

# The Mojave Desert Land Trust

6393 Sunset Road, Suite 211  
Joshua Tree, CA 92252

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April 25, 2008

Gary Kovall  
29 Palms Band of Mission Indians  
46-200 Harrison Place  
Coachella, CA 92236

Subject: 29 Palms Casino Project

Dear Mr. Kovall:

The Mojave Desert Land Trust appreciates this opportunity to comment on the NuWu Casino Project. We are addressing the construction and placement of the campground and buildings as they relate to the surface hydrology on the alluvial fan. We offer these comments for your consideration as you go forward.

The NuWu Casino complex is being built on the alluvial fan which drains from Joshua Mountain toward the Oasis of Mara. The Oasis was formed by fault movement 9,400 years ago and was a sacred area supporting the Serrano and Chemehuevi peoples before becoming the signature landmark for Twentynine Palms. The groundwater supplies are limited and infiltration (if there is any) happens at the Oasis where the fault line naturally traps the water. As the water level has dropped in recent years it has been necessary to supplement the pond and water the palms. The surface vegetation south of the Oasis functions as both habitat and erosion control and is totally dependent on surface runoff.

The surface hydrology feeding the Oasis is compromised by several roads on the west but relatively free of interruption east of Adobe Road. The NuWu Casino is the first real impediment to the natural flow of water down the fan. Normally a retention or detention basin would be built on the Casino property to capture hundred year flood waters. The 29 Palms Inn has constructed detention basins south of their cabins to capture summer flood waters and possibly recharge the groundwater.

We are suggesting that as the planning goes forward every consideration be given to allowing the natural drainage to continue to the Oasis to preserve the existing surface vegetation and possible recharging opportunities. This would include using permeable pavers on the hard surfaces to slow the water down rather than speed it up. It would also require that grading be kept to the areas of construction so the natural vegetation and surface crust can continue to function as erosion control. It would require designing and siting a detention basin with the down slope needs in mind. And it would require working with the city to additionally modify the asphalt curbs on Base Line.

We thank you for your consideration and please feel free to contact me if I can provide needed clarification.

Sincerely,

Pat Flanagan  
Project Coordinator