

The Mojave Desert Land Trust

6393 Sunset Road, Suite 211

Joshua Tree, CA 92252

March 11, 2008

Yucca Valley Community Development

Robert Kirschmann

Associate Planner

Subject: Pre Application PA 01-08 – Katz

Dear Mr. Kirschmann

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 Katz Pre-Application PA 01-08.

The project is located in a Wildland-Urban Interface Zone of lush Joshua Tree Woodland foothills fronting steep mountainous slopes. During a survey several years ago Circle Mountain Biological Consultants identified desert tortoise habitat in the lower elevations (personal communication). The mountainous terrain is contiguous with the mule deer linkage to the west which connects the San Bernardino Mountains with Joshua Tree National Park (see the attached map from *A Linkage Design for the San Bernardino-Little San Bernardino Connection*).

Although the number of houses conforms to the zoning designation, the density of homes on the precipitous slopes as shown is reminiscent of the worst sprawl design that Orange County has to offer. If this project were developed at this density it would blight the gateway view into Yucca Valley, create flooding and siltation problems downslope, and it would hinder the natural movement of animals between the two mountain ranges.

In September 2007 the California Department of Forestry and Fire Protection released the updated Hazard Severity Zone maps which support the Wildland-Urban Interface codes adopted by the California Building Commission effective in July 2008. This project is located in a large area identified as a very high fire hazard severity zone. (See attached map.) The codes contain standards, including those for materials and construction methods for wildfire exposure and vegetation clearance requirements in WUI areas. The updated zones will also be used by property owners to comply with natural hazards disclosure requirements at the time of property sale and 100 foot defensible space requirement.

The density of the proposed development could create devastating public safety conditions in the event of a wildland fire sweeping down the mountain face. 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.

In closing, we believe that the scale of this project would not preserve the wildlife habitat and natural plant communities which connect the San Bernardino and Little-San Bernardino Mountains nor provide the citizens of Yucca Valley with a safe and healthful quality of life as intended by the General Plan.

Sincerely,

Pat Flanagan

Program Coordinator

Phone 760.366.5440 - FAX 760.366.9103 – www.mojavedesertlandtrust.org

The Mojave Desert Land Trust
is a 501(c)(3) public charity