service farther to the southeast?

Noise and light: Even assuming there will be no music festivals or other mass participation events on the property: Will the entire facility be available for rent to one party for special events, such as weddings, film shoots, conferences? How many emergency helicopter landings/departures are envisioned per month? Studies of potential noise levels should be undertaken. Lighting sufficient for hundreds of guests, plus ambient light from lodging units, fires, visitor headlights, party lights, and other sources of illumination are likely to pose a substantial addition to light trespass in this relatively dark area, posing threats to safety, wildlife, and quiet enjoyment by neighbors.

Traffic safety: Old Woman Springs Road is a dangerous highway. According to UC Berkeley's Transportation Incident Mapping System¹, the stretch of 247 nearest the proposed project is among the most dangerous along the entire length of Route 247 between Yucca Valley and Barstow. Again, according to TIMS, the worst times for accidents here are Friday afternoon/evening and to a lesser extent throughout the weekend. Adding more than 100 cars exiting and entering the highway here during busy weekend hours will prove dangerous, especially given drivers who pick up speed once they emerge from Pipes Canyon south of the project. A thorough traffic study, dedicated turn lanes, and perhaps a stop light should be considered if the project goes forward. The likelihood of extra costs to the county for first responders should be assessed.

Other questions:

- Would the proposed project be accessible for those with physical limitations?
- How would the proposed project utilize local labor and contractors to support the local community?
- How would the campground keep their guests from trespassing on adjacent properties?
- What limits might the county have in mind for overall campground saturation in the area, and to what extent will this project displace or prevent potential development of more affordable camping accommodations within reach of the County's underserved populations?

Again, we urge the County's Land Use Services to conduct a full and rigorous Environmental Impact Report process on this proposal.

Thank you for your attention to this set of comments. I am happy to answer any questions you might have.

A handwritten signature in cursive script that reads "Chris Clarke".

Chris Clarke
Ruth Hammett Associate Director
California Desert Program
National Parks Conservation Association
(760) 600-0038

1

<https://tims.berkeley.edu/>

Biggs, Lupe

From: Thao Nguyen <thaowowwow@gmail.com>
Sent: Tuesday, April 19, 2022 5:42 PM
To: Morrissey , Jim; Supervisor Rowe
Subject: PROJ-2020-00191 aka Glamping project

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

My name is Thao Nguyen.

I live in Flamingo Heights. I'm writing to outline my overall opposition to PROJ-2020-00191 on parcel 0629-181-01 aka Glamping Project.

I take my dogs on walks in this area on weekly basis and notice there are joshua trees, mojave yuccas and a wide range of plant life. Additionally I've spotted native owls, lizards, coyotes, squirrels, jackrabbits and desert tortoise. The area is a haven for the native wildlife.

The glamping project is alarming to me because I have heard the county is not requiring the developers go thru an environmental review process. It's absurd. You're putting us all at risk this way. With a development of this scale brings serious issues to the community. Helicopters flying above are a disturbance. Potential for deadly wildfires from poorly maintained outdoor fire pits. It's an incredibly windy area... tents are going to blow away undoubtedly. Regular excess traffic on an already poorly maintained very busy rural road (Hwy 247) known for regular fatal accidents. Plowing pristine wildlife area for thousands of vehicles and tourists. Loud and obnoxious festivals, weekly parties, excessive lighting and tourists competing with us locals for the already scarce resources of restaurants.

If the county is going to build a glamping site, do it on already commercial land, closer to the park. And festivals that accommodate thousands of attendants seems largely damaging.

We need the county to build infrastructure that helps support a fulltime community. We need investment in our local community... not more investment in tourism. This is not bringing anything but nuisance and minimum wage jobs. None of the facilities this developer is pitching such as restaurant, are open to community members. What is the benefit to the local community at all? Locals will be dealing with the negative impact while the out of town developers reap profits. Just shameful.

Thao Nguyen

Biggs, Lupe

From: Nicholas Brown <brown.nicholasd@gmail.com>
Sent: Sunday, April 17, 2022 11:20 PM
To: Morrissey, Jim
Subject: Concerns about Project # PROJ-2020-00191 Assessor Parcel Number (APN) 0629-181-01

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Mr. Morrissey,

I'm writing to express my concern about the Flamingo 640 project (PROJ-2020-00191 Assessor Parcel Number (APN) 0629-181-01) proposed in my Flamingo Heights neighborhood and to implore you to require a full Environmental Impact Report, plus a traffic review and more, to address deficiencies with the developer's insufficient proposal.

Among my many concerns are:

Safety on this stretch of Old Woman Springs. The initial study lacks a discussion of seasonal and weekly patterns in additional traffic, which is a *major* oversight (the differences from week to week can be stark, and have a noticeable impact on traffic flow through the area).

The proposed turn-off is right on a blind corner, around which drivers regularly speed in excess (especially on weekends when traffic going to the OHV area increases, many with large trucks and trailers in tow). In recent months, I've seen at least two flipped cars in this section of the road, one of which was a pretty serious wreck. This stretch is already home to numerous roadside memorials, I can't help but think massively increasing the amount of non-local traffic will only lead to more tragedy. A full and thorough traffic study cannot be blown off like this.

The impact on local wildlife, including protected desert tortoises (which are 100% found in the area, despite what project stakeholders want you to believe) and birds, including the LeConte's thrasher which has been observed locally on multiple occasions in recent years.

That's not to mention the destruction of local plant life, chiefly hundreds of mature Joshua trees and mesquite--neither of which can be realistically moved, another wild assertion made in the initial report--and historic creosote rings, which are some of the coolest and most underappreciated features in our little corner of the desert.

This property is part of an important wildlife corridor that needs significant, impartial study before it can be considered for development.

Water use and wastewater. The initial study suggests that the project will consume an incredible 18,150 gallons of potable water from our aquifer per day. This is taking the developers at face value, despite their proven tendency to tell little fibs anywhere they can. Drawing twenty thousand gallons or more out of our aquifer daily puts everyone in this community at risk. That's not to mention the amount of wastewater infrastructure needed to handle these guests, and the likelihood of serious mismanagement that pollutes our groundwater. This alone should warrant a more thorough environmental study.

Light and sound pollution. Despite what the developers say, this project will absolutely violate the SB County Dark Skies ordinance and will create distracting light on a dangerous stretch of road. Period.

A festival venue like they propose is obviously going to produce sound pollution beyond the 10 pm curfew. There's no mention of the helipad in the noise section? Also, where promises were made to upset locals, they weren't kept... the bar and helipad were supposed to be dropped from the plan but weren't.

Advocates for this project have produced a document that doesn't pass a cursory smell test. **The whole project requires more due diligence in the form of traffic studies, a full and impartial environmental impact report, and frankly more real conversations with local residents.**

Nobody who lives here wants this monstrosity to go through. **The project should be stopped outright before irreparable damage is done to the community and to local ecosystems, by people who care for little more than a fast, exploitative profit.**

Thank you for your time and your consideration,
Nicholas Brown
430 Inca Trail, YV 92284



Biggs, Lupe

From: caroline partamian <caroline.partamian@gmail.com>
Sent: Wednesday, April 20, 2022 7:58 AM
To: Morrissey, Jim
Subject: Project # PROJ-2020-00191 Assessor Parcel Number (APN) 0629-181-01
Attachments: Desert Tortoise_Caroline Partamian.JPG; Desert Tortoise_AiliSchmeltz.jpg; DesertTortoise2_AiliSchmeltz.jpeg; Save Flamingo Heights Signed 4.20.22.csv

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Jim Morrissey,

I hope you are taking the time to read through all the emails you are receiving about this project. As an adjacent property owner to the site, I am incredibly disheartened to find that this project is moving forward without a proper and diligent Environmental Impact Report. After reading through the Draft study, I was shocked by the outright dishonest work done to hastily try to pass this project through backchannels without the support or consultation with the surrounding community and with blatant disregard of the local ecological environment. I write here to impress upon you the disastrous effect this project will have on our lands as proposed, and hope that my voice along with the others of our community will manage to at the very least persuade the county to require a thorough and unbiased Environmental Impact Report before this project moves along any further. I have also attached pictures and coordinates of Desert Tortoises I have seen in the area along with a [petition](#) I started last year with nearly 4,000 signatures on it (more than a 1,000 more names than there were on it last year).

ENVIRONMENTAL HAZARD:

Firstly, this project should be abandoned, but if you must continue this process, we DEMAND a full Environmental Impact Report (EIR). This project is an environmental hazard to our fragile ecosystem. Mojave Desert Land Trust and the Center for Biological Diversity have both deemed this area in question a wildlife corridor. On page 27, the Initial Study claims that the project won't contribute to habitat fragmentation because permanent structures would not physically block wildlife migration. But building and human presence on the rim of the wash may very well dissuade wildlife species such as bighorn sheep, bobcats, and mountain lions from migrating through Pipes Canyon if those species are wary of any contact with humans.

There are hundreds of western Joshua trees (*Yucca brevifolia*) on the developable section of the property. Joshua trees are a state protected species being considered for listing as Threatened under the California Endangered Species Act. At this time, the County cannot issue a permit to take (by removal or transplanting any individual) western Joshua trees. The contention on page 14 that there will be no impact to forestland because the trees will be moved elsewhere is pretty laughable - Joshua trees generally die after relocation, as do mature mesquites. Relocating a creosote ring destroys the prehistoric value of the plant. There are potential creosote clonal rings in excess of 4,000 years old on the site. Yucca clonal rings of similar age may exist.

A 2006 study by leading tortoise experts found seven adult desert tortoises on the developable section of the property. The proponents' recent study finding no tortoises is methodologically suspect. The Initial study claims "There are no desert tortoise occurrences documented on site or directly adjacent to it...Desert Tortoise are therefore currently absent from the Project Site." Neighbors near the site, including myself, have evidence to the contrary. Please see attached pictures - here are the photo credits and coordinates for each picture:

The first picture (by me)
Caroline Partamian
34.2115718, -116.4346062
May 30, 2020 6:14 PM

Next two pics:
By my neighbor Aili Schmeltz
34.21728, -116.43339
April 25, 2020, 9:21 AM

I have submitted these to the CNDD database. This information should be provided in a full Environmental Impact Report.

The study claims “LeConte’s thrasher was neither observed nor detected on-site during the avian auditory and visual survey. Therefore, LeConte’s thrasher is currently absent from the project site.” However, community scientists have documented multiple observations of LeConte’s thrasher within a mile of the site in the last three years. Though they’re not strong fliers, they do so on occasion, and it’s hard to imagine a local population not taking advantage of a square mile of habitat. This information should be provided in a full Environmental Impact Report.

The study also doesn’t offer any details about the survey: how long was it? How many observers? What time of year? What were the conditions?

Other wildlife species using the site include burrowing owls, coyotes, black-tailed jackrabbits, migratory bird species, badger, bobcats, desert kit fox, Gambel’s quail, and Bendire’s thrasher.

VISUAL IMPACT

The proposed project would have a severe visual impact on scenic vistas. I am an adjacent property owner to the glamping project proposal and bought property in Yucca Valley a few years ago as to avoid the gross overbuilding I encountered in San Francisco and Brooklyn during my times living there in the last ten years. The high desert is special and this project would strip it of its many peaceful and visual wonders. Please keep in mind that just because something is up to code and compliant with zoning ordinances it does NOT mean there’s no significant visual impact.

LIGHT POLLUTION

The proposed project would cause terrible light pollution. The report’s specifications on night lighting is not specific enough and my neighbors and I do not want this to effect our dark night skies. The county says that new light pollution and glare from the glamping site will not constitute a significant impact because the project will abide by the recently revised light trespass ordinance in San Bernardino County. The point of the light trespass ordinance was to establish basic minimum standards to prevent glare and light trespass, leading not only to darker skies but also increased public safety. While the ordinance *will* reduce the impact of existing lighting as it is phased in, it does *not* mean new construction in a formerly dark area will not introduce a new source of light where none existed before. Again, simple compliance with the law is NOT equivalent to no impact. Also, 12 feet in height for pole lighting does not guarantee compliance with the light trespass ordinance. The light sources will still be visible from neighboring properties, and (dangerously) from the highway.

AIR QUALITY:

Air quality impacts from visitor traffic are based in the initial study on an assumption of 20 vehicles per hour for a total of 200 vehicle trips. However, this assumes not only that visitors will arrive at times staggered throughout the day, rather than within a few hours on a Friday night (and similarly leaving on Sunday morning) but also that once arrived, visitors will not make multiple trips to Joshua Tree NP, to Pioneertown, to Coachella or even a few hundred yards up the road to La Copine. Given that the proponents expect a maximum visitorship of 300 and as many as 50 seasonal employees arriving at the site each day, 200 vehicles may be a conservative estimate. There is a number missing from the narrative on page 19 in the Air Quality section, in which the first paragraph ends “However, the distance to the proposed campground improvements are approximately (insert number) feet.” This could be used to bolster the point that this document was prepared hurriedly and with no real attention to detail. The Helipad is mentioned in the beginning of the document (page 2) as taking up 7,854 square feet, but emissions from helicopters are not mentioned in the air quality section. Dust from construction, with wind, would be hazardous to the surrounding human community and wildlife

TRAFFIC SAFETY

Route 247 is a dangerous high-speed highway. Adding a destination which hundreds of vehicles (primarily of tourists who are not used to driving on the 247) will be entering and exiting on a particularly hazardous stretch of the road is a bad idea. For all the trips listed in my previous section on Air Quality (JTNP, Pioneertown, etc.) there would be more traffic coming into these places too that also have roads with traffic incidents (e.g. Pipes Canyon Road). First responder response times can be lengthy. Safety would require adding an additional lane and even a vehicle-controlled stoplight. A traffic study is warranted.

In the last five years there have been more than a dozen accidents in the stretch of highway between Aberdeen and Reche that were serious enough to have had first responder involvement. Adding more than 100 cars exiting and entering the highway here during busy hours will prove dangerous, especially given drivers who pick up speed once they emerge from Pipes Canyon south of the project. A thorough traffic study, dedicated turn lanes, and perhaps a stop light should be considered if the project goes forward. The likelihood of extra costs to the county for first responders should be assessed. We demand you do a traffic report.

The importance of this cannot be overemphasized. Additional traffic on a high-speed two lane cannot be treated with this level of disregard.

NO AMENITIES OPEN TO THE PUBLIC

This site is being proposed without any concern or care for its surrounding community. According to the Notice of Availability sent out to neighbors, Glamping “destination resort” with support facilities, none of which are to be open to the public, including restaurants/bar, reception area/store, trails and paths, recreation buildings, and helipad on a 25-acre portion of a 640-acre parcel.

Furthermore, community members were given assurances that the music festival venue, helipad, restaurant and bar would be excluded from the project plan. Only the amphitheater has been dropped. The helipad is mentioned only once, in a description of the square footage of the physical plant. Similarly with the bar and restaurant, which would at the very least generate food waste that offers a potential subsidy to raven and other animals that may affect populations of sensitive species such as the desert tortoise.

How does this project positively impact our community at all? There is obviously no consideration for the neighbors.

FIRE SAFETY:

There is inadequate analysis of fire safety in the report. Winds get up to 20mph and upwards of 80mph in this proposed area. Pipes Canyon is a natural break in the mountains through which high winds from the west are often funneled. Placing a campsite for hundreds of people at the mouth of Pipes Canyon means that any campfires lit during high wind events could easily spread eastward, threatening habitat and people's homes. High winds also imply that trash discarded by careless campers will be distributed throughout the Landers area, an unsightly inconvenience to residents and a threat to local wildlife.

Concentrating campfires in this area upwind of most of the Morongo Basin also means a new source of particulate matter pollution, a serious concern in the Basin during both winter months and the peak of fire season.

The emissions of particulate matter and other pollutants from fire pits should be discussed in more detail; rather than simply assigning those emissions to a total category claimed to be at 0.0 tons per year of emissions.

Wood smoke can also include benzene, benzo(a)pyrene and dibenz(a,h)anthracene, carbon monoxide, formaldehyde, organic gases (including aldehyde gases and other respiratory irritants), nitrogen oxides, polycyclic aromatic hydrocarbons (PAHs), and dioxin. All of these are toxic. We deserve more than a dismissal of any need for analysis of their possible impact on downwinders.

Also, the initial study claims that the nearest "sensitive receptors" (a.k.a. potentially affected residents) are 800 feet away from the site, that odors from campfire smoke will not be significant. This is worth challenging as subject to personal sensitivities. Smoke every weekend from four bonfires might affect quality of life on a consistent basis even several miles downwind.

NOISE LEVELS

There is no discussion of noise levels after 10 pm in the initial study. Unless the operators intend to enact and enforce a 10 pm curfew policy, this should be discussed in an environmental assessment. Noise from traffic on Old Woman Springs road would be appreciably lower during night-time "party" hours than the 50.6dBA cited during daytime hours.

The Helipad is nowhere discussed in the noise section.

WATER:

Proponents' plans suggest that wastewater will be directed to a leach field on the property, north of the resort. A stormwater retention basin will be sited immediately east of the sewage disposal leach field. What volume of wastewater is projected to be disposed of via this leach field (considering perhaps 200-300 guests in a typical weekend in season)? Are hydrology studies available that ensure this large addition of wastewater won't infiltrate into neighbors' wells (there are at least 61 domestic wells within a few miles downstream) or the aquifer serving Bighorn Desert View Water Agency? Would stormwater capture from the project's hardened surfaces accentuate this percolation of sewage?

- Water use: the Initial study says that the project would consume 18,150 gallons of potable water per day, a bit more than 20 acre-feet per year. The study compares this to an estimate of 14,568 gallons per day were the site to be developed to its maximal footprint for residential use at 82 units. The failure of attempts to develop residences on the land due to seismic hazards is not mentioned, nor is the fact that not developing the land instead of developing the resort would consume zero gallons per day.

SEISMIC ACTIVITY:

A housing project on this site was denied permit due to a nearby earthquake fault. Though Flamingo 640 would be a much smaller development than that previous proposal, the plan still incorporates structures (camping "lofts," as well as other guest amenities) that could pose a hazard during a quake, and which may disqualify the project from obtaining a Conditional Use Permit.

OTHER POINTS:

Would the proposed project be accessible for those with physical limitations? How would the proposed project utilize local labor and contractors to support the local community? How would the campground keep their guests from trespassing on adjacent properties.

The Morongo Basin needs additional camping capacity. However, preference should be given to sites that are closer to the park, are preferably on land that is previously degraded, and which are more readily accessible by highways capable of bearing the increased

traffic. Additionally, we favor development of campgrounds that are economically accessible to more potential visitors, so that families with less disposable income have a way to visit the high desert.

To close, Flamingo 640 meets none of these criteria. Instead, it would convert valuable conservation land surrounded by low-density rural zoning into a traffic-choked playground for the more-affluent. If you plan to build this site, build it somewhere else - closer to the 62 or the park if your concern is to house tourists coming from out of town.

I hope to see these comments addressed and again, will not be satisfied until a thorough and unbiased Environmental Impact report is conducted.

As a Rural Living community, we do not need a private "resort" experience or "hotel" in a rural zoned area that would do nothing to our community except add danger on the roads, add unnecessary hazard in an area already distinguished as a threat from wildfires, knowingly disrupt and destroy the natural environment, pollute the area with noise and light and change the character of our community irreparably. If one of the listed "objectives" for this development is to relieve camping congestion in the National park, then a safe and small public campsite and trails would do much less damage, not a private resort experience out of the price range of the residents who live here, or campers who would otherwise camp in the national park.

Jim, I hope you read this with thought and concern, and do not leave those in your fellow SB community feeling dismissed.

With disappointment,
Caroline Partamian







Name	City	State	Postal Code	Country	Signed On
caroline pa	Yucca Valle	CA		US	#####
Aili Schmel	Yucca Mes	CA	92284	US	#####
Michael En	Yucca Valle	CA	92284	US	#####
Thao Nguy	Yucca Valle	CA	92284	US	#####
ethan prim	Yucca Valle	CA	92284	US	#####
Stephanie	Yucca Valle	CA	92284	US	#####
Hans Hans	Joshua Tre	CA	92252	US	#####
hans wagn	Anaheim	CA	92801	US	#####
Kayla Cohe	ee	CA	90042	US	#####
Mary Hall	Joshua Tre	CA	92252	US	#####
Ian James	Los Angele	CA	90027	US	#####
Greg Bryan	Los Angele	CA	90065	US	#####
Melisa My	Landers	CA	92285	US	#####
Sarah LaCh	Yucca Valle	CA	90017	US	#####
Bryan Harri	Landers	CA	92285	US	#####
Holly Ellis	Los Angele	CA	90039	US	#####
Jax Pollock	Minneapolis		55429	US	#####
Yvonne Gr	Elkridge		21075	US	#####
Amy Keele	Yucca Valle	CA	92284	US	#####
Joshua Alm	Yucca valle	CA	92284	US	#####
JON INWO	Brooklyn	NY	11230	US	#####
Halyna Cal	Tujunga	CA	91042	US	#####
joan horne	Yucca Valle	CA	92284	US	#####
Franco Carlo		NY		US	#####
Liz Weisser	Philadelph	PA	19148	US	#####
Jon Pack	Yucca Valle	CA	92284	US	#####
Brian DeRa	Joshua Tre	CA	92252	US	#####
Rachel Mic	Yucca Valle	CA	92284	US	#####
Sarah Jura	Lafayette	CA	94549	US	#####
Amy Ander	Yucca Valle	CA	92284	US	#####
Lauren Ste	Van Nuys	CA	91406	US	#####
Hunter Wis	Brooklyn	NY	11237	US	#####
Benjamin v	Twentynin	CA	92277	US	#####
Bob Dornb	Los Angele	CA	90046	US	#####
Jacqueline	Landers	CA	92285	US	#####
Megan Mo	Colton	CA	92324	US	#####
Jennalee B	Chicago	IL	60622	US	#####
Paul Quatt	Yucca Valle	CA	92284	US	#####
Jon Brooks	Palm Spring	CA	92262	US	#####
p buck	Yucca Valle	CA	92284	US	#####
Beale Dab	landers	CA	92285	US	#####
Sami Taylo	Los Angele	CA	90029	US	#####
Courtney B	Yucca Valle	CA	92284	US	#####
Valerie Ho	Landers	CA	92285	US	#####
Travis Mye	Landers	CA	92285	US	#####
panda land	joshua tree	CA	92284	US	#####

Nicole Eme Yucca Valle CA	92284 US	#####
Patricia Fer Los Angeles CA	90027 US	#####
Evan Walsf Los Angeles CA	90029 US	#####
katie gaydc Santa Moni CA	90403 US	#####
Dave Moor Los Angeles CA	90042 US	#####
meredith c san francisc CA	94107 US	#####
marissa glu los angeles CA	90046 US	#####
Lauren Say La Mesa CA	91941 US	#####
kevin faulk los angeles CA	90008 US	#####
Jessica Pfei JoshuaTree CA	92252 US	#####
Derek Mon Yucca valle CA	92284 US	#####
Jennifer Ce Long Beach CA	90805 US	#####
Ali Pearl Joshua Trei CA	92252 US	#####
Russell Tay Birmingham	B15 UK	#####
Bo Cheshiri Twentynin CA	92277 US	#####
Katelyn Mc Columbus OH	43220 US	#####
philip trian Yucca Valle CA	92284 US	#####
Brice Jame Los Angeles CA	90004 US	#####
Jennifer Ru Twentynin CA	92277 US	#####
Christina Pi Joshua Trei CA	92252 US	#####
Lisa Burfori Yucca Valle CA	92252 US	#####
Rachael Be Yucca Valle CA	92284 US	#####
Claudia Bur Yucca Valle CA	92284 US	#####
Ellis Oakley Altamonte FL	80233 US	#####
Kali Niema Joshua Trei CA	92252 US	#####
Laura Vall Yucca Valle CA	92284 US	#####
Rossellini I Whittier CA	90604 US	#####
Anna Nelsc Maywood CA	90270 US	#####
Martha We Yucca Valle CA	92284 US	#####
David Irelai Los Angeles CA	90027 US	#####
Melodi Mcl Landers CA	92285 US	#####
Jamie Yosh Joshua Trei CA	92252 US	#####
elle sea joshua tree CA	US	#####
Amanda Ol Landers CA	92285 US	#####
Gary Wise Joshua Trei CA	92252 US	#####
Linda Saffic Yucca Valle CA	92284 US	#####
Andrea Vin Yucca Valle CA	92284 US	#####
Colin Dono Yucca Valle CA	92284 US	#####
Emily Nem Castle Rock CO	80108 US	#####
Aidan Koch Yucca Valle CA	92284 US	#####
Bridget Ak Wyckoff NJ	7481 US	#####
Theresa Wi Landers CA	54889 US	#####
Rachel Ras Berlin MD	21811 US	#####
Matthew B Yucca valle CA	92284 US	#####
Michele Jaf Yucca Valle CA	92284 US	#####
Eli Thorne Twentynin CA	92277 US	#####
Jenny Ziese Santa Barb CA	93105 US	#####

Chloe Bow	Ball LA	71405	US	#####
Paul Grebe	Yucca Valle CA	92284	US	#####
KC Slagle	Los Angeles CA	90048	US	#####
Heather Or	Landers CA	92285	US	#####
Deanna Br	Yucca Valle CA	92284	US	#####
Ashley Tho	West Yarm MA	2673	US	#####
Gianna Qui	Oakland CA	94609	US	#####
James Huff	Upland CA	91786	US	#####
Lynn Hogar	Pensacola FL	32526	US	#####
Matthew B	Spokane WA	99258	US	#####
Cris Dawso	Chicago IL	60612	US	#####
Nikki Bown	Yucca Valle CA	92284	US	#####
David Scott	Yucca Valle CA	92284	US	#####
Danielle Ki	Joshua tree CA	92252	US	#####
Anna Pears	Yucca Valle CA	92284	US	#####
B Nelson	Twentynine CA	92277	US	#####
Reed Price	Yucca valle CA	92284	US	#####
ben campb	Pleasant Gr UT	84062	US	#####
Tiffani Wat	Landers CA	92285	US	#####
Leah Quina	Brooklyn NY	11215	US	#####
Thomas Hje	Yucca Valle CA	92284	US	#####
Vavine (V)	Yucca Valle CA	92284	US	#####
Edgar Cast	Riverside CA	92501	US	#####
Alexandria	Yucca Valle CA	92284	US	#####
Jessica Robertson			US	#####
Jona Maary	Yucca Valle CA	92284	US	#####
Briana Ven	Valencia CA	91321	US	#####
Bernard Le	Joshua Tree CA	92252	US	#####
Lynne Haas	Biggsville IL	61418	US	#####
Ilis Geronin	Ojai CA	93023	US	#####
Taylor Pow	Elgin IL	60120	US	#####
Carlos Ara	San Clemer CA	92672	US	#####
Krystal Cas	Landers CA	92285	US	#####
Stacie Lewi	Yucca Mesa CA	92284	US	#####
Ariane Bich	Flamingo H CA	92284	US	#####
Jennifer Sh	Brooklyn NY	11222	US	#####
Nader Gha	Long Beach CA	90815	US	#####
Eleanore Pi	New York NY	10012	US	#####
Corinne M	Costa Mesa CA	92627	US	#####
Kara Hurwi	Studio City CA	91604	US	#####
Kari Bobko	Los Angeles CA	90032	US	#####
Francesca I	Glendale CA	91204	US	#####
Deborah M	Yucca Valle CA	92284	US	#####
Barbara Bo	Cathedral C CA	92234	US	#####
joanne karl	Yucca Valle CA	92284	US	#####
Shannon W	Los Angeles CA	90025	US	#####
Brian Boye	Cathedral C CA	92234	US	#####

Dominoe F. Los Angele: CA	90026 US	#####
Ashmore El Temecula CA	92591 US	#####
Anna Schoe San Francis CA	94109 US	#####
Alice Jones Yucca Valle CA	92284 US	#####
Dana Seige Maple Shade	8103 US	#####
Ruben Zuni Yucca Valle CA	92284 US	#####
Ryan Cowlc Yucca Valle CA	92284 US	#####
Danielle Aq Brooklyn NY	11211 US	#####
JO Abbie Yucca Valle CA	92284 US	#####
Crispijn Nei Jabbeke	8490 Belgium	#####
Carly Powe New Ipswic NH	3071 US	#####
Cara Santin Los Angele: CA	90029 US	#####
Elizabeth N Anaheim CA	92808 US	#####
Emma Paln Yucca Valle CA	92284 US	#####
Kristy Erick Yucca Valle CA	92284 US	#####
Claudia Ver Alhambra CA	91803 US	#####
Danielle Za Arcadia CA	91007 US	#####
Melissa Gri Twentynine CA	92277 US	#####
Jed Gumira Johnson Va CA	92285 US	#####
Emily Hay Ojai CA	93023 US	#####
Nikki Nalep Los Angele: CA	90066 US	#####
Angel John South Pasa CA	91030 US	#####
Steve Burr Porterville CA	93257 US	#####
Jay Lucas Cliffside Pa NJ	7010 US	#####
Andrea Ber Chicago	60632 US	#####
Kathryn Pa Vaudreuil-c QC	J7V Canada	#####
Alyssa Dian Portland OR	97214 US	#####
C J Prosper	75078 US	#####
Shannon Lc Great Neck NY	11021 US	#####
gail butens los angeles CA	90042 US	#####
Samantha I Los Angele: CA	90048 US	#####
Laura Cran Yucca Valle CA	92284 US	#####
Monica Cui Ontario CA	91764 US	#####
Cam Schusi Los Angele: CA	90008 US	#####
Felipe Albe Redlands CA	US	#####
Dominik Hc South Pasa CA	91030 US	#####
Andrew Yi Arcadia CA	91007 US	#####
Corinna Ge Santa Moni CA	90404 US	#####
Hannah Lei San Jose CA	95136 US	#####
George Nat Coachella CA	92236 US	#####
Aaron/Alex Orange Park	32065 US	#####
Marie Goel Bend OR	97703 US	#####
Kurtis Saldi Morongo v CA	92256 US	#####
Jessicka Ba Yucca valle CA	92284 US	#####
Ronald Sari Yucca Valle CA	92284 US	#####
Kara Bade Las Vegas NV	89113 US	#####
Nathan Ob Santa Cruz CA	95060 US	#####

Matthew S Yucaipa	CA	92399	US	#####
Richard Tor Sudbury		P3A	Canada	#####
Tyler R Ontario	CA		US	#####
Tommy Ha Nashville	TN	37115	US	#####
Eva Soltes Yucca Valle	CA	92284	US	#####
Stacy davis yucca valle	CA	92284	US	#####
Melody An Raleigh	NC	27612	US	#####
Ron Therri Joshua Tre	CA	92252	US	#####
c f Joshua Tre	CA	92252	US	#####
Felix Anton Hamburg		22301	Germany	#####
Shayan Har Park City	UT	84060	US	#####
Trisha Mill Las Vegas	NV	89178	US	#####
Julianne Ell Yucca Valle	CA	92284	US	#####
Diego Dura Big Bear La	CA	92315	US	#####
Debbie Ro San Juan ca	CA	92675	US	#####
J R Los Angele	CA	90031	US	#####
Eliza Hardy Rockinghar	NC	28379	US	#####
Laurel Rho Carmichael	CA	95608	US	#####
amanda ho Anaheim	CA	92805	US	#####
Stephen Bu Yucca Valle	CA	92284	US	#####
Cody Alder Brooklyn	NY	11206	US	#####
Eleanor Sc San Francis	CA	94110	US	#####
nicholas alr Landers	CA	92285	US	#####
Leila Smith Yucca valle	CA	92284	US	#####
Brian leata Los Angele	CA	90001	US	#####
Alicia Guille Espanola	NM	87532	US	#####
anonymous student			US	#####
Dylan Thad Yucca Valle	CA	92284	US	#####
Ashley Mo Carlsbad		92009	US	#####
Ainsley Mc Franklin	MA	2038	US	#####
shannon Br Landers		92801	US	#####
David Rous Yucca Valle	CA	92284	US	#####
Chris Newsom			US	#####
Chatel Mck Yucca Valle	CA	92284	US	#####
Mher Tara Brooklyn	NY	11238	US	#####
Lisa Snyder Los Angele	CA	90008	US	#####
Lauren Wo Cathedral C	CA	92234	US	#####
Aileen Aco Houston		78501	US	#####
josefa mari sant frutos de bages		8272	Spain	#####
Robin Owe Yucca Valle	CA	92284	US	#####
Corina Caz Corona	CA	92881	US	#####
Jeff GoldBl Los Gatos		95032	US	#####
Dabney Mc Los Angele	CA	90042	US	#####
Eve Gilbert Seattle	WA	98133	US	#####
Zoe Ward Yucca Valle	CA	92284	US	#####
Emene Ale JoshuaTree	CA	92252	US	#####
Sierra Keyli Yucca Valle	CA	92284	US	#####

Jenna Dori: Los Angele: CA	US	#####
Emily Endo	US	#####
Mike McM Los Angele: CA	90027 US	#####
Christy Ro: YUCCA VAL CA	92284 US	#####
Stephanie : Joshua tree: CA	92252 US	#####
Violet Sant: Flamingo H CA	92284 US	#####
Britt Carr Yucca Valle CA	92284 US	#####
Alanna Cov Yucca Valle CA	92284 US	#####
Jordan Cari Yucca valle CA	92284 US	#####
Skye Ander south pasa: CA	91030 US	#####
Tyler Sabb: Joshua Tre: CA	92252 US	#####
Shelly Fred Yucca Valle CA	92284 US	#####
Jacobine v: Landers CA	92285 US	#####
Abraham N Whitewate CA	92282 US	#####
Genevieve Riverside CA	92504 US	#####
Cristal Mor Desert hot CA	92240 US	#####
david maci: Palm Deser CA	92211 US	#####
KINGz Mon Whitewate CA	92282 US	#####
Dana Long: Twentynin: CA	92277 US	#####
Urs Baur Flamingo H CA	92258 US	#####
Jen Marlow Vista CA	92083 US	#####
Yehuda Poi New Orlea: LA	70115 US	#####
Brit Tucker Twentynin: CA	92277 US	#####
Jack Sherid New York	10023 US	#####
Milos Faitl Yucca Valle CA	92284 US	#####
Janie Branc Yucca Valle CA	92284 US	#####
Debra1 #2: Palm Deser CA	92260 US	#####
Peo Haggst Yucca Valle CA	92284 US	#####
Nicholas Br Los Angele: CA	90026 US	#####
Xavier Burt Yucca Valle CA	92284 US	#####
Rita Macia: Whitewate CA	92282 US	#####
Bettie Rine Rimrock CA	92268 US	#####
CHRISTINA Joshua Tre: CA	92252 US	#####
Natalie Lip: Sydney	2000 Australia	#####
Sant Khals: Joshua Tre: CA	92405 US	#####
Franciska H Joshua Tre: CA	92252 US	#####
Michelle St Landers CA	92285 US	#####
Doria Gree Santa Mon: CA	90403 US	#####
Harlie Aroc San Diego CA	92123 US	#####
Jo Bollen Yucca Valle CA	92284 US	#####
Mark Reba Los Angele: CA	90039 US	#####
Licia Perea Yucca valle CA	92284 US	#####
Erin Gavle Landers CA	92285 US	#####
John Schoe Landers CA	92285 US	#####
Brandi Ber: Yucca Valle CA	92284 US	#####
Jenna Belai Costa Mes: CA	92627 US	#####
Maya Hern Las Vegas	89145 US	#####

Jade Porter Twentynine CA	92277 US	#####
Mick Gram Yucca Valle CA	92284 US	#####
Brooke Ma Nicholasville	40356 US	#####
Rohini Wal Joshua Tre CA	92252 US	#####
Judith Lynn Landers CA	92285-069 US	#####
Abby Broth Los Angele CA	90013 US	#####
Torryne Ch San Francis CA	94102 US	#####
Hourig Sar Los Angele CA	90068 US	#####
Konkani De Riverside CA	92503 US	#####
Ashly Willi Yucca Valle CA	92284 US	#####
Nicole Lipo Laguna Hill CA	92653 US	#####
Claire Wad Landers CA	92285 US	#####
Kaitlin Koss Twentynine CA	92277 US	#####
Chris Kelly CA	US	#####
Beverly Enc Yucca Valle CA	92284 US	#####
Frank Hadl Joshua Tre CA	92252 US	#####
Madison Gi Twentynine CA	92277 US	#####
Melinda Ar MORONGC CA	92256-977 US	#####
Stacy O'Tor Twentynine CA	92277 US	#####
Monica Chl Chicago IL	60629 US	#####
Katherine T Los Angele CA	90042 US	#####
Corey Robb	US	#####
Jan Voegtly Yucca Valle CA	92284 US	#####
M Boswort Yucca Valle CA	92284 US	#####
Lisa Spayde San Francis CA	94134 US	#####
Lucas Dura Joshua Tre CA	92252 US	#####
sarah benje brooksville FL	34602 US	#####
Lauren Ash Joshua Tre CA	92252 US	#####
Melissa Wi Guatemala City	91403 Guatemala	#####
Ana B Merida	97314 Mexico	#####
Julie Cavali vv CA	92392 US	#####
Cynthia Co Twentynine CA	92277 US	#####
Kathy Chisr Flamingo H CA	92284 US	#####
Amanda Lo Apple Valle CA	92307 US	#####
Ryan Verdu Yucca Valle CA	92284 US	#####
Mickayla Fr San Clemer CA	92672 US	#####
Madison Ki 29 palms CA	92277 US	#####
Peter Hasti Sherman O CA	90046 US	#####
Philip Sinsh Los Angele CA	90006 US	#####
Veronica Li Twentynine CA	92277 US	#####
Hilary Parki Los Angele CA	90005 US	#####
Natalia Par Yucca Valle CA	92284 US	#####
Ren Rossini San Francis CA	94102 US	#####
Michele Bl los angeles CA	90049 US	#####
Caroline H Berkeley CA	94705 US	#####
Susan Blair Corona CA	92879 US	#####
Jose Macia Palm Deser CA	92260 US	#####

McLean Al	Yucca Valle CA	92284 US	#####
Jae Taylor	Yucca Valle CA	92284 US	#####
Juliana Kiv	Redlands CA	92374 US	#####
Dustin Tutt	Yucca Valle CA	92284 US	#####
Riah Bucha	Seattle WA	98136 US	#####
Benicia Sm	Ventura CA	93001 US	#####
Florence M	Twentynine CA	92277 US	#####
tina miyak	huckleberr CA	90016 US	#####
Diana R	Los Angele CA	90027 US	#####
Chanette N	Yucca Valle CA	92284 US	#####
J Tzedek	Johnson Va CA	92285 US	#####
Scott Holm	Huntington Beach	92649 US	#####
Jenna Cars	Twentynine CA	92277 US	#####
Lional Robi	Landers CA	92285 US	#####
Ashley Solc	Los Angele CA	90042 US	#####
Pam Ander	Yucca Valle CA	92284 US	#####
mark talkin	Cathedral CA	92234 US	#####
Patti Kitt	Joshua Tre CA	92252 US	#####
Sunshine K	Joshua tree CA	92252 US	#####
Victoria Ra	Landers CA	92285 US	#####
Haylee Lew	Yucca valle CA	92284 US	#####
Dabbie Gac	Twentynine Palms	92277 US	#####
Gary Young	Flamingo H CA	92284 US	#####
Courtney F	Yucca Valle CA	92284 US	#####
Nancy Hale	Fresno CA	93704 US	#####
Janelle Hor	Running Sp CA	92382 US	#####
Louie John	Homesteac CA	95060 US	#####
Adam Nels	Corona CA	92880 US	#####
Kelly Donal	Landers CA	92285 US	#####
Breana V	Joshua Tre CA	92252 US	#####
Kenneth La	Twentynine CA	92277 US	#####
Kbigham Bi	Lake Elsin CA	92530 US	#####
Lauren Tun	Norco CA	92860 US	#####
Nancy Kion	Yucca Valle CA	92284 US	#####
Matthew G	Yucca Valle CA	92284 US	#####
Theresa Dc	Joshua Tre CA	92252 US	#####
cura jones	yucca valle CA	92284 US	#####
Reto Kaufm	Landers CA	92285 US	#####
Corinne Lei	Landers CA	92285 US	#####
Dylan Rupe	san francisc CA	94103 US	#####
Hugo Gonz	Landers CA	92285 US	#####
Adrian Gan	Indio CA	92201 US	#####
Nathaniel /	Landers CA	92285 US	#####
Joseph Cor	Pioneertow CA	92268 US	#####
LAURA DAF	Yucca Valle CA	92284 US	#####
Chanae Ow	Malibu CA	90265 US	#####
Erik Garant	Joshua Tre CA	92252 US	#####

Kellie Stoke Joshua Tre	CA	92252	US	#####
Kaylee Mat Yucca Valle	CA	92284	US	#####
Cara Hall Pioneertow	CA	92268	US	#####
Marielle St Topanga	CA	90290	US	#####
Jan Nygren Seattle	WA	98168	US	#####
Sandra Bra Yucca Valle	CA	92284	US	#####
Barbara Le Long Beach	CA	90814	US	#####
Donna Cols Yucca Valle	CA	92284	US	#####
Heather Ne Twentynine	CA	92277	US	#####
R. Leonetti Ventura	CA	93004	US	#####
gregory qui Yucca Valle	CA	92284	US	#####
Laura Bart Landers	CA	92285	US	#####
Danielle De Yucca Valle	CA	92284	US	#####
Toni Gonza Landers	CA	92285	US	#####
Jeffrey Ger Los Angele	CA	90026	US	#####
Michael Cl Windsor		95492	US	#####
Daniela Bu Los Angele	CA	90004	US	#####
Karen Cuoz Bothell	WA	98012	US	#####
Alejandra E Yucca Valle	CA	92284	US	#####
Maggie Fol Los Angele	CA	90026	US	#####
Kristen Pyl San Diego	CA	92109	US	#####
Dan Ander Yucca Valle	CA	92284	US	#####
Kelly Raub Everett	WA	98208	US	#####
Shannon B Buckley	WA	98321	US	#####
Michael Po San Jose	CA	95117	US	#####
Mary Ande Mojave	CA	92285	US	#####
trevor robe Joshua tree	CA	92252	US	#####
Johnny san North Holly	CA	91602	US	#####
Christi Lew Joshua Tre	CA	92252	US	#####
Tawnia Ma Joshua Tre	CA	92252	US	#####
Deidra We Joshua Tre	CA	92252	US	#####
Susanne De La Habra	CA	90631	US	#####
Jennifer K 1 San Francis	CA	94122	US	#####
Shawna Sai Joshua Tre	CA	92252	US	#####
Nicholas Le Denver	CO	80205	US	#####
Crystal Dicl Lemon Gro	CA	91945	US	#####
Cole Kiburz Yucca Valle	CA	92284	US	#####
Fred House Yucca Valle	CA	92284	US	#####
Walter Der Albuquerque	NM	87111	US	#####
Krystal Mai Yucca valle	CA	92256	US	#####
tom berry Hudson	NY	12534	US	#####
Mickey Ne Chicago	IL	60647	US	#####
Melissa Boi Joshua Tre	CA	92252	US	#####
Wiebren S Brugge		8000	Belgium	#####
Edward Agi 29 palms	CA	922277	US	#####
Audrey Cas Laval		53000	France	#####
Allison Skei Newburgh	OH	44105	US	#####

Dacie Seeg Yucca Valle CA	92284 US	#####
Pedro Benç Barcelona	8001 Spain	#####
Julie Burns Twentynine CA	92277 US	#####
Katherine I New York NY	10002 US	#####
Barbara Lo Landers CA	92285 US	#####
Elizabeth S Largo FL	33773 US	#####
kim loser Los Angeles CA	92284 US	#####
Sheri king Landers CA	92285 US	#####
Sarah Deigl Orange VA	22960 US	#####
Sophia Aitr Spotswood NJ	8884 US	#####
Jessica Lyn Joshua Tre CA	92252 US	#####
Michael Gr Yucca Valle CA	92284 US	#####
brenda rob Landers CA	92285 US	#####
Jasmine Da 29 palms CA	92277 US	#####
Ronald Bric Twentynine CA	92277 US	#####
michael sm Landers CA	92285 US	#####
Mary Beth Granger IN	46530 US	#####
Rainbow M Yucca Valle CA	92284 US	#####
Christophe Klamath Fa OR	97603 US	#####
glen Small Joshua Tre CA	92252 US	#####
Richard Ga Yucca Valle CA	92284 US	#####
Robert Jun Twentynine CA	92277 US	#####
Katina Allai Yucca valle CA	92284 US	#####
Barbie Som Yucca Valle CA	92284 US	#####
Derrick Sey Twentynine CA	92277 US	#####
Pamela Gu Landers CA	92285 US	#####
Patricia Kni Joshua Tre CA	92252 US	#####
Bianca Edw Johnson Va CA	92356 US	#####
Jennifer Cu Joshua Tre CA	92252 US	#####
CATHE Salv twentynine CA	92277 US	#####
Holly Overt Nags Head NC	11206 US	#####
Cheryl Mat Yucca Valle CA	92284 US	#####
Andy Ciceri Yucca Valle CA	92284 US	#####
Ruenell Pet Yucca Valle CA	92284 US	#####
Emily Silver Yucca Valle CA	92284 US	#####
Wendy Hac Pioneertow CA	92286 US	#####
Jess Schule Vero Beach FL	32963 US	#####
Hannah Lic Hobart	46342 US	#####
Scott Murd Yucca Valle CA	92285 US	#####
Yvette Mitç Yucca Valle CA	92284 US	#####
Michele Shoemaker	US	#####
Rachel Bos 29 palms CA	92277 US	#####
S Hacker Washington DC	20001 US	#####
Julianne Ru Yucca Valle CA	92284 US	#####
John Vicker Desert Hot CA	92240 US	#####
Dorothy Ch Yucca valle CA	92286 US	#####
Carol Coop Joshua Tre CA	92252 US	#####

Elizabeth L Portland	OR	97211	US	#####
Pauline Cat Landers	CA	92285	US	#####
Jessica Dah Landers	CA	92285	US	#####
Sarah Sheri Voorheesvi	NY	12054	US	#####
Valerie Me Landers	CA	92285	US	#####
Sarah Tabb Pioneertow	CA	92268	US	#####
maryann sc Concord	NC	28025	US	#####
Roxanne Tr Lodi	CA		US	#####
Gigi Jack Santa Moni	CA	90403	US	#####
Ramona Es Yucca Valle	CA	92284	US	#####
Cheryl Mor Joshua Tre	CA	92252	US	#####
Nancy Sam Joshua Tre	CA	92252	US	#####
Tawanna G Twentynin	CA	92277	US	#####
Phoenix De West Jorda	UT	84088	US	#####
Linda Santi Glendale	CA	91206	US	#####
Keith Mina Cathedral C	CA	92234	US	#####
Jolene Phill Corona	CA	92880	US	#####
Kendall Ho Flamingo H	CA	92284	US	#####
Sara Comb Joshua Tre	CA	92252	US	#####
Tina Hunte Joshua Tre	CA	92252	US	#####
Clea Benso Whittier	CA	90604	US	#####
Elle Engstr Los Angele	CA	90032	US	#####
Sheila Cox Lakewood	CA	90713	US	#####
Brian LaFai Yucca valle	CA	92284	US	#####
Maggie Mo Yucca valle	CA	92284	US	#####
D Tomlinso Yucca Valle	CA	92284	US	#####
kim white Yucca Valle	CA	92284	US	#####
Megan Lies Henderson	NV	89012	US	#####
Brenda Ara Anaheim	CA	92805	US	#####
Tanya Ranc Twentynin	CA	92277	US	#####
April Stant Landers	CA	92285	US	#####
Scott Cochi Cerritos	CA	90703	US	#####
Jim Hamm Joshua Tre	CA	92252	US	#####
Alexandra I Santa Ana	CA	92704	US	#####
Gloria L Val Sanger	CA	93657	US	#####
John Jacob Landers	CA	92285	US	#####
Kelly Sawyr Los Angele	CA	90025	US	#####
kimberly w Joshua Tre	CA	92258	US	#####
J Bercovici Los Angele	CA	90042	US	#####
Cristie Cart Yucca valle	CA	92284	US	#####
valerie lies Landers	CA	92285	US	#####
Melissa W Twentynin	CA	92277	US	#####
Will Hanse Temecula	CA	92592	US	#####
Stephanie I Joshua tree	CA	92252	US	#####
Chelsea Ro Yucca valle	CA	92284	US	#####
Dawn John Landers	CA	92285	US	#####
Breeann H Yucca Valle	CA	92284	US	#####

Spencer Hu Yucca Valle CA	92284 US	#####
Heidi Pears Joshua Tre CA	92252 US	#####
Lacee Burk Yucca Valle CA	92284 US	#####
Amy Hite Encinitas CA	92024 US	#####
Lauren Vill Los Angele CA	90036 US	#####
Lindi Mills Yucca Valle CA	92284 US	#####
Brooke Ma Monrovia CA	91016 US	#####
Vicky Dyer Rockwall TX	75087 US	#####
Kirstin Saln Hammond OR	97121 US	#####
Amanda Etter	US	#####
Lizmarie Lo Lake Wort FL	33467 US	#####
Jessika Dal San Diego CA	92107 US	#####
Holly Brun Oceanside CA	92057 US	#####
Ally Wray-Pioneertow CA	92268 US	#####
Timothy U Yucca valle CA	92284 US	#####
Dawn Pala Desert Hot CA	92240 US	#####
Mindie Redlin CA	92028 US	#####
rifka owen CA	92284 US	#####
Holly Pinhe Irvine CA	92606 US	#####
Robbin Pra Twentynine CA	92277 US	#####
Jesus Cabal Yucca Valle CA	92284 US	#####
Sophia San Chino CA	91710 US	#####
Ivy Malone Valencia CA	91355 US	#####
Rachel Luzi Peoria AZ	85345 US	#####
Lex Teague Joshua Tre CA	92252 US	#####
Katie Callar Landers CA	92285 US	#####
Marina Dol Tacoma WA	92284 US	#####
Anna De La Costa Mesa CA	92626 US	#####
Marlene Di Seal Beach CA	90740 US	#####
Lisa Landav Union City CA	94587 US	#####
Darla McAl Joshua Tre CA	92252 US	#####
William Malin	US	#####
Mary Moor Yucca Valle CA	92284 US	#####
Erin Dwyer Fairfield CA	94534 US	#####
Wendy Fitz Yucca Valle CA	92284 US	#####
Errol Colan Landers CA	92285 US	#####
Tara Killian Running Sp CA	92382 US	#####
Caitlyn Lov Grand Junc CO	81507 US	#####
Joseph Giel Fayetteville NC	28306 US	#####
Nancy Johr Yucca Valle CA	92284 US	#####
Debi Zickef Lake Havas AZ	86404 US	#####
Jenny Adar Chapel Hill NC	27516 US	#####
Judy Masse Yucca Valle CA	92284 US	#####
Rachel Buri Santa Ana CA	92706 US	#####
Patty Riley Johnson Va CA	92285 US	#####
Carrie Schii San Antoni TX	78209 US	#####
John Sheck San Diego CA	92102 US	#####

Chris Nicho Yucca Valle CA	92284 US	#####
georganne Joshua Tre CA	92252 US	#####
Annelie Fur Salt Lake Ci UT	84117 US	#####
Jomar Man Coronado	92118 US	#####
Jennifer Lie Las Vegas NV	89123 US	#####
Deserie Thi Johnson Va CA	92285 US	#####
Andrew Pr Yucca Valle CA	92284 US	#####
Janice Mor Yucca Valle CA	92284 US	#####
Dyan Carro Yucca Valle CA	92284 US	#####
Alanna Fou West Holly CA	90069 US	#####
Ann Bost Yucca Valle CA	92284 US	#####
Mark Aller Los Angele: CA	90042 US	#####
Lisa Hwang Ontario CA	92252 US	#####
Judy Jack Landers CA	92285 US	#####
Dawn Bost Joshua Tre CA	92252 US	#####
debbie jon Morongo V CA	92256 US	#####
Theresa M Yucca Valle CA	92284 US	#####
Oana Cups Los Angele: CA	91606 US	#####
Jane Steph Los Angele: CA	90026 US	#####
brianna ett corpus chri TX	78410 US	#####
Shirley Perl Yucca Valle CA	92284 US	#####
Barbara Bu 29 Palms CA	92277 US	#####
Misti Webs Grantsville UT	84029 US	#####
Scott Mere Palm Sprinç CA	92262 US	#####
Kathryn W Lake Isabella	93240 US	#####
Lori Portill Colton CA	92324 US	#####
Darian Ma Berkeley CA	94708 US	#####
Neg Noori Joshua Tre CA	92252 US	#####
Krista Knap Yucca Valle CA	92284 US	#####
Aidan Parir Twentynin CA	92277 US	#####
Jimmy Bro Twentynin CA	92277 US	#####
Cameron S Elk Grove CA	95624 US	#####
ANN MARI San Francis CA	94112 US	#####
Monica Uri San Francis CA	94122 US	#####
Sean Mylet Pioneertow CA	92286 US	#####
Joanne Rer Encinitas CA	92024 US	#####
Candice Na Yucca Valle CA	92284 US	#####
Natalie Smi Westminst CA	92683 US	#####
Bruce Well Seattle WA	98109 US	#####
Adella Albi Penn Valle CA	95946 US	#####
Alysia And Alameda CA	94501 US	#####
Heather D Los Angele: CA	90028 US	#####
April Whar Fpo AP	96350 US	#####
Jessica Wai Yucca Valle CA	92284 US	#####
Teah Stran Los Angele: CA	90038 US	#####
Sylvia Brow Gig Harbor WA	98335 US	#####
Jovita Gunc Yucca Valle CA	92284 US	#####

Dayna Mar Long Beach CA	90814 US	#####
Kathleen R Thousand C CA	91360 US	#####
Brock Auxie Austin TX	78702 US	#####
Arturo Rey Joshua Tre CA	92252 US	#####
Ruffy Land Los Angele CA	90013 US	#####
Sophia Bur Espanola NM	87532 US	#####
Keith Urick Mill Valley CA	94941 US	#####
Renee Cup Twentynin CA	92277 US	#####
Jessica Oje Culver City CA	90230 US	#####
Jacquelyn Yucca Valle CA	92284 US	#####
Tiana Dudl Yucca Valle CA	92284 US	#####
Jennifer Al Pasadena CA	91103 US	#####
Justin Go Joshua Tre CA	92252 US	#####
Sue Decker Las Vegas NV	89101 US	#####
Daniel Gor Joshua Tre CA	92252 US	#####
Brigitte Sch Twentynin CA	92277 US	#####
Fro Vakili Pioneertow CA	92268 US	#####
Darl Sabrav Palm Spring CA	92262 US	#####
lauren kofc Carlsbad CA	92008 US	#####
J G Torrance CA	90503 US	#####
Leslie Mille Landers CA	92285 US	#####
Lisa Hiatt Joshua Tre CA	92252 US	#####
Joscelyn Te Joshua Tre CA	92252 US	#####
Sierra Delg Joshua Tre CA	92252 US	#####
Herman Pl Twentynin CA	92277 US	#####
Carly Foulk Brooklyn NY	11237 US	#####
Dana Boley Yucca Valle CA	92284 US	#####
Rachel Swe Brooklyn NY	11215 US	#####
Brooke Haggstrom	US	#####
Ryan Keesl Yucca Valle CA	92284 US	#####
Patricia Bol Cypress TX	77429 US	#####
Donel Edw Yucca Valle CA	92284 US	#####
Rhianna Nc Joshua Tre CA	92252 US	#####
Devon Nus Los Angele CA	90046 US	#####
Indra Rodie Forest Hills NY	11375 US	#####
Lisa McColl Fullerton CA	92832 US	#####
Tia Kanaeh ATWATER CA	95301 US	#####
Alex Perez Yucca Valle CA	92284 US	#####
Hailey Bog Joshua Tre CA	92252 US	#####
Robert Jorc Twentynin CA	92277 US	#####
Ariadna Or Los Angele CA	90027 US	#####
Jonathan N 29 palms CA	92277 US	#####
Caila Jordai Twentynin CA	92277 US	#####
Alicja Clark Costa Mesa CA	92627 US	#####
Chelsea Di Coachella CA	92236 US	#####
Katie Lee Morongo v CA	92256 US	#####
Savoy Halli Santa Moni CA	90404 US	#####

Cynthia Jor Las Vegas	NV	89121	US	#####
Therese Da Menifee	CA	92584	US	#####
Vanessa Cu Syosset	NY	11791	US	#####
Rachel Cuc Hamtramcl	MI	48212	US	#####
Nikita John Norfolk	VA	23518	US	#####
Pen Wurst Morongo V	CA	92256	US	#####
Lauren Stai Joshua tree	CA	92252	US	#####
Kirby Kratk Long Beach	CA	90802	US	#####
matt adam Los Angeles	CA	90077	US	#####
Matt Kautz Yucca valle	CA	92284	US	#####
Clayton Hu Twentynine	CA	92277	US	#####
Tin Santos Los Angeles		90602	US	#####
Mark Smot SF	CA	94114	US	#####
Matthew P Huntington	CA	92647	US	#####
Sarah Wats San Diego	CA	92104	US	#####
John Ostrai Los Angeles	CA	90027	US	#####
Olivia Hill Altadena	CA	91001	US	#####
Renee Rob Joshua Tre	CA	92252	US	#####
Amanda Yc Hillsboro	OR	97124	US	#####
Kimena Lov Tampa	FL	33615	US	#####
Dana Funai Los Angeles		90031	US	#####
Theresa Bri Anaheim	CA	92801	US	#####
Natalie Krir Ojai	CA	93023	US	#####
Remy Thigr Grantsville	UT	84029	US	#####
Kathleen M Los Angeles	CA	90036	US	#####
Mark Fuller Sebastopol	CA	95472	US	#####
Raven Prat Valdosta	GA	31602	US	#####
Joseph Mei Los Angeles	CA	90027	US	#####
Tatiana Par Los Angeles	CA	90026	US	#####
Christine G Austin	TX	78724	US	#####
Matthew N Fullerton	CA	92832	US	#####
Kathleen T Culver City	CA	90230	US	#####
Curt Sautte Ontario	CA	91762	US	#####
Melissa Sav Alhambra	CA	91801	US	#####
Stephanie I Riverside	CA	92507	US	#####
Chris Dima Los Angeles	CA	90013	US	#####
Adina Bish Lake Orion	MI	48360	US	#####
Lisa Campb Wildwood	MO	63038	US	#####
Charles Ma Twentynine	CA	92277	US	#####
Mikel Hubt Joshua Tre	CA	92252	US	#####
Douglas plc Eureka	CA	95501	US	#####
Julie Reyes Palm Spring	CA	92262	US	#####
Victoria Co Orlando	FL	32803	US	#####
Victoria Fri Los Angeles	CA	90004	US	#####
Greg Varra Yucca Valle	CA	92284	US	#####
Bill Rilley Yucca Valle	CA	92284	US	#####
Patricia Sm Mecca	CA	92284	US	#####

Jaclyn Mor: Pioneertow CA	92268 US	#####
bella c Austin TX	78704 US	#####
Marisa Kerl Alameda CA	94501 US	#####
Susan Uter Yucca Valle CA	92284 US	#####
Samantha / Riverside CA	92508 US	#####
Alisa Okam Glendale CA	91205 US	#####
Trace Cava Orlando FL	32803 US	#####
Robin Sylve Lakewood OH	44107 US	#####
Daniel Dor Los Angele: CA	90008 US	#####
Diana Wojl Palmyra NJ	8065 US	#####
Karen Stral Joshua Tre: CA	92252 US	#####
sai yakkanti	US	#####
Leslie Gord Burbank CA	91501 US	#####
Sonja Hein: Olfen	59399 Germany	#####
Chelsea Wi Austin TX	78744 US	#####
Dave Castil Long Beach CA	90802 US	#####
Adina Mills Landers CA	92285 US	#####
Chelsea Ca: Los Angele: CA	90004 US	#####
Kristjana E\ Missoula MT	59804 US	#####
Giselle Sarr Saint Petersburg	33713 US	#####
Dan Lawrei Phoenix AZ	85048 US	#####
Joycelyn R: Landers CA	92285 US	#####
Kristin Lore Los Angele: CA	90026 US	#####
Paul Rudol\ Yucca Valle CA	92284 US	#####
Sara Boggs Yucca Valle CA	92284 US	#####
Melissa Fin Los Angele: CA	90048 US	#####
Jennfer Rol Joshua tree: CA	92252 US	#####
Summer M Queens NY	11102 US	#####
andrew hu: Long Beach CA	90815 US	#####
Jennifer Lle Ontario CA	91762 US	#####
olivia parke Joshua Tre: CA	92252-210 US	#####
Jesse Orral San Leandr CA	94577 US	#####
Marisa Petr Phoenix AZ	85017 US	#####
Alicia Sanct Los Angele: CA	90022 US	#####
Lauren Pae Flamingo H CA	92284 US	#####
Jillian Peco Landers CA	US	#####
David Alf Los Angele: CA	90022 US	#####
Jenny Ruch Seattle WA	98188 US	#####
Joanna Fod Yucca Valle CA	92284 US	#####
Michelle R: Riverside CA	92506 US	#####
tamra davi: Malibu CA	90265 US	#####
Jeanette M Los Angele: CA	90002 US	#####
Brett Dickir Burlington ON	L7L Canada	#####
Ian Wellma Los Angele: CA	90005 US	#####
Al Sal Anaheim CA	92801 US	#####
Paul Rocha Los Angele: CA	90065 US	#####
Cindy Beck Joshua Tre: CA	92252 US	#####

Lejia Bowrr	Ventura CA	93001	US	#####
Eva Pererr	Yucca Valle CA	92284	US	#####
Michael Str	Nashville TN	37206	US	#####
Danna McA	Yucca Valle CA	92284	US	#####
Isidro Barc	Santa Ana CA	92704	US	#####
Kaylene Ke	Payson AZ	85541	US	#####
Alexis Kleyl	Yucca valle CA	92284	US	#####
John Basse	Los Angele: CA	90028	US	#####
fran krysto	Palm Spring CA	92262	US	#####
Kristen Gre	Los Angele: CA	90065	US	#####
Bruce Evans			US	#####
Deborah M	Denver CO	80227	US	#####
Mark Laver	Oviedo FL	32765	US	#####
Anabel Nev	Perris CA	92860	US	#####
Robyn Lew	Twentynin CA	92277	US	#####
Michael Ha	Orange CA	92866	US	#####
Holly Keen:	Los Angele: CA	90011	US	#####
Jeff Ryan	Los Angele: CA	90068	US	#####
Francis Kea	Joshua Tre: CA	92252	US	#####
Thomas So	Los Angele: CA	90803	US	#####
Lisa Morga	Marshall VA	20115	US	#####
Alexandra I	San Bernar CA	92407	US	#####
Zach Lowry	Pioneertow CA	92268	US	#####
Dennis Unz	Boise ID	83702	US	#####
Linda Mock	Yucca Valle CA	92284	US	#####
Shiela Curt	Cameron MO	64429	US	#####
Joelle Graff	Portland OR	97211	US	#####
Jenny Cher	Irvine CA	92604	US	#####
Mackenzie	Boise ID	83646	US	#####
Kari Colvin	Yucca Valle CA	92284	US	#####
Maggie Elli	Nashville TN	37206	US	#####
Greg Lewis	Yucca Valle CA	92284	US	#####
Barry Norw	LANDERS CA	92285	US	#####
Noelle Gon	Palm Spring CA	92262	US	#####
Kimiyo Hei	Los Angeles	90026	US	#####
Donna Scot	Colton CA	92324	US	#####
Carly Rushf	Tacoma WA	98406	US	#####
Mike Small	Yucca Valle OR	92284	US	#####
Sharon Lop	Yucca Valle CA	92284	US	#####
Judy Hears	Yucca Valle CA	92284	US	#####
Alan Setser	Rancho Cordova	95670	US	#####
Dawn John	Yucca Valle CA	92284	US	#####
ann zerin	Grass Valle CA	95945	US	#####
Susie Seatc	Joshua Tre: CA	92252	US	#####
Wendy Kut	Fullerton CA	92832	US	#####
Lilianna Da	Cathedral C CA	92234	US	#####
NICKY WAF	Detroit MI	48221	US	#####

Lorah Yacc: Landers	CA	92285	US	#####
Kimberlie E Yucca Mes:	CA	92284	US	#####
Angella Nu Yucca Valle	CA	92284	US	#####
sheila bowi pioneertow	CA	92268	US	#####
John Mann Brooklyn	NY	11233	US	#####
TERRY HAN LANDERS	CA	92285	US	#####
Angela Ferç Yucca Valle	CA	92284	US	#####
Parker Lloy Portland	OR	97601	US	#####
Julio Rodrige Bonsall	CA	92003	US	#####
Tony Salto Yucca Valle	CA	92284	US	#####
Christophe Las Vegas	NV	89117	US	#####
klbn j philly		97658	US	#####
nicholas ch los angeles	CA	90065	US	#####
Nancy Kleir Joshua Treç	CA	92252	US	#####
Susan McC Yucca Valle	CA	92284	US	#####
Rivers Page Mullins		29574	US	#####
Layla M Albuquerque	NM	87102	US	#####
Janessa Mc Yucca Valle	CA	92284	US	#####
CHERYL Bal Joshua Treç	CA	92252	US	#####
Jenni Ehrnr Upland	CA	91786	US	#####
Megan Gro Columbia	SC	29205	US	#####
Dale Bober Yucca Valle	CA	92284	US	#####
Jaycene Ha Pomona	CA	91767	US	#####
Mills Mora: Anaheim	CA	92805	US	#####
Kenda Tayl Garden Grc	CA	92841	US	#####
Destiny Bu: Twentyninç	CA	92277	US	#####
Susan Herr Pioneertow	CA	92268	US	#####
Elyse Malla Woodland	CA	91367	US	#####
Hannah Ro Bristol		BS6	UK	#####
Robert M. (Oceanside	CA	92054	US	#####
Eric Alperir Los Angele:	CA	90013	US	#####
William Mç Murrieta	CA	92562	US	#####
Patricia Dai Yucca Valle	CA	92284	US	#####
VALERIE Dç JOSHUA TR	CA	92252	US	#####
Grayson Qi Yucca Valle	CA	92284	US	#####
Susan Kear Portland	OR	97202	US	#####
Erica Johns Mission Vie	CA	92692	US	#####
Dane Spurl Yucca valle	CA	92284	US	#####
Alex C Joshua treeç	CA	92252	US	#####
Paul Dove Yucca Valle	CA	92284	US	#####
marie esco Hemet	CA	92544	US	#####
Rylan Taylc Lakeland		33809	US	#####
Jennifer W: Portland	OR	97205	US	#####
Richard Cai Yucca Valle	CA	92284	US	#####
Breanna Bç Virginia		201482	US	#####
Coleman Li Anaheim	CA	92801	US	#####
Sean CULLç San Francis	CA	94130	US	#####

Jocelyn Joh Portland OR	97217 US	#####
Keri Strausl Winter Park FL	32789 US	#####
Alex Fink Los Angeles CA	90004 US	#####
Barbara Tu Seattle WA	98105 US	#####
Michelle R San Diego CA	92116 US	#####
Jonathan D Yucca Valle CA	92284 US	#####
Grant Gera Los Angeles CA	90022 US	#####
Janice Hurr Yucca Valle CA	92284 US	#####
Connie Rog Yucca Valle CA	92284 US	#####
Richard Hu Joshua Tree CA	US	#####
Patrick Hog Lorton VA	22079 US	#####
Cheri Skatr Eden Prairie MN	55347 US	#####
Jimmy Zep Panorama CA	91402 US	#####
Sheran Swi Twentynine CA	92277 US	#####
Bella Johns Landers CA	92285 US	#####
Martin Cox Joshua Tree CA	92252 US	#####
kevin simm Tampa	33617 US	#####
Sharianne Yucca Valle CA	92284 US	#####
Helga Grim los angeles CA	90039 US	#####
Anna Laidle East Stroudsburg	18301 US	#####
Dave Cox Joshua Tree CA	92252 US	#####
Susan Burn Pioneertown CA	92268 US	#####
Nikkiana Di San Diego CA	92129 US	#####
Jean k pioneertown CA	92268 US	#####
Maria Card Upland CA	91786 US	#####
Janis Comn Yucca Valle CA	92284 US	#####
Gregory Nu Playa Del R CA	90293 US	#####
Mary Cox Monterey CA	91754 US	#####
Cris Jackm Yucca Valle CA	92284 US	#####
Jennifer Cu Yucca Valle CA	92284 US	#####
Ryan Rios Monterey CA	91754 US	#####
Giselle Don Encino CA	91316 US	#####
Mary Ellen Joshua Tree CA	92252 US	#####
Cynthia Kn Landers CA	92285 US	#####
Dominique Los angeles CA	90039 US	#####
Doreen Go Lisle IL	60532 US	#####
Lizbeth Ma Mecca CA	92254 US	#####
Karlie Horn Waynesville	65583 US	#####
Christina H Pioneertown CA	92268 US	#####
Lainard Bu Yucca Valle CA	92284 US	#####
Janelle Feri Fullerton CA	92833 US	#####
Maryjo Pes Yucca Valle CA	92284 US	#####
Joshua Holl Yucca Valle CA	92284 US	#####
Victoria Wi Twentynine CA	92277 US	#####
Cynthia Wl Pioneertown CA	92268 US	#####
Lucas Sharj Long Beach CA	90802 US	#####
Laura Van Los Angeles CA	90036 US	#####

Maribel Ra Los Angeles	CA	90006	US	#####
Chris Winkl Covina	CA	91723	US	#####
sophia tarq needham	MA	2492	US	#####
Chad Walk Landers	CA	92285	US	#####
Julia Doty Studio City	CA	91604	US	#####
Dee Thomç Pioneertow	CA	92268	US	#####
Diane Thor Corona	CA	92878	US	#####
Veronica Lç Morongo V	CA	92256	US	#####
Molly Holkç Oceanside	CA	92056	US	#####
Eva Pererrç Yucca valle	CA	92284	US	#####
Amber sur Yucca valle	CA	92284	US	#####
Jennifer Lit Landers	CA	922285	US	#####
Ane Leopold Fayetteville		28314	US	#####
Dennis Rok Williston		58801	US	#####
Sydney Coc Pinson	AL	35126	US	#####
Michael kir Yucca Valle	CA	92284	US	#####
Angie Park Los Angeles	CA	90008	US	#####
Loren Mccc Twentyninç	CA	92277	US	#####
Elizabeth P Landers	CA	92285	US	#####
Julee Sumn Big bear cit	CA	92314	US	#####
Mark DeBo La Habra	CA	90631	US	#####
Fiona Flore Joshua Treç	CA	92252	US	#####
Sherrì Yoch Yucca Valle	CA	92284	US	#####
Vicki Moreç Azusa	CA	91702	US	#####
John Etz Joshua Treç	CA	92284	US	#####
josh mcguil Sydney		2000	Australia	#####
Rebecca Be landers	CA	92285	US	#####
Paul Altma New Braun TX		78130	US	#####
Kaleigh Yoç West Kelowna	V1Z		Canada	#####
Heather Hç Morongo V	CA	92256	US	#####
Michael Bo Landers	CA	92285	US	#####
Teresita de Mexico City		6693	Mexico	#####
Rebecca H Bullhead Ci	AZ	86442	US	#####
Stephanie \ Yucca Valle	CA	92284	US	#####
Tracy Falluç Yucca Valle	CA	92284	US	#####
Justine Mcç Riverside	CA	92503	US	#####
Alexandra I Yucca Valle	CA	92284	US	#####
ROGER MC JOSHUA TR	CA	92252	US	#####
Gabriela Fa Queens	NY	11367	US	#####
Pedro Herr Yucca Valle	CA	92284	US	#####
Sarah McM Joshua treeç	CA	92252	US	#####
Valeree Wç Joshua Treç	CA	92252	US	#####
Jennifer Stç Joshua Treç	CA	92252	US	#####
Lesley Mur Yucca valle	CA	92284	US	#####
Cyd Detiegç Palm Sprinç	CA	92264	US	#####
Emanuel Sr Palm Sprinç	CA	92262	US	#####
Kathy Henk Twentyninç	CA	92277	US	#####

Brianna Rill Yucca Valle CA	92284 US	#####
Mersiha M. Gostivar	Macedonia	#####
Barbara Dil Yucca Valle CA	92284 US	#####
Steven Moi Sharps Chapel	37866-189 US	#####
Cheri Russe Grass Valle CA	95945 US	#####
Karin Skiba Yucca Valle CA	92284 US	#####
Brandon Hudnall	US	#####
Timothy M Anaheim CA	92805 US	#####
Vivi Rama West Holly CA	90069 US	#####
Thomas Of Sacramento CA	95828 US	#####
Janna Pace Joshua Tree CA	92252 US	#####
Tina Mai Se Clarksville TN	37042 US	#####
evelyn mar Phoenix	85043 US	#####
Allison Wy Los Angeles CA	90026 US	#####
Brsndon Sa Yucca Valle CA	92284 US	#####
Dean Mack Landers CA	92285 US	#####
Malia Hase Ontario CA	91762 US	#####
Kurya Hoc Bermuda D CA	92203 US	#####
Alona Dadi West Holly CA	90069 US	#####
Lauren Wo Joshua Tree CA	92252 US	#####
Michelle Di San Diego CA	92117 US	#####
Charles For Cedartown GA	30125 US	#####
Matthew C Los Angeles CA	90031 US	#####
VLADEK JU Yucca Valle CA	92284 US	#####
Steven Zyls silverado CA	92676 US	#####
Bridgette N Yucca Valle CA	92284 US	#####
Robert Thu Yucca Valle CA	92284 US	#####
Janet Peter Troy	48084 US	#####
Linda Horn Yucca Valle CA	92284 US	#####
Vincent Mi Palm Spring CA	92264 US	#####
Barbara Ha Yucca Valle CA	92284 US	#####
Tom Hyatt Moreno Va CA	92555 US	#####
Tyson Holn Indio CA	92201 US	#####
Adriana An Glendale CA	91205 US	#####
yolanda scl Wittenbach	9300 Italy	#####
Janet Nort Santa Cruz CA	95065 US	#####
dominique Villiers-en-Désoeuvre	94440 France	#####
Darrin Pilki San Diego CA	92109 US	#####
Roxie Gree San Bernar CA	92404 US	#####
Christina H Pinon Hills CA	92372 US	#####
Stephanie I Cathedral CA	92234 US	#####
Andrew Va Ventnor ENG	PO38 1BH UK	#####
Sarah Radfi Yucca Valle CA	92284 US	#####
Kimberly R Yucca Valle CA	92284 US	#####
Francois M Long Beach CA	90804 US	#####
Ethan Cohe Henderson NV	89074 US	#####
John Baker Upland CA	91786 US	#####

Mikaela Co Henderson NV	89074 US	#####
jocelyne laj Terrebonnε CA	j6w0b5 US	#####
Tara Wilson Bakersfield CA	93312 US	#####
Bethany Ri Ridgecrest CA	93555 US	#####
Karen McK Wilmington DE	19803 US	#####
Albert Nevi Bloomingtc CA	92316 US	#####
Kathy T Irvine CA	92620 US	#####
Evan Oliver Newport B CA	92662 US	#####
Adam Scho Los Angele: CA	90004 US	#####
Donna Isen Culver City CA	90230 US	#####
Christophe Shobdon	HR6 UK	#####
David John: Joshua Tre CA	92252 US	#####
Djamila grc Paris	75011 France	#####
Jennifer St: Los Angele: CA	91040 US	#####
Nancy Grar Tucson AZ	85741 US	#####
Heidi Girlin Long Beach CA	90803 US	#####
Linda Smitf Salt Lake Ci UT	84121 US	#####
Kat campb: Yucca Valle CA	92284 US	#####
Jenn Herna Joshua Tre CA	92252 US	#####
rolf wiesler Johannesburg	2041 South Afric	#####
Naomi Coll Joshua tree CA	92252 US	#####
Jesse Child: Yucca valle CA	92284 US	#####
Bernard Be Birkirkara	BKR 4018 Malta	#####
Mikhaylla Desonia	Philippines	#####
Victor Mor: Riverside CA	92509 US	#####
Maja Dimk: Skopje	Macedonia	#####
Emma Nes: Elk River	55330 US	#####
Aurora Lar Johannesburg	2064 South Afric	#####
Heather Sp Riverside CA	92503 US	#####
Lynne Cam Kempton Park	South Afric	#####
Biljana Pet: Skopje	1000 Macedonia	#####
Maria Van Zdroisko	Poland	#####
G. DaPonte Yucca Valle CA	92284 US	#####
Evie Kirby Round Rock	78665 US	#####
Marina Ris zagreb	Croatia	#####
Rogelio Car Los Angele: CA	90002 US	#####
Brenda Chc Los Angele: CA	90009 US	#####
Michelle Jo Joshua Tre CA	92252 US	#####
Sue Cone Hull ENG	HU13 9DS UK	#####
Eva Maria C Muttenz	Switzerlanc	#####
Sandra Car Roccadaspide	84069 Italy	#####
Kamila Koł: Warsaw	Poland	#####
david falos: Yucca Valle CA	92284 US	#####
godefroid r Spa	Belgium	#####
wendy smii nelson ENG	bb98tt UK	#####
Angel Berr San Diego CA	92113 US	#####
Christophe Norfolk VA	23507 US	#####

Graham Du Dublin	D02	Ireland	#####
Katherine J Santa Rosa CA	95401	US	#####
Jenean McI Lancaster CA	93535	US	#####
Eric Castan Haines City	33844	US	#####
Heather Hc New Port Richey	34655	US	#####
Uwe Vietzke		Germany	#####
Niina Anttii Espoo	41330	Finland	#####
Mags Roy † Newcastle	NE1 0FA	UK	#####
Christeen A Crestview FL	32539	US	#####
Sylvie Lem; Féternes	74500	US	#####
Cary Plumr Pecatonica IL	61063	US	#####
Priscilla Eld Groton CT	6340	US	#####
Jennifer Ca Haines City	33844	US	#####
Daryl Hunnicutt		US	#####
Евгения Бл Tel Aviv		Israel	#####
Niki Vetten Johannesburg	2000	South Afric	#####
Antoine To valletta		Malta	#####
alison willi; Aberystwyf ENG	sy231qg	UK	#####
LAUREN CL Joshua tree CA	92252	US	#####
Lori Bryant Pendleton OR	97801	US	#####
Sabine Möl sabine.stiker@web.de	87839	Germany	#####
Nathan Bur Tampa	33625	US	#####
june joyce Singapore	120356	Singapore	#####
A. Otto Auerbach	8209	Germany	#####
Kelli Parks Floral city FL	33644	US	#####
Jerielyn Lor Iloilo City		Philippines	#####
Ian Mayor Davis CA	95616	US	#####
Tyler Klunk Salt Lake City	84107	US	#####
Nancy Mc† Victorville CA	92395	US	#####
Sandra Sne Lowell MA	1854	US	#####
Christina Fr Esch	4069	Luxembour	#####
Erika Whitv Saint Louis MO	63146	US	#####
Kenneth Tr Northridge CA	91325	US	#####
Prescott M Yucca Valle CA	92284	US	#####
Carol Eicksi Aurora CO	80016	US	#####
jody green; New Lothrc MI	48460	US	#####
Shelley Bar Shelbyville TN	37160	US	#####
Adea Claud Saint quentin	O2100	France	#####
Ellen Goldii Brooklyn NY	11211	US	#####
Cindy Rom; Bronx	10454	US	#####
George Ma Loule	8100-175	Portugal	#####
susan abbo joshua tree CA	92252	US	#####
Susan Moo Altadena CA	91001	US	#####
Jim Lachey Tucson AZ	85716	US	#####
Nadine Bal; Karlsdorf-Neuthard	76709	Germany	#####
KAREN GEN Yucca Valle CA	92284	US	#####
Michele Fis Desert Edg; CA	92241	US	#####

Jaimie Coq Joshua Tre CA	92252 US	#####
Cody Agua: Twentynin CA	92277 US	#####
Rik Livingst JoshuaTree CA	92252 US	#####
kendra sea Denver	80241 US	#####
Ryan Heffir Los Angele: CA	90026 US	#####
Kim Simmo Rowland Hi CA	91748 US	#####
Courtney N West Hartf CT	6107 US	#####
Chris McM Arroyo Gra CA	93420 US	#####
Ross Shiery Fayetteville	72703 US	#####
Simon Adai Worcester	WR4 UK	#####
Erin Laird Landers CA	92285 US	#####
Betty Ann I Tifton	31794 US	#####
Amanda Bi Henderson NV	89011 US	#####
Susan Poer Santa Paul CA	93060 US	#####
Anthony N: Simi Valley	93065 US	#####
JoAnn Nied Riverside CA	92509 US	#####
Colleen Th Lancaster CA	93535 US	#####
Jennifer Hc Landers CA	92285 US	#####
Jonathan Jc Orange CA	92869 US	#####
Barbie Win Yucca Valle CA	92284-906 US	#####
Jose Temas Placentia CA	92870 US	#####
Ben Loesch Pioneertow CA	92268 US	#####
sylvyane la Benon	17170 France	#####
Bobby Furs Joshua Tre CA	92252 US	#####
Holly Vaugl Lancaster CA	93536 US	#####
Melissa Ad Yucca Valle CA	92284 US	#####
Michael Di: Yucca Valle CA	92284 US	#####
Donna Bel Bradley	60915 US	#####
Shayna Tyl Vallentigny	10500 France	#####
Laurie Kaye Los Angele: CA	90019 US	#####
Anna Lisecl Yucca Valle CA	92277 US	#####
Chris Pat Austin	78704 US	#####
Kenny Ram Los Angeles	90011 US	#####
Adrianna R Avenel	7001 US	#####
Sabrina Ma Yermo CA	92398 US	#####
Brianna Bru Haslet TX	76052 US	#####
Donna Evar Yucca Valle CA	92284 US	#####
Mariah Coc Yucca Valle CA	92284 US	#####
Douglas Du Los Angele: CA	90014 US	#####
Michael sir Flamingo h CA	92284 US	#####
CALYPSO P. CHARLEROI	6000 Belgium	#####
Ryan Zappi Redlands CA	92373 US	#####
Giselle Abu Joshua Tre CA	92252 US	#####
Kyle Thurst Vancouver	98662 US	#####
Lynn McNa Landers CA	92285 US	#####
Malak Fouc Yucca Valle CA	92284 US	#####
nick kostidi Chicago	60647 US	#####

Frank Park	Newark DE	19702	US	#####
Andrea Bo	Los Angeles CA	90065	US	#####
Anita Smit	Desert Hot CA	92240	US	#####
catherine c	LYON	73000	Spain	#####
Hailey Mas	Cabarrus	28083	US	#####
Diane Kunt	Los Angeles CA	90017	US	#####
Dawn Jurac	Lancaster CA	93534	US	#####
Riemer Ha	Morongo v CA	92256	US	#####
Steve Dots	Cloverdale	97112	US	#####
Jamie Harv	Desert Hot CA	92240	US	#####
Lisa Salazar	Shasta Lake CA	96089	US	#####
Ryan Platul	Minneapolis	55428	US	#####
Ahmad She	Amman Jordan			#####
walter schu	galesburg	61401	Canada	#####
Penny Dee	Landers CA	92285	US	#####
Loretta Rus	Woodland CA	91364	US	#####
Tiziana Dor	via xx settembre 11 C	20094	Italy	#####
Julie Port	Slough SL1		UK	#####
Brandon W	LANDER	82520-271	US	#####
Kari Dies			US	#####
Gloria Beet	Joshua Tre CA	92252	US	#####
Tara Becke	Oxford	48371	US	#####
Branden Ni	Sebring	33870	US	#####
Jean Moun	Brooksville	34601	US	#####
Alain Neve	Seraing Belgium			#####
brbr4244@	Littleton	80128	US	#####
Mary Shar	North Hills CA	91343	US	#####
Laurel Lewi	Columbus OH	43228	US	#####
Charles Sta	Cumming	30040	US	#####
Ivana de la	Palm Spring CA	92264	US	#####
Irene Lee	Cleveland OH	44106	US	#####
Don Lomb	Joshua tree CA	92252	US	#####
Cindy Sue I	Johnson Va CA	92285	US	#####
Noah Maci	Walnut Cre CA	94597	US	#####
Liz Nea	Daggett CA	92327-025	US	#####
Linda Bidas	Glendale CA	91208	US	#####
Tyler Holla	Liberty I'll	60048	US	#####
Gina Bost	Joshua Tre CA	92252	US	#####
Cinda Hitch	Tampa FL	33608	US	#####
Elle Weath	Yucca Valle CA	92284	US	#####
Crystal Rill	Colton CA	92324	US	#####
Richard Ma	Deltona	32738	US	#####
S�verine S�	Dijon France			#####
Ami Flori	Yucca Valle CA	92284	US	#####
Silvia Steinbrecher		53881	Germany	#####
Alicia Muni	Yucca Valle CA	92284	US	#####
Valarie Ma	Desert Hot CA	92240	US	#####

Nena Woel olmué	32 Chile	#####
Amy Mam Palm Harbor	34683 US	#####
Danelle Thi Marin City CA	94965 US	#####
Tiffany Lan La Quinta CA	92253 US	#####
Elena Stojk Skopje	Macedonia	#####
Judson Coll Danville	40422 US	#####
Kurt St Am: D.H.S. CA	92240 US	#####
Jay Vora State College	16801 US	#####
Sharon Anc Glendale CA	91206 US	#####
Deb Hager Mansfield OH	44906 US	#####
Philip Soan Krakow	30-540 Poland	#####
ursula schil Mayen	56727 Germany	#####
Fred Wrigh Whittier CA	90604 US	#####
Astrid V.d. Stadskanaal	9502 Netherland	#####
Gary Tufel Twentynin CA	92277 US	#####
Paula Larsc North Benc NE	68649 US	#####
Jeanna Dei Dallas TX	75287 US	#####
John Rober Birmingham ENG	b314nu UK	#####
Joan Klatt Oakville	L6j4v7 Canada	#####
Casey Cox Yucca Valle CA	92284 US	#####
Merlo Borc San Leandro	94578 US	#####
Arielle May Yucca Valle CA	92284 US	#####
Andy Behre Battle Creek	49017 US	#####
Yesselynn f Anaheim CA	89135 US	#####
Kelsey Don Sarasota	34232 US	#####
Jelica Rolar Zagreb	10360 Croatia	#####
Elizabeth A Atascadero CA	93422 US	#####
Lauren Mct El Cajon CA	92284 US	#####
Jenna Hoo Pomona CA	91766 US	#####
hur dongkv Dalseo-gu	42650 South Kore	#####
Tessa Kline Saint Augu: FL	32095 US	#####
Katrina Ler Landers CA	92285 US	#####
Tori Owens Las Vegas NV	89110 US	#####
Joyce Scob San Jacinto CA	92583 US	#####
Carol Corbi Bloomingtc CA	92316 US	#####
James Patt Hardwick	5843 US	#####
Dominique Vaison-la-Romaine	84110 France	#####
Billee Larson	US	#####
Susan Barn Colton CA	92324 US	#####
Nina Thurs Ventura CA	93003 US	#####
Patricia We Sayville NY	11782 US	#####
Jennifer Sci San Jacinto CA	92583 US	#####
Patrick Kea Landers CA	92285 US	#####
Ryan Flores Folsom CA	95630 US	#####
Tom Barne Colton CA	92324 US	#####
Consuelo V Strambino Fr Cerone	10019 Italy	#####
Gian waym Yucca Valle CA	92284 US	#####

armer teufi Nürnberg	90443	Germany	#####
Julie Feiner Northridge CA	91325	US	#####
Joy Garnet Los Angeles CA	90019	US	#####
Shrek The (Chicago	60602	US	#####
Yolanda Br Joshua Tre CA	92252	US	#####
John Hardii Yucca Valle CA	92284	US	#####
Roxana Mc Santiago		Chile	#####
Laurel Harr Chesapeake	23321	US	#####
Ryan Hoffn Yucca Valle CA	92284	US	#####
Heidi Monç Victorville CA	92392	US	#####
cathala cor Pierrelatte	26700	France	#####
clara keene Huntsville	35801	US	#####
Kelsey Lync O Fallon	63368	US	#####
Jennifer Bu Lake Arrow CA	92325	US	#####
Robert Mai Tucson AZ	85711	US	#####
Anamarija Las Vegas NV	89119	US	#####
Barb Blair Wells BC	VOK	Canada	#####
Susan Zakir Twentynine CA	92277	US	#####
Biancarosa Ovada	15076	Italy	#####
Martina Be Berlin	12163	Germany	#####
Soheila Foruzanfar		Iran	#####
Kate Cham Hawthorne CA	90250	US	#####
Ji su Lee 로렌스빌	30043	US	#####
Pam Miller Tolar TX	76046	US	#####
Rikki Zeller Yucca Valle CA	92284	US	#####
Ana Carolir Greenville	29615	US	#####
Sandra Ara Mississauga	L5N	Canada	#####
Ann-Marie Sherman O CA	91403	US	#####
Joshua San San Diego CA	92113	US	#####
Anja Relja Kumanovo		Macedonia	#####
C Webb Los Angeles CA	90002	US	#####
Justin Truo San Francisco	94112	US	#####
Traci Parad Fontana CA	92284	US	#####
Gayle Ande Joshua Tre CA	92284	US	#####
Toby Gram Flamingo H CA	92284	US	#####
katherine S Devon	Ex363bl	UK	#####
Stephanie I Lucerne val CA	92356	US	#####
Liliana Fiori Cordoba	5000	Argentina	#####
Gail Berglai Seattle WA	98144	US	#####
Everdina Fiebrandt	493	Netherland	#####
Karine Simi Châtelet	6200	Belgium	#####
Sinclair Pet Erlensee	63526	Germany	#####
Christiane I Moyeuve grande	57250	France	#####
Jasmin Por München		Germany	#####
Kenneth Nç Singapore		Singapore	#####
Josh Bangg Davao City		Philippines	#####
Isaiah Child Knoxville	37922	US	#####

hattori takako	5560014	Japan	#####
Theresia M Deutschland	66957	Germany	#####
Michael Scl Riverside CA	92503	US	#####
Tristan Toy Zurich	8002	Switzerland	#####
pilar blas san sebastian	20009	Spain	#####
laetitia faiv Varangéville	54110	France	#####
Angela Chu Skopje		Macedonia	#####
Olga Petrov Orlando	32829	US	#####
Oli Trog Saint Johns Wood NW8		UK	#####
Maja Danil Skopje		Macedonia	#####
Steven Nicl Tampa	33614	US	#####
Jeanne Nar Ballwin MO	63011	US	#####
Eriz Morales		Philippines	#####
Sarah Reev West Sacra CA	95691	US	#####
Emma Pan: Chicago	60642	US	#####
Karen Lars West Palm FL	33415	US	#####
Nelly PRESTAT	77169	France	#####
joyce alexa Edinburgh SCT	EH11	UK	#####
Carol Beau London	N5Y-5L5	Canada	#####
Lisa Gourdi Shelby	28152	US	#####
Cindy Kazai Flamingo H CA	92284	US	#####
cristiana de laurentis		Italy	#####
Francine Sæ Bauvin	59221	France	#####
Werner Oe Derendingen	4552	Switzerland	#####
Paul Coate Yucca Valle CA	92284	US	#####
LouAnn Pie Yucca Valle CA	92284	US	#####
Heidi Schw Yucca Valle CA	92284	US	#####
Jesse Supry Atlanta	30339	US	#####
Julie Wiebe Winnipeg	R2M0j4	Canada	#####
Paul Hadley Yucca Valle CA	92284	US	#####
Shauna Tur Joshua Tre CA	92252	US	#####
simone maes	9000	Belgium	#####
Yaravi Schv Livermore CA	94550	US	#####
Samantha I Albuquerque	87121	US	#####
Lisa Strand Carbondale	81623	US	#####
Lacey Finn Cheyenne	82001	US	#####
Nick Garcia Yucca Valle CA	92284	US	#####
Tiffany Eva Twentynin CA	92277	US	#####
Salvador de Yucca Valle CA	92284	US	#####
Fatima Lop Makati		Philippines	#####
Mary Majo Portland OR	97220	US	#####
Helen Billin Yucca valle CA	92284	US	#####
Hanneke M Poortvliet NE	4693EG	US	#####
laurence væ 5310 leuze	5310	Belgium	#####
Tharindu M Nugegoda		Sri Lanka	#####
Tree Care t Hesperia CA	92345	US	#####
Jeannine D Chandler	85248	US	#####

Vanessa Sc Hemet CA	92545 US	#####
Jeff Crawfo Los Angele: CA	90043 US	#####
Yolanda Ca Moreno Va CA	92553 US	#####
Emma Hurl Irvington	7111 US	#####
William Ho Northridge	91325 US	#####
Valérie RA\ Sainte-clotilde	97441 France	#####
sherri hodg Phoenix	85051 US	#####
Chardonne Mannens	1564 Switzerlanc	#####
Debbie Bre Columbia MD	21046 US	#####
Edel Verno Lichfield	Ws136nx UK	#####
Muzette Uı Portland	97013 US	#####
Michael Fri Los Angele: CA	90066 US	#####
jade ALF Blois	41000 France	#####
Thomas W: Bloomingtc CA	92316 US	#####
stan nicole Bucharest	1553 Romania	#####
Tom Klein Riverside CA	92509 US	#####
Marga Gili Palma	7003 Spain	#####
Jennifer Po Rochester	14620 US	#####
Melissa Roi Yucca Valle CA	92284 US	#####
Briana Sos Landolakes	34639 US	#####
James Henı Rochester	55901 US	#####
Gretchen D Overland P KS	66223 US	#####
Sasha Goclı Kapaau HI	96755 US	#####
Hannah Sm Joshua tree CA	92252 US	#####
Myra Cargc Franklin TN	92252 US	#####
Juan Liu Jersey City	7307 US	#####
Gregg Stevens FL	US	#####
Michael Ga Landers CA	92285 US	#####
Ann Roewe Olathe	66062 US	#####
Karen Flore Houston	77081 US	#####
Rachelle Hr Yucca Valle CA	92284 US	#####
priscella go Las Vegas NV	89134 US	#####
Nancy Nels Winfield IL	60190 US	#####
James Ham Joshua Treı CA	92252 US	#####
K e Orange	92869 US	#####
Peter Spuri Yucca Valle CA	92284 US	#####
juliantika d Gianyar	80582 Indonesia	#####
Charly Sara Ambon	97125 Indonesia	#####
lucas harfe New York	10028 US	#####
Felicia Harı Tangerang	15310 Indonesia	#####
Gianfranco Saint Petersburg	33710 US	#####
esa jatnika garut	44181 Indonesia	#####
Dwi Astri Andriani	Indonesia	#####
Maryrose C Yucca Valle CA	92284 US	#####
Wanda Kov Los Gatos CA	95032 US	#####
Lyndie Greı Yucca Valle CA	92284 US	#####
sarika aror; Alpharetta GA	30022 US	#####

Louise Goff Los Angeles: CA	90025 US	#####
Fei Fei Zhao	13120 Indonesia	#####
James Vop: Palm Springs CA	92264 US	#####
Miroslava I Garden Grc CA	92840 US	#####
Becca Card Anaheim CA	92804 US	#####
Shadow Re Houston	77008 US	#####
Kevin Voeg Yucca valle CA	92284 US	#####
Стас Аксён Tyumen	625000 Russia	#####
Emily Arch Spring Hill	34608 US	#####
Sarah Swar Uniontown	15401 US	#####
Katherine I Phoenix	85050 US	#####
Tori Sasso Orange CA	92868 US	#####
Carla David Joshua Tre CA	92252 US	#####
Melinda Lo Seneca SC	29678 US	#####
Victor Scho Lake Forest CA	92630 US	#####
Dave Eastn Santa Ana CA	92704 US	#####
Jack Flynn Springfield	6475 US	#####
Ryan Paulu Cumberland Center	4021 US	#####
Buildingone 409	Philippines	#####
Taresa Sim Lancaster	29720 US	#####
Fred Chanc Boynton Beach	33426 US	#####
muhtar uthay	12210 Indonesia	#####
Gina Barrei Yucca Valle CA	92284 US	#####
Elaine Beck Roanoke VA	24018 US	#####
Richard Bai Yucca Valle CA	92284 US	#####
brittaney h Yucca Valle CA	92284 US	#####
Jennifer Va Riverside CA	92509 US	#####
Gina Barrei Yucca Valle CA	92284 US	#####
Anwar Mus Tangerang	15152 Indonesia	#####
McClean Mc Los Angeles: CA	90035 US	#####
Gary Halvo Pine Moun: CA	93222 US	#####
Nicole Rou: Piraeus	Greece	#####
Taufiq Hida Jakarta	12520 Indonesia	#####
Anna Liza T Quezon City	1103 Philippines	#####
Nicole Bich San Francis CA	94117 US	#####
Josef Kohoi Garden Grc CA	92843 US	#####
Agim Demi Staten island	10310 US	#####
Louis Ryan Dublin	Ireland	#####
cara skube Yucca Valle CA	92284 US	#####
Robert Kon Woodland CA	91364 US	#####
Debbie Hof Landers CA	92285 US	#####
Georgia Lin Prescott AZ	86301 US	#####
Daisy Grah: Apple Valle CA	92307 US	#####
Wendy Gac Morongo V CA	92256 US	#####
Saenong yf Makassar	90221 Indonesia	#####
Burhan Udi Jakarta	14450 Indonesia	#####
Muhamma Mojokerto	61352 Indonesia	#####

Swatantra ` Bekasi	17115	Indonesia	#####
Sukma Effe Jambi	36129	Indonesia	#####
Renza Matl Surabaya	1604	Indonesia	#####
asep nurdi sambas	79463	Indonesia	#####
harry rochiyadi	20000	Indonesia	#####
Trian Arjun Samarinda	75125	Indonesia	#####
willy akbar Cilegon	42435	Indonesia	#####
Rose Miras Melbourne	3108	Australia	#####
Restu Fitria Tangerang	15720	Indonesia	#####
Mayang Nii Jakarta	12330	Indonesia	#####
rini oktavia tamgsel	15315	Indonesia	#####
Adi Widjan Balikpapan		Indonesia	#####
Helmi Nasu Jombang	61413	Indonesia	#####
Novin Halir Karawang	41314	Indonesia	#####
Nabilah Sas Surabaya		Indonesia	#####
Nur zalika I Sukabumi	43131	Indonesia	#####
Fatimah Az Medan	20857	Indonesia	#####
Eko Ariyant Yogyakarta	55892	Indonesia	#####
aliya sabila Jakarta		Indonesia	#####
m. husni mubarrok mubarrok	59453	Indonesia	#####
Debra Lear Landers CA	92285	US	#####
Kelly Taylor Warren	48093	US	#####
ANGELITA I Manila		Philippines	#####
Sita Ullar		Indonesia	#####
Muhamma Palembang	30153	Indonesia	#####
Nikki Parco Koronadal	9506	Philippines	#####
Dee clemei Chicago IL	60615	US	#####
jane fawke Joshua Trei CA	92252	US	#####
timi wood Ottawa	K1S	Canada	#####
Asriyani Pu Jakarta timur	13730	Indonesia	#####
Marina Kot Moscow	121359	Russia	#####
mae reynol dacula	30019	US	#####
Kayla Manr Los Angeles CA	90038	US	#####
Elizabeth V Indio CA	92201	US	#####
Chanel Bau Quezon City		Philippines	#####
A. Saito	11372-552	US	#####
Kammie Sa Cleveland	44125	US	#####
kellie nelso Charlotte	28209	US	#####
Robin Dale Johnson Va CA	92285	US	#####
Siti Patimal Depok	16425	Indonesia	#####
Teresa Don Cembo		Philippines	#####
Paul Cullun Yucca Valle CA	92284	US	#####
MaryHelen Joshua Trei CA	92252	US	#####
Cardi Mosli Crawford	90044	US	#####
HEATHER S Yucca Valle CA	92284	US	#####
Catherine z Twentynine CA	92277	US	#####
Roderick Pi Windsor	N9B	Canada	#####

Kevin Yoshi Yucca Valle CA	92284 US	#####
Adityo Muktiwibowo	40291 Indonesia	#####
Nancy Blac Yucca Valle CA	92284 US	#####
Jodi Thoma Los Angeles CA	90066 US	#####
michelle al Lake Forest IL	60045 US	#####
Salsabela si Palos Hills	60465 US	#####
Eric Simpsc Yucca Valle CA	92284 US	#####
Suzanna W Sun Valley, CA	91352 US	#####
Yana Fil Rochester	Нью-Йорк US	#####
Luke Itkoff Fountain V CA	92708 US	#####
HolyMolly !	Indonesia	#####
Juliana Wir San Diego	92111 US	#####
Elena Pere Valladolid	47002 UK	#####
Aelyn Rhoc Columbus	43229 US	#####
Tim Vigallo Joshua Tre CA	92252 US	#####
Juan Jimen San Bernardino	92411 US	#####
James Pain Los Angeles CA	90009 US	#####
John Legna Twentynin CA	92277 US	#####
cheryl cox Twentynin CA	92277 US	#####
miranda nc Sacramento	95833 US	#####
Laura Sides Coatesville	19320 US	#####
Lillyauna V Pelham	3076 US	#####
Steve Lazny Joshua Tre CA	92252 US	#####
Dody Robe BELITUNG	33412 Indonesia	#####
Martina Kr Skopje	Macedonia	#####
Mohamad Jakarta Selatan	12240 Indonesia	#####
Inge Stadle Hilpoltstein	91161 Germany	#####
Cordelia Re Landers CA	92285 US	#####
Carol Marti Westminst CA	92683 US	#####
Ankie Ellajc Tyresö	135 40 Sweden	#####
Leah Ruder Morgan	56283 US	#####
Cheyenne I Yucca Valle CA	92284 US	#####
Kimberly B Yucca Valle CA	92284 US	#####
WALTER M Johnson va CA	92285 US	#####
Kristen Gas Joshua Tre CA	92252 US	#####
Moch Iskar Sidoarjo	61214 Indonesia	#####
gamma arriva	12530 Indonesia	#####
Fox McBrid Joshua Tre CA	92252 US	#####
Tami Ohl Riverside CA	92504 US	#####
barbara be Manchester	3104 US	#####
Dorothea V Dublin	3444 US	#####
Karin Zimm Hersbruck	91217 Germany	#####
Miss claudi Plymouth	PI15bp UK	#####
Lori Cabot	US	#####
Bo Janes New York	10128 US	#####
Yewon Kim Rancho Palos Verdes	90275 US	#####
Rosalie Tor Norwalk	6850 US	#####

Kiran Naya Fairport	14450 US	#####
Natalie Me Dobbs Ferry	10522 US	#####
Marianne F Washington	15301 US	#####
Brigitte Hei Düsseldorf	40479 Germany	#####
Maurice Sa Pittsburgh	15206 US	#####
Adam Kalul Burleson	76028 US	#####
Anneke v. E Raamsdonksveer	4941JT Netherland	#####
David Rossi Joshua Tre CA	92252 US	#####
John Wagn Joshua Tre CA	92252 US	#####
chris beal louth	70740 US	#####
Nat F. Santa Fe	87505 US	#####
Ashley Wa Joshua Tre CA	92252 US	#####
sydney lew San Rafael	94901 US	#####
Norm Wilr Yuba City	95991 US	#####
Iris Moy Oakland CA	94611 US	#####
Rita Thio Walnut	91789 US	#####
Tammy Rai Corona CA	92882 US	#####
Elham Keif Elk Grove Village	60007 US	#####
Cindy Weir Yucca CA	92284 US	#####
Sobur Yudi: Subang	41271 Indonesia	#####
Michele La Niles	60714 US	#####
Christophe Orleans CA	95556 US	#####
Rose Herrn Northborough	1532 US	#####
Raylynn Lo: Joshua Tre CA	92252 US	#####
dino irwanto	73911 Indonesia	#####
M. Brownir Chandler	85224 US	#####
Kristal Hitcl Victorville CA	92392 US	#####
Gustaviano Padang	25000 Indonesia	#####
Laura Brow Hanover MA	2339 US	#####
sa. sang los angeles CA	91601 US	#####
Jeffrey Hut Walkersvill MD	21793 US	#####
Amy Thom Tehachapi CA	93561 US	#####
Just Ubay DKI Jakarta	11830 Indonesia	#####
Keith carr Torrington	6790 US	#####
Anthony C Valencia CA	91354 US	#####
Joseph Arn Pioneertow CA	92268 US	#####
Ane Leopold Greenville	29607 US	#####
Rosa Cabre Hospitalet de Llobrega	8906 Spain	#####
Monica Tul Sölvesborg	Sweden	#####
Yayat Ruchiat	12410 Indonesia	#####
Betsy Novera	40559 Indonesia	#####
SHIRLEY AL London ENG	E6 2EX US	#####
Angelique I San Jose	95133 US	#####
Lawrence F Joshua Tre CA	92252 US	#####
Erin Swoist Joshua Tre CA	92252 US	#####
Elka Wilder Yucca Valle CA	92284 US	#####
Abby River: Lenoir	28645 US	#####

Lisa Kiehn Eugene OR	97402 US	#####
awal Udin Wakatobi	93791 Indonesia	#####
C M Booko Desert Hot CA	92241 US	#####
Christophe Los Angeles CA	90042 US	#####
Victoria Pal Joshua Tree CA	92252 US	#####
Kayla Lallie Tucson	85719 US	#####
Kelsey Gaa TWENTYNINE CA	92277 US	#####
Marion Sch Brussels	4720 Belgium	#####
mollie lyth Chicago	60611 US	#####
Jeanie Fuller Tulsa OK	74119 US	#####
Dominique Antoniaz	49100 France	#####
Rainbow City Yucca Valle CA	92256 US	#####
Hannah Miller Elizabeth City	27909 US	#####
Marilyn Fly Cutchogue NY	11935 US	#####
Randy Dow East Jordan	49727 US	#####
Larry May Brooklyn NY	11218 US	#####
Scott Keyser Sun City CA	92586 US	#####
Emily Spencer Salt Lake City UT	84104 US	#####
t. s. San Jose	95124 US	#####
michelle ta nowhere	83227 Indonesia	#####
Diya Lailati Sidoarjo	61262 Indonesia	#####
Yaritza Gor Chillan	Chile	#####
Karen Clever San Jose CA	95125 US	#####
Teri Duchan Aliso Viejo CA	92656 US	#####
Cindy Janzer Niagara Falls	L2G Canada	#####
Penelope S Hollywood CA	90068 US	#####
Maria Row Tabaco City, Albay	4511 Philippines	#####
Muhamad Bandung Barat	40552 Indonesia	#####
Bonnie Bilg Yucca Valle CA	92284 US	#####
Catalina Ca Santiago	Chile	#####
Abdullah Is Somerset NJ	8873 US	#####
Astrid Tri W Jakarta	12330 Indonesia	#####
Karin Lux Kerpen	50170 Germany	#####
Ilas Korwac Bagan Batu	28992 Indonesia	#####
Patti Webs Yucca Valle CA	92284 US	#####
Selms Kess Omaha NE	68124 US	#####
Emma Loui Baltimore	21219 US	#####
Ale Herber Murrieta	92562 US	#####
Alfan Nasru Tangerang	15131 Indonesia	#####
Cintia Prav Pucon	Chile	#####
Rangga Per Bandung	40151 Indonesia	#####
Joselane Sil Esteio	93265100 Brazil	#####
Philip Bing Lynwood CA	90262 US	#####
Meira Zaha Bekasi	17530 Indonesia	#####
Britta Hans Kobenhavn N	1071 Denmark	#####
Joyce Pattc Lindon	84042 US	#####
laode arhai depok	16431 Indonesia	#####

Martin Stel Felton	95018 US	#####
Mira Maharani	40291 Indonesia	#####
Carolina Ar Coyhaique	Chile	#####
Derek O'Br Long Beach CA	90810 US	#####
James Schu Cathedral C CA	92234 US	#####
Patrick W. Mims	32754 US	#####
Michelle Sc South Lake CA	96150 US	#####
Fitrotin Azi Malang	65147 Indonesia	#####
Juni Arsyah Sidoarjo	61254 Indonesia	#####
Kate Baum, Denver CO	80219 US	#####
Hilmiya Sya Bogor	16340 Indonesia	#####
Kyle Svach Des Plaines	60016 US	#####
Kelly Castill 29 palms CA	92277 US	#####
yvette vernet	7015 Australia	#####
Jennifer Cri Linden	7036 US	#####
Tom O'Key Joshua Trei CA	92252 US	#####
Ni Kadek A Denpasar	80239 Indonesia	#####
Rolf Mense Puerto Lumbreras	30891 Spain	#####
Aubrey Ko Yucca valle CA	92284 US	#####
Margit Rist Helsinki	Finland	#####
Haley Russi Greenville	29617 US	#####
Ryan Etter San Bernar CA	92284 US	#####
Kevin Won, Joshua Trei CA	92252 US	#####
Abby fuson Dayton	37321 US	#####
IAN IMANL Manokwari	272727 Indonesia	#####
diana bryar ambleston WLS	sa625qy UK	#####
Dimas dwi Tangerang	15437 Indonesia	#####
Cichy Lagur	86513 Indonesia	#####
Sylvia Breu Canby MN	56220 US	#####
isabel este Castelloli	8719 Spain	#####
Kari Perry Yucca Valle CA	92284 US	#####
Lelah Simo Los Angele: CA	90027 US	#####
MIL User 21 Boystown	Philippines	#####
Alfian Sury: Klaten	57481 Indonesia	#####
Nuria Herr Villarrobledo	2600 Spain	#####
Vintage Saber	US	#####
Dr. L. Dona Denver CO	90049 US	#####
Monica Gr Pasadena CA	91101 US	#####
jannie ros	2514 KH Netherland	#####
齋藤 玉恵	410-0036 Japan	#####
shirley swa Birmingham	b14 7sr UK	#####
Alexis Smal Twentynin CA	92277 US	#####
Ade Ardian Karawang	41361 Indonesia	#####
Catalin Cat: Slatina	Romania	#####
Eko Ardhia Jakarta Barat	11720 Indonesia	#####
Tania Llew Tonyrefail	CF39 8NE UK	#####
Judy Rees Glenalta	5037 Australia	#####

MIL User 19 Boystown		Philippines	#####
Darron Her Springfield MO	65802	US	#####
Darla Morr Farmingtor UT	84025	US	#####
Avelys Actc Vashon WA	98070	US	#####
Luka Žarić Podgorica		Montenegr	#####
Susan .. Katowice	40-014	Poland	#####
Heidi Mülle Giswil		Switzerlanc	#####
Muhamad Afdal		Indonesia	#####
Daniela Do Meldorf	25704	Germany	#####
Fadhlina N: Medan	20122	Indonesia	#####
micHEL/ber namur	5100	Belgium	#####
Robert Nowak		Poland	#####
Kemas Ahmad Zen	16144	Indonesia	#####
annie van-s houdeng-goegnie	7110	Belgium	#####
Caroline Sé Paris	75001	France	#####
MONTSERF Barcelona	8032	Spain	#####
Marianne T Mosjøen	8665	Norway	#####
Sab De Guzman		Philippines	#####
hoeru anw: Bogor	16880	Indonesia	#####
arlette simon	57560	France	#####
Fabienne S Oulens-Echallens		Switzerlanc	#####
Pam Kersey Cerritos CA	92284	US	#####
Dr_ Yavvas		Greece	#####
Traci Stinn Orlando	32811	US	#####
Jose Schwe Auckland		New Zealar	#####
Marie Gaul Yucca Valle CA	92286	US	#####
Kate Kenne Guilford VT	5301	US	#####
Daniela Ga La Calera		Chile	#####
Melinda Ca Los Angele: CA	90027	US	#####
Geena Mer Bethpage	11714	US	#####
erin lindqui Landers CA	92285	US	#####
kenny lindc landers CA	92285	US	#####
Brian Ford New YOrk NY	10026	US	#####
Francisca G Santiago		Chile	#####
Renata Puç Milan	20124	Italy	#####
Valentina S Santiago		Chile	#####
Sandra Far Pittsford NY	14535	US	#####
Christina S: Morongo V CA	92256	US	#####
Daniela ale Puerto Cisnes		Chile	#####
Dory Rober Manhattan Beach	90266	US	#####
Alice Spies Los Angele: CA	90027	US	#####
Maria Mira Brooklyn	11222	US	#####
Alexis F Tampa	33602	US	#####
Javiera Mo Casablanca		Chile	#####
Ria Rizki Depok	16454	Indonesia	#####
Alma Hern: Denver	80214	US	#####
Sharon Ellis Yucca Valle CA	92284	US	#####

Thomas Alt Yucca Valle CA	92284 US	#####
Alyce Herr Riverside CA	92252 US	#####
Ilse Vander Leuven	1011 Belgium	#####
Thiare Sant Valdivia	US	#####
Karen Som North Holly CA	91601 US	#####
Daniela Go Yucca Valle CA	92284 US	#####
Danielle Bl Detroit MI	48221 US	#####
Fernanda R Concepcion	Chile	#####
Syd I Doty Yucca Valle CA	92284 US	#####
Carla Jara C Santiago	Chile	#####
Michelle Zc Stuart FL	34997 US	#####
Deborah G Los Angele CA	90019 US	#####
Polly Hugh Austin TX	78749 US	#####
Tamra Spe Yucca Valley	92284 US	#####
Ian L Landers CA	92285 US	#####
Brandon N Saint Louis	63129 US	#####
janis keave Tattershall ENG	LN4 4NW UK	#####
Ronald Mu Port Saint L FL	34983-256 US	#####
Maryann Si Evergreen IL	60805 US	#####
Ainsley Thc Berkeley CA	94708 US	#####
Leticia Leor Morongo V CA	92256 US	#####
Miguel Áng Sant Jordi de ses Saline	7817 Spain	#####
Kim DiFede Mission Vie CA	92694 US	#####
Deegan An Rockford	49341 US	#####
Jami Lovell Salt Lake Ci UT	84106 US	#####
Katie Filipa Knox	46534 US	#####
Hannah Sin San Francis CA	94112 US	#####
Iqbal Hiday Sidoarjo	61257 Indonesia	#####
Nikaiya Srr Vidalia	3033 US	#####
Aleksandar Kocic	Serbia	#####
Kim Garne Brooklyn	11226 US	#####
Dorian Kirk Yucca valle CA	92884 US	#####
sabrina jensen	US	#####
S Kern Joshua Tre CA	92252 US	#####
Daniel Law New Orleans	70130 US	#####
Melanie To Yucca Valle CA	92284 US	#####
monique cc Ronkonkon NY	11779 US	#####
Ayesha Sae Alexandria	22315 US	#####
Alexandria Saint Paul	55116 US	#####
Awesome Kids	US	#####
Ann Murdy Joshua Tre CA	92252 US	#####
Ellen McCa Escondido	92027 US	#####
Tupu Sepp Lappeenranta	53550 Finland	#####
Joshua Cor Mineral Bluff	30559 US	#####
Darko Trajc Skopje	Macedonia	#####
Sheila Cald North Holly CA	91606 US	#####
Heather La Yucca Valle CA	92284 US	#####

Peggy Hen	Joshua Tre	CA	92252	US	#####
Makayla B	Hartford		6106	US	#####
Sara Hayte	Canton	GA	30115	US	#####
Katherine T	Brooklyn		11223	US	#####
Melenie Tu	Pasadena		91109	US	#####
kris Juhl	Mckinleyville		95519	US	#####
L Saunders	Masterton			New Zealar	#####
John Wells	Phoenix		85295	US	#####
* Vrljić	Cavtat		20210	Croatia	#####
sadie al	South Jakarta		12514	Indonesia	#####
Shelby Rutl	Auckland			New Zealar	#####
nelle linfor	wolseyey			South Afric	#####
Amelia Tab	Kansas City		64152	US	#####
Kelly Marti	Colorado springs		80911	US	#####
Jennifer De	Milan	TN	38358	US	#####
Gabbie Hal	Paris		75460	US	#####
Katelyn Bul	Oxford		45056	US	#####
Elisabeth B	Polten		3100	Austria	#####
Hamidah L	Calgary	T3p0h3		Canada	#####
Autumn D	Pelham		3076	US	#####
sue sch.	Florida	FL	89077	US	#####
Morgan Vu	Huntington Beach		92649	US	#####
gilava falah	lahijan			Iran	#####
Kristina Sec	Zagreb		10000	Croatia	#####
Erin Martin	Hesperia	CA	92345	US	#####
Andréa Bra	Sao Paulo		4110	Brazil	#####
FRANCES L	Fontana	CA	92336	US	#####
Kerrie Aley	Long Beach	CA	90803	US	#####
Jim Ellinger	Santa Moni	CA	90402	US	#####
Mallorie At	Tulsa		74129	US	#####
Ana Priogli	Lomas De Zamora		1832	Argentina	#####
Ana María	Calama		33	Chile	#####
Karen Schw	Los Angeles	CA	90032	US	#####
Alaina Peru	Chino	CA	91710	US	#####
Pete Wood	Park City		84098	US	#####
Bob Grubb	Yucca Valle	CA	92284	US	#####
Maribel M	New York		11106	US	#####
J Vez	Ottawa	K1K		Canada	#####
Filimena K	Ohrid			Macedonia	#####
Andi Fachr	Jakarta		13810	Indonesia	#####
Lisa Rosa-R	Alpharetta		30009	US	#####
Cris Morat	Manresa		8242	Spain	#####
Joanne Pad	Palm Deser	CA	92211	US	#####
reese fishe	South Orange		7079	US	#####
Jennifer Wi	Pioneertow	CA	92268	US	#####
Sheila Hoff	Simi Valley	CA	93065	US	#####
Khaled Bila	Riyadh			Saudi Arabi	#####

Mona Kaur Tracy	95377 US	#####
John Calve Yucca valle CA	92284 US	#####
Rosemary I Norwich	NR118PW UK	#####
Cara Schmi Newport News	23602 US	#####
Lawrence E Simi Valley	93063 US	#####
Clifford Gia Yucca Valle CA	92284 US	#####
Stephanie I Salisbury	21801 US	#####
Sarah Hein Los Angeles	90059 US	#####
farazdaq yasar	16320 Indonesia	#####
Stacy Magc San Bernardino	92411 US	#####
Estrella Cor Chicago	60647 US	#####
Christa Jen Landers CA	92285 US	#####
Gillian Kimi Yucca Valle CA	92284 US	#####
Cathy Shee New Wash NV	89704 US	#####
Tanton Ath Los Angele CA	90002 US	#####
Kaylene Jer Union KY	41091 US	#####
Brittany Co Yucca Valle CA	92284 US	#####
Kayla Lakin Yucca valle CA	92284 US	#####
Lisa Starr Joshua Tre CA	92252 US	#####
Angelica Vi Landers CA	92285 US	#####
Ivy Black cu Yucca valle CA	92284 US	#####
Ivory Mcch Yucca Valle CA	92284 US	#####
Andy Tama Landers CA	92285 US	#####
Nicholas Sc Yucca Valle CA	92284 US	#####
Matt Kime Yucca Valle CA	92284 US	#####
Heather Wright	US	#####
Isaiah Cruz Joshua tree CA	92252 US	#####
Meghan Uc Yucca Valle CA	92284 US	#####
Richard A. I Yucca Valle CA	92284 US	#####
Kazumi Ma Yucca Valle CA	92284 US	#####
Rebecca Si Cerritos CA	90703 US	#####
Betsy Goza Yucca Valle CA	92286 US	#####
Yasmine Hc Bessemer	35020 US	#####
Anastasia F Yucca Valle CA	92284 US	#####
Molly Smith	US	#####
Gabriela M Lees Summit	64064 US	#####
Brandi Van San Francis CA	94118 US	#####
Chloe Hyug Beaver	25813 US	#####
Elizabeth B Big Bear Cit CA	92314 US	#####
Alyssa Mcl Cortland NY	13045 US	#####
Laurie Pere Calimesa CA	92320 US	#####
Jessica Hig Cerritos CA	90703 US	#####
Sondra Mc Yucca Valle CA	92284 US	#####
Monona W Joshua Tre CA	92252 US	#####
Elise T Dallas	75248 US	#####
Gwen Jone Tucson AZ	85718 US	#####
Daniel Mill Cape May Court House	8210 US	#####

Kylee Thon Yucca valle CA	92284 US	#####
Isabel Sanc Rancho Mir CA	92270 US	#####
E E London	US	#####
Ellen Hill Joshua Tre CA	92252 US	#####
Christy Hin Los Angeles CA	90042 US	#####
Raihanna A Tangerang Selatan	15315 Indonesia	#####
kaylee mus Henrico	23228 US	#####
Derwood A Yucca Valle CA	92284 US	#####
Matthew P Los Angeles CA	90042 US	#####
Tyler-jame: Coventry RI	2816 US	#####
Carmen Alv Coachella CA	92236 US	#####
lynn reed r Augusta GA	30909 US	#####
Michelle W Yucca Valle CA	92284 US	#####
William Ce: Hesperia CA	92345 US	#####
Paula Dane San Diego	92122 US	#####
Kelly Huggi Nashville TN	37207 US	#####
Joseph Nat Yucca valle CA	92503 US	#####
Angel Pont Manila	Philippines	#####
Kristen Lal Joshua Tre CA	92252 US	#####
Michael W: Palm Spring CA	92262 US	#####
oky adisty jakarta barat	11240 Indonesia	#####
Adam Lewi Bloomfield CT	6002 US	#####
Brenda Alv. Aguascalientes	20126 Mexico	#####
Heather Hc Oceanside CA	92057 US	#####
Theresa W: Joshua Tre CA	92252 US	#####
Daryl Smitf Clayton CA	94517 US	#####
emily olouç Wheaton IL	60187 US	#####
Ashley Mck Fayetteville NC	28311 US	#####
Leighlani Lc San Diego CA	92101-133 US	#####
Marija K Thousand C CA	91360 US	#####
Kristen Riv Jackson WY	83001 US	#####
Jane Bering Abilene TX	79601 US	#####
Austin Mac Los Angeles CA	90026 US	#####
Rudi Sofian	17111 Indonesia	#####
enrique bri ensenada	22785 Mexico	#####
Salma Jihar Palembang	30114 Indonesia	#####
Annas Sula Bandung	57316 Indonesia	#####
Susan Angelica Agustine	80114 Indonesia	#####
Julia Lunga Ploiesti	100248 Romania	#####
Edward Bo: Los Angeles CA	90046 US	#####
kelly macki Newburyport MA	1950 US	#####
Martyna Ar Kaunas	Lithuania	#####
Steven Pyn New Haver CT	6512 US	#####
Lidija Risto: Skopje	Macedonia	#####
Samantha / Virginia Be: VA	23451 US	#####
Amanda Bi: Morrow	30260 US	#####
virginia red dover-foxci ME	4426 US	#####

Jeff Goodr Milton MA	2186 US	#####
Annabelle (West Chest PA	19380 US	#####
Winda Sari Jakarta	11630 Indonesia	#####
Shreya Pan Thane	400080 India	#####
Nathaniel (Jeffersonvil NY	12748 US	#####
Sarah Bickr Apopka FL	32712 US	#####
Anastasja Kostić	Serbia	#####
Biljana Spa Skopje	1000 Macedonia	#####
Attilio Lasc Pittston	18640 US	#####
Chloe Almu Riyadh	Saudi Arabi	#####
Brianna Alk Belchertown	1007 US	#####
Brian Maye Yucca valle CA	92284 US	#####
Maria G Nashville	37211 US	#####
Odontsatsr Ulaanbaatar	Mongolia	#####
bernadette Joshua Tre CA	92252 US	#####
Kristine W Indian Well CA	92211 US	#####
Joseph Plar Boulder CO	80301 US	#####
Cathryn Be Lucerne Va CA	92356 US	#####
Elizelot Cal Orlando	32801 US	#####
Julia McBei Decatur GA	30033 US	#####
Ana Gonzal San Marinc CA	91108 US	#####
Rocio Gonz Mesa AZ	85204 US	#####
Linda Doyle Joshua Tre CA	92252 US	#####
Marlana H Peoria	85383 US	#####
Linda Cove Farwell MI	48622 US	#####
lucy laun Minneapolis	55414 US	#####
Martha Go Paramount CA	90723 US	#####
Anthony Sc Guilderland	12084 US	#####
Lauren Klin Yucca valle CA	92284 US	#####
Adrian Tarr Landers CA	92285 US	#####
Ron Jackso Cambridge MA	2140 US	#####
Eunice Gon Riverside CA	92503 US	#####
robb Torre: Yucca Valle CA	92284 US	#####
John Laure Joshua Tre CA	92252 US	#####
Sharifah Fa Kuala Lumpur	43300 Malaysia	#####
Gina Coron Riverside CA	92503 US	#####
Isabelle l'm Urbandale	50322 US	#####
Ines Kapur Silver Spring	20906 US	#####
Max Frank New York	10069 US	#####
Brian Simp: Yucca Valle CA	92284 US	#####
Dwi hadrav Kabupaten kukar jelur	75251 Indonesia	#####
Vivi Rama Los Angele: CA	90046 US	#####
Matthew N Joshu Tree CA	92252 US	#####
Marnie Val Landers CA	92285 US	#####
Brad Byrd Landers CA	92882 US	#####
Maria Gon: Compton CA	90221 US	#####
Steve Marsel	US	#####

Barbara Mi New Glasgow	B2H	Canada	#####
mallory jon Anaheim CA	92825	US	#####
McKenzie F Gresham	97030	US	#####
Emma Hirs Levittown	11756	US	#####
Jacqui Mas Joshua Tre CA	92252	US	#####
Diyar Ali Ar Newcastle Upon Tyne	NE	UK	#####
Lianne Mat Azusa CA	91702	US	#####
Stacey Nos Santa Barb CA	93109	US	#####
Mynor Ivar Yucca Valle CA	92284	US	#####
Carol Hickn Westerville	43082	US	#####
Sharon Mil Los Angele: CA	90065	US	#####
Robin s Erickson		US	#####
Alexis Timr Birmingham	48009	US	#####
Marlee Gig New York	10011	US	#####
Sierra Roge Yucca Valle CA	92284	US	#####
Angelique \ Arcata CA	95521	US	#####
Adam Wag Pioneertow CA	90025	US	#####
Charletta H Yucca Valle CA	92284	US	#####
Jacqueline Yucca Valle CA	92284	US	#####
Barbara Bri Yucca Valle CA	92602	US	#####
Dawn Pom Joshua Tre CA	92284	US	#####
Kalina Wall Big Bear Cit CA	92314	US	#####
Anna Schni North Holly CA	91601	US	#####
Cheryle Bo Flamingo H CA	92284	US	#####
Adriana M: Pico Rivera	90661	US	#####
Katie Malo Lafayette CA	94549	US	#####
Vera Topin Desert Hot CA	92240	US	#####
jaydee lope Beaumont CA	92223	US	#####
Danielle Hc Reno	89506	US	#####
Rigo Plasce Indio	92203	US	#####
Deven Wat Joshua Tre CA	92252	US	#####
Rosanna Br Aosta	127	Italy	#####
Lia Willams Kansas City	64121	US	#####
Jeremy Lub Los Angele: CA	90026	US	#####
Michelle M Redondo B CA	90278	US	#####
Chris Yellov Edmonton	T0g1w0	Canada	#####
Juan Gonza Riverside CA	92509	US	#####
Seth Camp Amesbury MA	1913	US	#####
Eric Paquet Fullerton CA	92833	US	#####
Rachel Arn Los Angele: CA	90043	US	#####
Christine C Twentynin CA	92277	US	#####
Joni van Leeuwen	1900-305	Portugal	#####
Viet Le Indianapolis	46226	US	#####
Nick Olsen Encinitas	92024	US	#####
Joyce Arno Duxbury MA	2332	US	#####
Greg Petlis Iselin NJ	8830	US	#####
Charlotte N DeKalb	60115	US	#####

Evan Coad Denver	80237 US	#####
Samantha I Chelsea	4330 US	#####
Montse Ro La massana	Andorra	#####
Lawrence S Tucson AZ	85749 US	#####
Michael Sa Tampa	33610 US	#####
Amanda Sa La Crescent CA	91214 US	#####
Mary Keeg; Severn MD	21144 US	#####
kira sitema portland	4103 US	#####
Laura Forst South Amboy	8879 US	#####
Kat Vander Truckee CA	96161 US	#####
Gillyan Tho Twentynin CA	92277 US	#####
susan Rippl Yucca Valle CA	92284 US	#####
Heather Sh Yucca Valle CA	92284 US	#####
Bryce Reco Santa Barb CA	93108 US	#####
Lorraine Sa Palm Deser CA	92211 US	#####
Alfi Zakki Lombok	83654 Indonesia	#####
Marie Gegg Punta Gord FL	33950 US	#####
Cool Beand Atlanta	30303 US	#####
Praise Wini Beaumont	77713 US	#####
Judy Keil Ithaca NY	14850 US	#####
Sara Regan State Colle PA	16801 US	#####
Arthur Golc Lancaster NY	14086 US	#####
G. DaPonte Joshua Tre CA	92252 US	#####
Lawrence F Kilauea HI	96754 US	#####
Kelsey Mor Los Angele CA	90042 US	#####
Greg Seller Glendale CA	91206 US	#####
Eric Flanag; Palm Sprin CA	92262 US	#####
Kyle Strope Palm Sprin CA	92262 US	#####
Raina King Atlanta	30303 US	#####
Justin Leine JOHNSON \ CA	92285 US	#####
niber freita Doraville	30340 US	#####
Philippa M; Marina del CA	90295 US	#####
Aaliyah Da Valencia	91355 US	#####
Legacy Leir Landers CA	92285 US	#####
julia gonzal JOSHUA TR CA	92252 US	#####
Thuy Jacob North Holly CA	91602 US	#####
Corey Dow Somerville	8876 US	#####
patrick moi Duxbury MA	2332 US	#####
Sarah Burk; Sevierville	37862 US	#####
Itoria Willie Philadelphia	19138 US	#####
Shannon D. Kihei	96753 US	#####
Stephanie / Intervale NH	3845 US	#####
Sophie Wal Calgary	T3K Canada	#####
Jennifer Bu Yucca Valle CA	92284 US	#####
IDolores H; Yucca Valle CA	92284 US	#####
Cyber Girl Ravena	12143 US	#####
Justin Moo Polson	59860 US	#####

Dylan DeLu Yucca Valle CA	92284 US	#####
Stevan Wol Desert Hot CA	92240 US	#####
Maile Truo Brooklyn	11221 US	#####
Irani Puspit Tasikmalaya	46416 Indonesia	#####
Roxanne Ai San Marco CA	92069 US	#####
Armando C Indio	92201 US	#####
Evan Pulvei Los Angele CA	90731 US	#####
Austin Jane Clanton	35045 US	#####
Margo Gibi Yucca Valle CA	92284 US	#####
Maury Quii Santa Clara UT	84765 US	#####
Lupe Stratt Chino CA	91710 US	#####
Kerstin Nei Yucca Valle CA	92286 US	#####
mariann ad Nashville TN	37211 US	#####
Sam Ford Anderson	46016 US	#####
Jamie Boca Salt Lake Ci UT	84107 US	#####
Shadee Joh Joshua Trei CA	92252 US	#####
J-Me Elder Austin TX	78746 US	#####
faiq Hafni Kediri	64121 Indonesia	#####
Angel Quin Aurora	80013 US	#####
Maria Brun Twentynine CA	92277 US	#####
Thomas Bri Buffalo NY	14228 US	#####
Megan PfaI Irvine CA	92618 US	#####
Derek Girlii Long Beach CA	90803 US	#####
Mary Price Landers CA	92285 US	#####
Stephaney Victoria	77904 US	#####
sam boatm fimlango h CA	92284 US	#####
Agung Priy; Tangerang	15710 Indonesia	#####
Ade Iman Santoso	42182 Indonesia	#####
Sheri Enocl Yucca Valle CA	92284 US	#####
mara moor chicago IL	60624 US	#####
Brandon Ke Yucca Valle CA	92284 US	#####
Anne Lorir Tampa	33606 US	#####
Curtis Bum Monterey CA	93944 US	#####
M K Finster Joshua Trei CA	92252 US	#####
Elizabeth Li Fairfield	52556 US	#####
Melanie loj Del Valle	78617 US	#####
Julianne Hæ Desert Hot CA	92240 US	#####
Brian McM Yucca Valle CA	92284 US	#####
Ray Pessa Yucca Valle CA	92284 US	#####
dvora silbe yucca valle CA	92284 US	#####
Trevor Whi Los Angele CA	90008 US	#####
Taylor Simç Culver	46511 US	#####
Natalie Goi Modesto	95355 US	#####
Shauna Olii Denver CO	80226 US	#####
Julie Gury Desert Hot CA	92240 US	#####
MIL User 81 Boystown	Philippines	#####
MIL User 93 Boystown	Philippines	#####

MIL User 84 Boystown		Philippines	#####
Kyle Donah Hampton F NH	3844	US	#####
Katherine T Yucca Valle CA	92284	US	#####
John Wage Boca raton	33432	US	#####
Gregory Ca Hawthorne CA	90250	US	#####
Nancy Klep Arlington HIL	60004	US	#####
Linda Moffi Yucca Valle CA	92284	US	#####
Jerry Mular Richland	39218	US	#####
Ashley Torr Azusa	91702	US	#####
Adella Her: Tangerang	15158	Indonesia	#####
Nica Ramo: Bayside	11361	US	#####
Katie Sandl Yucca Valle CA	92284	US	#####
Shawna Gr Port Orchard	98367	US	#####
Catherine C Yucca Valle CA	92284	US	#####
Christophe Wasilla	99654	US	#####
sumargiyono sumargiyono	56353	Indonesia	#####
Saiful Anwar	10520	Indonesia	#####
Reenysha F Port Louis		Mauritius	#####
Jln Godinez		Philippines	#####
Rolando Torregosa Jr.		Philippines	#####
Owen Hum London	W11 1LY	UK	#####
Connie Pot Columbus OH	43202	US	#####
hannah Far Haarlem	2012	Netherland	#####
MIL User 11 Tungkop		Philippines	#####
LJ Roberts Brooklyn NY	11213	US	#####
Simone Me Radebeul	1445	Germany	#####
Jonathan H Gardnerville	89410	US	#####
bellinda rol Wijk Bij Duurstede	3961	US	#####
Michelle Tε Plymouth MA	2360	US	#####
Dustin Dis Brooklyn NY	11226	US	#####
Deborah H Joshua Tre CA	92252	US	#####
Giovanny B Lake Worth	33461	US	#####
Pi Nas Karanganyar	57783	Indonesia	#####
Raphaël PC Aucamville	31140	France	#####
Aida Nobar Tampere	33540	Finland	#####
Cindy Hass Joshua Tre CA	92252	US	#####
Sara O'Con Austin TX	78732	US	#####
Biljana Jovε wien		Austria	#####
annabella c Havertown	19083	US	#####
Jack Cook 29 Palms CA	92277	US	#####
Joshua Cur Peterborough	PE7	UK	#####
Jo-Anne W. Joshua Tre CA	92252	US	#####
Airin Safast Jakarta		Indonesia	#####
Pamela Hill High River	T1V1J5	Canada	#####
Quinn Bret Estes Park CO	80517	US	#####
Jean Whitc Harrisville NH	3465	US	#####
shush plus Ahwaz		Iran	#####

Carolina Bl: West Covina	91790 US	#####
Bonnie Rei: Anaheim CA	92802 US	#####
Nate Pakul: Joshua Tre: CA	92252 US	#####
Maureen R Attleboro MA	2703 US	#####
Katherine I Joshua tree: CA	92252 US	#####
Rachel Lan: North Olmsted	44070 US	#####
Tammy Fre Yucca Valle CA	92284 US	#####
Denise Yu Baliuag	3006 Philippines	#####
Dan Joerigt Yucca Valle CA	92284 US	#####
Kathy Tob: Augusta	30909 US	#####
Karen Sing: Potomac	20854 US	#####
Paula River Joshua Tre: CA	92252 US	#####
tori kuzum: Osaka	US	#####
Patricia Mc Newport Beach	92660 US	#####
Richard Wi Philadelphia	19144 US	#####
Samme Chi Pioneertow CA	92268 US	#####
Oscar West Kansas City	64111 US	#####
amanda bl: Yucca Valle CA	92284 US	#####
bh kraft Drachten	9203 Netherland	#####
Keri Coupl: Arlington	22205 US	#####
Imani S New York	11111 US	#####
Heidi Piepe Flamingo H CA	92284 US	#####
brooke smi Goleta CA	93117 US	#####
Rachael Da Cincinnati	45220 US	#####
Gabby Mck Houston	77002 US	#####
Sophie Oril Lancaster	93536 US	#####
Jacob Lebr: Kirkland	98033 US	#####
marissa martinez	US	#####
Jasmine Wi Philadelphia	19114 US	#####
Violeta Joh Auburn	98071 US	#####
Mark spen: Orlando	32822 US	#####
Dean Piepe Orange CA	92865 US	#####
alexandra myer Las Vegas	89135 US	#####
Slagjana Jo Kavadarci	Macedonia	#####
Wilson Fre: Missoula	59808 US	#####
Sergio Lop: Daly City	94014 US	#####
Mariko Sot Berkeley	94703 US	#####
Lorraine Ba South Gate CA	90280 US	#####
Barbara Te Henderson	89074 US	#####
victoria rivi key west FL	33040 US	#####
Khasiah Pai San Antonio	78227 US	#####
Alana Levy Dundalk	21222 US	#####
tara wheel: Oakton	22124 US	#####
Mary Knut: Yucca Valle CA	92284 US	#####
Penny Mes London ENG	N160uh UK	#####
macy maxwell	97035 US	#####
Adriana Pe Los Angeles: CA	90027 US	#####

Sally Morte Flintham	Ng23 5IJ	UK	#####
Stefen Vas Corona CA	91762	US	#####
Perry Gx Tustin	92780	US	#####
CRISTINA AGUIRRE	1431	Argentina	#####
Jaxon Baer Santa Clara	95051	US	#####
Constance Yucca Valle CA	92284	US	#####
Anya Masc Mount Dora	32757	US	#####
Michael Su Waynesville	28786	US	#####
Stephanie / Yucca valle CA	92284	US	#####
Samuel Wil Cedar Rapids	52404	US	#####
Stephanie I Los Angeles: CA	90033	US	#####
Salina Kum Wolverhampton	WV10	UK	#####
Jackson Lyc West Des Moines	50266	US	#####
Robert Har Yucca Valle CA	92284	US	#####
Tatjana Bar Auckland		New Zealar	#####
Sharla Ensl Austin TX	78745	US	#####
Erin Africa Canyon Cor CA	91351	US	#####
Ezra Snider Yorba Linda	92886	US	#####
Grace Benc East Brunsv NJ	8816	US	#####
Patrice Wa Santa Cruz CA	95060	US	#####
Marta Galic Galicia	33891	Spain	#####
Edward Ma Huntsville AL	35801	US	#####
César Retal Los Angeles: CA	91402	US	#####
Kelly Cole Joshua Tre CA	92252	US	#####
Molly Keari Orrington	4474	US	#####
Kelly Corbi Twentynin CA	92277	US	#####
Laura Dens Riverside CA	92505	US	#####
DONNA Le Toms River NJ	8753	US	#####
Veva Hargu Crossville TN	38571	US	#####
Susan Carl Easton PA	18042	US	#####
Cheri Kunz Redmond WA	98052	US	#####
Somer Hea Glendale AZ	85304	US	#####
trinity ford Millington	38053	US	#####
Karen De H Dunedin		New Zealar	#####
Carlos Cam Mérida		Venezuela	#####
Brandon R Pasadena CA	91104	US	#####
Naoh Gold Quincy MA	2169	US	#####
Jana Clark Bronx	10471	US	#####
Arianna De Lima		Peru	#####
bozena fry; old bridge NJ	8857	US	#####
Jodi Igard Studio City CA	91607	US	#####
Michelle M Twenty-nin CA	92277	US	#####
Faris Eskon Fort Lee	7024	US	#####
Emmanuela Compiani		US	#####
Heather M Austin TX	78703	US	#####
Sam Chaud Mancheste ENG	M16 0SF	UK	#####
Farrah Has: Sacramento CA	95817	US	#####

Sonia Corni Arequipa		Peru	#####
Karen Baka Cass City MI	48726	US	#####
Kari Stringer Minneapolis MN	55407	US	#####
Franco Ville Tampa	33612	US	#####
Karver Mur Flagstaff AZ	86011	US	#####
Kolton Gray Crozet	22209	US	#####
Chris Orozco Fullerton	92833	US	#####
Sue King Springdale AR	72762	US	#####
Stormie Inge Yucca Valle CA	92284	US	#####
Manuel Pei Los Angeles	90032	US	#####
Esther Gar Miami FL	33186	US	#####
John Thom Placentia CA	92870	US	#####
Robert Tho Placentia CA	92870	US	#####
Etzar Cisne Birmingham AL	35206	US	#####
david catch joshua tree CA	92252	US	#####
Judy Kushn Elmont NY	11003	US	#####
Gabi Johns Minneapolis	55430	US	#####
Isabella Ve Portland	97232	US	#####
Rebeckah Biddick		New Zealand	#####
Muhamma Surabaya	62364	Indonesia	#####
doria wosk miami FL	33116-335	US	#####
Kaitlyn Kun Fargo	58105	US	#####
Rebekah H. Anaheim CA	92806	US	#####
Jaden Gatz New York	10022	US	#####
vincent che ronkonkor NY	11779	US	#####
Francis Pov Riverside CA	92504	US	#####
TJ Aflaki Joshua Tree CA	92252	US	#####
Kait Robin Tulare CA	93274	US	#####
Joshua Vog Norfolk VA	23513	US	#####
sisi robin Joshua Tree CA	92252	US	#####
Nick Garab Trabuco Canyon	92679	US	#####
Marshall H. Yucca Valle CA	92284	US	#####
Brady Enge Big Bear Cit CA	92314	US	#####
Ron Dudley Joshua Tree CA	92252	US	#####
Dawn Alba Bensenville IL	60106	US	#####
sherrie king Torrance	90501	US	#####
Urbiegato I Gilbert AZ	85233	US	#####
Shayna Gar San Pedro CA	90731	US	#####
Liz Wyatt Yucca Valle CA	92284	US	#####
Jada Tremk Atlanta	30331	US	#####
Danna Dea Kittery Poir ME	3905	US	#####
natalie pete San Diego	92103	US	#####
Christina G Los Angeles CA	90059	US	#####
Chad Liscin San Francis CA	94109	US	#####
Gwen Schif Palmdale CA	93551	US	#####
Andres Lari Norwalk CA	90650	US	#####
Ina Dow Ridgway	81432	US	#####

Richard Rei Waynesbor	GA	30830-702	US	#####
Ilse Spiegel Brooklyn	NY	11233-271	US	#####
Erica Henni Phoenix	AZ	85043	US	#####
ANGANA CLASS NUMBER 06			Philippines	#####
Victor Rom Banning	CA	92220	US	#####
madi messi Fort Lauderdale		33315	US	#####
Kate Harde Glen Ellyn	IL	60137	US	#####
Maggie K Hawthorne	CA	90250	US	#####
Robert Lon Brooklyn	NY	11234	US	#####
Heather Da Yucca Valle	CA	92284	US	#####
Steven Ran Hyannis	MA	2601	US	#####
Paul Blackt Elizabethto	KY	42701	US	#####
Finley B'Hy Joshua Trei	CA	92252	US	#####
Selma Elita Bogor		17515	Indonesia	#####
Jesstin Ran Bell Garder	CA	90201	US	#####
MIL User 72 Boystown			Philippines	#####
lusienne lo savaneta		297	Aruba	#####
Lauretta Pa Sullivan	IN	47882	US	#####
Laurie Cocf Miami	FL	33129	US	#####
ashle meye San Francis	CA	94121	US	#####
Alyssa Lawi College Station		77845	US	#####
Nina Kemp Oxford		Ox3 9fn	UK	#####
Cade Herm Oak Ridge	NJ	7438	US	#####
MIL User 20 Boystown			Philippines	#####
Tami Lukac Henderson		89014	US	#####
Clare Lowe Gabriola		VOR 1X7	Canada	#####
Steve O'Do Twentyninr	CA	92277	US	#####
Teresa Bea Yucca Valle	CA	92284	US	#####
Trinity Mec Yucca Valle	CA	92284	US	#####
MIL USER 1 BOYSTOWN			Philippines	#####
Ingrid Eiser Maxhütte	DE	93142	US	#####
cedric cinco Boystown			Philippines	#####
MIL User 38 Boystown			Philippines	#####
Alan Hamb Phoenix	CA	90026	US	#####
Sheila Mille Longmead	MA	1106	US	#####
Briseida Ur Morongo V	CA	92256	US	#####
Elaine Fisch Roanoke	VA	24018-262	US	#####
Jhon Kevin Codoy			Philippines	#####
David Fehr Palm Deser	CA	92260	US	#####
MIL User 7 Boystown			Philippines	#####
Brian Healey			US	#####
Alvord Skin Ridgecrest	CA	93555	US	#####
Ioana Truta Timisoara		300280	Romania	#####
Dragana R. kumanovo			Macedonia	#####
Guido Sein Viljandi		71301	Estonia	#####
Crystal Har Leesburgh		20176	US	#####
Tyler Boudi Los Angele	CA	90036	US	#####

pablo bob	1013	Argentina	#####
Herbert Sta Vienna	1200	Austria	#####
Kyliemera Nema Kapiri		Vanuatu	#####
Diane Fear Birmingham	B16	UK	#####
Elaine Cher London ENG	SW12 8SS	UK	#####
Rebecca Sn Sale	3850	Australia	#####
Lorna Hill Houston TX	77090	US	#####
Jewel Rank Whippany	7981	US	#####
tanja israel Mahwah	7430	US	#####
Darlene Ke Titusville FL	32780	US	#####
Lukas Capo Whitinsville MA	1588	US	#####
Jim Takaha Christchurch	8051	New Zealar	#####
Mirjam Sei Viljandi		Estonia	#####
Diana Rami Staten Islar NY	10305	US	#####
george bou belleville NJ	7109	US	#####
Jackelyn Af Joshua Tre CA	92252	US	#####
Matthias D Harelbeke		Belgium	#####
Ann Marie Seymour CT	6483	US	#####
Piers Gunt LOS ANGEL CA	90018	US	#####
Carl Balaor Quezon City		Philippines	#####
Jozko Kuku Novy Oldrichov		Czech Repl	#####
Ramona Br Elizabeth CO	80107	US	#####
Louise Chic Landers CA	92285	US	#####
Corey May Silver Spring	20901	US	#####
Omar Tova Cicero	60804	US	#####
David Evan Tustin CA	92780	US	#####
Lacy Tavzel Yucca Valle CA	92284	US	#####
Jeffrey San Sacramento	95821	US	#####
Kristy McK San Luis O CA	93401	US	#####
Jamie Ludo Yucca Valle CA	92284	US	#####
Spencer Ke Yucca Valle CA	92284	US	#####
Cameron Si Cleveland	44127	US	#####
Kari Turner Desert Hot CA	92241	US	#####
carina colo Rockland MA	2370	US	#####
Debora Yer Tangerang	15123	Indonesia	#####
Tania Ham Joshua Tre AZ	92252	US	#####
Pearl Charl Landers CA	92285	US	#####
Albert Carl Miami FL	33133	US	#####
Michael Ra Landers CA	92285	US	#####
Lynn Baller Los Angele CA	90027	US	#####
Alexander I Boynton B FL	33437	US	#####
Themelina Brookhaven	30319	US	#####
Irene Karsc Palos Verde CA	90274	US	#####
Lily Haskell Fort Laude CA	33317	US	#####
Kathryn Kn Bountiful UT	84010	US	#####
Kevin Gravi Mammath CA	93546	US	#####
Pamela Cot Truckee CA	96161	US	#####

Amber Cau Vallejo	CA	94590	US	#####
Louise Gau Big Pine	CA	93513	US	#####
Rebecca Ta Burbank	CA	91505	US	#####
Samantha ` Ormond Be	FL	32176	US	#####
Carrie Bissr yucca valle	CA	92286	US	#####
Reno Lott Twentynine	CA	92277	US	#####
Bill Gilman Long Beach	CA	90815	US	#####
Emily Voge Los Angeles	CA	90059	US	#####
Amanda Ta Los Angeles	CA	90042	US	#####
Reine Botr Tel Aviv			Israel	#####
John Shippl Morongo V	CA	92256	US	#####
sylvie auge Trois-Rivières		G8Y 6S9	Canada	#####
Naomi Schi Bonaire		...	Caribbean I	#####
Dora Noval Zagreb		10000	Croatia	#####
Peter Nich Landers	CA	92285	US	#####
Ugh yourat Miami		33170	US	#####
Mya D Martinsburg		25403	US	#####
Tony Yeary Arcadia	CA	91007	US	#####
Karen Kupc Yucca Valle	CA	92284	US	#####
Hailee Max Walla Walla		99362	US	#####
Милена Дј Skorpe			Macedonia	#####
Jessie Sout Dudley		Dy1	UK	#####
James Phel St. Louis	MO	63130	US	#####
Jackie Sam Valley Villa	CA	91607	US	#####
Cindy Cruz Tucson	AZ	85719	US	#####
Mike Kutch Queens	NY	11691	US	#####
Carol Hiest Joshua Tre	CA	92252	US	#####
Albar Roch Jakarta		14270	Indonesia	#####
Sandra Har North Holly	CA	91601	US	#####
Jack Lindah Huntington	CA	92646	US	#####
Kathy Mille Joshua Tre	CA	92252	US	#####
Catherine E West Chicago		60185	US	#####
Sylvia Mills Fairfax	VA	22033	US	#####
Delijha Ari Maywood		60153	US	#####
Melissa Ch North Holly	CA	91602	US	#####
Terrie Pher Silver Cliff	WI	54104	US	#####
steve phen silvercliff	WI	54104	US	#####
Emily Trum Brighton		Tn20 6hl	UK	#####
Grace Silva North Holly	CA	91615	US	#####
Colleen Hal Philadelph	PA	19106	US	#####
Hannah Shi Oklahoma City		73160	US	#####
Edi Sutoyo Pekanbaru		28283	Indonesia	#####
Don Wilsor Tucson	AZ	85719	US	#####
Charles Hu Pleasantville		8232	US	#####
Srinivasa Cl Littleton		80126	US	#####
Allyson Bill La Habra	AZ	85006	US	#####
yusvina qoriaturrahma		55511	Indonesia	#####

Elliott Van Pioneertow CA	92268 US	#####
Kelly Burns Joshua Tre CA	92252 US	#####
Loisa Bartle Morongo V CA	92256 US	#####
Erfin Harto Valley Villa CA	91607 US	#####
Petra Cimb Yucca Valle CA	92284 US	#####
Kate O'Con Joshua Tre CA	922252 US	#####
Patricia Fet Los Angele CA	90039 US	#####
Brian Dibb Nevada city CA	95959 US	#####
Sallyecker I Oakland CA	94608 US	#####
Fikri Naufal Anwari	20143 Indonesia	#####
JULIA BALL BROOMFIE CO	80021 US	#####
Jeena Choi	US	#####
Janine Vint Hastings	3915 Australia	#####
Mitch Mille Joshua Tre CA	92252 US	#####
Alyssa Love Florence MA	1062 US	#####
Birgül Aslar Istanbul	Turkey	#####
Germaine C Yucca Valle CA	92284 US	#####
Caroline Sic Oakland CA	94611 US	#####
Andy P Homestead	33031 US	#####
Katie Swint Pioneertow CA	92268 US	#####
Janae Taylc Allston MA	2134 US	#####
Jen Michae Yucca Valle CA	92284 US	#####
Efik Mulyat Kota Bandung - Sukasa	40154 Indonesia	#####
Kirsten Nar Sandy Sprir GA	30350-540 US	#####
Marla McF: EUGENE OR	97405 US	#####
Kathleen Ki Warren	44484 US	#####
Magdalena Svalöv	Sweden	#####
Hanna Tsiri Amsterdam	Netherland	#####
Carl Schoer Twentynin CA	92262 US	#####
Annalee Os Oceanside CA	92057 US	#####
Frances M: Beachwoor NJ	8722 US	#####
Roger Kulp Albuquerque NM	87108 US	#####
Tracy Robe Newport B CA	92661 US	#####
Tracy Wrigl Arvada CO	80403 US	#####
Pat Horwat Joshua Tre CA	92252 US	#####
Kashmira K Westlake	44145 US	#####
Dale Barret Reno NV	89523 US	#####
S R Joshua Tre CA	92252 US	#####
Kim Perrin Santa Ysabi CA	92070 US	#####
Sue Lengva Vanderbilt	15486 US	#####
Taylor Leffl Yucca Valle CA	92284 US	#####
Rhonda Hy Charlotte NC	28269 US	#####
Edgar Rodr Los Angele CA	90026 US	#####
karen rosei poway CA	92064 US	#####
Holly Newt Murrieta	92563 US	#####
Julianne Kc Yucca Valle CA	92284 US	#####
Theresa Dc Chicago IL	60610 US	#####

Terrie Willi Vidor	77662-631	India	#####
Russell Chr Hickory	28601	US	#####
Amanda B† JT CA	92252	US	#####
Andre Ferr Helmond	5707RN	Netherland	#####
Shena Aller Pleasant Hi CA	94523	US	#####
Tracey Han Providence RI	2908	US	#####
Savannah S Schuylerville	12871	US	#####
Cynthia Pel Seattle WA	98103	US	#####
Darcy Casti Los Angele: CA	90041	US	#####
Bartosz Dei Leeds	LS9 8PD	UK	#####
Owen Bald Granite Bay CA	95746	US	#####
Lisa Gariba Long Beach CA	90805	US	#####
Melanie Izquierdo		US	#####
Janice Lobc Madikeri	571201	India	#####
Loretta Col Orlando FL	32810	US	#####
Chris Bowd Seattle WA	98117	US	#####
Ramon Visr Tucson AZ	85711	US	#####
Allison Gilb Las Vegas	89103	US	#####
Samantha I Kalispell	59901	US	#####
Zoey Sengadara		US	#####
Leyzar Ferr Bronx	10457	US	#####
Evan Lutz Oakland CA	94618	US	#####
Angela Cun Covtree	2868	US	#####
Marths Bak Twentynine CA	92277	US	#####
Teena Blak Phoenix AZ	85029	US	#####
Joshua Wal Colorado Sp CO	80910	US	#####
marie carti lakewood CA	90712	US	#####
Jocelyn Bor Nashville	47448	US	#####
Amy Campi Knoxville	37914	US	#####
Kevin Wals Silver Sprin MD	20910	US	#####
Cak Saifudi Mojokerto	61375	Indonesia	#####
Dawn Scott San Francis CA	94903	US	#####
Ojulu Char Lancaster	17602	US	#####
Esmeralda Van Nuys	91401	US	#####
Judith Wol Joshua Tre CA	90077	US	#####
Juliann Em Riverside CA	92503	US	#####
E. N. Ander Riverside CA	92507	US	#####
Maman Sui Jakarta	15710	Indonesia	#####
Julie Scott Artesia CA	90701	US	#####
Melinda Ta Pangaribuan	22472	Indonesia	#####
Mary Becr Colton CA	92324	US	#####
Zoe Blasing Cincinnati	45206	US	#####
Peter Berg Fullerton CA	92833	US	#####
Adrian Adri Medan		Indonesia	#####
Sue Henley Glendale AZ	85308	US	#####
Sayuri Doi Seattle WA	98118	US	#####
Perry Hoffr Santa Barb: CA	93101	US	#####

Michael J. I Ann Arbor MI	48104 US	#####
Charlotte K Anaheim CA	92805 US	#####
Lim Hock an An	Malaysia	#####
Meredith K Yucca Valle CA	92284 US	#####
Sara Adam: Madisonvil KY	42431 US	#####
Olivia Beall Yucca Valle CA	92284 US	#####
Manar Hija Rancho Cuc CA	91701 US	#####
Josh Lattan Brooklyn NY	11231 US	#####
Peggy Lee I Yucca Valle CA	92286 US	#####
theo de we Best	65437 Netherland	#####
Steven Belf Bishop CA	93514 US	#####
Irene Wald Yucca Valle CA	92284 US	#####
Susan Brad Desert Hot CA	92240 US	#####
Doug Hard: Glen Ellyn IL	60137 US	#####
McKenna V Mount Vernon	43050 US	#####
Suzanne Dc Tucson AZ	85716 US	#####
Kelly Grah: Twentynine CA	92277 US	#####
Matthew N Los Angeles: CA	90026 US	#####
Marietta Tr Yucca Valle CA	92284 US	#####
Carolyn Ric Santa Barb: CA	93101 US	#####
Teresa Barl Yucca Valle CA	92284 US	#####
Maria Mon Rancho Cuc CA	91701 US	#####
Gail South: Inverness FL	34452 US	#####
Brina Hern: Bakersfield	93307 US	#####
Ann Rieser Seattle WA	98103 US	#####
Allan Song: Pipes Canyon CA	92268 US	#####
7layers ofsky	70117 Indonesia	#####
Ismani Cep Boston	2128 US	#####
Nolan Wya Freehold NJ	7728 US	#####
Ava Munoz Boise	83702 US	#####
Jill Brown Joshua tree CA	92252 US	#####
Beaucham: Glendale CA	91205 US	#####
Maria Nay Los Angeles: CA	91306 US	#####
Sara Gardn Los Angeles: CA	90068 US	#####
Brian Baile: Riverside CA	92509 US	#####
Isadora Fer Millbrae CA	94030 US	#####
Ava Young Williamsburg	40769 US	#####
Kristen Gas Los Angeles	90041 US	#####
Will Hyde Spring TX	77386 US	#####
L Ablan Vineyard H MA	2568 US	#####
Alanna Pat: Tuscaloosa	35401 US	#####
Staci Hall Palm Spring CA	92262 US	#####
Ellen Brill Los Angeles: CA	90027 US	#####
Kevin Pujol Visalia	93277 US	#####
Camille Po: Miami	33169 US	#####
Doran Shel San Francis CA	94112 US	#####
Ribin Maye Yucca Valle CA	92284 US	#####

Joshua Larl Yucca Valle CA	92254 US	#####
Sharon Linc Loma Rica CA	95901 US	#####
Yana Nirvai Stevenville MT	59870 US	#####
Gail Anne-\ Desert Hot CA	92240 US	#####
Lina Gasca Palmdale CA	93551 US	#####
Jessy Ware Yucca Valle CA	92284 US	#####
Aläya Corrn Eunice	70535 US	#####
isabella gal Sacramento	95818 US	#####
ROSE CEFA Joshua Trei CA	92252 US	#####
Wyatt Meli Yucca valle CA	92284 US	#####
Weston Ca Artesia CA	90701 US	#####
Aspen Albr Millersville	21108 US	#####
beth dolos ashland OR	97520 US	#####
Elizabeth B Landers CA	92285 US	#####
Kandice Ad Lucerne Va CA	92356 US	#####
halley slack San Bernar CA	92407 US	#####
brianna b Brooklyn	11205 US	#####
Matthew A Landers CA	92252 US	#####
Ramona Ar Yucca valle CA	92284 US	#####
Reiko Robe Yucca Valle CA	92284 US	#####
Gary Alan F Squaw Vall CA	93675 US	#####
elisabeth si venice CA	90291 US	#####
Michael Str Rockport	47635 US	#####
Carla Reprs Austin	78704 US	#####
Tawnja Pfl Chico CA	95928 US	#####
Alejandro Penalva Martinez	US	#####
Carolina M kew garder NY	11418 US	#####
Maike Botf Los Angele: CA	90048 US	#####
Sterling Wi Joshua Trei CA	92252 US	#####
Jerie Kelter Southampt NY	11968 US	#####
Sharlay Ma Petersburg AK	99833 US	#####
Steve Egert Fallbrook	92028 US	#####
Lenore Blar Markham	L3R Canada	#####
James Yepc Klamath Fa OR	97603 US	#####
Jordan Ligh Yucca Valle CA	92284 US	#####
Russel Wal Yucca Valle CA	92284 US	#####
Anne Miett Tampere	33100 Finland	#####
Karla Sanct El Paso	79928 US	#####
Ollin Trujilli Los Angele: CA	90019 US	#####
JOHN NOBI Newbury P CA	91320 US	#####
LeeAnn Lee San Francisco	94134 US	#####
Jeremy Dai Tustin CA	92782 US	#####
Karina Araç Los Angele: CA	90020 US	#####
Tina Hering Oakland CA	94610 US	#####
Anneliese 1Wales north	LI298ea UK	#####
scanlon gai Los Angele: CA	90039 US	#####
Heidi Siebe Muizen	2800 Belgium	#####

Cyndi Ande Joshua Tre	CA	92252	US	#####
Kaly Jin Guelph		N1H2Z3	Canada	#####
Thorvald Ja Whitewate	CA	92282	US	#####
Eva Palafox Orlando		32803	US	#####
Ting Chin Joshua Tre	CA	92252	US	#####
Secret Wir Champlin	MN	55316	US	#####
Lynda Coul Grass Valle	CA	95945	US	#####
Shawn Smi Yucca Valle	CA	92284	US	#####
Jennifer Br: Central Poi	OR	97502	US	#####
Conrad Eva Eveleth	MN	55734	US	#####
Grant Kee Cerritos	CA	90703	US	#####
Save the Earth			US	#####
Angelina C: Yucca Valle	CA	92284	US	#####
Steve Coov Los Angele:	CA	90007	US	#####
Glenn War: Joshua Tre	CA	92252	US	#####
Peter Brool Yucca Valle	CA	92284	US	#####
Margarita F Hialeah		33015	US	#####
Sarah Rose Portland	OR	97232	US	#####
Mara DesL: Portland	OR	97211	US	#####
Wills Brew: Los Angele:	CA	90039	US	#####
Matthew B Yucca Valle	CA	92284	US	#####
Kelsi Ephra Los Angele:	CA	90042	US	#####
madeline v fort wayne	IN	46814	US	#####
Greg Lang Yucca Valle	CA	92284	US	#####
James Tayl: Yucca Valle	CA	92284	US	#####
Eea Marais Palm Deser	CA	92260	US	#####
Anisse Gro: San Leandr	CA	94577	US	#####
Benjamin J: Yucca Valle	CA	92284	US	#####
Faye Allen San Diego	CA	92284	US	#####
Timothy Ke Portland	OR	97214	US	#####
Nicole Hou Santa Moni	CA	90403	US	#####
Marie Keer Yucca Valle	CA	92284	US	#####
Louis Litrer Twentynin	CA	92277	US	#####
Matthew C Delmar	NY	12054	US	#####
Ansel Gust: Joshua Tre	CA	92252	US	#####
Angela Spe Yucca Valle	CA	92284	US	#####
Kara Tew Hillsboroug	NC	27278	US	#####
Dorothee F Yucca Valle	CA	92284	US	#####
Hunter Vur Morongo V	CA	92256	US	#####
Ian O Los Angeles		90024	US	#####
Jane Jarlsb: Point aren	CA	95468	US	#####
Lauren Star San Diego	CA	92122	US	#####
Annie Dem Joshua Tre	CA	92254	US	#####
Tara Jane C Landers	CA	92285	US	#####
Eugenia Be Brooklyn	NY	11201	US	#####
Mary Placa Tampa		33635	US	#####
Gloria Nav: Lawrencevi	GA	30042	US	#####

Philippine I San Diego	CA	92109	US	#####
Killian Aub	Emeryville CA	94608	US	#####
Andrew Pri	Yucca Valle CA	92284	US	#####
Jennifer Wl	Hemet CA	92544	US	#####
Susan Hall	Los Angele: CA	90019	US	#####
Lily Stockm	Los Angele: CA	90039	US	#####
Dana Wric	Hugo	55038	US	#####
Nicole Mill	Shorewood IL	60404	US	#####
Catherine F	Rockwall TX	75032	US	#####
Terry Appl	Villa Park CA	92861	US	#####
Jen Roger	Ottawa ON	K2A	Canada	#####
Webster Ju	Seattle WA	98115	US	#####
Patricia Fit	Los Angele: CA	90042	US	#####
Erica Boon	Hyattsville MD	20782	US	#####
Cassidy An	San Diego CA	92119	US	#####
Miranda Cc	Portland OR	97220	US	#####
Parker Howard			US	#####
Evelyn Ratl	Grand Junction	81501	US	#####
Melissa Bol	Joshua Tre: CA	92252	US	#####
Katharine F	Los Angele: CA	90042	US	#####
Alison Wad	Landers CA	92285	US	#####
Connor Sm	Herndon	20171	US	#####
alfi ano	surabaya	61229	Indonesia	#####
Christina St	Riverside CA	92507	US	#####
Lauren Naç	Los Angele: CA	90018	US	#####
charlotte n	Lynwood CA	90262	US	#####
Arshia Kha	Little Rock AR	72205	US	#####
Melissa Mc	Coos Bay OR	97420	US	#####
Alex Hamil	Portland OR	92867	US	#####
Jordan Hick	Little Rock AR	72202	US	#####
Stacy Wolf	Pioneertow CA	92268	US	#####
Stephanie I	Bayville NJ	8721	US	#####
Scott Fajac	Los Angele: CA	90026	US	#####
Christophe	Sanford	27330	US	#####
Kelsey Keit	New York NY	10014	US	#####
Shari Altm	Hartland Fc VT	5049	US	#####
Jeanine Pe	Federal Wa WA	98023	US	#####
Stephanie (Los Angele: CA	90059	US	#####
Freya Harri	Atlanta GA	30342	US	#####
Nayevah Jc	Yucca Valle CA	92284	US	#####
Julian Shah	Los Angele: CA	90049	US	#####
Paul Nosc	Concord CA	94521	US	#####
Candelaria	Lakewood WA	98498	US	#####
Kristen Call	Houston TX	77083	US	#####
Rowland B	Yucca valley	92284	US	#####
Laurie Salr	Joshua Tre: CA	94609	US	#####
Jason Jarra	Longmont CO	80503	US	#####

Jordan Egly	Yucca Valle CA	92284 US	#####
Iratze Rami	Corona CA	92882 US	#####
Erin Morga	Helena	59601 US	#####
Taylor Sout	Somerville MA	2144 US	#####
Kristian Mu	Crestline CA	92325 US	#####
Teri Weber	Thousand C CA	91360 US	#####
Angelica M	Beaumont CA	92223 US	#####
Eileen Fruic	Indio CA	92201 US	#####
Krista Nara	Pearl City HI	96782 US	#####
michaele p	Los Angele: CA	90026 US	#####
Lori Goe	Yucca Valle CA	92284 US	#####
courtaney	Portland OR	97211 US	#####
Sabrina Ric	Yucca Valle CA	92284 US	#####
Chris Eichir	Yucaipa CA	92399 US	#####
Celine Vaal	Los Angele: CA	90026 US	#####
Devin Sinsk	Yucca Valle CA	92284 US	#####
Linnea Broi	Berkeley CA	94707 US	#####
Francesca C	Greenwich CT	6831 US	#####
Christine S	Torrance CA	90503 US	#####
Michelle K	Petaluma CA	94952 US	#####
Terese Jenl	Flamingo H CA	92284 US	#####
Autumn Ha	Los Angele: CA	90026 US	#####
Desiree Sal	Los Angele: CA	90027 US	#####
Ash Triplet	Yucca Valle CA	92284 US	#####
Kara Sajesk	Chicago IL	60607 US	#####
Lucy Hedric	Breckenridj CO	80424 US	#####
Mirian Veg	Anaheim CA	92825 US	#####
Sally Garcia	Downey CA	90242 US	#####
Michelle R	Psg AK	99833 US	#####
Lisa Richar	Redondo B CA	90278 US	#####
Cara Paneb	Oakland CA	94619 US	#####
Sam Richar	Redondo B CA	90278 US	#####
Ryan Schne	Yucca Valle CA	92284 US	#####
Miranda Jo	Oakland CA	94601 US	#####
Kathryn Gr	Los Angele: CA	90066 US	#####
Kerry Mulfr	Long Beach CA	90804 US	#####
Hannah Shi	Joshua Trei CA	92252 US	#####
Lauryn Moi	Los Angele: CA	90230 US	#####
Stacey Oon	San Jose	95123 US	#####
Nathan Sak	Yucca Valle CA	92284 US	#####
jennifer m	joshua tree CA	92252 US	#####
Elvina Payn	Ventura CA	93001 US	#####
Kaylee Calf	Yucaipa CA	92399 US	#####
Emily Koeh	Benicia CA	94510 US	#####
Tami Lewis	Petersburg AK	99833 US	#####
Kai Morgar	Riverside CA	92509 US	#####
jeannine re	Santa Moni CA	90409 US	#####

Aryanna M Joshua Tre	CA	92252	US	#####
Matt Kinse	Los Angeles: CA	90026	US	#####
Amy Wayrr	Santa Ana CA	92704	US	#####
Joshua Gre	Los Angeles: CA	90026	US	#####
Christophe Flamingo H	CA	92284	US	#####
Kathryn Sir	Manhattan CA	90266	US	#####
Andy Olsor	West Holly: CA	90046	US	#####
Jessica Sim	Los Angeles: CA	90026	US	#####
Yadi Lopez	Los Angeles: CA	90042	US	#####
Molly Gree Landers	CA	92285	US	#####
Ian Raikow	Twentynine CA	92277	US	#####
Lona Goud:	Maidenwell 4615	Australia	#####	
Elizabeth F	San Francis CA	94107	US	#####
Susan Ryan	Fresno CA	93720	US	#####
Tina Florell	Stockholm	10000	Sweden	#####
Ariel Simor	Somerville MA	2144	US	#####
Melvin Jay	Quezon City		Philippines	#####
Mandie Bir	Denver CO	80033	US	#####
john paul t:	San Mateo, Rizal		Philippines	#####
James Kopj	Decatur	30030	US	#####
Naixa Brign	Clermont	34711	US	#####
Wendi Mor	Indio CA	92201	US	#####
Clara Hill	Mount Veri NY	10552	US	#####
Camille Goi	West Covin CA	91790	US	#####
Shani Mani	Charlotte NC	28205	US	#####
Cara Sipan	La Mesa CA	91941	US	#####
Kathy Mas	Sebewaing MI	48759	US	#####
James Tim	Washingto DC	20011	US	#####
Juan Canet	Oceanside CA	92057	US	#####
Bernie Ma	Angelus oa CA	92305	US	#####
Kimberly L	Lynchburg VA	24502	US	#####
Maria Lope	Yucca Valle CA	92284	US	#####
Chloe Puto	HOBOKEN NJ	7030	US	#####
scotty coat	Long Beach CA	90808	US	#####
William Mc	Los Angeles: CA	90034	US	#####
Eric Pasch	Yucca Valle CA	92284	US	#####
Michael O'	Burbank CA	91505	US	#####
lauren woc	Los Angeles: CA	90029	US	#####
Erin Fong	Emeryville CA	94608	US	#####
Deanna M	Yucca valley	92284	US	#####
Morgan Kn	Los Angeles: CA	90063	US	#####
Ashila Mufi	Sukabumi	43359	Indonesia	#####
Alison Mal	Santa Cruz CA	95060	US	#####
Chelsea Ke	Riverside CA	92503	US	#####
Ramzi Hog	Los Angeles: CA	90032	US	#####
GARY GOS	Orange CA	92867	US	#####
T Morris	Henrico	23233	US	#####

Hillary Han Los Angeles: CA	90007 US	#####
Jeannie Col North Holly CA	91601 US	#####
Nadia Harp Oceanside CA	92058 US	#####
Coy Johnso Victoria	77905 US	#####
Catherine S kirkwood	63122 US	#####
David Corsi Pioneertow CA	92268 US	#####
Emily Doll Washington DC	20008 US	#####
Eliza Pater Koszalin	Poland	#####
Melba Vale Santa Ana CA	92707 US	#####
Susan Woo Prairie Villa KS	66208 US	#####
aria ehrari corona CA	92879 US	#####
Jocelyn Rul Riverside CA	92509 US	#####
Lupe Guzm Rowland H CA	91748 US	#####
Shannon Fe Los Angeles: CA	91406 US	#####
Vanessa Ne Santa Ana CA	92705 US	#####
Kelly Van P Landers CA	90085 US	#####
Christina Jc Camarillo CA	93012 US	#####
dani edgrei Los Angeles: CA	90022 US	#####
Maria Valle Sacramento CA	95820 US	#####
Lorena Cox Irvine CA	92612 US	#####
Maharani M Jember	68111 Indonesia	#####
Diane Kuzn Lexington KY	40513 US	#####
Dan De Yo Yorba Linda	92886 US	#####
Molly Kroe Los Angeles: CA	90026 US	#####
Cecilia Rorr Yucca Valle CA	92284 US	#####
Beah Rome Riverside CA	92509 US	#####
Shelly Barr Joshua Tre CA	92252 US	#####
Cynthia Do Flamingo H CA	92284 US	#####
Katherine M Los Angeles: CA	90004 US	#####
Poonam Sh Los Angeles: CA	90065 US	#####
Andrew Stc Joshua Tre CA	92252 US	#####
Patricia Hai Harvey LA	70058 US	#####
Cheryl And Cleveland OH	44120 US	#####
Danny Nati Yorktown Heights	10598 US	#####
Frederick H Rancho Cucamonga	91739-192 US	#####
Brittany Sa Glen Cove NY	11542 US	#####
Mae McAle Altadena CA	91001 US	#####
Matthew B Stillwater MN	55082 US	#####
Christophe Kalaheo	96765 US	#####
Ashley Sisir Yucca Valle CA	92284 US	#####
Kaitlyn Mc Coachella CA	92236 US	#####
Jami Gardn Los Angeles: CA	90066 US	#####
Percival Ha Duvall	98019 US	#####
Sebastian F Gurnee	60031 US	#####
Andrew Ho Los Angeles: CA	90046 US	#####
Michelle M Yucca Valle CA	92284 US	#####
Estelle Rub San Francis CA	94114 US	#####

Eliza Boll Rochester	14623 US	#####
Jackie Thar Seattle WA	98122 US	#####
Sean Buche Twentynine CA	92277 US	#####
Tonya Lant Myrtle Bea SC	29579 US	#####
Jessica Gomez	92707 US	#####
Jacqueline Los Angeles CA	90026 US	#####
Bethany Ka Nixa	65714 US	#####
Tajeer Robi Union NJ	7083 US	#####
Ellen Redish	US	#####
Biruk Zelak Minneapolis	55407 US	#####
Chris Avalo Union City	7087 US	#####
Jessica Bras Stuart	34997 US	#####
Stanley Blas Santa Maria CA	93454 US	#####
Melissa Ob Fontana CA	92336 US	#####
Ercil Howar Upland CA	91784 US	#####
Juliet Kurth San Dimas CA	91773 US	#####
Tony Crino Portage	49024 US	#####
Theresa Str Rawlins WY	82301 US	#####
Sara Grazic East Canaan CT	6024 US	#####
Lorraine M Lutz	33558 US	#####
Afrianyah Muara Enim	31314 Indonesia	#####
Eni Hasana Tirana	Albania	#####
Andrea Flic Alexandria	22315 US	#####
Mary Kelly Albany	12209 US	#####
Elviira Liim Jyväskylä	Finland	#####
David Roac Norristown	19401 US	#####
Keith Jones Los Angeles CA	90027 US	#####
Christine T Adelanto CA	92301 US	#####
Eric Linnert Yucca Valle CA	92284 US	#####
Kevin Figueroa Cardona	US	#####
Erin van Ro Warner Robins	31088 US	#####
Dave David Dallas	75235 US	#####
maria I Lynwood	90262 US	#####
Kendall Rol Wasilla	99654 US	#####
Jordyn Oku Valley Springs	95252 US	#####
Laine Abrai Huntington CA	90255 US	#####
Robert Orti San Francisco	94945 US	#####
Nicole Jedr Northampton	18067 US	#####
Danielka Al Bratislava	Slovakia	#####
niocle vent Oceanside	92056 US	#####
Jennifer Ro Hudson	34667 US	#####
blanca hue Palmdale	93550 US	#####
Ilir Aliaj Tirana	Albania	#####
James Tave Danbury	6810 US	#####
Isabel Arria La habra	90631 US	#####
Jonathan M Tustin	92780 US	#####
Carrena An Renton	98059 US	#####

Oliver Mor: Chicago	60623 US	#####
Jorge Ceval Sacramento	95821 US	#####
Israel Orda Woodlake	93286 US	#####
Eva Kim Milford	6460 US	#####
Joslyn Milb Wadsworth	44281 US	#####
Adriana te: Montesano	98563 US	#####
Arini Ahya Bandung	41124 Indonesia	#####
Andrew Flii Phoenix	85022 US	#####
Erich Kerr Duarte CA	91010 US	#####
Jennifer St: 59377 Belf: CA	92284 US	#####
Shannon Fc Richmond CA	94804 US	#####
Catherine F Yucca Valle CA	92284 US	#####
Yeremey Ki Richmond CA	94804 US	#####
Al Ma Antioch TN	37013 US	#####
Justin Fabe Los Angele: CA	90034 US	#####
alison malf San Francis CA	94117 US	#####
Tri Wahyur Jakarta	Indonesia	#####
imelda mer houston	77070 US	#####
LACEY OLSI Yucca Valle CA	92284 US	#####
Donna Leoi Murrieta	92563 US	#####
David Spinl San Francis CA	94117 US	#####
Jessica Che Los Angele: CA	90049 US	#####
Isabella Me North Hills	91343 US	#####
Ursula Gilnr Yucca Valle CA	92284 US	#####
Joshua Fish Los Angele: CA	90026 US	#####
Annette Be Miami FL	33143 US	#####
Kara Bartor Los Angele: CA	90066 US	#####
Kristi Adar Yucca valle CA	92284 US	#####
Salena Sme Palmdale CA	93551 US	#####
Susanna Pc Miami Bea: FL	33139 US	#####
Griffin Blaz Southbury CT	6488 US	#####
June Harris New York NY	10065 US	#####
Nur Yamin Makassar	90551 Indonesia	#####
Sophia Der San Francis CA	94117 US	#####
Rachel Buri Englewood CO	80110 US	#####
Gloria Mari Bronx NY	10457 US	#####
Duffy Kunt: Chandler	85224 US	#####
Johanna Ba Houston	77076 US	#####
Shirley Tov Saddle Brook	7663 US	#####
Marc Hawc Los Angele: CA	90043 US	#####
Chris Pecar New York	20017 US	#####
Cynthia All: Lawre GA	30043 US	#####
Eva Rruka-: Alexandria	22307 US	#####
Rachmi Rer Gorontalo	96112 Indonesia	#####
Seneca Ani Eagle pass	78852 US	#####
Taylor Hymr Keller	76244 US	#####
Cristal Bust Anaheim	92806 US	#####

Jo McGuire Upland	91786 US	#####
Sharlianys I Bayamon	956 US	#####
Hue Truong Alhambra	91801 US	#####
Shirley Yan Aptos CA	95003 US	#####
cindy becer Inglewood	90301 US	#####
Dori Bachr Los Angeles	90066 US	#####
Dee Sturde Summit NJ	7901 US	#####
jocelyn san Los Angeles	90044 US	#####
Mario Met Bell Garder CA	90201 US	#####
Tess Lalor Pittsburgh PA	15238 US	#####
paola cam Fredericksburg	22401 US	#####
andrea aria Brawley	92227 US	#####
Emma Wor Claiborne county	37604 US	#####
Sara Semp Ashland	68003 US	#####
samantha s Mableton	30126 US	#####
Bob Mcghe Millerhattan	12546 US	#####
Baysia Brae Boerne	78006 US	#####
Camie Rod RADCLIFF	40160 US	#####
Kevin Lope Monroe	28110 US	#####
Shannon Bi Fulton	13069 US	#####
Patricia Fer Norwich	6360 US	#####
Jerald Sigod	Philippines	#####
Bob Dilling Troy	45373 US	#####
Maria Herr Indianapolis	46220 US	#####
susan thab chesterlanc OH	44026 US	#####
Ashley Sch San Clemer CA	92672 US	#####
Paige O Ladera Ran CA	92694 US	#####
mary gutie Granbury	76049 US	#####
Christine D Rancho Cuc CA	91701 US	#####
Venture M Mission Viejo	92692 US	#####
Katie Filice San Marcos	92078 US	#####
William Far Chicago	60640 US	#####
Maverick F water valley	38965 US	#####
Ruth Bentk Fort Worth TX	76118 US	#####
Kendra Sta Denver CO	80220 US	#####
F C New York	10037 US	#####
Olivia Jenki Frederick MD	21703 US	#####
al legittino Malibu CA	90265 US	#####
Heidi Mugr Clifton NJ	7011 US	#####
Mary Ann \ Mayfield H OH	44124 US	#####
gene webe Dry Ridge KY	41035 US	#####
Sergio Nun Melbourne	3001 Australia	#####
Tricia Legit Lahaina HI	96761 US	#####
Jenn Antho Houston	77002 US	#####
Wyatt Geig Yulee	32097 US	#####
Trisha Holl Raeford	28376 US	#####
Kevin Rodri El Paso	79912 US	#####

Mani Davar Los Angeles: CA	90046 US	#####
Chantal Blc Waldorf	20601 US	#####
Natalia Bar Ridgewood NJ	7450 US	#####
Gema Elvir: Garden Grove	92843 US	#####
mack c Rogersville	37857 US	#####
Crystal Hut Landers CA	92285 US	#####
Carissa Ree Swedesboro	8085 US	#####
Marvel Bro Orlando	32805 US	#####
Shawn Hay El Dorado Hills	95762 US	#####
Kelly oliver Tempe	85281 US	#####
jayasuriya j 4101 Feldk AS	4101 US	#####
Miguel De l Los Angeles: CA	90039 US	#####
Jayanti Gal: Long Valley	7853 US	#####
Arthur Ten: Forks	98331 US	#####
Cheryl Gall: OR	97760 US	#####
Ketra Bock Albuquerque: NM	87144 US	#####
Jessie How Rio Rancho NM	87124 US	#####
Jewel Dula: Long Beach	90807 US	#####
Jenni Evans: Twentynine: CA	92277 US	#####
michael jof San Diego CA	92111 US	#####
John Martii Lebanon	97355 US	#####
Janina Grage	44649 Germany	#####
Juan Carlos San Lorenz: CA	94580 US	#####
Livy Bargiel Santa Barbara	93105 US	#####
Joel F NY	US	#####
Kim Minjee Elkhart	46516 US	#####
Ashley Gra: Ammon	83406 US	#####
Francisco R San Juan	US	#####
Sejzane Rr: Hartford	53027 US	#####
Xenia Nino Windermere	34786 US	#####
Lovely Quis Chicago	60641 US	#####
Desiree Pie Las Vegas	89101 US	#####
Jessica Pasi Boonton Township	7005 US	#####
Dakota Baa Fruitport	49415 US	#####
Jacob Veliz South El Monte	91733 US	#####
Nessa Esco Lake Elsinore	92530 US	#####
Fortnite M: Bel Air	21015 US	#####
Charolette Kenton	43326 US	#####
Agnès MOREAU	37000 France	#####
jocelyn dor cuyahoga falls	44223 US	#####
Joshua Bro: Salt Lake City	84102 US	#####
Isaac Luper Lancaster	93536 US	#####
trinity r Cypress	77429 US	#####
Rick Gray johnson va: CA	92691 US	#####
Athena Yiv Norwalk	90650 US	#####
Stian Johns Snoqualmie	98065 US	#####
Ryan Culler Winter Gar FL	34787 US	#####

Parker Ken Homeland	92548 US	#####
Kelly Hersh New York NV	10013 US	#####
Tora Spenc Las Vegas	89117 US	#####
林 工 三	US	#####
Jacob Erwir Flamingo H CA	92284 US	#####
lord Trump Peachtree City	30269 US	#####
Alma Garcí Los Angeles	90037 US	#####
Yeimaris Melendez	US	#####
Pierce Mar Wallingford	19086 US	#####
Jessica Arai West Palm Beach	33409 US	#####
Jazmin Leo Santa Ana	92704 US	#####
Shannon Le Potterville	48876 US	#####
Yaeliz Rios Bayamon	US	#####
Liz Lopez Mexico	1000 US	#####
genevieve I Fontana	92336 US	#####
Adriana He Modesto	95354 US	#####
Nicholas Fa Yucca Valle CA	92284 US	#####
Rick Gerg Rochester	14619 US	#####
Morgan Mc Roseville	Zip 95661 US	#####
Sonya Ortiz Santa Maria	93434 US	#####
eva parker Rockledge	32955 US	#####
Robin Bake APO	9020 US	#####
Heather Ll Lebanon IN	46052 US	#####
Richard Mc Olympia Fields	60461 US	#####
Tony Yang Corona	92879 US	#####
Kimberly A Saint Cloud	34771 US	#####
Aidon Ferkl Wisconsin Rapids	54494 US	#####
Rob Spohr Delmar	12054 US	#####
Devin Brew Plymouth	3264 US	#####
Shdhhdhsh Auburn Hills	48326 US	#####
me Cana Mckinney	75070 US	#####
Corey Pach Manchester	3103 US	#####
Novella Pat Prescott	86301 US	#####
Patricia Cor Elmer	8318 US	#####
Marco Mur Indianapolis	46254 US	#####
Ben Rosenl Yucca Valle CA	92284 US	#####
tizzy . Douglasville	30135 US	#####
Xiomara Ta Mesquite	75149 US	#####
Camila Her Spring	77386 US	#####
Sarahy Aya Waukegan	60087 US	#####
cesar narva Englewood	7631 US	#####
Sha Madde Milton	32571 US	#####
Claire Robe Cincinnati	45217 US	#####
Helena Edd Denver	80216 US	#####
Allison Leo Vista	92084 US	#####
Luisa Loper Winthrop	2152 US	#####
Jennifer Ne Bellwood	60104 US	#####

Nicolette S Maplewood	7040 US	#####
Kylie Ogle Edmonds	98020 US	#####
Adriana Wi Loveland	45140 US	#####
Dulce o Greenville	16125 US	#####
Morgan Bri Port Orange	32127 US	#####
Matthew N Chelsea MA	2150 US	#####
Josey Graci Rowland Heights	91748 US	#####
Michael Ch Harwich	20019 US	#####
Ann Steinr Juneau	99801 US	#####
Cesar Romi Los Angeles	90033 US	#####
Anayah Thc Hanford	93230 US	#####
Maria Lassr Denver	80203 US	#####
Deisy Santc Chico	95973 US	#####
Havana Gle Los Angeles	90042 US	#####
Yanira Mat Duncanville	75116 US	#####
Katie C Marietta	30062 US	#####
Taylor Mar San Francisco	US	#####
Jacky Pascu Fresno	93702 US	#####
Em Perez Lancaster	93535 US	#####
H A	32907 US	#####
Annette St: Coos Bay	97420 US	#####
brenda cas Oxnard	93033 US	#####
Miles Haro Lacey	98516 US	#####
Joshua Star Lake Zurich	60047 US	#####
Izabell Mer Anaheim	92825 US	#####
MaKayla Al Houston	77084 US	#####
Miguel Flor Riverside	92505 US	#####
Raven Bass Akron	44319 US	#####
Emily O'Ne Rincon	31326 US	#####
Kevin Anay Ceres	95307 US	#####
Cheyenne / Charlotte	28206 US	#####
SAMUEL Pa Daly City	94015 US	#####
Ellie Szul North East	16428 US	#####
Quin Cavaz Alameda	94501 US	#####
Nancy Kellc Corning	96021 US	#####
Finn Hunde Kailua	96734 US	#####
Laura Ferre Hollywood	90068 US	#####
Abraham C Hayward	94541 US	#####
Yeligssa Ap West Covina	91791 US	#####
Chey Willia Seattle	98105 US	#####
Fresia Men Salinas	93905 US	#####
Isabel Cam El Monte	91732 US	#####
Alexis Flore Ontario	91762 US	#####
Shailynne E Riverton	82501 US	#####
Liliana Mat Comodoro Rivadavia	9000 US	#####
Madison Si Rancho Cucamonga	91737 US	#####
aaron collir Wahiawa	96786 US	#####

Valerie Leo monroe	8831 US	#####
Nohemi Pa La Puente	91744 US	#####
Michelle N Santa Clara	95051 US	#####
Ary-Anna S Bronx	10456 US	#####
Alyssa Villa San diego	92109 US	#####
Brooks Wa Littleton	80127 US	#####
Jessica East Stephenville	76401 US	#####
Belen Card Guttenberg	7093 US	#####
Karra Ross Firebaugh	93622 US	#####
Sofia Stone Larkspur	80118 US	#####
Maite Paez Miami	33167 US	#####
Emily Carra Palatine	60067 US	#####
Darby Meri Charleston	29492 US	#####
Samantha S Kitty Hawk	27949 US	#####
Kathryn Scl Dahlonga	30533 US	#####
octavian n Harvey	70058 US	#####
Barbara Sn Lakeland	33803 US	#####
RC Bukows RIVERSIDE	60546 US	#####
Maci Newe Streamwood	60107 US	#####
andrea ald Houston	77089 US	#####
Tyler Tarpey	US	#####
Jacky Marti Laredo	78046 US	#####
Cameron L Sparta	7871 US	#####
Sgsjab Hdjs San Francisco	94016 US	#####
Saniya Witi Albany	31707 US	#####
billy collins Oneida	13421 US	#####
melanie es Oxford	36203 US	#####
Felix Guerr Yucca Valle CA	92284 US	#####
Aku Omani Yucca Valle CA	92284 US	#####
Dimitrios G Yucca Valle CA	92284 US	#####
Darrell Gib Hoboken	7030 US	#####
rebecca lov Los Angeles CA	90042 US	#####
Stephen Pr Twentynine CA	92277 US	#####
Rebecca Cc Running Sp CA	92382 US	#####
Lori Waetzi Yucca Valle CA	92284 US	#####
Jim Mastro Trumbull CT	66611 US	#####
Rose Cesar Belmar NJ	7719 US	#####
Neil Sturm Salt Lake City	84109 US	#####
Jennifer Cerezo	US	#####
Deborah W Greencastle	46135 US	#####
Hailey Enni Los Angeles	90006 US	#####
Susan Ullo Crestline	92325 US	#####
Margaret L Thermal CA	92274 US	#####
Jacqueline Glendora	91741 US	#####
Julie Besen Oak Lawn	60453 US	#####
Naima wils Los angeles CA	90046 US	#####
Aurora Gor San Francis CA	94127 US	#####

John Diamc Indio CA	92203 US	#####
Jaber Sulier Yucca Valle CA	92284 US	#####
Tony Coop Tallahassee FL	32304 US	#####
Eric Saulnie North Attle MA	2760 US	#####
Channin Sn Enterprise	36330 US	#####
Francie Sch Austell GA	30106 US	#####
Daniel Robi Mckinleyville	95519 US	#####
Courtney R Newport	37821 US	#####
Tiarrah Bug Layton	84041 US	#####
Kaleb Zewdu	US	#####
Maile Sera Oakland	94610 US	#####
Tena Petro Yucca Valle CA	92284 US	#####
Alexander I Twentynine CA	92277 US	#####
Matthew B Panama City Beach	32413 US	#####
Mary Ellen Oak Ridge	37830 US	#####
Amanda Hc Herriman	84096 US	#####
Katherine \ Eureka	95502 US	#####
Anthony M Portland OR	97222 US	#####
Stacy VerBi San Mateo CA	94403 US	#####
Hanneke Kl Amstelveen	1181 US	#####
Jonathan B Pensacola	32514 US	#####
Maria Luz C Los Angeles	90011 US	#####
Emma Mos Commerce	75428 US	#####
Bailee Lintc Fort Wayne	46814 US	#####
Gregory M: Lafayette	7848 US	#####
IRYNA SHE POWAY	92064 US	#####
Martin Her Chicago	60609 US	#####
Tiffany Tou Pataskala	43062 US	#####
Da Sheep Lacombe	70445 US	#####
Julia Smith San Antonio	78216 US	#####
Andrew Stc Saco	4072 US	#####
Yvette Y Sherman O CA	91423 US	#####
Christian T: Studio City CA	91602 US	#####
Heidi Yousc Encino CA	91316 US	#####
Nicole Hoe Minneapolis	55116 US	#####
Heather Sc Winchester	92596 U.S. Outlyir	#####
sandra her: fremont CA	94539 US	#####
Riley Jose Waianae	96792 US	#####
Korinne Ta Palm Deser CA	92260 US	#####
Vivian Woc Altadena CA	91001 US	#####
Chad koep Nashville TN	37216 US	#####
Anthony Ve Cathedral C CA	92234 US	#####
Daniel Bald Hemet CA	92545 US	#####
ERIC LAWS Fontana CA	92337 US	#####
Gerson Gor Fontana CA	92337 US	#####
Dakotah Gi Los angeles	90015 US	#####
Sophia Gar El Centro CA	92243 US	#####

Alex Pujol	Visalia	93277	US	#####
Ana Smith	Tustin CA	92780	US	#####
ivan pialesi	prato	59100	Italy	#####
Alexandria	Milwaukee	53214	US	#####
Juan José A	Madrid	28013	Spain	#####
Elizabeth K	Joshua Tree CA	92252	US	#####
Patricia Vrt	Fort Smith AR	72904	US	#####
Angelo Mo	Los Angeles	90016	US	#####
Erin Willian	Tacoma	98403	US	#####
Keely Shaw	Lake Helen	32744	US	#####
Delecia Wh	Fairburn	30213	US	#####
Lisa Harper	Nampa ID	83316	US	#####
Fabio Losur	Los Angeles CA	91606	US	#####
Faby Diez	Los Angeles CA	90059	US	#####
Alan SHAPI	Pacific Palis CA	90272-201	US	#####
leticia past	upland CA	91786	US	#####
Johanna Li	Glendale CA	91203	US	#####
Janis Clarke	Palm Deser CA	92260	US	#####
Tom Biggin	Austin TX	78745	US	#####
Lori Smith	Cathedral CA	92234	US	#####
Victoria Fis	Canoga Par CA	91304	US	#####
Randy Voss	Los Angeles CA	90068	US	#####
Joan How	Luton	LU3 2PU	UK	#####
Erik Haig	Sun Valley CA	91352	US	#####
Jay Redd	Santa Moni CA	90401	US	#####
Bryn Pelleg	Las Vegas NV	89106	US	#####
sasha chos	Garden City	48135	US	#####
Stacy Sanct	Avondale	85323	US	#####
Sophie Dia	Upland	91784	US	#####
Jacqueline	Powder Springs	30127	US	#####
Victoria Sn	Portsmouth	23701	US	#####
Melodi Gul	Los Angeles	90066	US	#####
Katherine E	Hayfork	96041	US	#####
Jeremy Far	Hollister	65672	US	#####
yusuf syed	Concord	28025	US	#####
Jessie Ellisc	Portsmouth	23703	US	#####
Amber Roll	Davison	48412	US	#####
Marjorie Kr	Venice	90291	US	#####
Peyton Lau	Pittsburgh	15237	US	#####
Benjamin R	Frostburg	21532	US	#####
Nelson Gor	San jose	95112	US	#####
Brianna Mu	Newark	7106	US	#####
Sophie Grir	Eureka CA	95503	US	#####
Nancy Hecl	Santa Mari CA	93454	US	#####
Adian Figu	Kissimmee	34741	US	#####
Sheylatain	Honolulu	96818	US	#####
Rhaiza Rive	Corozal		US	#####

Ana Torres Bayamon	US	#####
Alejandra F Atlanta	30317 US	#####
Isabel Fern Brunswick	31525 US	#####
Julianne Bc Ponce	US	#####
Natalie San Vega Alta	US	#####
deborah sn Sun city west	85375 US	#####
Coral Oterc San Juan	US	#####
Juan Mand Humacao	US	#####
Elein Freire San Juan	927 US	#####
Taisha Rive Humacao	US	#####
Auggie Esq South Gate CA	90280 US	#####
Kai R	US	#####
Mariana La Ponce	US	#####
Esteban Fa Dorado	646 US	#####
Shannia Se Delray Beach	33445 US	#####
Giovan Vaz San Juan	US	#####
Jeannette I Las Marias	US	#####
Tyson Grah Grass Valle CA	95945 US	#####
Mariluz Riv Waterbury	6704 US	#####
Carmin Bas Brooklyn	11222 US	#####
María Vict Guaynabo	966 US	#####
Robin Ham Westlake V CA	91361 US	#####
Laurie S West Holly CA	90069 US	#####
shelby wint indianapolis	46220 US	#####
Johnathan Sacramento CA	95821 US	#####
Elizabeth O Puerto Rico	687 US	#####
John Flavin Woodland CA	91367 US	#####
Night Fores Berkeley CA	94702 US	#####
Josué Zaya Bayamon	US	#####
Yolanda Cri Bayamon	US	#####
Jasmin Quil Palm Deser CA	92260 US	#####
Carmi River Barranquitas	794 US	#####
Calle Ander Chico CA	95928 US	#####
Jo Dee Pres huntington CA	92847 US	#####
Melissa Mc Palm Spring CA	92264 US	#####
John Medir Tarzana CA	91356 US	#####
George Lev Los Osos CA	93402 US	#####
Jennifer Ankele	US	#####
jessiaha ad Somerville MA	2144 US	#####
Genesis Ur Huntington CA	90255 US	#####
Marin Xiqu Mill Valley CA	94941 US	#####
Tamar Lore Ibiza	7800 Spain	#####
Isabel Perg San Francis CA	94127 US	#####
Kylan Soutl Claremore	74019 US	#####
Robert Jacc San Francis CA	94116-174 US	#####
Xanthe Saa Petaluma CA	94952 US	#####
Linda Hunt San Marco CA	92078 US	#####

Joy Turlo Redondo B CA	90277 US	#####
Patricia Bui Los Angeles	90066 US	#####
Tammy Las Carpinteria CA	93013 US	#####
Mayra Carl Chino CA	91710 US	#####
Cindy Jaska Tehachapi CA	93561 US	#####
Kristen R San Leandr CA	94577 US	#####
Evelyn Furr Riverside CA	92508 US	#####
Angie Jone: San Diego CA	92122 US	#####
Elise Son Monterey CA	93940 US	#####
michael mc Menlo Park CA	94025 US	#####
Victoria Sel Landers CA	92285 US	#####
Jose Varga: Woodland CA	91367 US	#####
Joy Doerza Sylmar CA	91342 US	#####
Blake Roth: Oakland CA	94610 US	#####
Cristina Go Mission Vie CA	92691 US	#####
Kimberly A Los Angeles: CA	90068-403 US	#####
Megan Jam Los Angeles: CA	90029 US	#####
theresa mil San Pedro CA	90731 US	#####
Mitchelle P Barstow CA	92311 US	#####
Beth Hight: San Jose CA	95129 US	#####
FREDERICK Queens	11378 US	#####
Izzy Shahm Puyallup	US	#####
Lauren Wa Olathe KS	66062 US	#####
Jack Andol: Bayville	8721 US	#####
Willard Snc Cathedral C CA	92234 US	#####
Parisa Mor: New York	10118 US	#####
Booker Dar Setagaya-ku	154-0017 Japan	#####
Julie Mceland Cayce SC	29033 US	#####
Lamonique Allen	US	#####
Matt Benn: Minneapolis	55403 US	#####
Jaime O'De Viborg	57070 US	#####
Anita Brzez Las Vegas	89110 US	#####
Clark Hunt: Yucca Valle CA	92284 US	#####
Alex Valdiv Joshua Tre: CA	92252 US	#####
Lauren Sliv Joshua Tre: CA	92284 US	#####
Mary Effroi Yucca Valle CA	92284 US	#####
oliver segal Ann Arbor MI	48104 US	#####
Cody Valdiv Riverside CA	92509 US	#####
Taylor Thor Yucca Valle CA	92284 US	#####
Marley Anc Reno	89523 US	#####
Wendy You Bloomington	55841 US	#####
Aiyana Lim revere	1906 US	#####
Michael Os San Diego	92131 US	#####
Gloria Koo Los Angeles	90016 US	#####
Wendy Ma North Yarmouth	4097 US	#####
licas main Owensboro	42301 US	#####
Bonnie Bat Hawai'i HI	96703-084 US	#####

Joy Park Rowland Heights	91748 US	#####
Grace Cook Rowland Heights	91748 US	#####
Anthony Bl Rowland Heights	91748 US	#####
Adrienne N Walnut	91789 US	#####
Vo Nguyen Walnut	91789 US	#####
michelle ch Bloomington	92316 US	#####
Julian Sanc Covina	91722 US	#####
Rachel Lau Amherst	1002 US	#####
Zoe Dagan Morongo V CA	92256 US	#####
Janine Schc Vista CA	92084 US	#####
Rene Branc Cerritos	90703 US	#####
Christian S; Walnut	91789 US	#####
Annika Jagl Ann Arbor	48103 US	#####
Susan ONe Yucca Valle CA	92284 US	#####
sarah zhan; Walnut	91789 US	#####
Edward W; Walnut	91789 US	#####
Marc Lozar South Gate	90603 US	#####
Miguel San Parkland	33076 US	#####
Vanessa Cu Palm Deser CA	92211 US	#####
Willy KUO 20515 Lake Canyon Dr	91789 US	#####
Yu Zhao Pleasanton	94588 US	#####
zhaoliang x Walnut	91789 US	#####
Deborah S; San Lorenzo	US	#####
Lorna Ramos	US	#####
Steph Cron Joshua tree CA	92252 US	#####
Santa Erika Brooklyn NY	11234 US	#####
Deborah Pc Yucca valle CA	92284 US	#####
Arnquist Sc Pilot Point TX	33178 US	#####
Lindsay Kin Rockville	20847 US	#####
Erina Hsu South Gate	90280 US	#####
James Trun Chicago	60007 US	#####
victoria gau Georgetown	78628 US	#####
Haydee Esc Miami	33176 US	#####
Jackie Gon; San Antonio	78244 US	#####
Sheila Cylc Tampa	33622 US	#####
Theresa O; Liverpool	13088 US	#####
Kristina Gre Knox	46534 US	#####
Janie Morb Knightdale	27545 US	#####
Jesus Chav; Los Angeles	90023 US	#####
j howell Los Angele: CA	90065 US	#####
george cos: Los Angele: CA	90009 US	#####
Dominic Bu Los Angeles	90033 US	#####
Dora Trevir New Braunfels	78132 US	#####
michael he north bend	98045 US	#####
Tara Roque brick	8724 US	#####
Christophe Pleasantville	10570 US	#####
Yana Pirum Tacoma	98411 US	#####

Macy Ciriac San Francisco	94133 US	#####
Don Cianell Newtown Square	19073 US	#####
Rachel Lou Mountain View	94040 US	#####
Debbie E Felton	19943 US	#####
Peter Kahig Haverhill	1832 US	#####
Jovonne Gr Eufaula	36072 US	#####
John Sarna North Little Rock	72118 US	#####
Julie Morgz Fort Jones	96032 US	#####
Shannon Le Edwardsville	62025 US	#####
Laurie Ellis Port Charlotte	33952 US	#####
Peter Koch Ladera Ranch	92694 US	#####
andrew Ru marengo	60152 US	#####
christine re whitehall	18052 US	#####
Katelynn H Queensbury	12804 US	#####
Kevin Blair Madison	7940 US	#####
jerry tuckel ludlow	60949 US	#####
Sophia Z Baltimore	21230 US	#####
Melissa He Mckinney	75070 US	#####
Jamey Wat Atlanta	30305 US	#####
Jennifer Ml Saint Louis	63130 US	#####
Natalie Var Omaha	68102 US	#####
Linda Ande Indianapolis	46260 US	#####
Robyn Mer Melbourne	32904 US	#####
Kyle Cousir Richmond	77406 US	#####
Sandi Mille Pasco WA	99301 US	#####
莱利 教区 Mt. Vernon	62864 US	#####
Nicole Mar San Francis CA	94121 US	#####
Linda Freer Yuba City	95991 US	#####
Marilyn Ra Nashville	37215 US	#####
Tamitha Th Belpre	45714 US	#####
Lillie Christ Salt Lake City	84109-332 US	#####
Staci Brunn Amherst	44001 US	#####
Tiffany Mo Salt Lake City	84047 US	#####
Matt White Fort Sill	73503 US	#####
karen moo Lorain	44052 US	#####
Tate Ander Orem UT	84058 US	#####
Gabriela Sa Palm Desert	92260 US	#####
David Sifue Indio CA	92203 US	#####
Tierra M San Leandro	94578 US	#####
Zed Hawk Brooklyn NY	US	#####
Linda King Guilford	6437 US	#####
Deborah K Phoenix	85016 US	#####
alan chen San Gabriel	91775 US	#####
Malinda Jei Columbus	47203 US	#####
Chris Carbc Torrington	6790 US	#####
Tian Sun Marietta	30068 US	#####
Imelda Zar Indio CA	92203 US	#####

Rana Bozor La Mesa	CA	91942	US	#####
FRANCO PE Manhattan	NY		US	#####
Eva Alvarez Desert Hot	CA	92240	US	#####
Briana Mye Mount Sterling		40353	US	#####
mackenzie Cypress		77433	US	#####
Maraij San Milledgeville		31061	US	#####
Leif Kerche Evansville		47710	US	#####
Charlene R Los Angeles		91780	US	#####
Kinjal Govil			US	#####
Kimberly M Desert Hot	CA	92241	US	#####
Nancy Woc Yucca Valle	CA	92268	US	#####
J Miller Phoenix	AZ	Zgh	US	#####
Martin Run Santa Clarita		91350	US	#####
Lora Kemp Spencer		47460	US	#####
Claire Whe Charleston		25314	US	#####
Craig Miller Dallas		75287	US	#####
Molly Rynn Secaucus		7094	US	#####
Susan Stou Conroe		77304	US	#####
Kaelynn Da Chatham		3813	US	#####
September Frost			US	#####
Nate Caron Somerville		2144	US	#####
Devan Hes Collegeville		19426	US	#####
Harrison Be Bell Gardens		90201	US	#####
Raybe Lucr The Bronx		10453	US	#####
Miki Hertog Lebanon		3766	US	#####
James Clan Boston		2115	US	#####
Mike Karpe Hampton		3842	US	#####
Olivia Ridle Baldwin		4091	US	#####
Padraic Gif Petaluma		94954	US	#####
Michele Hc madison		3849	US	#####
Tracy Aldric Corinth	MS	38834	US	#####
Dave Good Farmington		6032	US	#####
Lili Powers Charlestown		2129	US	#####
ishewish di Merrimack		3054	US	#####
ella R Plymouth		3264	US	#####
Isabella Pilkey			US	#####
Stuart John Portsmouth		3801	US	#####
Tony Marir Scottsdale		85260	US	#####
David Long Hiram		4041	US	#####
Ashley Pier Carver		2330	US	#####
hanna kunl Thompson		6277	US	#####
Morgan Richardson			US	#####
Nicholas Le Hamburg		7419	US	#####
Charlie Cor Newmarket		3857	US	#####
Ashley Hari Laconia		3246	US	#####
Riley Gillmer			US	#####
Scott Aldric Lisbon		3585	US	#####

Sophia gemmiti	US	#####
Joseph Rot New York	10025 US	#####
Tim Donne Yarmouth	4096 US	#####
Devin Lamç Lee	3861 US	#####
Luke Beard Dorchester	2122 US	#####
areanna sy pittsfield	3263 US	#####
Jacob Garsi Henniker	3242 US	#####
Luke Babic: Medway	2053 US	#####
tate therrie Bristol	5443 US	#####
Emily Mine Concord	3301 US	#####
Adelaide Lç Burlington	5401 US	#####
Christine D Boston	2111 US	#####
Sam Graha Manchester	3104 US	#####
Lauren Rob Milford	3055 US	#####
Matthew S -	3263 US	#####
Joseph Bar Berlin	3570 US	#####
Vanesa Simr Chicago	60605 US	#####
Garrison Pl Moultonborough	3254 US	#####
Ava Crumb Exeter	3833 US	#####
Meghan Vc Carpinteria	93013 US	#####
Robert Sipl Yucca Valle CA	92284 US	#####
Adam Balor Bartlett	3812 US	#####
Carmen Du Portsmouth	3801 US	#####
Chris Iannu Manchester	3103 US	#####
Jordyn Mec Norway	4268 US	#####
Randall Wiç Fryeburg	4037 US	#####
Haiden Joe Newmarket	3857 US	#####
Teddy Bake Burlington	5401 US	#####
Crystal Vog North Providence	2911 US	#####
avalon brov Barrington	3825 US	#####
Ella Ronci Plymouth	3264 US	#####
April Bright Yarmouth Port	2675 US	#####
Grady Dion Newmarket	3857 US	#####
Suzanne W Acton	1720 US	#####
Caroline Lu Portsmouth	Random US	#####
K. Murphy Juneau	99801 US	#####
mark bette Center Conway	3813 US	#####
Maverick Z Hudson	1749 US	#####
Chris Laubç Bedford	3110 US	#####
Billy Spider United Kingdom	27845 US	#####
Joshua Dov Webster	3303 US	#####
Benjamin B Suffield	6078 US	#####
Danielle Ril Bloomfield	6002 US	#####
Gretchen R RAYNHAM	2767 US	#####
Dave Harro Hauppauge	11788 US	#####
Denali Brac Plymouth	3264 US	#####
Jennifer Tri North Port	34286 US	#####

Leonie Free Sandown	3873 US	#####
Juliana Sieg Miami	33102 US	#####
Benjamin C Milford	1757 US	#####
Elena Rios Cranston	2910 US	#####
Angela Mui Manchester	3102 US	#####
Meg James Campton	3223 US	#####
Eric Fourni Waltham	2453 US	#####
Rebecca Bæ Hooksett	3106 US	#####
tom schwa orford	3777 US	#####
Stephen Væ Gambier	43022 US	#####
Bridgette N North Conway	3860 US	#####
Nicola Vruv Desert Hot CA	92241 US	#####
Annmarie C Richmond Hill	11418 US	#####
Jay Spring Worcester	1610 US	#####
Jason Perræ NorthAdams	1247 US	#####
anne ellis port charlotte	33952 US	#####
John Adam Tuscaloosa	35401 US	#####
Alyssa Lunc Belchertown	1007 US	#####
Kayla Kach East Brookfield	1515 US	#####
Dino Zabiai Pittsfield	1201 US	#####
molly palor Campton	3223 US	#####
Kevin Guille Springfield	5156 US	#####
Jayna Guer Berlin	3570 US	#####
Jocey Mart Conway	3813 US	#####
Leah Dunw Chester	3036 US	#####
JASON SLA' Yucca Valle CA	92284 US	#####
Carrie Gou Corona CA	92880 US	#####
Ron Smith Los Angele: CA	90059 US	#####
ROBERT Sc Yucca valle CA	92284 US	#####
Kelly Murp Ashland	1721 US	#####
jacey benw Groveton	3582 US	#####
Chris Biniel Denver CO	80515 US	#####
Emily Tang Gorham	3581 US	#####
Cheryl Boo Los Angele: CA	90029 US	#####
Hilary Sloar Yucca Valle CA	92284 US	#####
Ella Crowe London CA	92284 US	#####
Kate Short Riverside CA	92505 US	#####
Ethan Keni Barnstead	3218 US	#####
Dave Salon Miami	33157 US	#####
Kristian Go Marshallbe NC	28553 US	#####
Justin Repk Cheshire	6410 US	#####
Tanner Ret Atlanta GA	30317 US	#####
Mato Tatu Yucca Valle CA	92284 US	#####
Lisa Daniel Greensborr NC	27405 US	#####
Marie Bobi Yucca valle CA	92284 US	#####
Shanna Val Riverside CA	92509 US	#####
Kyle Andre Granby	80446 US	#####

L Starr Greensboro NC	27405 US	#####
Rebecca W Greensboro NC	27409 US	#####
Evelyn Zam Austin	78745 US	#####
karyna varę Keene	3431 US	#####
Nino Ficara Yucca valle CA	92284 US	#####
Kaitlyn Russell	US	#####
John Bertrę Los Angeles CA	90027 US	#####
Taylor Rogę Hudson FL	34667 US	#####
Ian Sinclair Los Angeles CA	90004 US	#####
Arlen Bohr Melvindale MI	48122 US	#####
Paloma Corę Cincinnati OH	45223 US	#####
Sidney Hillę West Chester OH	45069 US	#####
Michaela D Seattle WA	98101 US	#####
Maria Rosa Tacoma	98445 US	#####
Bret Giampę Frankfurt	60423 US	#####
desiree boę Dayton	4005 US	#####
Azora Simmons	US	#####
Patricia My York Village	3909 US	#####
Samantha I Naugatuck	6770 US	#####
Lisa Meiser Berlin	3570 US	#####
Elaine Chruę Somerville	8876 US	#####
Elena Yuę Joshua Tree CA	92252 US	#####
Donna Shelę Claremont	3743 US	#####
Joseph Stolę Chicago	60602 US	#####
Karen Charę Dorchester	2122 US	#####
Morgan Jacę Milton	32570 US	#####
David Galleę Dallas	75211 US	#####
Dan Madisę Franklin	3235 US	#####
Abby Irwin	US	#####
Iris Bautistę Fairfield	94533 US	#####
Tammy Roxę Brainerd	56401 US	#####
Zed Trickę Brooklyn NY	US	#####
Deborah Gę Salt lake city	84109 US	#####
Jack Nguyeę Williamsport	17701 US	#####
TERESA OLę Livermore Falls	4254 US	#####
Maria Specę Denver	17517 US	#####
Tami Navarę Modesto	95350 US	#####
Morgan Lelę Carlisle	17013 US	#####
Maria Herrę Bronx	10460 US	#####
Alex Idkę Schenectady	12308 US	#####
Christine C. Murfreesboro	37127 US	#####
austin vanę Concord	3301 US	#####
Kelly Heslirę Vergennes	5491 US	#####
Nikita Haasę Chicago	60660 US	#####
sandra allę mitchellville	50169 US	#####
max Thomę Pioneertown CA	92268 US	#####
joanna mazę Howell	48843 US	#####

Marla Surg Chesapeake Beach	20732 US	#####
Savannah \ Tacoma	98406 US	#####
Jennifer Co Eules	76039 US	#####
Elizabeth T Lexington	40517 US	#####
Laura Hack Pasadena CA	91103 US	#####
Nadia Niev Mansfield	76063 US	#####
Charles Ca Twentynine CA	92277 US	#####
Dee Hende Edinburgh	EH1 UK	#####
Tyler Greer San Diego	92130 US	#####
Esther Geo Sunnyvale TX	75182 US	#####
Jill Aubin Mountain Iron	55768 US	#####
Shakayla TI Compton	90220 US	#####
Cate Haslar Seattle	98122 US	#####
Christophe Raleigh	27610 US	#####
Rollin Bens Central	29630 US	#####
Mayra Zuni Saint Paul	55112 US	#####
Richard Boi Rancho Pal CA	90275 US	#####
Juanita Boi Rancho Pal CA	90275 US	#####
Karen Patr Saint Paul	55128 US	#####
giffin chees Eudora	66025 US	#####
Christine H Newburypc MA	1950 US	#####
rita kovshu Aurora	80013 US	#####
Robert Ing Tampa	33618 US	#####
Jack Kline Lancaster	17601 US	#####
Brittney Di Sarasota	34236 US	#####
Gwenever Lebanon	45036 US	#####
Zote the Lobster	US	#####
Ella Douthi Portland	97221 US	#####
Joy Bryson Coachella CA	92236 US	#####
Tory Prestc Yucca Valle CA	92284 US	#####
Mary Bren Yucca Valle CA	92284 US	#####
Douglas Re Flamingo H CA	92284 US	#####
Nadia Khan	US	#####
Martha No Redondo B CA	90277 US	#####
Cassidy Coi Latta	29564 US	#####
Linda Iacha Ontario CA	91761 US	#####
Jaylen Brag San Antonio	78239 US	#####
Tiffanie Thr Sacramento	95825 US	#####
Raechel Do Landers CA	92285 US	#####
Jennifer Pri Los Angele: CA	91214 US	#####
Raul ORTEC Salt Lake Ci UT	84118 US	#####
Gilbert Pirc Riverside CA	92508 US	#####
Ivana Ford Flamingo H CA	92284 US	#####
Deborah Pt Yucca valle CA	92284 US	#####
Vanla Forre Wilson NC	27893 US	#####
Betty Kerr Tucson AZ	85706 US	#####
Juan Benite Los Angele: CA	90034 US	#####

Julianne M Landers	CA	92285	US	#####
Jessica Hue	Los Angeles: CA	90065	US	#####
Julie Unter	Agoura Hill CA	91301	US	#####
Dale Pfarr	Cathedral C CA	92234	US	#####
Craig Swift	Hayfork CA	96041	US	#####
Avishi Das	Flower Mound	75028	US	#####
John Cleme	Landers CA	92285	US	#####
Khrystina L	Landers CA	92286	US	#####
Camila Gar	Sydney	2000	Australia	#####
kerry drozc	Yucca Valle CA	92286	US	#####
Lynn Fonta	Yucca Valle CA	92284	US	#####
Liz Re	Cahors	46000	France	#####
Taylor B	Statesville	28117	US	#####
Leslie Burkl	Landers CA	92285	US	#####
Naomi Jon	Portland OR	97267	US	#####
Shelly Fred	Yucca Valle CA	92284	US	#####
Lorraine Da	Yucca Valle CA	92284	US	#####
Mohamma	Baltimore	21210	US	#####
Asher Little	New York	10118	US	#####
Carole Coff	Pomona CA	91767	US	#####
William Ga	Van nuys	91405	US	#####
Alissa Polsh	Hamden	6514	US	#####
Tiffany Ant	Long Beach CA	90806	US	#####
Payton Tho	Etta	388627	US	#####
Nohely Bar	Desert Hot Springs	92240	US	#####
Jessica Burj	Temple	30179	US	#####
gypsy dora	Washington	20001	US	#####
Annie Starl	Mount Royal	8061	US	#####
Trinity Mar	Elberfeld	47613	US	#####
Jaquea Jacl	Anderson	29621	US	#####
Max Wilde	Tulsa	74137	US	#####
Jadyn Shep	Maringouin	70757	US	#####
Aryana LeC	Kingsland	31548	US	#####
Sidra Rasul	Orlando	32835	US	#####
riley le pog	Woodland	98674	US	#####
Ella Battso	Cincinnati	45231	US	#####
Aldo Herna	New York NY	10009	US	#####
Jeff Saunde	Corunna	48817	US	#####
Jasmina Ab	Detroit	48221	US	#####
John Collin:	Dubuque	52001	US	#####
Felix Byrne	San Diego	92130	US	#####
William Git	Los Angeles: CA	90815	US	#####
alex aleco	Pittsburgh PA	15206	US	#####
Kim White	Yucca Valle CA	92284	US	#####
Bryan Hall			US	#####
Mekeyla L	Buford	30519	US	#####
Ella Anders	Albert Lea	56007	US	#####

Dana Torok Los Altos CA	94022 US	#####
Heather De Joshua Tre CA	92252 US	#####
Patricia We Yucca Valle CA	92284 US	#####
Jessica Gra Yucca Valle CA	92284 US	#####
Lauren We Manhattan CA	90266 US	#####
Logan Wei Riverside CA	92508 US	#####
Pam Whea Church Hill TN	37642 US	#####
Jaemi Littr St Louis MO	63124 US	#####
Chase McB Joshua Tre CA	92252 US	#####
Kelsey Bow Durango CO	81301 US	#####
Zachary Sze Falls Church VA	22046 US	#####
Lauren Eve Los Angeles CA	90017 US	#####
Gail W New York NY	10065 US	#####
G Valentin Sonora CA	95370 US	#####
Jessica Pier Virginia Be VA	23462 US	#####
Virginia Pie La Porte TX	77571 US	#####
Nicholas Rf Jersey City NJ	7302 US	#####
Zach Tulloc St. Louis MO	63124 US	#####
Michelle ar O'Fallon MO	63366 US	#####
Lauren Kau Butler NJ	7405 US	#####
James Kidd Landers CA	92285 US	#####
Lisa Blair Pinetop-Lal AZ	85929 US	#####
Raymond E Valley Villa CA	91607 US	#####
Alix Zielinsl Goodrich	48438 US	#####
Michael Ar Cincinnati OH	45206 US	#####
Brennan W LA CA	7407 US	#####
Ellen Weav St Louis MO	63119 US	#####
Jessica Gan Saint Peter MO	63376 US	#####
Chase John Enfield	3748 US	#####
Erin Ander Hollywood FL	33027 US	#####
Nat Brande Saint Paul	55124 US	#####
Andrew Mc Coachella CA	92236 US	#####
Emily Bert Framinghar MA	1701 US	#####
Susan Beto Los Angeles CA	90064 US	#####
Kate Shear Yucca Valle CA	92284 US	#####
James Brov Bloomingtc CA	92316 US	#####
Renee Mor Yucca Valle CA	92284 US	#####
Megan Mo San Francis CA	94109 US	#####
heather M Hemet CA	US	#####
Jeremy Lap Garden City KS	67846 US	#####
Ashlee Buc Hemet CA	92544 US	#####
Judy Masse London AZ	92284 US	#####
Katie Caray Joshua Tre CA	92252 US	#####
Charles Mc Yucca Valle CA	92284 US	#####
Tariq Chau London	US	#####
Howard Be Medford	97504 US	#####
Jo Ann Boll Yucca Valle CA	92284 US	#####

Sheryl Wise Pueblo CO	81005 US	#####
Brett Trim Garden Gr CA	92840 US	#####
Amanda Gr Riverside CA	92509 US	#####
Marilyn Mc Yucca Valle CA	92284 US	#####
Julia Calabr Portland OR	97213 US	#####
Lyndsi Hell Tustin CA	92780 US	#####
Randy Torr Pioneertow CA	92268 US	#####
Jonah Mes Crested Bu CO	81224 US	#####
Rachael Po Santee CA	92071 US	#####
Deuparo Jo White Lake MI	48386 US	#####
Kyla Biba Palm Spring CA	92264 US	#####
Alicia Carls Pompano Beach	33060 US	#####
Elizabeth B Landers CA	92285 US	#####
David Cost Orange CA	92867 US	#####
Cat Landry Redondo B CA	90278 US	#####
Linda Straw Cathedral C CA	92234 US	#####
Jenifer Palr Los Angele CA	90065 US	#####
Patti Berge Fontana CA	92335 US	#####
Mark Wilsc Nipomo CA	93444 US	#####
Letsee wha Morongo V CA	92254 US	#####
Aaron cribt Santa Mari CA	93455 US	#####
Michael En Cathedral C CA	92234 US	#####
Stephanie Nipomo CA	93444 US	#####
Alona Ding Whittier CA	92277 US	#####
Patrick Dav Landers CA	92285 US	#####
Beverly Bai Panorama CA	91402 US	#####
Zohifa Hani Buffalo	14216 US	#####
Ryan Cowle Yucca Valle CA	92284 US	#####
Morgan Wl Los Angele CA	90060 US	#####
Gregory Gc Yucca Valle CA	92284 US	#####
Emily Endo Cathedral C CA	92234 US	#####
Ellison Mor Kailua-Kona	96740 US	#####
Devyn Whi Yucca Valle CA	92284 US	#####

Biggs, Lupe

From: caroline partamian <caroline.partamian@gmail.com>
Sent: Thursday, April 21, 2022 6:29 AM
To: Morrissey , Jim
Subject: Re: Project # PROJ-2020-00191 Assessor Parcel Number (APN) 0629-181-01

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Jim Morrissey,

Thank you for your response. I linked the petition in my original email, but here it is as well.
<https://www.change.org/p/residents-of-flamingo-heights-saveflamingoheights>

We have been posting updates about it since last year since it was published when we originally received the letter.

The excel file is the only way of sharing the names with you (last year a PDF option was available when extracting a file, hence you getting my PDF last year). As you can see, the # of signatures has also grown since our exchange yesterday, and continues to grow.

Best,
Caroline

On Wed, Apr 20, 2022 at 12:53 PM Morrissey , Jim <Jim.Morrissey@lus.sbcounty.gov> wrote:

Good Afternoon;

Thank you for comments. You also attached an excel file with names. How was this list assembled and what written statement was provided to those who signed indicating what their names would represent. Thanks.

Jim Morrissey

Planner
Land Use Services Department
Phone: 909-387- 4234
Fax: 909-387-3223
385 N. Arrowhead Avenue, 1st Floor
San Bernardino, CA 92415-0187



Our job is to create a county in which those who reside and invest can prosper and achieve well-being.

www.SBCounty.gov

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From: caroline partamian <caroline.partamian@gmail.com>
Sent: Wednesday, April 20, 2022 7:58 AM
To: Morrissey , Jim <Jim.Morrissey@lus.sbcounty.gov>
Subject: Project # PROJ-2020-00191 Assessor Parcel Number (APN) 0629-181-01

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Jim Morrissey,

I hope you are taking the time to read through all the emails you are receiving about this project. As an adjacent property owner to the site, I am incredibly disheartened to find that this project is moving forward without a proper and diligent Environmental Impact Report. After reading through the Draft study, I was shocked by the outright dishonest work done to hastily try to pass this project through backchannels without the support or consultation with the surrounding community and with blatant disregard of the local ecological environment. I write here to impress upon you the disastrous effect this project will have on our lands as proposed, and hope that my voice along with the others of our community will manage to at the very least persuade the county to require a thorough and unbiased Environmental Impact Report before this project moves along any further. I have also attached pictures and coordinates of Desert Tortoises I have seen in the area along with a [petition](#) I started last year with nearly 4,000 signatures on it (more than a 1,000 more names than there were on it last year).

ENVIRONMENTAL HAZARD:

Firstly, this project should be abandoned, but if you must continue this process, we DEMAND a full Environmental Impact Report (EIR). This project is an environmental hazard to our fragile ecosystem. Mojave Desert Land Trust and the Center for Biological Diversity have both deemed this area in question a wildlife corridor. On page 27, the Initial Study claims that the project won't contribute to habitat fragmentation because permanent structures would not physically block wildlife migration. But building and human presence on the rim of the wash may very well dissuade wildlife species such as bighorn sheep, bobcats, and mountain lions from migrating through Pipes Canyon if those species are wary of any contact with humans.

There are hundreds of western Joshua trees (*Yucca brevifolia*) on the developable section of the property. Joshua trees are a state protected species being considered for listing as Threatened under the California Endangered Species Act. At this time, the County

cannot issue a permit to take (by removal or transplanting any individual) western Joshua trees. The contention on page 14 that there will be no impact to forestland because the trees will be moved elsewhere is pretty laughable - Joshua trees generally die after relocation, as do mature mesquites. Relocating a creosote ring destroys the prehistoric value of the plant. There are potential creosote clonal rings in excess of 4,000 years old on the site. Yucca clonal rings of similar age may exist.

A 2006 study by leading tortoise experts found seven adult desert tortoises on the developable section of the property. The proponents' recent study finding no tortoises is methodologically suspect. The Initial study claims "There are no desert tortoise occurrences documented on site or directly adjacent to it...Desert Tortoise are therefore currently absent from the Project Site." Neighbors near the site, including myself, have evidence to the contrary. Please see attached pictures - here are the photo credits and coordinates for each picture:

The first picture (by me)
Caroline Partamian
34.2115718, -116.4346062
May 30, 2020 6:14 PM

Next two pics:
By my neighbor Aili Schmeltz
34.21728, -116.43339
April 25, 2020, 9:21 AM

I have submitted these to the CNDD database. This information should be provided in a full Environmental Impact Report.

The study claims "LeConte's thrasher was neither observed nor detected on-site during the avian auditory and visual survey. Therefore, LeConte's thrasher is currently absent from the project site." However, community scientists have documented multiple observations of LeConte's thrasher within a mile of the site in the last three years. Though they're not strong fliers, they do so on occasion, and it's hard to imagine a local population not taking advantage of a square mile of habitat. This information should be provided in a full Environmental Impact Report.

The study also doesn't offer any details about the survey: how long was it? How many observers? What time of year? What were the conditions?

Other wildlife species using the site include burrowing owls, coyotes, black-tailed jackrabbits, migratory bird species, badger, bobcats, desert kit fox, Gambel's quail, and Bendire's thrasher.

VISUAL IMPACT

The proposed project would have a severe visual impact on scenic vistas. I am an adjacent property owner to the glamping project proposal and bought property in Yucca Valley a few years ago as to avoid the gross overbuilding I encountered in San Francisco and Brooklyn during my times living there in the last ten years. The high desert is special and this project would strip it of its many peaceful and visual wonders. Please keep in mind that just because something is up to code and compliant with zoning ordinances it does NOT mean there's no significant visual impact.

LIGHT POLLUTION

The proposed project would cause terrible light pollution. The report's specifications on night lighting is not specific enough and my neighbors and I do not want this to effect our dark night skies. The county says that new light pollution and glare from the glamping site will not constitute a significant impact because the project will abide by the recently revised light trespass ordinance in San Bernardino County. The point of the light trespass ordinance was to establish basic minimum standards to prevent glare and light trespass, leading not only to darker skies but also increased public safety. While the ordinance *will* reduce the impact of existing lighting as it is phased in, it does *not* mean new construction in a formerly dark area will not introduce a new source of light where none existed before. Again, simple compliance with the law is NOT equivalent to no impact. Also, 12 feet in height for pole lighting does not guarantee compliance with the light trespass ordinance. The light sources will still be visible from neighboring properties, and (dangerously) from the highway.

AIR QUALITY:

Air quality impacts from visitor traffic are based in the initial study on an assumption of 20 vehicles per hour for a total of 200 vehicle trips. However, this assumes not only that visitors will arrive at times staggered throughout the day, rather than within a few hours on a Friday night (and similarly leaving on Sunday morning) but also that once arrived, visitors will not make multiple trips to Joshua Tree NP, to Pioneertown, to Coachella or even a few hundred yards up the road to La Copine. Given that the proponents expect a maximum visitorship of 300 and as many as 50 seasonal employees arriving at the site each day, 200 vehicles may be a conservative estimate. There is a number missing from the narrative on page 19 in the Air Quality section, in which the first paragraph ends "However, the distance to the proposed campground improvements are approximately (insert number) feet." This could be used to

bolster the point that this document was prepared hurriedly and with no real attention to detail. The Helipad is mentioned in the beginning of the document (page 2) as taking up 7,854 square feet, but emissions from helicopters are not mentioned in the air quality section. Dust from construction, with wind, would be hazardous to the surrounding human community and wildlife

TRAFFIC SAFETY

Route 247 is a dangerous high-speed highway. Adding a destination which hundreds of vehicles (primarily of tourists who are not used to driving on the 247) will be entering and exiting on a particularly hazardous stretch of the road is a bad idea. For all the trips listed in my previous section on Air Quality (JTNP, Pioneertown, etc.) there would be more traffic coming into these places too that also have roads with traffic incidents (e.g. Pipes Canyon Road). First responder response times can be lengthy. Safety would require adding an additional lane and even a vehicle-controlled stoplight. A traffic study is warranted.

In the last five years there have been more than a dozen accidents in the stretch of highway between Aberdeen and Reche that were serious enough to have had first responder involvement. Adding more than 100 cars exiting and entering the highway here during busy hours will prove dangerous, especially given drivers who pick up speed once they emerge from Pipes Canyon south of the project. A thorough traffic study, dedicated turn lanes, and perhaps a stop light should be considered if the project goes forward. The likelihood of extra costs to the county for first responders should be assessed. We demand you do a traffic report.

The importance of this cannot be overemphasized. Additional traffic on a high-speed two lane cannot be treated with this level of disregard.

NO AMENITIES OPEN TO THE PUBLIC

This site is being proposed without any concern or care for its surrounding community. According to the Notice of Availability sent out to neighbors, Glamping "destination resort" with support facilities, none of which are to be open to the public, including restaurants/bar, reception area/store, trails and paths, recreation buildings, and helipad on a 25-acre portion of a 640-acre parcel.

Furthermore, community members were given assurances that the music festival venue, helipad, restaurant and bar would be excluded from the project plan. Only the amphitheater has been dropped. The helipad is mentioned only once, in a description of the square footage of the physical plant. Similarly with the bar and restaurant, which would at the very least generate food waste that offers a potential subsidy to raven and other animals that may affect populations of sensitive species such as the desert tortoise.

How does this project positively impact our community at all? There is obviously no consideration for the neighbors.

FIRE SAFETY:

There is inadequate analysis of fire safety in the report. Winds get up to 20mph and upwards of 80mph in this proposed area. Pipes Canyon is a natural break in the mountains through which high winds from the west are often funneled. Placing a campsite for hundreds of people at the mouth of Pipes Canyon means that any campfires lit during high wind events could easily spread eastward, threatening habitat and people's homes. High winds also imply that trash discarded by careless campers will be distributed throughout the Landers area, an unsightly inconvenience to residents and a threat to local wildlife.

Concentrating campfires in this area upwind of most of the Morongo Basin also means a new source of particulate matter pollution, a serious concern in the Basin during both winter months and the peak of fire season.

The emissions of particulate matter and other pollutants from fire pits should be discussed in more detail; rather than simply assigning those emissions to a total category claimed to be at 0.0 tons per year of emissions.

Wood smoke can also include benzene, benzo(a)pyrene and dibenz(a,h)anthracene, carbon monoxide, formaldehyde, organic gases (including aldehyde gases and other respiratory irritants), nitrogen oxides, polycyclic aromatic hydrocarbons (PAHs), and dioxin. All of these are toxic. We deserve more than a dismissal of any need for analysis of their possible impact on downwinders.

Also, the initial study claims that the nearest "sensitive receptors" (a.k.a. potentially affected residents) are 800 feet away from the site, that odors from campfire smoke will not be significant. This is worth challenging as subject to personal sensitivities. Smoke every weekend from four bonfires might affect quality of life on a consistent basis even several miles downwind.

NOISE LEVELS

There is no discussion of noise levels after 10 pm in the initial study. Unless the operators intend to enact and enforce a 10 pm curfew policy, this should be discussed in an environmental assessment. Noise from traffic on Old Woman Springs road would be appreciably lower during night-time "party" hours than the 50.6dBA cited during daytime hours.

The Helipad is nowhere discussed in the noise section.

WATER:

Proponents' plans suggest that wastewater will be directed to a leach field on the property, north of the resort. A stormwater retention basin will be sited immediately east of the sewage disposal leach field. What volume of wastewater is projected to be disposed of via this leach field (considering perhaps 200-300 guests in a typical weekend in season)? Are hydrology studies available that ensure this large addition of wastewater won't infiltrate into neighbors' wells (there are at least 61 domestic wells within a few miles downstream) or the aquifer serving Bighorn Desert View Water Agency? Would stormwater capture from the project's hardened surfaces accentuate this percolation of sewage?

- Water use: the Initial study says that the project would consume 18,150 gallons of potable water per day, a bit more than 20 acre-feet per year. The study compares this to an estimate of 14,568 gallons per day were the site to be developed to its maximal footprint for residential use at 82 units. The failure of attempts to develop residences on the land due to seismic hazards is not mentioned, nor is the fact that not developing the land instead of developing the resort would consume zero gallons per day.

SEISMIC ACTIVITY:

A housing project on this site was denied permit due to a nearby earthquake fault. Though Flamingo 640 would be a much smaller development than that previous proposal, the plan still incorporates structures (camping "lofts," as well as other guest amenities) that could pose a hazard during a quake, and which may disqualify the project from obtaining a Conditional Use Permit.

OTHER POINTS:

Would the proposed project be accessible for those with physical limitations? How would the proposed project utilize local labor and contractors to support the local community? How would the campground keep their guests from trespassing on adjacent properties.

The Morongo Basin needs additional camping capacity. However, preference should be given to sites that are closer to the park, are preferably on land that is previously degraded, and which are more readily accessible by highways capable of bearing the increased traffic. Additionally, we favor development of campgrounds that are economically accessible to more potential visitors, so that families with less disposable income have a way to visit the high desert.

To close, Flamingo 640 meets none of these criteria. Instead, it would convert valuable conservation land surrounded by low-density rural zoning into a traffic-choked playground for the more-affluent. If you plan to build this site, build it somewhere else - closer to the 62 or the park if your concern is to house tourists coming from out of town.

I hope to see these comments addressed and again, will not be satisfied until a thorough and unbiased Environmental Impact report is conducted.

As a Rural Living community, we do not need a private "resort" experience or "hotel" in a rural zoned area that would do nothing to our community except add danger on the roads, add unnecessary hazard in an area already distinguished as a threat from wildfires, knowingly disrupt and destroy the natural environment, pollute the area with noise and light and change the character of our community irreparably. If one of the listed "objectives" for this development is to relieve camping congestion in the National park, then a safe and small public campsite and trails would do much less damage, not a private resort experience out of the price range of the residents who live here, or campers who would otherwise camp in the national park.

Jim, I hope you read this with thought and concern, and do not leave those in your fellow SB community feeling dismissed.

With disappointment,
Caroline Partamian

--

Caroline Partamian | www.carolinepartamian.com | caroline.partamian@gmail.com | 818.606.5220

4/20/22

Dear Ms. Marriasey,

Re Resort Camping Proj. 2020-001
Please recommend denial.

A line not far from the proposed is
1. one unit per 5 ac. NOT 2 units
5 ac.

2. Where is the impact report re: the
gered tortoise, and the burrowing owls
I care about the desert, Jim 92 & has
lived in "Rural living (next to uncl
land" for 20 years.

This is very sad! Its very wrong
who will protect our desert if not the
local dwellers?

RL not Corp. living!

NO NO NO!

Biggs, Lupe

From: Peter T <ptreitler9@gmail.com>
Sent: Tuesday, April 19, 2022 6:35 AM
To: Morrissey , Jim
Subject: Comments on Flamingo 640 Glamping Project

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hi Mr. Morrissey,

I am a resident of Yucca Mesa, a part of Yucca Valley and the Homestead Valley community. I am writing to express my concern around the development of the Flamingo 640 Glamping Project. I recognize the importance of tourism to the area, but this project should not be allowed to proceed without a careful and detailed environmental analysis. The most important issue from my perspective is the worsening drought, which threatens long-term water supplies for people already living here and the many tourists that use existing campgrounds, short-term rentals, etc. A project of this scale would draw further on the area's dwindling water supplies, through unrestricted water use for cooling and other purposes. There is also a strong potential for adverse effects on water wells within the area.

As a local resident who is invested in the long-term well-being of this community, I support the preparation of a complete Environmental Impact Report for these reasons, and because of:

- The potential adverse effect on wildlife due to the proximity of the wildlife corridor and the destruction of the Joshua tree woodland habitat.
- The creation of adverse noise sources within an otherwise quiet area.
- The introduction of artificial light sources within a relatively dark area.
- The impact of additional traffic on Highway 247, an already dangerous highway.
- The use of campfires and their effect on air quality and the potential for wildfires.
- The inappropriate use of tents provided with heating and cooling that would utilize energy and water in an unrestricted manner.

Thank you,
Peter Treitler
58139 Canterbury St
Yucca Valley, CA 92284
201-419-1355

Biggs, Lupe

From: Ethan Primason <eprimason@gmail.com>
Sent: Thursday, April 14, 2022 9:40 PM
To: Morrissey, Jim
Subject: Comments on # PROJ-2020-00191 Assessor Parcel Number (APN) 0629-181-01

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Jim Morrissey,

As an adjacent property owner to the proposed project, I am deeply disheartened to find that this project is being moved forward without a proper and diligent Environmental Impact Report. After reading through the Draft study, I was shocked by the outright flimsy and dishonest work done to hastily try to pass this project through backchannels without the support or consultation with the surrounding community and with blatant disregard of the local ecological environment. I write here to impress upon you the disastrous effect this project will have on our lands as proposed, and hope that my voice along with the others of our community will manage to at the very least persuade the county to require a thorough and unbiased Environmental Impact Report before this project moves along any further.

This project would block the entire width of an important wildlife connectivity corridor between the San Bernardino Mountains, Joshua Tree National Park, and the central Mojave. Conservation groups have expressed interest in paying fair market value for the land and managing it for conservation. The state of California is planning for preservation of 30 percent of the state's lands and waters by 2030. This critical corridor should be part of that process.

On page 27, the Initial Study claims that the project won't contribute to habitat fragmentation because permanent structures would not physically block wildlife migration. But building and human presence on the rim of the wash may very well dissuade wildlife species from migrating through Pipes Canyon if those species are wary of any contact with humans. Examples include desert bighorn sheep, Desert Tortoise and mountain lions. This warrants a full Environmental Impact Report. As an adjacent property owner, I have personally witnessed and documented Desert Tortoise on this plot which I have uploaded to the CNDD database along with other neighbors.

There are hundreds of western Joshua trees on the developable section of the property. Joshua trees are a state protected species being considered for listing as Threatened under the California Endangered Species Act.

Joshua trees may still be listed by the California Fish and Game Commission in June. The county suggests that as Joshua trees and other desert plants will be avoided or relocated, there's no significant impact. Joshua trees generally die after relocation, as do mature mesquites. Relocating a creosote ring might work technically but destroys the prehistoric value of the plant. There are potential creosote clonal rings in excess of 4,000 years old on the site. Yucca clonal rings of similar age may exist. A 2006 study by leading tortoise experts found seven adult desert tortoises on the developable section of the property. The proponents' recent study finding no tortoises is methodologically suspect, inaccurate and purposefully destructive to our habitat.

Route 247 is a dangerous high-speed highway. Adding a destination which hundreds of vehicles will be entering and exiting on a particularly hazardous stretch of the road is a bad idea. First responder response times can be lengthy. Safety would require adding an additional lane and even a vehicle-controlled stoplight. A traffic study is warranted. As someone who travels this stretch daily, I am beyond concerned for my own safety as is, not to mention for those visiting who don't know how dangerous these dark country roads can be.

The Helipad is nowhere discussed in the noise section.

A housing project on this site was denied a permit due to a nearby earthquake fault. Though Flamingo 640 would be a much smaller development than that previous proposal, the plan still incorporates structures (camping "lofts," as well as other guest amenities) that could pose a hazard during a quake, and which may disqualify the project from obtaining a Conditional Use Permit.

The Morongo Basin needs additional camping capacity. However, preference should be given to sites that are closer to the park, are preferably on land that is previously degraded, and which are more readily accessible by highways capable of bearing the increased traffic. Additionally, we favor development of campgrounds that are economically accessible to more potential visitors, so that families with less disposable income have a way to visit the high desert.

Flamingo 640 meets none of these criteria. Instead, it would convert valuable conservation land surrounded by low-density rural zoning into a traffic-choked playground for the more-affluent.

I hope to see these comments addressed and again, will not be satisfied until a thorough and unbiased Environmental Impact report is conducted.

With concern and respect,

Ethan Primason

Biggs, Lupe

From: royergrizz <royergrizz@aol.com>
Sent: Monday, April 18, 2022 1:42 PM
To: Morrissey , Jim
Subject: Flamingo 640 project

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

I have owned a piece of property outside of Joshua Tree for almost twenty five years and I have supported the efforts of the MOJAVE DESERT LAND TRUST for many years; further, I have been coming out to Joshua Tree National Park for more than forty years.

I recently read about the proposed campsites west of Landers and Old Woman Springs Road and I am in strong opposition to it, particularly since it appears that the environmental impact report and other issues involved with the development are have been done in a slipshod way at best.

It also appears that the developers have given little or no consideration as to how this development would affect the surrounding area on several different levels, such as its impact on traffic congestion and safety on highway 247 and highway 62.

I therefore request that the county carefully weigh the costs and benefits of this project rather than blindly giving the green light to what could well be a poorly conceived, speculative white elephant.

David Royer

Sent from my Verizon, Samsung Galaxy smartphone

Biggs, Lupe

From: Heidi Schwegler <hms@heidischwegler.com>
Sent: Tuesday, April 19, 2022 6:39 PM
To: Morrissey, Jim
Subject: Public comment regarding Project # PROJ-2020-00191

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Mr. Morrissey -

I am a resident of Yucca Valley. I have lived here since 2018. I am writing to express my deep and sincere concern regarding Project # PROJ-2020-00191, the proposed "glamping" site in Flamingo Heights.

This project would block the entire width of an important wildlife connectivity corridor between the San Bernardino Mountains, Joshua Tree National Park, and the central Mojave. Conservation groups have expressed interest in paying fair market value for the land and managing it for conservation. The state of California is planning for preservation of 30 percent of the state's lands and waters by 2030. This critical corridor should be part of that process.

There are hundreds of western Joshua trees on the developable section of the property. Joshua trees are a state protected species being considered for listing as Threatened under the California Endangered Species Act. There are potential creosote clonal rings in excess of 4,000 years old on the site. Yucca clonal rings of similar age may exist. A 2006 study by leading tortoise experts found seven adult desert tortoises on the developable section of the property. The proponents' recent study finding no tortoises is methodologically suspect.

The county should confirm in writing that the owner will not be allowed to develop the music festival venue with helipad described in the project documents, or the bar and restaurant also described. We appreciate the verbal assurances from contract staff, but that change needs to be made formal and permanent.

Concentrating campfires in this area upwind of most of the Morongo Basin also means a new source of particulate matter pollution, a serious concern in the Basin during both winter months and the peak of fire season.

Proponents' plans suggest that wastewater will be directed to a leach field on the property, north of the resort. A stormwater retention basin will be sited immediately east of the sewage disposal leach field. What volume of wastewater is projected to be disposed of via this leach field (considering perhaps 200-300 guests in a typical weekend in season)? Are hydrology studies available that ensure this large addition of wastewater won't infiltrate into neighbors' wells (there are at least 61 domestic wells within a few miles downstream) or the aquifer serving Bighorn Desert View Water

Agency? Would stormwater capture from the project's hardened surfaces accentuate this percolation of sewage?

Will the entire facility be available for rent to one party for special events? Will concerts or festivals be planned here? How many helicopter landings/departures are envisioned per month? Studies of potential noise levels should be undertaken. Lighting sufficient for hundreds of guests, plus ambient light from lodging units, fires, visitor headlights, party lights, and other sources of illumination are likely to pose a substantial addition to light trespass in this relatively dark area, posing threats to safety, wildlife, and quiet enjoyment by neighbors.

I find everything about this development to be deeply disturbing, so I appreciate the opportunity to share these comments with you.

Sincerely,
Heidi Schwegler
Yucca Mesa, CA

FOLLOW

HEIDI SCHWEGLER // [Website](#) / [IG](#) / [Vimeo](#)
YUCCA VALLEY MATERIAL LAB // [IG](#) /

Biggs, Lupe

From: Lee Scott <pipoon@sbcglobal.net>
Sent: Monday, April 18, 2022 10:16 AM
To: Morrissey, Jim
Subject: Flamingo 640 PROJ-2020-00191

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Mr. Morrissey,

I am writing to add my concerns and opposition in regards to PROJ-2020-00191 on parcel 0629-181-01.

The most glaring concern is this – Why would the county even consider allowing a 75 unit hotel to be built in the middle of a quiet, residential neighborhood? There will a total of 95 permanent structures. A housing project on this site was denied permit years ago due to a nearby earthquake fault. This would pose a hazard during a quake, and which may disqualify the project from obtaining a Conditional Use Permit. What has changed?

There are many questions and problems with the INITIAL STUDY/MITIGATED NEGATIVE DECLARATION that has been submitted. For example – the study states that there are no desert tortoises on the site. The wildlife survey was done during the winter when tortoises are underground. Of course they didn't find any. I have seen many photos from residents of the tortoises they found on their property adjacent to the proposed project. This information should be provided in a full Environmental Impact Report.

On page 27, the Initial Study claims that the project won't contribute to habitat fragmentation because permanent structures would not physically block wildlife migration. But building and human presence on the rim of the wash may very well dissuade wildlife species from migrating through Pipes Canyon if those species are wary of any contact with humans. Examples could include desert bighorn sheep and mountain lion. Fuller discussion is needed.

The Initial Study estimates the project would generate 16 morning peak hour trips and 20 evening peak hour trips. Justification for this assumption, which appears elsewhere in the study, is scant. Moreover, no discussion of seasonal and weekly patterns in additional traffic is included. This lack of information suggests that a traffic study is needed, but the study proposes exempting the developer from a Traffic Impact Study that would help answer exactly these questions.

Community members were given assurances that the music festival venue, helipad, restaurant and bar would be excluded from the project plan. Only the amphitheater has been dropped. The helipad is mentioned only once, in a description of the square footage of the physical plant.

A Helipad is completely unacceptable in a residential neighborhood

Route 247 is a dangerous high-speed highway. Adding a destination which hundreds of vehicles will be entering and exiting on a particularly hazardous stretch of the road is a bad idea

This draft mitigated Negative Declaration is poorly done and insufficient, and the county needs to conduct a full Environmental Impact Report to address the deficiencies

All these issues suggest that the County needs to proceed with a full Environmental Impact Report.

Thank you for your attention,

Lee Scott, resident of Flamingo Heights, Yucca Valley



SAN GORGONIO CHAPTER

Regional Groups Serving Riverside and San Bernardino Counties: Los Serranos, Tahquitz, San Bernardino Mountains, Mojave, Moreno Valley, Big Bear

April 17, 2022

Jim Morrissey, Contract Planner
County of San Bernardino
By email to Jim.Morrissey@lus.sbcounty.gov

Re: PROJ-2020-00191 Draft Initial Study/ Mitigated Negative Declaration Flamingo 640
Assessor Parcel Number: 0629-181-01

Dear Mr. Morrissey:

This letter is on behalf of the Tahquitz Group of Sierra Club which represents over 1000 members in the Morongo Basin of San Bernardino County and the desert portion of Riverside County. I am writing regarding the above-referenced Draft Initial Study/ Mitigated Negative Declaration (hereinafter MND).

We continue to have grave concerns about the unmitigated significant impacts caused by siting a commercial 300 person resort-campground type of facility in a known habitat corridor connecting preserved areas, and in a rural residential neighborhood. As a threshold matter, this is inconsistent with sound land use planning as well as vision statements in the County General Plan.

Equally important, the MND for the project is deficient in numerous ways, including but not limited to:

- Failure to acknowledge that relocating Joshua Trees has significant failure rates, so the project as proposed would cause significant unmitigated impacts to the survival of this species, which is a candidate for state listing as threatened
- Contrary to the MND's assertion, simply allowing physical space between project elements does not provide assurance that wildlife will tolerate the extensive human intrusion, lights, noise, etc that this type of intense use will bring to Pipe's Wash
- The biological assessment is faulty; desert tortoise and Le Conte's thrasher are known to occur in the immediate area
- The MND is unclear as to whether various clearly incompatible uses are proposed for this rural residential area, such as a concert venue, helipad, and restaurant/bar. A clear and stable project description is the *sine qua non* of an environmental document; it is lacking here

- Traffic and VMT studies are obviously crucial for public safety when considering a project of this sort which is located on a busy two lane road with steep and dangerous approaches in two directions, yet the MND lacks such studies
- The noise study lacks analysis of helicopter use.

In sum the MND for Flamingo 640 is clearly inadequate. The preparation of an Environmental Impact Report is warranted in a case such as this which is a substantial departure from what would be expected for the locale, given the existing land use designation - and a project which poses significant unmitigated biological and other impacts as well.

Thank you for the opportunity to comment.

Very truly yours,

A handwritten signature in black ink that reads "Joan Taylor". The signature is written in a cursive style with a large initial "J" and a long, sweeping underline.

Joan Taylor, Chair
Tahquitz Group of the Sierra Club

Biggs, Lupe

From: Lauren Slivosky <lslivosky@gmail.com>
Sent: Wednesday, April 20, 2022 8:28 AM
To: Morrissey, Jim
Subject: Project # PROJ-2020-00191 STOP PLANS OF DEVELOPMENT

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Jim Morrissey,

I am incredibly disheartened to hear that steps are being taken to move forward with this project off route 247 in Flamingo Heights. Please take a moment to realize the severe effects this would have on an ecosystem that is so crucial to our state. WE DO NOT WANT ANOTHER PALM SPRINGS up here in the high desert. This is a community of folks that enjoy the rural life, quiet nights and minimal traffic.

I've included below detailed outlines of all the terrible effects this development would have on quality of life for everyone living here.

ENVIRONMENTAL HAZARD

Firstly, this project should be abandoned, but if you must continue this process, we DEMAND a full Environmental Impact Report (EIR). This project is an environmental hazard. Mojave Desert Land Trust and the Center for Biological Diversity have both deemed this area in question a wildlife corridor. On page 27, the Initial Study claims that the project won't contribute to habitat fragmentation because permanent structures would not physically block wildlife migration. But building and human presence on the rim of the wash may very well dissuade wildlife species such as bighorn sheep, bobcats, and mountain lions from migrating through Pipes Canyon if those species are wary of any contact with humans.

There are hundreds of western Joshua trees (*Yucca brevifolia*) on the developable section of the property. Joshua trees are a state protected species being considered for listing as Threatened under the California Endangered Species Act. At this time, the County cannot issue a permit to take (by removal or transplanting any individual) western Joshua trees. The contention on page 14 that there will be no impact to forestland because the trees will be moved elsewhere is pretty laughable.

Joshua trees generally die after relocation, as do mature mesquites. Relocating a creosote ring destroys the prehistoric value of the plant. There are potential creosote clonal rings in excess of 4,000 years old on the site. *Yucca* clonal rings of similar age may exist.

A 2006 study by leading tortoise experts found seven adult desert tortoises on the developable section of the property. The proponents' recent study finding no tortoises is methodologically suspect. The Initial study claims "There are no desert tortoise occurrences documented on site or directly adjacent to it...Desert Tortoise are therefore currently absent from the Project Site." Neighbors near the site have evidence to the contrary.

The study claims "LeConte's thrasher was neither observed nor detected on-site during the avian auditory and visual survey. Therefore, LeConte's thrasher is currently absent from the project site." However, community scientists have documented multiple observations of LeConte's thrasher within a mile of the site in the last

three years. Though they're not strong fliers, they do so on occasion, and it's hard to imagine a local population not taking advantage of a square mile of habitat. This information should be provided in a full Environmental Impact Report.

The study also doesn't offer any details about the survey: how long was it? How many observers? What time of year? What were the conditions?

Other wildlife species using the site include burrowing owls, coyotes, black-tailed jackrabbits, migratory bird species, badger, bobcats, desert kit fox, Gambel's quail, and Bendire's thrasher.

VISUAL IMPACT

The proposed project would have a severe visual impact on scenic vistas. I am an adjacent property owner to the glamping project proposal and bought property in Yucca Valley a few years ago as to avoid the gross overbuilding I encountered in San Francisco and Brooklyn during my times living there in the last ten years. The high desert is special and this project would strip it of its many peaceful and visual wonders. Please keep in mind that just because something is up to code and compliant with zoning ordinances it does NOT mean there's no significant visual impact.

LIGHT POLLUTION

The proposed project would cause terrible light pollution. The report's specifications on night lighting is not specific enough and my neighbors and I do not want this to effect our dark night skies. The county says that new light pollution and glare from the glamping site will not constitute a significant impact because the project will abide by the recently revised light trespass ordinance in San Bernardino County. The point of the light trespass ordinance was to establish basic minimum standards to prevent glare and light trespass, leading not only to darker skies but also increased public safety. While the ordinance *will* reduce the impact of existing lighting as it is phased in, it does *not* mean new construction in a formerly dark area will not introduce a new source of light where none existed before. Again, simple compliance with the law is NOT equivalent to no impact. Also, 12 feet in height for pole lighting does not guarantee compliance with the light trespass ordinance. The light sources will still be visible from neighboring properties, and (dangerously) from the highway.

AIR QUALITY

Air quality impacts from visitor traffic are based in the initial study on an assumption of 20 vehicles per hour for a total of 200 vehicle trips. However, this assumes not only that visitors will arrive at times staggered throughout the day, rather than within a few hours on a Friday night (and similarly leaving on Sunday morning) but also that once arrived, visitors will not make multiple trips to Joshua Tree NP, to Pioneertown, to Coachella or even a few hundred yards up the road to La Copine. Given that the proponents expect a maximum visitorship of 300 and as many as 50 seasonal employees arriving at the site each day, 200 vehicles may be a conservative estimate. There is a number missing from the narrative on page 19 in the Air Quality section, in which the first paragraph ends "However, the distance to the proposed campground improvements are approximately (insert number) feet." This could be used to bolster the point that this document was prepared hurriedly and with no real attention to detail. The Helipad is mentioned in the beginning of the document (page 2) as taking up 7,854 square feet, but emissions from helicopters are not mentioned in the air quality section. Dust from construction, with wind, would be hazardous to the surrounding human community and wildlife

TRAFFIC SAFETY

Route 247 is a dangerous high-speed highway. Adding a destination which hundreds of vehicles (primarily of tourists who are not used to driving on the 247) will be entering and exiting on a particularly hazardous stretch of the road is a bad idea. For all the trips listed in my previous section on Air Quality (JTNP, Pioneertown, etc.)

there would be more traffic coming into these places too that also have roads with traffic incidents (e.g. Pipes Canyon Road). First responder response times can be lengthy. Safety would require adding an additional lane and even a vehicle-controlled stoplight. A traffic study is warranted.

In the last five years there have been more than a dozen accidents in the stretch of highway between Aberdeen and Reche that were serious enough to have had first responder involvement. Adding more than 100 cars exiting and entering the highway here during busy hours will prove dangerous, especially given drivers who pick up speed once they emerge from Pipes Canyon south of the project. A thorough traffic study, dedicated turn lanes, and perhaps a stop light should be considered if the project goes forward. The likelihood of extra costs to the county for first responders should be assessed. We demand you do a traffic report.

The importance of this cannot be overemphasized. Additional traffic on a high-speed two lane cannot be treated with this level of disregard.

NO AMENITIES OPEN TO THE PUBLIC

This site is being proposed without any concern or care for its surrounding community. According to the Notice of Availability sent out to neighbors, Glamping “destination resort” with support facilities, none of which are to be open to the public, including restaurants/bar, reception area/store, trails and paths, recreation buildings, and helipad on a 25-acre portion of a 640-acre parcel.

Furthermore, community members were given assurances that the music festival venue, helipad, restaurant and bar would be excluded from the project plan. Only the amphitheater has been dropped. The helipad is mentioned only once, in a description of the square footage of the physical plant. Similarly with the bar and restaurant, which would at the very least generate food waste that offers a potential subsidy to raven and other animals that may affect populations of sensitive species such as the desert tortoise.

How does this project positively impact our community at all? There is obviously no consideration for the neighbors.

FIRE SAFETY

There is inadequate analysis of fire safety in the report. Winds get up to 20mph and upwards of 80mph in this proposed area. Pipes Canyon is a natural break in the mountains through which high winds from the west are often funneled. Placing a campsite for hundreds of people at the mouth of Pipes Canyon means that any campfires lit during high wind events could easily spread eastward, threatening habitat and people’s homes. High winds also imply that trash discarded by careless campers will be distributed throughout the Landers area, an unsightly inconvenience to residents and a threat to local wildlife.

Concentrating campfires in this area upwind of most of the Morongo Basin also means a new source of particulate matter pollution, a serious concern in the Basin during both winter months and the peak of fire season.

The emissions of particulate matter and other pollutants from fire pits should be discussed in more detail; rather than simply assigning those emissions to a total category claimed to be at 0.0 tons per year of emissions.

Wood smoke can also include benzene, benzo(a)pyrene and dibenz(a,h)anthracene, carbon monoxide, formaldehyde, organic gases (including aldehyde gases and other respiratory irritants), nitrogen oxides, polycyclic aromatic hydrocarbons (PAHs), and dioxin. All of these are toxic. We deserve more than a dismissal of any need for analysis of their possible impact on downwinders.

Also, the initial study claims that the nearest “sensitive receptors” (a.k.a. potentially affected residents) are 800 feet away from the site, that odors from campfire smoke will not be significant. This is worth challenging as subject to personal sensitivities. Smoke every weekend from four bonfires might affect quality of life on a consistent basis even several miles downwind.

NOISE LEVELS

There is no discussion of noise levels after 10 pm in the initial study. Unless the operators intend to enact and enforce a 10 pm curfew policy, this should be discussed in an environmental assessment. Noise from traffic on Old Woman Springs road would be appreciably lower during night-time “party” hours than the 50.6dBA cited during daytime hours.

The Helipad is nowhere discussed in the noise section.

WATER

Proponents’ plans suggest that wastewater will be directed to a leach field on the property, north of the resort. A stormwater retention basin will be sited immediately east of the sewage disposal leach field. What volume of wastewater is projected to be disposed of via this leach field (considering perhaps 200-300 guests in a typical weekend in season)? Are hydrology studies available that ensure this large addition of wastewater won’t infiltrate into neighbors’ wells (there are at least 61 domestic wells within a few miles downstream) or the aquifer serving Bighorn Desert View Water Agency? Would stormwater capture from the project’s hardened surfaces accentuate this percolation of sewage?

Water use: the Initial study says that the project would consume 18,150 gallons of potable water per day, a bit more than 20 acre-feet per year. The study compares this to an estimate of 14,568 gallons per day were the site to be developed to its maximal footprint for residential use at 82 units. The failure of attempts to develop residences on the land due to seismic hazards is not mentioned, nor is the fact that not developing the land instead of developing the resort would consume zero gallons per day.

SEISMIC ACTIVITY

A housing project on this site was denied permit due to a nearby earthquake fault. Though Flamingo 640 would be a much smaller development than that previous proposal, the plan still incorporates structures (camping “lofts,” as well as other guest amenities) that could pose a hazard during a quake, and which may disqualify the project from obtaining a Conditional Use Permit.

OTHER POINTS

Would the proposed project be accessible for those with physical limitations? How would the proposed project utilize local labor and contractors to support the local community? How would the campground keep their guests from trespassing on adjacent properties.

The Morongo Basin needs additional camping capacity. However, preference should be given to sites that are closer to the park, are preferably on land that is previously degraded, and which are more readily accessible by highways capable of bearing the increased traffic. Additionally, we favor development of campgrounds that are economically accessible to more potential visitors, so that families with less disposable income have a way to visit the high desert.

To close, Flamingo 640 meets none of these criteria. Instead, it would convert valuable conservation land surrounded by low-density rural zoning into a traffic-choked playground for the more-affluent. If you plan to

build this site, build it somewhere else - closer to the 62 or the park if your concern is to house tourists coming from out of town.

I hope to see these comments addressed and again, will not be satisfied until a thorough and unbiased Environmental Impact report is conducted.

As a Rural Living community, we do not need a private "resort" experience or "hotel" in a rural zoned area that would do nothing to our community except add danger on the roads, add unnecessary hazard in an area already distinguished as a threat from wildfires, knowingly disrupt and destroy the natural environment, pollute the area with noise and light and change the character of our community irreparably. If one of the listed "objectives" for this development is to relieve camping congestion in the National park, then a safe and small public campsite and trails would do much less damage, not a private resort experience out of the price range of the residents who live here, or campers who would otherwise camp in the national park.

Jim, I hope you read this with thought and concern, and do not leave those in your fellow SB community feeling dismissed. We will continue to fight this even if you abandon our local community on it.

Lauren Slivosky

Movement Artist | Yoga | Thai Bodywork

web: www.slivyoga.com

email: lslivosky@gmail.com

IG: [@laursliv](https://www.instagram.com/@laursliv)

Youtube: [Forever Medicines](https://www.youtube.com/ForeverMedicines)

From: [Peter Spurr](#)
To: [Morrissey, Jim](#)
Subject: Letter advocating CEQA EIR for Flamingo 640 / project 2020-00191
Date: Thursday, April 21, 2022 9:04:00 AM
Attachments: [Letter to Jim Morrissey.docx](#)

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Mr. Morrissey,

I wanted to express opposition to PROJ-2020-00191 on parcel 0629-181-01, referred to as “Flamingo 640.”

Given the incredible scope of this project and the irreversible potential harm it could bring to this area if approved, I strongly feel the County Board of Supervisors require a **CEQA Environmental Impact Report** and not approve Flamingo640’s application for a **Conditional Use Permit**.

Specifically, in light of the following, the existing report causes alarming concerns:

With as much public outcry against the proposed Conditional Use Permit as there is and has been, on what basis can the County of San Bernardino Land Use Services not require a comprehensive EIR? It is my understanding that the primary role of Project Planner for Land Development is to protect the public interest in the fairness and integrity of land-use decisions. Public confidence in government depends on the integrity of its decisions, and the avoidance of bias and conflicts of interest is no doubt a factor in establishing that confidence. Given that Flamingo640 has irreversible environmental effects, *not* requiring a full EIR seems like there is bias to approve the Conditional Use Permit, in spite of its glaring flaws pointed out by the community directly affected; a community who cares about Wildlife Protection and the qualities of life they were assured of when they purchased real estate to live in Flamingo Heights and its neighboring communities. Approving this application by Flamingo640 will not only undoubtedly create danger and a long-lasting negative impact on endangered wildlife and traffic, but also set a precedent to other investors that SB County requirements can be pushed over without having to do a CEQA Environmental Impact Report for their projects. This invites additional pressure from outside the community to destroy the Countywide Plan designation of Rural Living (RL) when the RL Plan designation was put into place to be upheld.

Now, of course, you could give special privileges within the Rural Living (RL) zoning without changing the zoning. If you are asserting that this Conditional Use for a campground can be approved without changing the zoning from residential to commercial, then there needs to be a new application for the public to comment on with all the exemptions of residential zoning as part of the application.

The primary purposes of CEQA are to avoid, reduce, or prevent environmental damage, and foster an informed and transparent public decision-making process by providing information to decision-makers and the public concerning the environmental effects of projects either undertaken or approved by lead agencies.

It is crucial that applications such as Flamingo640 that serve outside investors don't become a routine matter of submitting inadequate reports with an intent to slide through environmental and zoning protections. Both residents and outside investors should have reason to respect the protections the County Board of Supervisors Staff and Planning Commission afford to local communities under their jurisdiction.

Amphitheater:

Other residents have relayed information received from you that the applicant has withdrawn the Amphitheater and Parking Component from the application. *If that is accurate, where can the public find the amended application for comments?*

Regarding Flamingo640's original plan's intention to hold concerts: Since any property owner can apply for a Temporary Special Event Permit of any size subject to conditions, then *any* entitlement conditions should specifically **prohibit** the property's use for any public event.

Impact on Residents:

Noise and light pollution will undoubtedly be increased with the proposed project, when both are already things residents can complain about and have protections, such as the Night Sky Ordinance, to ensure.

The proposed project will also create an intrusion of the Glampsite's facilities and multiple vehicles into the line-of-sight in the State Route 247 Scenic Corridor.

As for noise generated, the Noise Report poorly addresses the ongoing intrusion and nuisance of noise, both in the building process, and during its completion and operation. It attempts to measure decibels for a non-existent origin of sound. How can the decibel level be measured of something that doesn't exist? The Noise report is flawed.

Flamingo640's plan for a private helicopter for emergencies is yet another devastating intrusion on the rural zoning. If this is allowed without changing zoning, are we all allowed to build helipads on our properties? Once a helipad is there, the threat of vibration and noise disturbance is exponentially increased. It also creates the possibility of wealthy guests accessing the helipad for non-emergency use.

For light, noise and traffic nuisance and dangers alone, the single use parcel is not suitable for development. The presently-submitted report insufficiently addresses all of the above. The sought-after *Conditional Use Permit* should be rejected, and a full EIR required.

Community Concerns:

This project is driven by out-of-town investors. The disregard by the developers proposing to construct an undeniably commercial project outside the commercial corridor puts them at an advantage against other commercial investors who respect the appropriate zoning of their venture. They are angling to get something for less and change the rules to suit the objectives of their investment. The possibility of benefit coming back to the community is disproportionate to the benefit to a single out-of-county investment company. Why should

residents have to put up with having this next to our doorstep? The purchasers of this property did know the zoning when they bought the property. A previous project did not go through on the parcel. Any development of such a scope as this should understand the need to seek out a parcel that suits the size and environmental impact of their commercial venture. *Yet they are already selling it on their website without having approval as if they feel assured they will be able to do what they want.*

Traffic:

Flamingo640's Trip Report cannot be viewed as realistic as it doesn't address an accurate number of trips for the addition of 400 extra daily visitors to the proposed site, nor does it quantify other commercial elements (retail, restaurant, etc.) already needed when entering and exiting the normal flow of traffic on the 247. The potential for blockages and accidents on the winding, undivided route can cause backups to supply chain vehicles that rely on this one highway.

Anyone familiar with perilous highway 247 entry and exit problems this development would create will take issue with the current impact report. Additionally, hwy 247 is an arterial trucking route, connecting Yucca Valley with Barstow / Victorville. The additional burden in traffic, wait times, congestion is bad for County of San Bernardino commercial interests and residents alike.

Endangered wildlife:

There is a known wildlife corridor within the property. I have neighbors who have shown me photos of desert tortoises, desert foxes, and bobcats taken by motion-activated security cameras, all within 600 feet of the property that claims there are no endangered species nearby. Specifically, it is known that there are desert tortoises where it was wrongly declared that none were indicated in the proposal. The report is inaccurate and untrustworthy. A full comprehensive ***CEQA Environmental Impact Report*** should at the very least be a requirement to disclose whether endangered tortoises who spend part of their time underground, do in fact live on the property. The wildlife corridor is presently undisturbed and should remain protected.

Any development must be required to adhere to the county's regulations with respect to removal or relocation of any Joshua Trees, of which there are hundreds.

Intended Noise:

On page 2 of the Noise Assessment report, there is mention that the project owner would like to hold music festivals several times a year with as many as 25,000 attendees and specifically calls out the Hullabaloo Festival in Flagstaff as their example of the type of festival they'd like to have. The Hullabaloo Festival might see 25,000 people over the course of an entire weekend on a 2.5 acre park in a commercial zone off Route 66 in downtown Flagstaff, but it is entirely inappropriate, dangerous and not at all in the correct zoning to stage such an event in this remote and environmentally sensitive area, which the Flamingo640's sub-standard noise report overlooks. What one expects for noise and traffic in a city center of 70,000 people is not comparable to what residents in a rural environmentally-sensitive area

should have to contend with in Flamingo Heights. Additionally, as previously mentioned, the noise report fails to account for noise generated by a major source of significant nuisance noise and vibration – the proposed helipad.

Fire Risk:

There is a genuine threat to human life when 20-30 mph winds are not uncommon even during routine weather conditions and winds can at times reach up to 60 mph. Campfires and firepits are simply a terrible idea in a highly hazardous wildfire area. The project proposes four large fire pits, which could generate traveling embers and cause wildfires either on or off-site, or both. The project is immediately adjacent to San Bernardino County's FS-2 Fire Safety Overlay which underlines the area's susceptibility to wildfire. The addition of 400 campers daily increases the risk exponentially, and the resort-related growth in traffic would increase firefighters and emergency vehicle response times. Escape routes on the 247 – the sole artery that would get people out in a wildfire emergency – would be congested. People could be trapped and unable to get out of the area if the only highway in and out was blocked. Wildlife and Joshua Trees would also be destroyed in such a scenario, as would private properties. Water resources are historically low, contributing to the situation. Without question, it seems one of the conditions of this project should be that no wood or other solid fuel campfires be used in firepits or barbecues. There are clay logs, gas burning, smokeless and ember-less alternatives. Any campsite, private or commercial, should have an enforced no-smoking, no fire zone with a hefty penalty for violation.

Pollution

The number of vehicles for construction, guests, employees, and the service vehicles supporting the project would create additional dust and airborne emissions and chemicals that can travel to humans and wildlife, in a biologically-sensitive area. Numerous threatened and endangered species inhabit these lands and migrate through them. The Pipes Canyon Wash and its adjoining areas form a vital undeveloped migratory pathway, linking neighboring protected wilderness areas.

The proposed campsite will create several hundred pounds of solid human waste daily. The MND underestimates how much 400 guests a day would actually produce in waste. The number claimed doesn't add up to an average human's waste times 400. Septic systems would not be ideal for a project of this size and scope which includes a proposed restaurant and bar. A newly built sewer system should be mandatory. Residents utilize private septic systems and leech fields. There are no public sewer systems. Some residents rely on wells, utilizing ground water.

Biological Protections

The wildlife corridor falls under The Bureau of Land Management's mission to preserve specially-designated landscapes that include wilderness areas, wilderness study areas, and wild and scenic trails. The BLM was not cited as a Federal entity that needs to approve all claims are substantiated that's on the submitted INITIAL STUDY/MITIGATED NEGATIVE DECLARATION. The declarations on the MND claiming the Project site does not fall within any designated critical habitat, and that no special status species were observed on site (during their survey) does not constitute an

acceptable study.

In order to minimize impacts to the environment and community and its wildlife, and allow the Planning Commission to live up to its role protecting the public interest in the fairness and integrity of land-use decisions, the application for a Conditional Use Permit should be rejected and the developers should be required to do *CEQA Environmental Impact Report*.

Sincerely,

*Peter Spurr
Joshua Tree*

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*Peter Marshall Spurr, GRI
Broker Associate @ Joshua Tree Realty
Broker License # 01414588
(760) 861-5895 cell
Peter@BrokerPeter.com
www.BrokerPeter.com*

Dear Mr. Morrissey,

I wanted to express opposition to PROJ-2020-00191 on parcel 0629-181-01, referred to as “Flamingo 640.”

Given the incredible scope of this project and the irreversible potential harm it could bring to this area if approved, I strongly feel the County Board of Supervisors require a **CEQA Environmental Impact Report** and not approve Flamingo640’s application for a **Conditional Use Permit**.

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Sincerely,

*Peter Spurr
Joshua Tree*

Biggs, Lupe

From: Steve Brown <sunrunnermedia@gmail.com>
Sent: Saturday, April 16, 2022 11:03 AM
To: Morrissey, Jim
Subject: Project # PROJ-2020-00191, Assessor Parcel Number (APN) 0629-181-01

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

I understand that this project, the Flamingo Heights glamping resort proposed for this parcel, is accepting public comments through April 21. Here are my comments regarding this proposed project:

As a journalist who has covered environmental and developmental issues for decades, and as a resident of the hi-desert near where this project is located, I took a serious interest in it when it was announced. While the original proposal has been modified, I want to stress that I absolutely object to any potential uses of the site for a concert/festival venue. I think that, without extreme modifications to Highway 247, any attempt to drive thousands of people to that location at a particular time, would create a disastrous traffic situation that could not be mitigated. Therefore, any approval of this glamping resort project needs to be clear in the limitations allowed for the project site.

To see for myself what the potential impact of this project could be, I went in person and spent an afternoon walking the property in and around the project site. I fully expected to find numerous reasons to object to the development of the site.

However, what I found instead, shocked me. The land has been extremely compromised. There has been a large amount of illegal dumping, recreational garbage, and blow trash that I found across the land. Obviously, any resort opening on the land would need to clean this garbage up and would prevent future dumping if it wants to keep its paying guests coming.

I also found an extreme amount of damage caused by illegal off-roading. Off-roaders like to use the large wash here and its slopes for recreational use, making numerous trails and a great deal of erosion. Again, a resort would not allow illegal off-roading through its property and would work to control unsightly erosion. In fact, if the resort worked to prevent illegal off-roading through the wash on its property, that may actually help preserve the wash as a wildlife corridor, allowing only foot traffic.

While in an ideal world, land like this could just be purchased for preservation, cleaned up, erosion mitigated, and future destruction prevented, I have not seen a serious attempt by any land trust to negotiate a purchase of this land. I think that, counter-intuitively, if built and managed properly, this project, while not without its impacts, could have an overall positive impact on this land.

However, if this project were to be approved, traffic management to and from Highway 247 needs to be required. The highway is already dangerous, with regular fatality accidents, and it would be negligent to allow visitors and locals to be subjected to increased dangers from this project. Dedicated turn lanes should be required at the very least. The county seems to be grossly negligent so far in its required traffic mitigations for planned resort properties in our area (the Joshua Tree "bubble hotel" project is a good example of a declaration of no impact that resulted from some county bureaucrat looking at the traffic situation from viewing Google Maps, not realizing that while the road may be straight, it is also a steep incline with blind spots and speeding traffic and illegal passing that can result in increased injury and

fatality accidents), but it's far easier and cheaper to prevent accidents in these cases, rather than dealing with them when they happen.

Serious scrutiny also needs to be applied to any large fire pits on the property. With the winds that sweep down from the mountains through that wash, and considering how dry our area remains, any mismanagement of open fires could very well destroy a large amount of land, habitat, and homes. I know the LA folks love their s'mores and the big primal adventure that comes with having an open fire in the "wilderness," but many of us local residents remember the Lake Fire, the Sawtooth Fire, and others, and we'd greatly prefer to not see more of them. Our own home nearly burned down several years ago during a windstorm. The fire was caused by an upwind neighbor's large trampoline being propelled into the power lines. Had the Yucca Mesa fire station not seen the fire's smoke before we called it in, several homes could have easily been lost. I strongly urge controls on open fires on the project site.

I also strongly recommend working glamping sites around existing Joshua trees and other native plants, instead of attempting to relocate them. We are all aware that relocation usually doesn't work for these plants, and the nature of this project seems flexible enough that most native plants can, and should be, left alone. In addition to averting impact to these plants, that also improves the attractiveness of the resort property with a minimum of cost and effort.

Overall, however, unless additional environmental data comes to light that shows this project site is home to threatened or endangered species that didn't show up on the biological surveys, I think the negative impacts of this proposed project could be well balanced by the positive impacts it is likely to have on the property.

Thank you for accepting my comments on this project.

Steve Brown

--

Steve Brown

Journalist, publisher, editor, producer, destination & event marketing services, video & specialty publication production

Sun Runner Media & Blue Highways Media

Joshua Tree, California

(760)820-1222 (voice/text)

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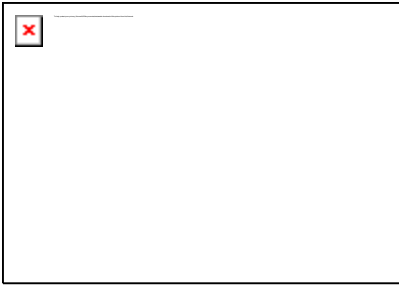
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Blue Highways Media: www.bluehighwaysmedia.com



Biggs, Lupe

From: Olivia <oliviarosestroud@gmail.com>
Sent: Tuesday, May 17, 2022 10:07 PM
To: Morrissey , Jim
Subject: Flamingo 640 Cannot Happen

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hello Mr. Morrissey,

As a resident of Yucca Valley, please do not allow the Flamingo 640 campsite to happen. The land needs to stay raw desert for the sake of all that is still good in the world. It would ruin the quiet which is one of the best things about out here. It would displace animals and plants. I live miles from where it would be. Please let us know when there will be an open house to come and protest. I am a local who feels very strongly about this not happening and I am not alone.

-Olivia Stroud

Sent from my iPhone

Biggs, Lupe

From: Barna Szász <barnaszasz@gmail.com>
Sent: Wednesday, April 20, 2022 6:34 AM
To: Morrissey , Jim
Subject: ☹️ Project # PROJ-2020-00191, Assessor Parcel Number (APN) 0629-181-01

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Mr. Morrissey,

Please be on the good side of history. It will feel great! 😊

There are hundreds of western Joshua trees on the developable section of the property. Joshua trees are a state protected species being considered for listing as Threatened under the California Endangered Species Act. At this time, the County cannot issue a permit to take (by removal or transplanting any individual) western Joshua trees.

Sending you love and wisdom!

Barna Szász

--

Barna Szász
646-943-9321
barnaszasz.com
IG @instabarna_

Biggs, Lupe

From: Robert Thomas <mrrctjr@yahoo.com>
Sent: Thursday, April 21, 2022 3:54 PM
To: Morrissey , Jim
Subject: Resort Camping - Conditional Use Permit PROJ-2020-00191

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Flamingo Heights is already overbuilt and causing excessive light pollution.

This proposed development MUST be stopped - there is nothing good that can come from the continued development of this area that will have any sort of positive benefit to our community.

Robert Thomas
56610 Breezy Ln.
Yucca Valley, CA 92284

Biggs, Lupe

From: Ollin Trujillo <ollin_trujillo50@hotmail.com>
Sent: Wednesday, April 20, 2022 1:15 PM
To: Morrissey, Jim
Subject: Flamingo 640 Subject: Project # PROJ-2020-00191, Assessor Parcel Number (APN) 0629-181-01

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hello Mr. Morrissey.

I own 2 separate properties within a mile from this proposed development. I was made aware of the proposed Project and have signed the Change.org petition in opposition. On my property there is a small cabin, and I actually purchased it because it was surrounded on 2 sides by BLM land and I loved the peace and quiet it offered, and enjoyed seeing all the different animal and plant wild life of the area.

I actually purchased the adjacent lot and have left it undeveloped specifically to maintain the peaceful tranquility.

I am very concerned at the size and scope of this proposed project "Flamingo 640". Its located right near the wash, which is a huge concern in itself.

I think we all can see very well what's going on with tourism coming to JT and the surrounding areas, however, I don't believe this property is the right location for a project of this type.

It's a Rural- residential neighborhood, and from what I have seen, it offers very little to the surrounding community and surrounding landscape.

I urge you to reconsider this project, and we need to see an environmental impact report.

Thank you for your time and consideration.

Ollin Trujillo (310) 993-5163

Biggs, Lupe

From: Alex Valdivia <alex.e.valdivia.89@gmail.com>
Sent: Thursday, April 21, 2022 11:22 AM
To: Morrissey, Jim
Subject: To Do The Impossible

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Jim,

I hope this email finds you great. My name is Alex Valdivia. I am a resident and dweller in the Yucca Mesa region of the high desert. I am writing you in regards to the new development under way for the Flamingo 640 project. You may have already received hundreds if not thousands of voices trying to reach you to halt or stop the project. I am writing not to force convincing but to ask from the bottom of my heart and the heart of the people of the high desert, to consider the impossible. You have worked hard and done many a great deed for others and the county. You have helped lead the way for opportunity, development, growth, and giving people the okay they need to make their dreams happen. Here today I am asking you to find it in your heart to do the impossible. To help make an impossible dream happen. To do what very few men have done, because it has not brought them fame or fortune.

What is the impossible? To stand up with an open heart and see the devastating affect the project would have on the people and land. A people who need little, and a wildlife that needs even less. Together we thrive ever lastingly in spirit and joy because of what little we need. Now I understand it is hard for a man in your position, who's entire work is approving developments, and you may very well have spent your entire life doing it effectively. And which is why I believe you have what it takes to be brave, to stand up for the lives of those who have no direct impact on you, and for a land that has remained untouched since the beginning of time. A land which has given those who need nothing, everything. I reach out to you because You have what it takes to do something impossible, to be a man of greatness and bravery, and to very well make a sacrifice that may go against your beliefs or nature. I assume nothing of your character, and I hope one day we get to meet and shake hands, and it will be a great honor. In the meantime, I hope my words, coming from a stranger, reach you in some way, and if not at all, then that is the tragedy that we as residents of the mesa off Old Woman Springs will carry for the remainder of our lives. But there is still time. Those who support the government of San Bernardino need a true voice, a voice from within. And we all pray that voice can be you. Your actions, your sacrifice, can save the lives of hundreds of ancient living Joshua Trees, the lives of people of the land who need little and are abundant, the people you may not know but rely upon you. The hardest denial we all accept in our day and age: the supernatural ability to see a piece of mother nature, and do nothing. This is what we ask, what we pray for. Thank you for taking the time to read this, and thank you for all that you do. I hope you find it in your heart to help us do the impossible.

With love,
Alex Valdivia
1310-962-8259

Biggs, Lupe

From: Nicola Vruwink <nicola@nicolavruwink.com>
Sent: Wednesday, April 20, 2022 10:06 PM
To: Morrissey, Jim
Subject: Project # PROJ-2020-00191, Assessor Parcel Number (APN) 0629-181-01

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Mr Morrissey,

I am writing you again to express my concern regarding Project # PROJ-2020-00191, Assessor Parcel Number (APN) 0629-181-01, also known as Flamingo 640. If you read no further, do understand that I am demanding a complete, unbiased, and diligent **Environmental Impact Report be conducted.**

I trust that you will complete the due diligence to thoroughly consider the negative impact this project will have on the environment, the community, and the future of the desert as we now know it.

I am deeply concerned to learn that this project is being moved forward without a complete and diligent **Environmental Impact Report.** The Draft study that has been made available contained unsubstantiated claims clearly with the goal of trying to pass this project through backchannels without the support or consultation with the surrounding community and with blatant disregard of the local ecological environment.

The proposed development will have a disastrous effect this project will have on our lands and beyond, effects that will be irreversible. I am writing to urge you, at the very least, to persuade the county to require a **thorough and unbiased Environmental Impact Report before this project moves along any further. Truthfully, the project should be completely abandoned, but, should it proceed, a full EIR needs to be conducted.**

As you are aware, the Mojave Desert Land Trust and the Center for Biological Diversity have both deemed this a wildlife corridor, and this ridiculous project that clearly has zero regard for the environment would block the entire width of an important wildlife connectivity corridor between the San Bernardino Mountains, Joshua Tree National Park, and the central Mojave.

Again, clearly, this project has no invested interest in the local habitat and environment as demonstrated by the following: on page 27, the Initial Study claims that the project won't contribute to habitat fragmentation because permanent structures would not physically block wildlife migration. However, the extensive presence of humans camping and recreating on the land will dissuade wildlife species from migrating through Pipes Canyon as these species, such as

bighorn sheep, the mountain lions, and others, are wary of any contact with humans. **Clearly, an unbiased and complete EIR (Environmental Impact Report) needs to take place.**

Additionally, there are hundreds of western Joshua trees (*Yucca brevifolia*) on the proposed site of the development. Joshua trees are a state-protected species being considered for listing as Threatened under the California Endangered Species Act. At this time, the County cannot issue a permit to take (by removal or transplanting any individual) western Joshua trees.

The suggestion that any harm could be avoided by relocating the trees is extremely misleading as Joshua trees generally die after relocation, as do mature mesquites.

The initial study also lists other false claims including "There are no desert tortoise occurrences documented on-site or directly adjacent to it...Desert Tortoise are therefore currently absent from the Project Site". However, a 2006 study by leading tortoise experts found seven adult desert tortoises on the developable section of the property. Neighbors of the proposed site can provide evidence and have pictures of tortoises within the vicinity of the proposed development.

Additional environmental hazards include the following:

- the original study claims "LeConte's thrasher was neither observed nor detected on-site during the avian auditory and visual survey. Therefore, LeConte's thrasher is currently absent from the project site." However, community scientists have documented multiple observations of LeConte's thrasher within a mile of the site in the last three years.
- Other wildlife species using the site include burrowing owls, coyotes, migratory bird species, badger, desert kit fox, Gambel's quail, and Bendire's thrasher

Additional negative ramifications:

LIGHT POLLUTION

- Dark skies: new construction in a formerly dark area will introduce a new source of light where none existed before. Simple compliance with the law is NOT equivalent to no impact. The light sources will still be visible from neighboring properties, and (dangerously) from the highway.

TRAFFIC SAFETY

- Route 247 is a dangerous high-speed highway. Adding a destination which hundreds of vehicles will be entering and exiting on a particularly hazardous stretch of the road is potentially disastrous. First responder response times can be lengthy. Safety would require adding an additional lane and even a vehicle-controlled stoplight. A Traffic Impact Study is not only warranted but necessary and failing to do so is unacceptable. I demand you do a traffic report.

NO AMENITIES OPEN TO THE PUBLIC

- According to the Notice of Availability sent out to neighbors, Glamping “destination resort” with support facilities, none of which are to be open to the public, including restaurants/bar, reception area/store, trails and paths, recreation buildings, and a helipad on a 25-acre portion of a 640-acre parcel

- The county needs to confirm, in writing, that the owner will not be allowed to develop the music festival venue with the helipad, the bar, and the restaurant described in the project documents, We appreciate the verbal assurances from contract staff, but that change needs to be made formal and permanent.

FIRE SAFETY

- Winds get up to 20mph and upwards of 100mph in this proposed area. Placing a campsite for hundreds of people at the mouth of Pipes Canyon means that any campfires lit during high wind events could easily spread eastward, threatening habitat and people’s homes. High winds also imply that trash discarded by careless campers will be distributed throughout the Landers area, an unsightly inconvenience to residents and a threat to local wildlife.

- Concentrating campfires in this area upwind of most of the Morongo Basin also means a new source of particulate matter pollution, a serious concern in the Basin during both winter months and the peak of fire season.

WATER

- Proponents’ plans suggest that wastewater will be directed to a leach field on the property, north of the resort. A stormwater retention basin will be sited immediately east of the sewage disposal leach field. What volume of wastewater is projected to be disposed of via this leach field (considering perhaps 200-300 guests in a typical weekend in season)? Are hydrology studies available that ensure this large addition of wastewater won’t infiltrate into neighbors’ wells (there are at least 61 domestic wells within a few miles downstream) or the aquifer serving Bighorn Desert View Water Agency? Would stormwater capture from the project’s hardened surfaces accentuate this percolation of sewage?

- Water use: the Initial study says that the project would consume 18,150 gallons of potable water per day, a bit more than 20 acre-feet per year. The study compares this to an estimate of 14,568 gallons per day were the site to be developed to its maximal footprint for residential use at 82 units. The failure of attempts to develop residences on the land due to seismic hazards is not mentioned, nor is the fact that not developing the land instead of developing the resort would consume zero gallons per day.

SEISMIC ACTIVITY

- A housing project on this site was denied permit due to a nearby earthquake fault. Though Flamingo 640 would be a much smaller development than that previous proposal, the plan still incorporates structures (camping “lofts,” as well as other guest amenities) that could pose a

hazard during a quake, and which may disqualify the project from obtaining a Conditional Use Permit.

There is much more to be said about the lack of thorough consideration of how Flamingo 640 would negatively impact the community, the desert ecosystem, and environment. Essentially, the developers want to convert valuable conservation land surrounded by low-density rural zoning into a traffic-choked playground for the more affluent.

I demand the issues I have pointed out be addressed and again, will not be satisfied until a thorough and unbiased Environmental Impact report is conducted.

As a Rural Living community, we do not need a private "resort" experience or "hotel" in a rural zoned area that would do nothing to our community except add danger on the roads, add unnecessary hazards in an area already distinguished as a threat from wildfires, knowingly disrupt and destroy the natural environment, pollute the area with noise and light and change the character of our community irreparably. If one of the listed "objectives" for this development is to relieve camping congestion in the National park, then a safe and small public campsite and trails would do much less damage, not a private resort experience out of the price range of the residents who live here, or campers who would otherwise camp in the national park.

Sincerely,
Nicola Vruwink
Resident, Landers
1025 Singletree
Landers, CA 92285

Biggs, Lupe

From: Rolf Wicklund <rolf@soaringife.com>
Sent: Monday, May 16, 2022 6:18 PM
To: Morrissey , Jim
Subject: Comment on the Flamingo 640 site proposal, from nearby property owner

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

To: Jim Morrissey, County Planner

Dear Mr. Morrissey,

My wife and I moved from Orange County to Yucca Valley several years ago, to enjoy the seclusion and nature found on the mesa.

I recently learned about the large Flamingo 640 site proposal, which is only a few thousand feet from our home at 57778 Junipero Trail. I am strongly against this proposal, to me it seems completely out of touch with the neighborhood and with the general reasons that people move up on the mesa. Since the proposal is from an outside development firm located in Beverly Hills, I am not surprised that it's tone deaf to the character of the neighborhood.

We hope that you will agree and do everything in your power so that this project does not proceed in the current location, in any form.

Thank you,
John Wicklund
57778 Junipero Trail, Yucca Valley
949-861-1404

Biggs, Lupe

From: Vicki Williams <dunedogs@aol.com>
Sent: Friday, April 22, 2022 12:57 PM
To: Morrissey , Jim
Subject: Resort Camping Project Number PROJ-2020-00191

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Jim,

We (myself and my family members) are sending this email today to address the proposed "Glamping" project referenced above. We received your NOTICE OF AVAILABILITY/NOTICE OF INTENT TO ADOPT AN INITIAL STUDY/MITIGATED NEGATIVE DECLARATION CONDITIONAL USE PERMIT FOR A RESORT CAMPING FACILITY.

We live directly across Highway 247 (on Yellowknife Rd.) from the proposed site and the view out of our windows in our home overlook this 640 acre site.

We purchased our family home way back in 1994, 28 years ago. We chose our remote location for the peace, quiet and solitude along with the natural surrounding beauty of the unexplored and undeveloped desert in this area. We decided to purchase our property outside of the Yucca Valley town limits to achieve this goal.

We have truly treasured our home over the years and we are extremely concerned that the proposed project would have a HUGE impact on our current living situation.

We have many, many concerns but the main concerns are environmental. We see wildlife constantly, on a daily basis and that is part of the magic and beauty of the desert. This project would definitely have an impact on the wildlife.

Another issue is the traffic. Highway 247 is already a very dangerous route and we see automobile accidents on a regular basis in front of our house due to the bend that occurs coming out of Pipes Canyon heading north where the road turns and becomes straight. Many cars choose to pass as soon as they get to this part of the highway and it is a danger zone. The proposed site begins exactly where the highway becomes straight (the danger zone). The proposed increase in traffic will only worsen this condition that we see first hand on a regular basis.

The next issue is that this property isn't zoned for commercial use and there is a good reason for that. The local neighbors all agree that we live in a residential zone, NOT A COMMERCIAL zone.

And then there is the helipad and amphitheater. That is a whole different issue. This isn't Los Angeles and why would local residents support such opulence ??? And why would San Bernardino County even consider imposing this on us?

We understand that past surveys (performed during optimal times of year for the developer) have been done, but this isn't solid proof of what actually happens in an ongoing situation year-round.

We are convinced that an accurate Environmental Impact Report should be mandatory and will produce findings for significant impacts to biological, cultural, visual resources, and traffic and highway safety, not determined in the less comprehensive Mitigated Negative Declaration that was provided to the public.

We hereby request respectfully that you consider the devastating impact that you are proposing on an entire community who just want to live peacefully without big city interference.

Sincerely,

Vicki Williams
2376 Yellowknife Rd.
Yucca Valley, CA 92284 (Flamingo Heights)

Biggs, Lupe

From: Lauren Every-Wortman <laurenallegra3w@gmail.com>
Sent: Friday, April 15, 2022 9:36 AM
To: Morrissey, Jim
Subject: Project # PROJ-2020-00191, Assessor Parcel Number (APN) 0629-181-01

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Mr. Morrissey,

This project should be abandoned but if proceeds *we DEMAND a full Environmental Impact Report (EIR).*

After every instance of you pointing out insufficient information - or discussion of a topic, it would be good to include a sentence to the effect of "This information should be provided in a full Environmental Impact Report."

Mojave Desert Land Trust and the Center for Biological Diversity have both deemed this a wildlife corridor

The project would block the entire width of an important wildlife connectivity corridor between the San Bernardino Mountains, Joshua Tree National Park, and the central Mojave

On page 27, the Initial Study claims that the project won't contribute to habitat fragmentation because permanent structures would not physically block wildlife migration. But building and human presence on the rim of the wash may very well dissuade wildlife species from migrating through Pipes Canyon if those species are wary of any contact with humans. Examples could include desert bighorn sheep and mountain lion. Fuller discussion is needed.

There are hundreds of western Joshua trees (*Yucca brevifolia*) on the developable section of the property. Joshua trees are a state protected species being considered for listing as Threatened under the California Endangered Species Act. At this time, the County cannot issue a permit to take (by removal or transplanting any individual) western Joshua trees.

Joshua trees may still be listed by the California Fish and Game Commission in June. The county suggests that as Joshua trees and other desert plants will be avoided or relocated, there's no significant impact. Joshua trees generally die after relocation, as do mature mesquites. Relocating a creosote ring might work technically but destroys the prehistoric value of the plant.

There are potential creosote clonal rings in excess of 4,000 years old on the site. Yucca clonal rings of similar age may exist. A 2006 study by leading tortoise experts found seven adult desert tortoises on the developable section of the property. The proponents' recent study finding no tortoises is methodologically suspect.

The Initial study claims "There are no desert tortoise occurrences documented on site or directly adjacent to it...Desert Tortoise are therefore currently absent from the Project Site" Neighbors of the site have evidence to the contrary. Worth mentioning in as many comments as possible.

If something is up to code and compliant with zoning ordinances it does NOT mean there's no significant visual impact.

Air quality impacts from visitor traffic are based in the initial study on an assumption of 20 vehicles per hour for a total of 200 vehicle trips. However, this assumes not only that visitors will arrive at times staggered throughout the day, rather than within a few hours on a Friday night (and similarly leaving on Sunday morning) but also that once arrived, visitors will not make multiple trips to Joshua Tree NP, to Pioneertown, to Coachella or even a few hundred yards up the road to La Copine. Given that the proponents expect a maximum visitorship of 300 and as many as 50 seasonal employees arriving at the site each day, 200 vehicles may be a conservative estimate.

Route 247 is a dangerous high-speed highway. Adding a destination which hundreds of vehicles will be entering and exiting on a particularly hazardous stretch of the road is a bad idea. First responder response times can be lengthy. Safety would require adding an additional lane and even a vehicle-controlled stoplight. A traffic study is warranted.

According to the Notice of Availability sent out to neighbors, Glamping "destination resort" with support facilities, none of which are to be open to the public, including

restaurants/bar, reception area/store, trails and paths, recreation buildings, and helipad on a 25-acre portion of a 640-acre parcel.

The county should confirm in writing that the owner will not be allowed to develop the music festival venue with helipad described in the project documents, or the bar and restaurant also described. We appreciate the verbal assurances from contract staff, but that change needs to be made formal and permanent.

Pipes Canyon is a natural break in the mountains through which high winds from the west are often funneled. Placing a campsite for hundreds of people at the mouth of Pipes Canyon means that any campfires lit during high wind events could easily spread eastward, threatening habitat and people's homes. High winds also imply that trash discarded by careless campers will be distributed throughout the Landers area, an unsightly inconvenience to residents and a threat to local wildlife.

No discussion of noise levels after 10 pm is included in the initial study. Unless the operators intend to enact and enforce a 10 pm curfew policy, this should be discussed in an environmental assessment. Noise from traffic on Old Woman Springs road would be appreciably lower during night-time "party" hours than the 50.6dBA cited during daytime hours.

Proponents' plans suggest that wastewater will be directed to a leach field on the property, north of the resort. A stormwater retention basin will be sited immediately east of the sewage disposal leach field. What volume of wastewater is projected to be disposed of via this leach field (considering perhaps 200-300 guests in a typical weekend in season)? Are hydrology studies available that ensure this large addition of wastewater won't infiltrate into neighbors' wells (there are at least 61 domestic wells within a few miles downstream) or the aquifer serving Bighorn Desert View Water Agency? Would stormwater capture from the project's hardened surfaces accentuate this percolation of sewage?

The Initial study says that the project would consume 18,150 gallons of potable water per day, a bit more than 20 acre-feet per year. The study compares this to an estimate of 14,568 gallons per day were the site to be developed to its maximal footprint for residential use at 82 units. The failure of attempts to develop residences on the land due to seismic hazards is not mentioned, nor is the fact that not developing the land instead of developing the resort would consume zero gallons per day.

As a Rural Living community, we do not need a private "resort" experience or "hotel" in a rural zoned area that would do nothing to our community except add danger on the roads, add unnecessary hazard in an area already distinguished as a threat from wildfires, knowingly disrupt and destroy the natural environment, pollute the area with noise and light and change the character of our community irreparably. If one of the listed "objectives" for this development is to relieve camping congestion in the National park, then a safe and small public campsite and trails would do much less damage, not a private resort experience out of the price range of the residents who live here, or campers who would otherwise camp in the national park.

Please respect the wishes of our community and do not bow down to corporate interests. They don't live here and don't know the hazardous impacts of their proposed developments.

Thank you for taking the time to read and take note of the community's concerns.

All my best,

Lauren Every-Wortman

Joshua Tree, CA, 92252

Sent on the go. Please excuse any typos.

Biggs, Lupe

From: Kevin Yoshikawa <kevin_y@fe26.com>
Sent: Tuesday, April 19, 2022 6:26 PM
To: Morrissey , Jim
Subject: PROJ-2020-00191

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Mr. Morrissey

I am very troubled by this project. It is a Major Commercial Development, disguised as a Campground in a Residential neighborhood in a vital Wildlife Corridor. Camping is allowed in this zone with a CUP, but these would be permanent structures and a real stretch of what the Development Code construed as Camping. None of the other proposed structures and uses would be allowed in this zone: Retail, Restaurant, Bar, Fitness Centers, Helipad, Warehouse Buildings.

This would be a very intensive use for the area and should be examined with much more scrutiny. The Traffic Impact, Noise Impact and Environmental Impacts would be much greater than the Initial Study assesses. The concentration of traffic at peak times is not properly accounted. The noise generated from a concentrated group should be assessed. Light Pollution for a concentrated development should be accounted. The observation of the existence of wildlife seems to contradict several recent studies. The concentration of Waste Water will definitely have an impact on groundwater.

Sincerely,
Kevin Yoshikawa

Biggs, Lupe

From: michael.z@verizon.net
Sent: Thursday, April 21, 2022 1:15 AM
To: Morrissey, Jim
Subject: RE: Resort Camping-Proj-202000191 APN 0629-181-01

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Jim Morrissey
jim.morrissey@lus.sbcounty.gov
909-387-4234

RE: Resort Camping-Proj-202000191 APN 0629-181-01

Mr Morrissey:

I respectfully request that San Bernardino County not approve this Conditional Use Permit, and reject this project.

This Initial Study fails to adequately address the impact, of the development, on both the natural environment and the local community.

Numerous issues are evident, to those familiar with the area, and these matters should not be trivialized or ignored.

Environmental Impact:

Pipes Wash is part of a vital migratory pathway. It links neighboring protected wilderness areas, including Joshua Tree National Park and The Bighorn Mountain Wilderness. Impacting this vital corridor would create far-reaching, environmental consequences. This migratory route needs to be protected. Seasonal access to highland and lowland regions is vital to the survival of Desert Bighorn Sheep.

The Desert Tortoise is an endangered species. Their presence in the wash is common knowledge. It appears the developers have failed to exercise due diligence, in their attempt to locate this species. The tortoise spends more than 95% of its life, in burrows. Knowledge of their habitat and timing are needed to locate them. The same is true of many other desert species. If the tortoises were listed as absent, I wonder what other species were similarly unobserved.

An Environmental Impact Report needs to be completed and must not be side-stepped, by this Conditional Use Permit.

Community Impact:

This is a sparsely populated rural area, with very limited infrastructure. Homestead Valley was laid-out in five acre parcels, intended for single family homes. Residents utilize private septic systems with leach fields. There are no public sewer systems. Some residents rely on wells. Police, Fire and Emergency Services are proportionately limited. Roads are unpaved and hard to navigate. Fire hydrants are few and far between. There are no street lights and stars fill the night sky. This full service commercial resort dose not belong here. The proposal of a helipad and 2,500 seat concert venue is egregious.

It seems foolish to ignore lessons taught by recent history. This is a high wind area. Wildfires have recently destroyed both homes and habitats. The proposed campfires would be hazardous, during routine weather conditions. Water resources are also historically low, contributing to the increased fire risk. Emergency access to the area is limited. After the Landers Earthquake, the roadway was impacted by the San Andreas Fault, creating serious issues.

Flamingo Heights is accessed by a very dangerous stretch of road . Old Woman Springs Road is an undivided, two lane highway. There are no paved shoulders and few passing areas. Speeds often exceed 90 mph. Visibility is very poor. Rolling terrain creates extended blindspots. Traffic safety is already of great concern, to residents. Unpaved roads present a challenge, when entering and exiting this high speed roadway. Those unfamiliar, with these extreme conditions, would be at increased risk of accidents. The presence of an "Aguave Bar" serving guests alcohol, would not help the situation.

This is not an appropriate place for a commercial resort, bar, restaurant, concert venue or heliport. The developers are downplaying their impact upon the environment and the rural community surrounding it.

These developers, are based in Beverly Hills. They serve the needs of their investors. Serving the needs of Flamingo Heights and protecting the environment are not their priorities.

Please help protect Flamingo Heights and Homestead Valley.
Reject this Conditional Use Permit.

Sincerely,
Michael Zielinski

Please keep me informed of any future communications (michael.z@verizon.net) 310-922-1889