

April 25, 2021

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.

1) In 2009, SB County Land Use Services asked HVCC to host a public hearing on proposed changes in land use zoning strategy along State Route 247 in Flamingo Heights and Landers.

HVCC widely publicized via newspaper, radio and social media this meeting, held on December 14th, in Landers.

2009 ZONING CHANGE: The existing zoning HV/SD-RES could make future high density residential development possible. The change to HV/RL 2.5, making the minimum property size 2.5 acres per residence was presented to us as a method to maintain the area's rural character.

Zoning along State Route 247 would change to Commercial, limiting the frequency of driveways into the highway. Property taxes would not change for residents, unless they changed their property to commercial use.

After the public agreement to these variances, LUSD recommended the change to the Board of Supervisors.

This determination of the Commercial Zone does not include Parcel No. 0629-181-01

2) HVCC is lead organization in the campaign to upgrade S.R.247 from a County Scenic Byway to a California Scenic Highway. Co-ordinating with County Land Use Services and the Caltrans Landscape Architect Dept., HVCC has presented a Visual Assessment which Caltrans has reviewed, and has almost completed the Corridor Protection Plan. The Scenic Corridor extends as far as the eye can see. We find it difficult to see how the proposed commercial campground can be established on this parcel without being considered a major intrusion by Caltrans.

3) In researching land protections already in existence in the Scenic Corridor, we discovered the Bureau of Land Management has included a very wide area around the black lava buttes in their *Pipes Canyon Area of Critical Environmental Concern*. This ACEC surrounds Pioneertown and Rimrock; it is south of Landers and North of Yucca Valley and includes the site of the proposed campground.

Nationally Significant Cultural Values: Cultural: The Pipes Canyon area

has numerous prehistoric resources that meet criteria for inclusion in the National Register of Historic Places (NRHP).

This area has the greatest concentration of known NRHP eligible sites within the Barstow Field Office. Sites include petroglyphs, pictographs, rock shelters, village sites, and milling sites. This area is of particular cultural interest to local native American Tribes.

4) County Land Use Services Department wrote the following in their introduction to the *Scenic 247 Visual Assessment*:

"SR 247 is still a two-lane "backcountry" highway, as it has been since it was first graded in 1958. It travels through high desert regions where little has changed for hundreds of years.

"The Mojave Desert is one of the largest intact ecosystem in North America. Vast swaths of land on both sides of the highway are designated as wildlife corridors and BLM ACEC's (*Areas of Critical Environmental Concern*.) Landforms and topographic features are varied and layered.

"Especially remarkable are the intact long-distance views from the highway. Travelers are delighted by desert plant life that is both visually sculptural and well-suited for survival in the dry landscape.

"The iconic Joshua tree appears alone and in forest stands. Mojave Yucca and Creosote bush prevail. Springtime wildflowers can be astonishing..."

Establishing a large campsite in the proposed location contradicts this description. The plant life on this parcel includes the leading edges of a Joshua Tree forest, amazing at this low altitude, nurtured by the snow and rain which Pipes Canyon funnels from higher altitudes into the region.

Given the zoning agreement we entered into in 2009, the intrusion of this commercial campsite not only into the line-of-sight in S.R. 247 Scenic Corridor, but also into this BLM *Area of Critical Environmental Concern*, HVCC strongly opposes a Conditional Use Permit for this project.

Thank you for your attention,



Betty Munson
Secretary, HVCC



SECTION 1

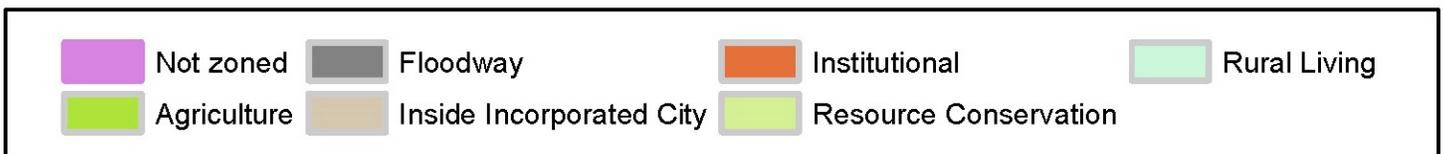
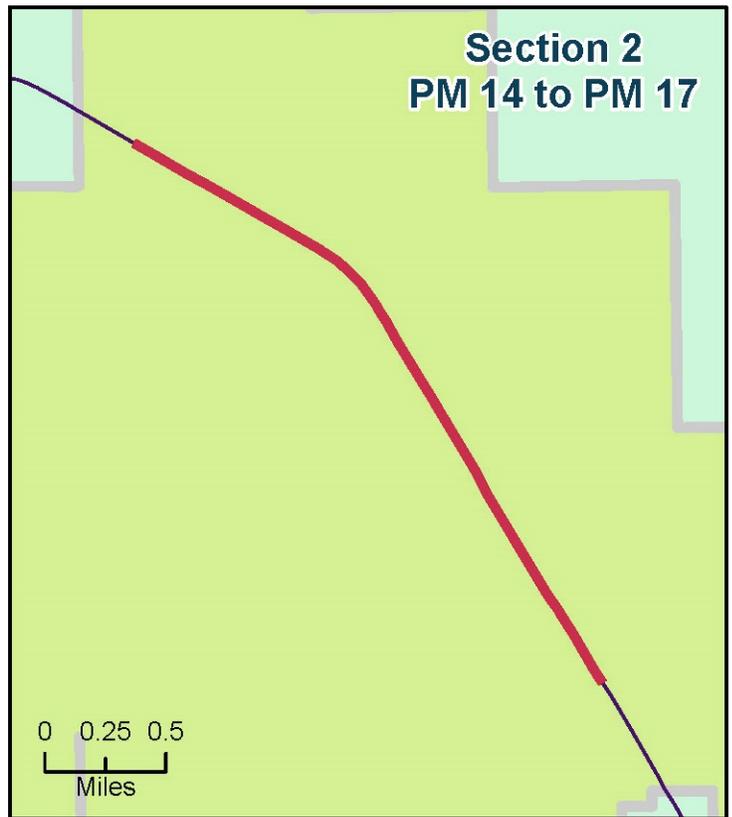
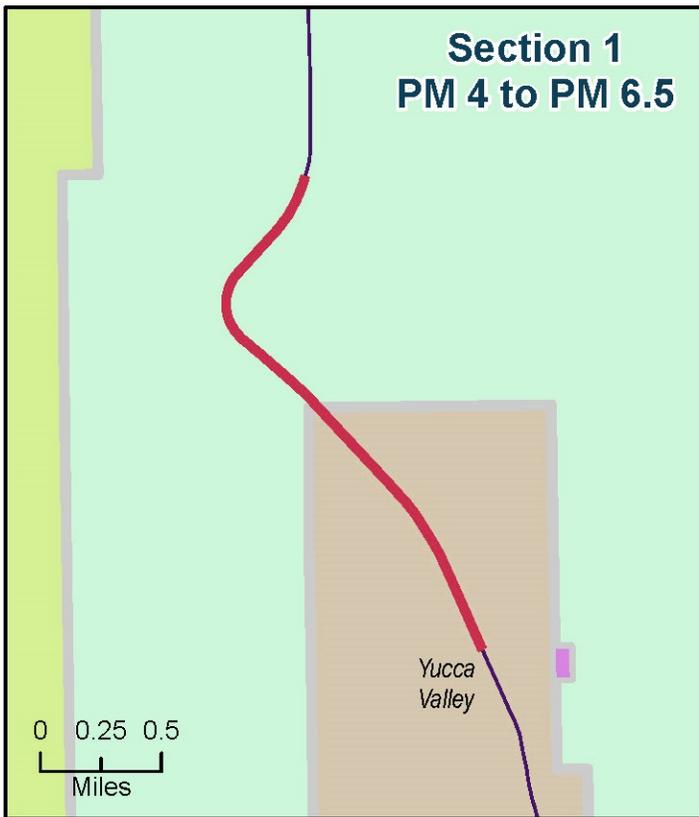
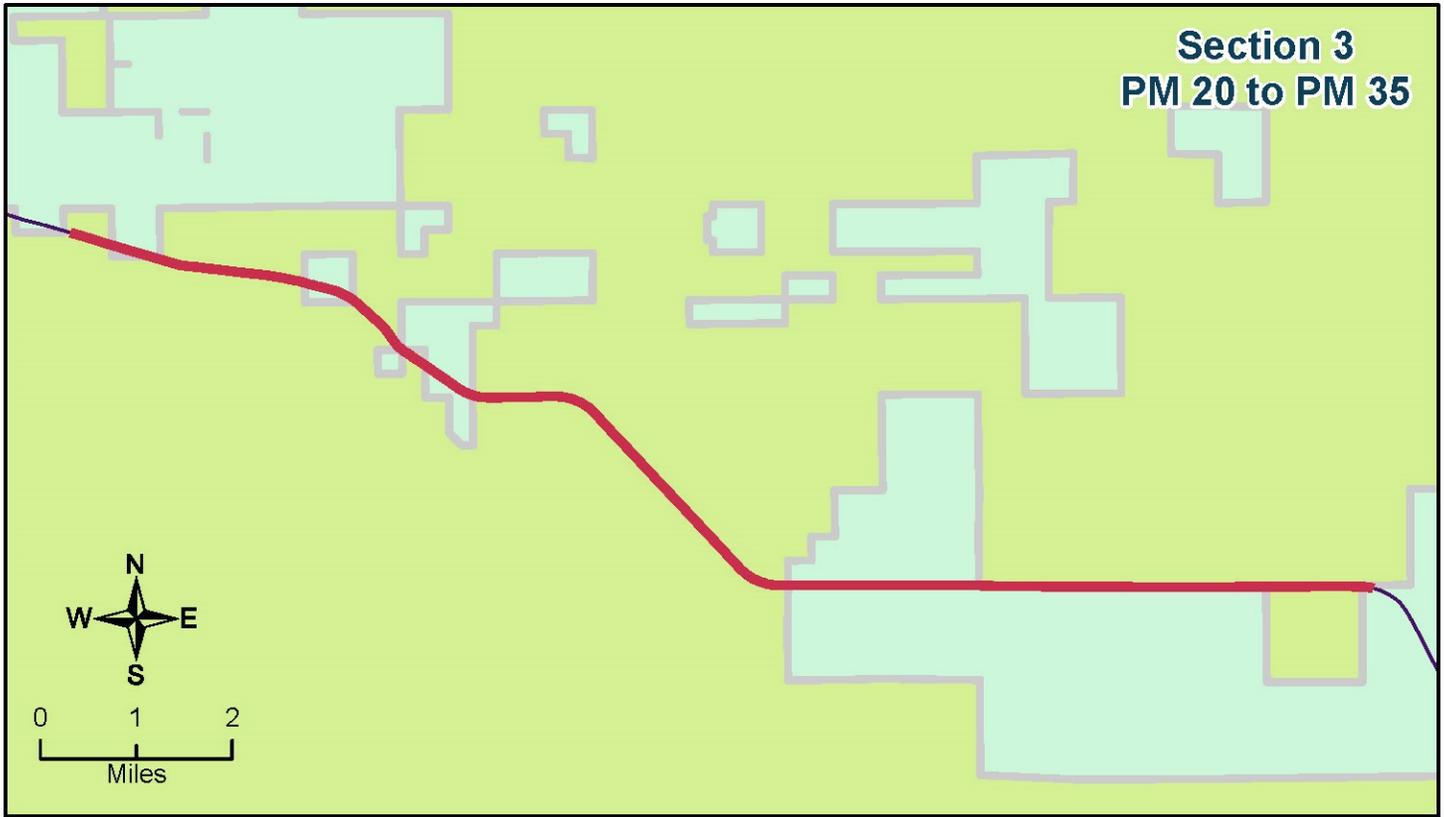
PM 4 to PM 6.5

- PM Figure Locations
- Minor Intrusion
- Moderate Intrusion
- Major Intrusion
- Scenic Highway

Unlabeled Intrusions are Residential



Land Use Type - Scenic Highway 247



Pipes Canyon

California Desert National Conservation Lands Ecoregion : Pinto Lucerne Valley and Eastern Slopes

Description/Location: Surrounds Pioneertown and Rimrock, it is south of Landers and North of Yucca Valley.

Nationally Significant Values:

Cultural: The Pipes Canyon area has numerous prehistoric resources that meet criteria for inclusion in the National Register of Historic Places (NRHP) as contributing elements of an Eligible District. This area has the greatest concentration of known NRHP eligible sites within the Barstow Field Office. Sites include petroglyphs, pictographs, rock shelters, village sites, and milling sites. This area is of particular cultural interest to local native American Tribes.

Special Designations/Management Plan/Date: No previous special designation.

Relevance and Importance Criteria: Relevant and important resource values include prehistoric cultural resources associated with various indigenous periods. Area has numerous prehistoric resources that would meet criteria for inclusion to the National Register of Historic Places as contributing elements of an Eligible District. This area has the greatest concentration of known NRHP eligible sites within the Barstow Field Office.

Overarching Goals: Protect cultural, historic, and scenic values while providing for compatible public uses.

Where the CMAs in this Special Management Plan conflict with the CMAs included in the LUPA, the more restrictive CMA would be applied (i.e. management that best supports resource conservation and limits impacts to the values for which the conservation unit was designated), unless otherwise specified.

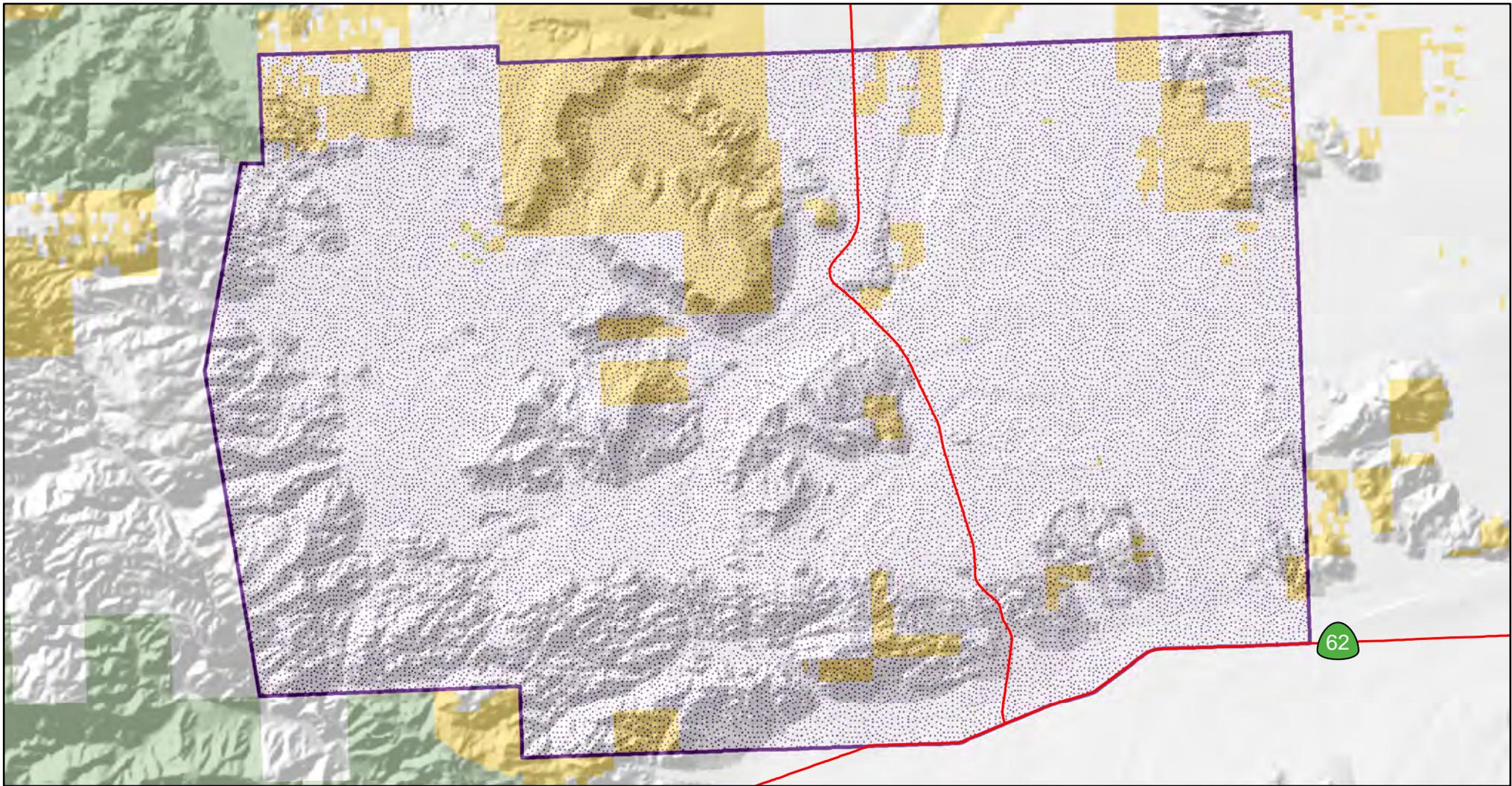
A portion of this area is included in the California Desert National Conservation Lands. The BLM will manage this area to protect the Nationally Significant Values above. Appropriate multiple uses will be allowed, consistent with this Special Unit Management Plan and the CMAs in the LUPA. If an activity is not specifically covered by the CMAs, it will be allowed if it is consistent with the Nationally Significant Values, but prohibited if the uses conflict with those values.

Designation and Acreage:

BLM Acres of NLCS within ACEC or Wildlife Allocation	BLM Acres within ACEC	BLM Acres within Wildlife Allocation	ACEC Disturbance Cap
4,600	8,720	0	0.10%

*** Acreage values are for BLM managed lands**

Objectives (desired future conditions)/Allowable Uses/Management Actions	Resource
<p>Objective: Protect sensitive cultural resources from human disturbance</p> <p>Allowable Uses: Restricted motorized use to designated routes of travel</p> <p>Management Actions:</p> <ul style="list-style-type: none"> • Monitor and enforce closure of selected routes of travel • Install signs and use barriers to direct vehicle traffic away from sensitive cultural resources 	Trails and Travel Management
<p>Objective: Provide for dispersed opportunities while protecting relevant resources</p> <p>Management Action:</p> <ul style="list-style-type: none"> • Prohibit establishment of new routes near sensitive cultural resources 	Recreation
<p>Objective: Consolidate through tenure adjustment.</p> <p>Management Action:</p> <ul style="list-style-type: none"> • Acquire inholdings, edgeholdings and other interests from willing sellers 	Land Tenure
<p>Objective: Protect resource values of the ACEC</p> <p>Management Actions:</p> <ul style="list-style-type: none"> • Land use authorization proposals (new, renewal, and amendment) will be analyzed on a case-by-case basis to assess whether they are compatible with the ACEC and its management goals. • Do not approve land use authorizations that would impact cultural resources 	Rights of Way (ROW)
<p>Not an allowable use. Renewable energy development is not compatible with NLCS and ACEC unit values and criteria.</p> <p>ACECs are closed to geothermal leasing and development unless they overlap with a DFA where geothermal is allowed. Where there is overlap, ACECs are open to geothermal leasing with an NSO stipulation.</p>	Renewable Energy



ACEC Boundaries

0.1% Disturbance Cap

DRECP Boundary

CDCA Boundary

LLPA

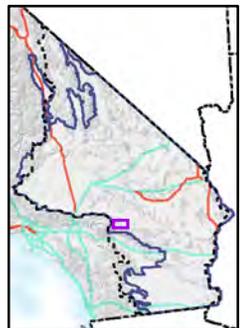
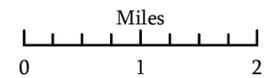
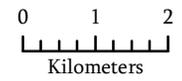
Land Status

Bureau of Land Management

Pipes Canyon ACEC

7/21/2016

BLM California State Office





-  SRMA Boundaries
-  ACEC Boundaries
-  CDNCL Boundaries
-  DRECP Boundary
-  CDCA Boundary
-  LLPA
- Land Status**
-  Bureau of Land Management

Pipes Canyon ACEC and Surrounding BLM Designations

7/22/2016

BLM California State Office

