

The Mojave Desert Land Trust

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March 3, 2008

Planning Commission
Town of Yucca Valley

Subject: Public Hearing 2. General Plan Amendment GPA 01-06, Rezone RZ 01-06, Tentative Tract Map TM 17862, Environmental Assessment EA 05-06-Copper Hills

Dear Commissioners:

The mission of Mojave Desert Land Trust (MDLT) is to protect the Mojave Desert ecosystem and its cultural and scenic resources. We are working with the Morongo Basin communities, Joshua Tree National Park and the Twentynine Palms Marine Base to identify and protect buffer lands and ecological linkages. We appreciate this opportunity to comment on the Copper Hills Homes development within the Wildland-Urban Interface (EUI) area.

Recently, with the support of citizens throughout the Basin, we were able to purchase Nolina Peak, a section of buffer land which shares boundaries with the National Park, Joshua Tree and Yucca Valley. In July 2006 the southern boundary of Nolina Peak was burned in the 990 acre Whispering Pines fire, which followed on the heels of the 352 acre Covington fire. These two fires were a frightening reminder that Covington Flats is an increasingly active fire corridor (5 fires since 1995 totaling 21,104 acres) that threatens the developed and developing areas in communities to the north. *Please see attached map.*

The California Department of Forestry and Fire Protection recently mapped fire hazard severity zones for Local Responsibility Areas (LRA). I am enclosing the map for the Town of Yucca Valley. The community of Yucca Valley is considered to be in a WUI area with significant fire threat from nearby sparsely settled federal Lands (National Park and Forest Service) with high fuel loads and rugged terrains. A buffer distance of 1.5 miles was used in the analysis to define "nearby" federal lands. The Copper Hills Homes development is in a moderately severe zone immediately adjacent to the very high zone at the toe of Long Canyon and foothills. *(Please see attached map and note that MDLT modified the map so that the legends are large enough to read and labeled Nolina Peak and the Park for reference.)*

The updated Hazard Severity Zone maps (2007) support the Wildland-Urban Interface codes adopted by the California Building Commission effective in 2008. The codes contain standards, including those for materials and construction methods for wildfire exposure and vegetation clearance requirements in WUI areas. Enforcement of the standards is by either the building official or fire authority.

When I initially spoke to the Commission on fire hazards associated with the Copper Hills Homes development I was instructed by Bill Warner of Warner Engineering that the County Fire Department had approved the project. We would want to be sure that the approval was current with the new codes. The density of the proposed development (109 homes on 63 acres), in addition to the surrounding existing and proposed developments at densities greater than 1 home per 5 acres, could create devastating public safety conditions in the event of a wildland fire sweeping down any of the canyons to the south. Firebrands riding convection currents can precede the fire front by a mile and recent fires demonstrate that tightly bunched houses create their own combustion zone as flames leap from building to building. In addition the hazardous traffic conditions created when a large number of people flee an area with limited escape routes needs to be analyzed.

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In summary, the Copper Hills Homes development is located within the Wildland-Urban Interface zone and should be analyzed under the new WUI codes, with additional consideration given to housing density and escape routes in the event of a wildland fire.

Thank you for this opportunity to comment. Enclosed you will find a copy of the Draft Fire Hazard Severity Zones for LRA – Yucca Valley map and the map for Joshua Tree National Park Fires 1995-2006.

Sincerely,

Pat Flanagan
Program Coordinator