



San Bernardino County  
Land Use Services Department  
Planning Division

385 North Arrowhead Avenue, 1st Floor • San Bernardino, CA 92415  
Phone Number: (909) 387-8311 Fax Number: (909) 387-3223

# NOTICE OF PREPARATION

**FROM:** San Bernardino County Land Use Services Department  
385 North Arrowhead Avenue, First Floor, San Bernardino, CA 92415-0187

**TO:** Interested Agencies, Organizations, and Individuals

**DATE:** August 27, 2015

**SUBJECT: Notice of Preparation of a Draft Environmental Impact Report**

The County of San Bernardino, as the lead agency under the California Environmental Quality Act (CEQA), will be coordinating the preparation of an Environmental Impact Report (EIR) for the proposed SkyPark at Santa's Village Project. The County is requesting identification of environmental issues and information that you or your organization believes should be considered in the EIR.

**Project Title:** SkyPark at Santa's Village

**Project Number:** P201500051

**Project Applicant:** Bill Johnson, Project Manager, SkyPark at Santa's Village

**Project Location:** The Project site is located adjacent to State Route (SR-18), approximately one mile east of the intersection of SR-18 and Kuffel Canyon Road in the unincorporated San Bernardino Mountain community of Sky Forest. The Project site includes the now closed Santa's Village attraction. The site includes land on both the north and south side of SR-18. The Project site is located on the Harrison Mountain quadrangle of the United States Geological Survey's (USGS) 7.5-minute topographic map series in Section 26 of Township 2 north, Range 3 west.

**Project Description:** The proposed Project requires a General Plan Amendment to change the Official Land Use Zoning District from Lake Arrowhead/ Special Development - Residential (LA/SD-RES) and Lake Arrowhead/ Single Residential-14,000 Square Foot Minimum lot size (LA/RS-14M) to Lake Arrowhead/ Rural

## NOTICE OF PREPARATION/PUBLIC SCOPING MEETING NOTICE

P20150051

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Commercial (LA/CR) on 152.92 Acres. The proposed Project also requires a Conditional Use Permit (CUP).

The Project site is divided into two distinct areas. The northern area includes the existing Santa's Village attraction. The southern portion is currently undeveloped and would be developed into a campground that would accommodate both Recreational vehicles (RV's) and tent camping for visitors.

The Project includes the redevelopment and re-use of the existing Santa's Village attraction. The Project would include the development of a mixed-use adventure park that would include a variety of activities and services. Nineteen original buildings exist on the project site totaling 24,104 square feet. The exteriors of these original buildings would not be drastically altered. Rather, the exterior of the buildings would be restored (re-painted, repaired). The interiors would be re-developed in order to achieve a variety of desired uses. None of the buildings would be demolished. All buildings are proposed to remain on site.

The Project also includes the removal of debris, woodchips, firewood, bark, and trash from the site and restoration of functions of the upstream portions with improvements to restore Hook Creek. Previously, the Project site was used as a storage site for wood material infested by bark beetles and the site was not restored. These materials would be properly disposed of and/or relocated to a suitable location. The Project also includes a watercourse that would allow for expansion and preservation of the wetland by a water aeration system controlled daily by the use of a solar array and water pumps. Ultimately, improvements to the health and beauty and natural resources of the project area would serve as a balanced ecosystem for recreation and wildlife, and encourage opportunities for outdoor education, recreation and wildlife.

### Mountain Bike Park (No motorized vehicles)

This feature would include trails, obstacles, bridges, and creek crossings approximately 25 miles in length within the project site. This feature would also include riding paths for persons of all ages and varied interests. This use would utilize many of the existing dirt access roads.

### Wilderness Adventure/Zipline and Aerial Park

This feature would include ziplines, rope courses, adventure swings, climbing walls, balance features, log crossings, and exploration trails. The Forest Zipline and tree house is estimated to be an average of 30 feet in height and approximately 1,200 feet in length; however the final designs would determine ultimate measurements. The tree house would have a zipline that is proposed to be approximately 16 feet high. A small children's zipline is proposed that would be approximately 8 feet high and 30 feet long. The tree house would be an engineered structure built among the trees. The final tree house platforms would either be constructed using a tree as the base or a standalone structure as shown within the Photo Figures at the end of this document. Final design would be dependent on County approval. The tree house is the only structure proposed to be developed north of SR-18 at the existing SkyPark at Santa's Village site.

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### Forest Playground

This feature would include bridges and swings. The playground would also provide seating, natural playscapes and sensory challenges such as log walks, stepping stones and exploration.

### Skybike Monorail

The existing bumblebee ride would be converted to a pedal operated bike monorail that would traverse the southern portion of the park.

### Fly Fishing Lake and Stream

Fly fishing clinics, guides and lessons, and fly fishing instruction would be offered at the site's improved and existing reservoir/pond system. The on-site ponds and stream would be stocked with fish per the California Department of Fish & Wildlife as permitted. Historically the pond has been stocked with trout. Trout fishing would be provided for catch and keep, or release as the guest wishes.

### Hiking and Tours

Eco-tours, education, and wildlife would be offered. The Project will promote wildlife and habitat education. Job skills will be introduced through "Pathways" an ongoing ROP program through local school districts. Ecotourism involving bird watching blinds, trails and assisted programs will be implemented to educate the public and students on the importance of wildlife preservation.

### Santa's Village/Winter Attractions

Winter attractions at Santa's Village, would operate during the months of November and December. Winter attractions would include an outdoor ice rink, snow shoeing, sledding, and snow play. It is anticipated that these attractions would attract the largest number of visitors for the year.

### Retail

A variety of related retail shops would be developed throughout the property. These uses would include gift shops, equipment rentals/purchases, and a variety of other retail uses which would be located within the existing buildings.

### Restaurants

A full service restaurant, snack bar, pub, and bakery/candy store are proposed within the existing buildings.

### Wedding Services

A wedding chapel, outdoor reception area, and full service wedding event center (including bridal room) would be developed within the existing buildings.

### Campground Site

A campground is proposed to be located south of the SkyPark site, across SR-18. The campground would provide accommodations for RV and 5th wheel support and would provide partial hookups (electricity and water). 70 RV sites and approximately 35 tent campsites are proposed within the 20 acre campground.

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### Restrooms

Restrooms would be located throughout the park. In addition, a full service restroom (including showers) would be constructed onsite, south of SR-18 to service campers. The restroom on the campground site would utilize a septic system that would be sized per restroom requirements and would have a tank with a leach field in the same design standards as the existing septic systems in the Santa's Village site. The current Santa's Village site has five existing septic systems with separating chambers and leach fields. The chambers that separate the solids are pumped out periodically as needed. The proposed campground restroom is to be approximately 1,450-1,500 square feet. It would include a laundry facility with two washers and dryers. The men's restroom would have two showers, two urinals, two toilets, and two sinks. The women's restroom would have two showers, two sinks, and four toilets. An RV septic dump station would not be included at the campsite.

### Parking and Circulation

575 car parking spaces are proposed: 275 located in the primary parking lot and 300 in secondary overflow lot located south across SR-18. A pedestrian signal, tunnel or bridge are options to aid in getting visitors from the overflow parking area across Highway 18 to the project site.

### Operating Hours

Peak season for the proposed project is anticipated to be November and December (approximately 2,000 visitors per day). Low season is anticipated to be during spring and early fall. Summer is anticipated to have an average of 1,000 visitors per day. Operating hours are proposed to be 8:00 a.m. to 10:00 p.m. The project is proposed to be fully operational year round, with no planned closures.

### Offsite Improvements

Offsite improvements would be included with the proposed project and would involve new dedicated left turn lanes, pedestrian access of one of the following: crosswalk, bridge or tunnel. SR- 18 would be widened to accommodate two left-turn lanes into the driveways of the campground site and the Santa's Village site as vehicles approach from both directions of SR-18. Trees would be trimmed to provide improved vision if the trees surrounding the driveways conflict with vehicles safely exiting from the proposed Project driveways. The at-grade pedestrian crosswalk would traverse SR-18 at the proposed project driveways or a pedestrian bridge or tunnel will direct visitors north and south across SR-18.

**Potential Environmental Effects:** An EIR will be prepared to evaluate the Project's potential environmental impacts and analyze project alternatives. The topic areas to be analyzed in detail in the EIR are Aesthetics, Agriculture and Forestry Resources, Air Quality, Biological Resources, Cultural Resources, Geology and Soils, Greenhouse Gas Emissions, Hazards and Hazardous Materials, Hydrology and Water Quality, Land Use and Planning, Mineral Resources, Noise, Population and Housing, Public Services, Recreation, Transportation and Traffic, Utilities and Service Systems, and Cumulative Impacts. The EIR will evaluate the Project's potential to generate additional traffic in the region, in particular on SR-18 and safety related to vehicles and pedestrians accessing the park and the campground. The EIR will also evaluate the Project's potential to

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result in emissions from construction and operation activities that could affect air quality and climate change and noise from construction and operation activities that could affect nearby sensitive receptors. The EIR will evaluate the Project's potential to affect any species identified as a candidate, sensitive, or special status, riparian habitat or other sensitive natural community, federally protected wetlands, or wildlife movement. The EIR will identify if there are any archaeological, historic, or paleontological resources onsite that could be adversely affected by Project. The potential for the Project to affect the existing drainage patterns of the site or to affect water quality for downstream waters will also be evaluated in the EIR. Potential impacts to the forest, including forest fires, will also be evaluated.

**Public Review Period:** August 27, 2015 and ends on September 25, 2015.

**Responses and Comments:** Please send your responses and comments by September 25, 2015 to Kevin White, Senior Planner at [Kevin.White@lus.sbcounty.gov](mailto:Kevin.White@lus.sbcounty.gov) or at the following address:

Kevin White, Senior Planner  
County of San Bernardino  
Land Use Services Department – Planning Division  
385 North Arrowhead Avenue, First Floor  
San Bernardino, CA 92415-0187

**Scoping Meeting:** The County will hold a scoping meeting for the Project to receive comments on the scope and content of the EIR. You are welcome to attend the scoping meeting and present environmental information that you believe should be considered in the EIR. The scoping meeting is scheduled as follows:

**Date:** Tuesday September 8, 2015  
**Time:** 6:00 p.m.  
**Place:** Lake Arrowhead Resort, 27984 Highway 189, Lake Arrowhead, CA, 92352

**Agencies:** In accordance with California Code Regulations, Title 14, Section 15082 (b), the County requests your agency's view on the scope and content of the environmental information relevant to your agency's statutory responsibilities in connection with the proposed Project. Your agency will need to use the EIR prepared by the County when considering any permits that your agency must issue, or other approval for the Project.

**Document Availability:** This Notice of Preparation can be viewed on the County of San Bernardino website at:

<http://www.sbcounty.gov/uploads/lus//Environmental/skypark/skyparknop.pdf>. The documents are also available during regular business hours at:

- County of San Bernardino Land Use Services Department, Planning Division, 385 North Arrowhead Avenue, San Bernardino, CA 92415; between the hours of 8:00 a.m. and 4:30 p.m., Monday through Friday.

**NOTICE OF PREPARATION/PUBLIC SCOPING MEETING NOTICE**

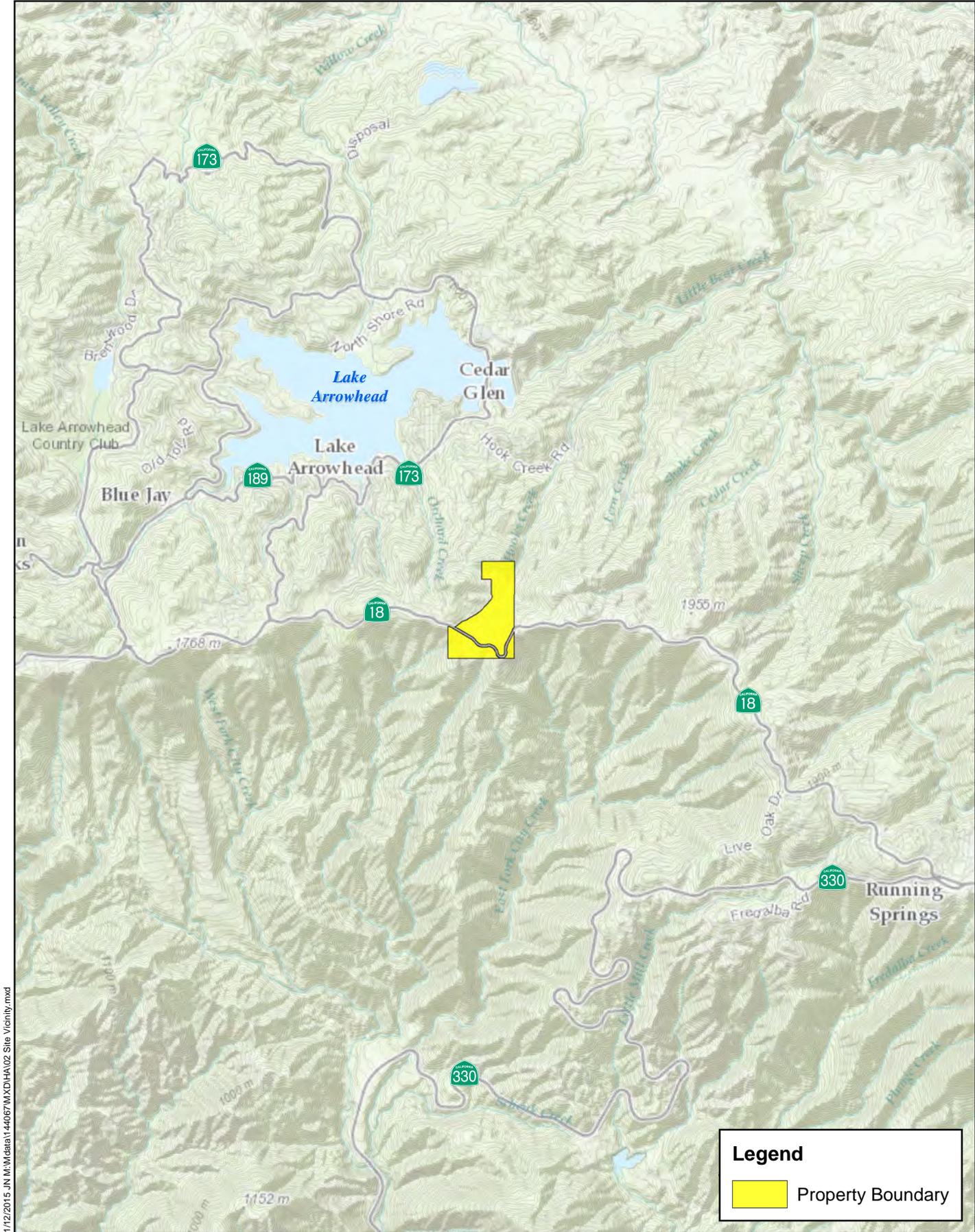
**P20150051**

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- Lake Arrowhead Branch Library, 27235 Highway 189, Blue Jay, CA 92317; Library Hours: Monday – Wednesday 11:00 a.m. to 7:00 p.m., Thursday 10:00 a.m. to 6:00 p.m., Saturday 9:00 a.m. to 5:00 p.m. This branch is closed Friday and Sunday.

If you require additional information please contact Kevin White, Senior Planner, at (909) 387-3067.

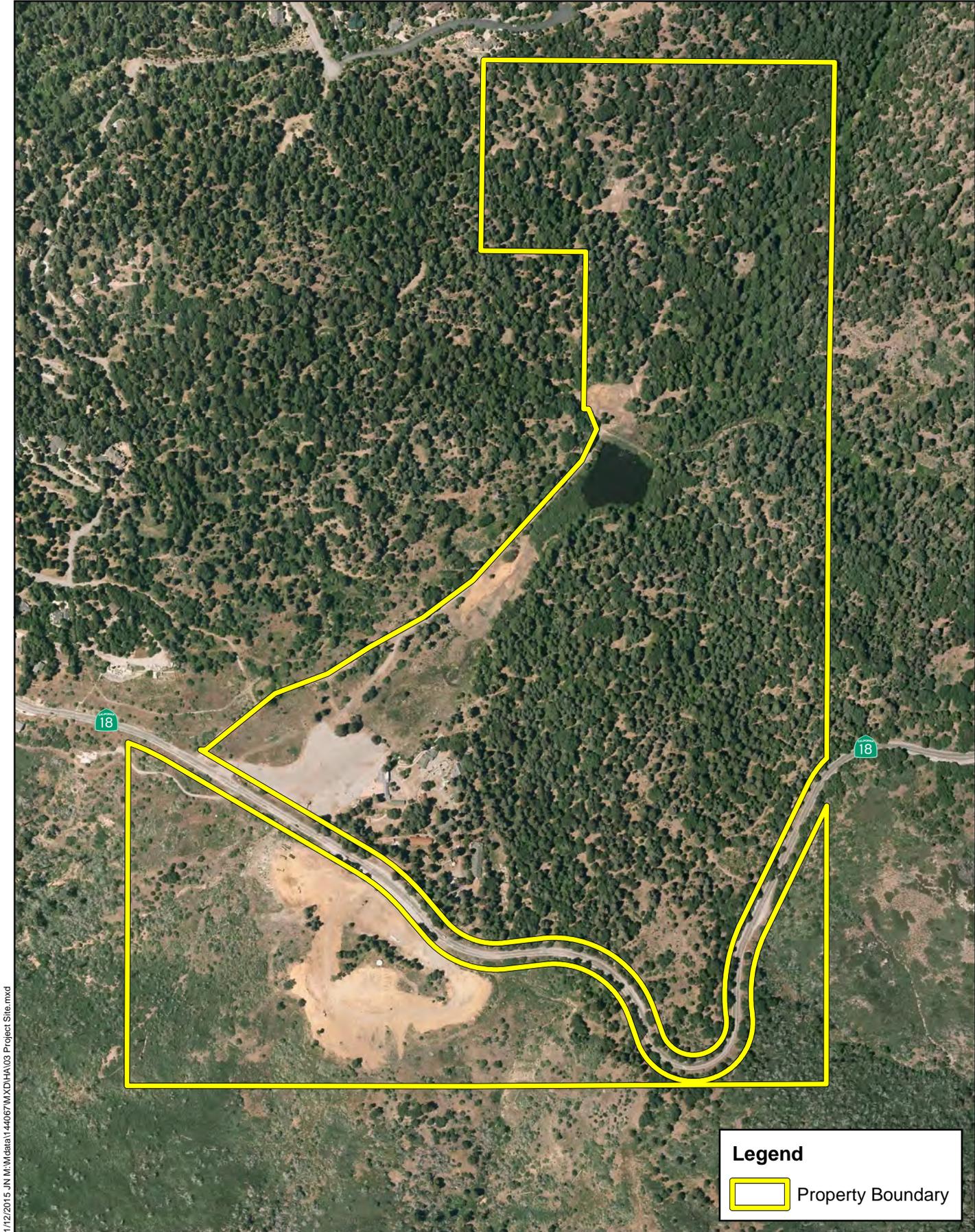


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**Legend**

Property Boundary

SKYPARK AT SANTA'S VILLAGE PROJECT



1/12/2015 J:\M:\data\144067\MXD\HA\03 Project Site.mxd

**Legend**

 Property Boundary

SKYPARK AT SANTA'S VILLAGE PROJECT



Source: San Bernardino County, Eagle Aerial 2013

Aerial Photo

# CALIFORNIA NEWSPAPER SERVICE BUREAU

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SONYA HOOKER  
RUTH VILLALOBOS & ASSOCIATES, INC  
3602 INLAND EMPIRE BLVD STE C310  
ONTARIO, CA 91764

SBS# 2789325

**FROM:** San Bernardino County Land Use Services Department  
385 North Arrowhead Avenue, First Floor, San Bernardino, CA 92415-0187

**TO:** Interested Agencies, Organizations, and Individuals

**SUBJECT: Notice of Preparation of a Draft Environmental Impact Report**

### COPY OF NOTICE

Notice Type: GPN GOVT PUBLIC NOTICE  
Ad Description: Notice of Preparation of a Draft Environmental Impact Report

To the right is a copy of the notice you sent to us for publication in the SAN BERNARDINO COUNTY SUN. Please read this notice carefully and call us with any corrections. The Proof of Publication will be filed with the County Clerk, if required, and mailed to you after the last date below. Publication date(s) for this notice is (are):

The County of San Bernardino, as the lead agency under the California Environmental Quality Act (CEQA), will be coordinating the preparation of an Environmental Impact Report (EIR) for the proposed SkyPark at Santa's Village Project. The County is requesting identification of environmental issues and information that you or your organization believes should be considered in the EIR.

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08/29/2015

The charge(s) for this order is as follows. An invoice will be sent after the last date of publication. If you prepaid this order in full, you will not receive an invoice.

|             |           |
|-------------|-----------|
| Publication | \$1222.48 |
| Total       | \$1222.48 |

**Project Description:** The proposed Project requires a General Plan Amendment to change the Official Land Use Zoning District from Lake Arrowhead/ Special Development - Residential (LA/SD-RES) and Lake Arrowhead/ Single Residential-14,000 Square Foot Minimum lot size (LA/RS-14M) to Lake Arrowhead/ Rural Commercial (LA/CR) on 152.92 Acres. The proposed Project also requires a Conditional Use Permit (CUP).

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buildings would be demolished. The southern portion is currently undeveloped and would be developed into a campground that would accommodate both Recreational vehicles (RV's) and tent camping for visitors.

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385 North Arrowhead Avenue, First  
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If you require additional information please contact Kevin White, Senior Planner, at (909) 387-3067.  
8/29/15

**SBS-2789325#**



South Coast  
Air Quality Management District  
21865 Copley Drive, Diamond Bar, CA 91765-4178  
(909) 396-2000 • [www.aqmd.gov](http://www.aqmd.gov)

September 8, 2015

Kevin White, Senior Planner  
County of San Bernardino  
Land Use Services Department – Planning Division  
385 North Arrowhead Ave, First Floor  
San Bernardino, CA 92415-0187

**Notice of Preparation of a CEQA Document for the  
Skypark at Santa's Village Project**

The South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The SCAQMD staff's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft CEQA document. Please send the SCAQMD a copy of the CEQA document upon its completion. Note that copies of the Draft EIR that are submitted to the State Clearinghouse are not forwarded to the SCAQMD. Please forward a copy of the Draft EIR directly to SCAQMD at the address in our letterhead. **In addition, please send with the draft EIR all appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

**Air Quality Analysis**

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. More recent guidance developed since this Handbook was published is also available on SCAQMD's website here: [http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-\(1993\)](http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/ceqa-air-quality-handbook-(1993)). SCAQMD staff also recommends that the lead agency use the CalEEMod land use emissions software. This software has recently been updated to incorporate up-to-date state and locally approved emission factors and methodologies for estimating pollutant emissions from typical land use development. CalEEMod is the only software model maintained by the California Air Pollution Control Officers Association (CAPCOA) and replaces the now outdated URBEMIS. This model is available free of charge at: [www.caleemod.com](http://www.caleemod.com).

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD staff requests that the lead agency quantify criteria pollutant emissions and compare the results to the recommended regional significance thresholds found here: <http://www.aqmd.gov/docs/default-source/ceqa/handbook/scaqmd-air-quality-significance-thresholds.pdf?sfvrsn=2>. In addition to analyzing regional air quality impacts, the SCAQMD staff recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LSTs can

be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/localized-significance-thresholds>.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("*Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis*") can be found at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mobile-source-toxics-analysis>. An analysis of all toxic air contaminant impacts due to the use of equipment potentially generating such air pollutants should also be included.

In addition, guidance on siting incompatible land uses (such as placing homes near freeways) can be found in the California Air Resources Board's *Air Quality and Land Use Handbook: A Community Perspective*, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB's Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process.

### **Mitigation Measures**

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate these impacts. Pursuant to CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed. Several resources are available to assist the Lead Agency with identifying possible mitigation measures for the project, including:

- Chapter 11 of the SCAQMD *CEQA Air Quality Handbook*
- SCAQMD's CEQA web pages at: <http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook/mitigation-measures-and-control-efficiencies>.
- CAPCOA's *Quantifying Greenhouse Gas Mitigation Measures* available here: <http://www.capcoa.org/wp-content/uploads/2010/11/CAPCOA-Quantification-Report-9-14-Final.pdf>.
- SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook for controlling construction-related emissions
- Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/docs/default-source/planning/air-quality-guidance/complete-guidance-document.pdf?sfvrsn=4>.

### **Data Sources**

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's webpage (<http://www.aqmd.gov>).

The SCAQMD staff is available to work with the Lead Agency to ensure that project emissions are accurately evaluated and mitigated where feasible. If you have any questions regarding this letter, please contact me at [Jwong1@aqmd.gov](mailto:Jwong1@aqmd.gov) or call me at (909) 396-3176.

Sincerely,

*Jillian Wong*

Jillian Wong, Ph.D.

Program Supervisor

Planning, Rule Development & Area Sources

SBC150901-06  
Control Number

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ADMITTED

Reply all | Delete Junk ...



# FW: Skypark at Santa's Village Project Comment

WK White, Kevin - LUS <Kevin.White@lus.sbcounty.gov>

Reply all |

To: Sonya Hooker; Villalobos, Juan (JVILLALOBOS@mbakerintl.com);

Wed 9/16/2015 10:15 AM

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### Kevin White

Land Use Services  
Senior Planner

Phone: 909.387.3067 | Fax: 909.387.3223

[www.SBCounty.gov](http://www.SBCounty.gov)

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

**From:** Herrera, Henry@CALFIRE [mailto:Henry.Herrera@fire.ca.gov]

**Sent:** Wednesday, September 16, 2015 10:13 AM

**To:** White, Kevin - LUS

**Cc:** Stock, Mary@CALFIRE; Herrera, Henry@CALFIRE

**Subject:** Skypark at Santa's Village Project Comment

Hello Kevin,

CAL FIRE would like to take this opportunity to touch on two areas of environmental interest regarding the Sky Park at Santa's Village Project. The two areas of interest are:

- Insuring proper timberland conversion practices are followed for new facilities
- Wildland fire protection

When a timberland owner proposes to carry out a project that will result in timberland being converted to a non-timber growing use they must proceed with the submission of a Conversion Exemption or an application for a Timberland Conversion Permit and Timberland Conversion Plan, whichever is applicable. Timberland is defined by the Forest Practice Rules as land which is available for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products. Commercial species include incense cedar, white fir, ponderosa pine, sugar pine, Coulter pine, among other species. If your proposed project proposes to convert timberland to a non-timber use please contact Henry Herrera, Forester, at (909)475-8091 for instructions on how to proceed with this process. Please visit [http://calfire.ca.gov/resource\\_mgt/resource\\_mgt\\_EPRP\\_TimberlandConversions.php](http://calfire.ca.gov/resource_mgt/resource_mgt_EPRP_TimberlandConversions.php) for more information on timberland conversions.

We would like to remind you, and the landowner, that Public Resource Code §4291 requires property owners in mountainous and forest environments to maintain a minimum of 100 feet of defensible space around each structure in order to reduce the wildland fire risk. For more information on defensible space requirements, please visit [www.fire.ca.gov](http://www.fire.ca.gov).

Please contact me if you have any questions or for further direction. Thank you for the opportunity to comment. We look forward to serving you.

*Henry Herrera*

Forester I, RPF #2936

**CAL FIRE**

San Bernardino Unit  
Resource Management  
3800 N. Sierra Way  
San Bernardino, CA 92405

Cell (909)253-6632

Fax (909)881-6969

Desk (909)475-8091

[henry.herrera@fire.ca.gov](mailto:henry.herrera@fire.ca.gov)



State of California - Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
Inland Deserts Region  
3602 Inland Empire Blvd., Suite C-220  
Ontario, CA 91764  
(909) 484-0459  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

**EDMUND G. BROWN, Jr., Governor**  
**CHARLTON H. BONHAM, Director**



September 30, 2015

Mr. Kevin White  
Senior Planner  
San Bernardino County  
Land Use Services Department – Planning Division  
San Bernardino, CA 92415

Subject: Notice of Preparation of a Draft Environmental Impact Report  
Skypark at Santa's Village Project  
State Clearinghouse No. 2015091001

Dear Mr. White:

The Department of Fish and Wildlife (Department) appreciates the opportunity to comment on the Notice of Preparation (NOP) of a Draft Environmental Impact Report (DEIR) for the Skypark at Santa's Village Project (project) [State Clearinghouse No. 2015091001]. The Department is responding to the NOP as a Trustee Agency for fish and wildlife resources (California Fish and Game Code Sections 711.7 and 1802, and the California Environmental Quality Act [CEQA] Guidelines Section 15386), and as a Responsible Agency regarding any discretionary actions (CEQA Guidelines Section 15381), such as the issuance of a Lake or Streambed Alteration Agreement (California Fish and Game Code Sections 1600 *et seq.*) and/or a California Endangered Species Act (CESA) Permit for Incidental Take of Endangered, Threatened, and/or Candidate species (California Fish and Game Code Sections 2080 and 2080.1).

The approximately 153-acre project site is located north and south of State Route 18, approximately one mile east of the intersection of SR-18 and Kuffel Canyon Road in the unincorporated San Bernardino Mountain community of Sky Forest, within San Bernardino County, California. The project site includes the now closed Santa's Village attraction.

The proposed project includes the redevelopment and reuse of the existing Santa's Village attraction into a mixed-used adventure park that would include a variety of activities and services. The existing Santa's Village buildings on the northern portion of the project site would be restored and redeveloped, and the currently undeveloped southern portion of the property would be developed into a tent and RV campground.

## COMMENTS AND RECOMMENDATIONS

The Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and the habitat necessary for biologically sustainable populations of those species (i.e., biological resources); and administers the Natural Community Conservation Planning Program (NCCP Program). The Department offers the comments and recommendations presented below to assist San Bernardino County (County; the CEQA lead agency) in adequately identifying and/or mitigating the project's significant, or potentially significant, impacts on biological resources. The comments and recommendations are also offered to enable the Department to adequately review and comment on the proposed project with respect to impacts on biological resources. The Department recommends that the forthcoming DEIR address the following:

### Assessment of Biological Resources

Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a project is critical to the assessment of environmental impacts and that special emphasis should be placed on environmental resources that are rare or unique to the region. To enable Department staff to adequately review and comment on the project, the DEIR should include a complete assessment of the flora and fauna within and adjacent to the project footprint, with particular emphasis on identifying rare, threatened, endangered, and other sensitive species and their associated habitats. The Department recommends that the DEIR specifically include:

1. An assessment of the various habitat types located within the project footprint, and a map that identifies the location of each habitat type. The Department recommends that floristic, alliance- and/or association based mapping and assessment be completed following *The Manual of California Vegetation*, second edition (Sawyer et al. 2009). Adjoining habitat areas should also be included in this assessment where site activities could lead to direct or indirect impacts offsite. Habitat mapping at the alliance level will help establish baseline vegetation conditions;
2. A general biological inventory of the fish, amphibian, reptile, bird, and mammal species that are present or have the potential to be present within each habitat type onsite and within adjacent areas that could be affected by the project. The Department's California Natural Diversity Database (CNDDDB) in Sacramento should be contacted at (916) 322-2493 or [bdb@dfg.ca.gov](mailto:bdb@dfg.ca.gov) to obtain current information on any previously reported sensitive species and habitat, including Significant Natural Areas identified under Chapter 12 of the Fish and Game Code, in the vicinity of the proposed project. The Department recommends that CNDDDB Field Survey Forms be completed and submitted to CNDDDB to document survey results. Online forms can be obtained and submitted at:  
[http://www.dfg.ca.gov/biogeodata/cnddb/submitting\\_data\\_to\\_cnddb.asp](http://www.dfg.ca.gov/biogeodata/cnddb/submitting_data_to_cnddb.asp)

Please note that the Department's CNDDDB is not exhaustive in terms of the data it houses, nor is it an absence database. The Department recommends that it be used

as a starting point in gathering information about the *potential presence* of species within the general area of the project site.

3. A complete, *recent* inventory of rare, threatened, endangered, and other sensitive species located within the project footprint and within offsite areas with the potential to be effected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish and Game Code § 3511). Species to be addressed should include all those which meet the CEQA definition (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the project area and should not be limited to resident species. Focused species-specific surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, are required. Acceptable species-specific survey procedures should be developed in consultation with the Department and the U.S. Fish and Wildlife Service, where necessary. Note that the Department generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed project may warrant periodic updated surveys for certain sensitive taxa, particularly if the project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought.
4. A thorough, recent, floristic-based assessment of special status plants and natural communities, following the Department's *Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities* (see <https://www.wildlife.ca.gov/Conservation/Plants>);
5. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines § 15125[c]);

### **Analysis of Direct, Indirect, and Cumulative Impacts to Biological Resources**

The DEIR should provide a thorough discussion of the direct, indirect, and cumulative impacts expected to adversely affect biological resources as a result of the project. To ensure that project impacts to biological resources are fully analyzed, the following information should be included in the DEIR:

1. A discussion of potential impacts from lighting, noise, human activity, and wildlife-human interactions created by zoning of development projects or other project activities adjacent to natural areas, exotic and/or invasive species, and drainage. The latter subject should address project-related changes on drainage patterns and water quality within, upstream, and downstream of the project site, including: volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and post-project fate of runoff from the project site.

2. A discussion of potential indirect project impacts on biological resources, including resources in areas adjacent to the project footprint, such as nearby public lands (e.g. National Forests, State Parks, etc.), open space, adjacent natural habitats, riparian ecosystems, wildlife corridors, and any designated and/or proposed reserve or mitigation lands (e.g., preserved lands associated with a Natural Community Conservation Plan, or other conserved lands).

Please note that the project area supports significant biological resources and contains habitat connections, providing for wildlife movement across the broader landscape, sustaining both transitory and permanent wildlife populations. The Department encourages project design that avoids and preserves onsite features that contribute to habitat connectivity. The DEIR should include a discussion of both direct and indirect impacts to wildlife movement and connectivity, including maintenance of wildlife corridor/movement areas to adjacent undisturbed habitats.

3. An evaluation of impacts to adjacent open space lands from both the construction of the project and long-term operational and maintenance needs. Based on review of aerial photography, the project has the potential to impact San Bernardino National Forest (SBNF) lands and lake and stream resources within the SBNF, both to the north, and south, of the project area. The Department encourages the County to contact the SBNF to determine if any portion of the project will impact forest lands, and to work collaboratively to avoid and minimize impacts.
4. A cumulative effects analysis developed as described under CEQA Guidelines § 15130. Please include all potential direct and indirect project related impacts to riparian areas, wetlands, vernal pools, alluvial fan habitats, wildlife corridors or wildlife movement areas, aquatic habitats, sensitive species and other sensitive habitats, open lands, open space, and adjacent natural habitats in the cumulative effects analysis. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

### **Mitigation and Avoidance Measures for Project Impacts to Biological Resources**

The DEIR should include appropriate and adequate avoidance, minimization, and/or mitigation measures for all direct, indirect, and cumulative impacts that are expected to occur as a result of the construction and long-term operation and maintenance of the project. When proposing measures to avoid, minimize, or mitigate impacts, the Department recommends consideration of the following:

1. *Fully Protected Species*: Several Fully Protected Species (Fish and Game Code § 3511) have the potential to occur within or adjacent to the project area, including, but not limited to: American peregrine falcon (*Falco peregrinus anatum*), southern bald eagle (*Haliaeetus leucocephalus leucocephalus*), golden eagle (*Aquila chrysaetos*),

and ringtail (*Bassariscus astutus*). Fully protected species may not be taken or possessed at any time. Project activities described in the DEIR should be designed to completely avoid any fully protected species that have the potential to be present within or adjacent to the project area. The Department also recommends that the DEIR fully analyze potential adverse impacts to fully protected species due to habitat modification, loss of foraging habitat, and/or interruption of migratory and breeding behaviors. The Department recommends that the Lead Agency include in the analysis how appropriate avoidance, minimization and mitigation measures will reduce indirect impacts to fully protected species.

2. *Sensitive Wildlife Species*: Species that are not fully protected or listed under CESA or the federal Endangered Species Act is nevertheless be considered to be endangered, rare, or threatened for CEQA purposes, if they meet the criteria listed in the CEQA Guidelines §15380 (b). These may include California Species of Special Concern, California Native Plant Society ranked Rare and Endangered Plants, US Forest Service Sensitive Species, and other species that are in danger of becoming extinct, threatened, or endangered within the foreseeable future. The DEIR should include a detailed and thorough analysis of potential project impacts to these species, including the California spotted owl (*Strix occidentalis occidentalis*), San Bernardino flying squirrel (*Glaucomys sabrinus californicus*), and any other sensitive species with the potential to occur on-site, as well as appropriate, feasible, and enforceable measures to avoid and/or mitigate for those impacts.
3. *Sensitive Plant Communities*: The Department considers sensitive plant communities to be imperiled habitats having both local and regional significance. Plant communities, alliances, and associations with a statewide ranking of S-1, S-2, S-3, and S-4 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by querying the CNDDDB and are included in *The Manual of California Vegetation* (Sawyer et al. 2009). The DEIR should include measures to fully avoid and otherwise protect sensitive plant communities from project-related direct and indirect impacts.

Due to the project's location within the SBNF and adjacent to high quality natural habitat, the Department recommends that the DEIR include detailed measures to prevent the introduction and/or spread of invasive species which may otherwise result from the construction and operation of the proposed project. We suggest that these measures include a requirement that any vehicles entering portions of the site where seeds may be introduced be washed prior to entry, and that the project design include a bike washing station to remove any invasive plant seeds prior to use of the mountain bike trail.

4. *Mitigation*: The Department considers adverse project-related impacts to sensitive species and habitats to be significant to both local and regional ecosystems, and the DEIR should include mitigation measures for adverse project-related impacts to these resources. Mitigation measures should emphasize avoidance and reduction of

project impacts. For unavoidable impacts, onsite habitat restoration and/or enhancement should be evaluated and discussed in detail. If onsite mitigation is not feasible or would not be biologically viable and therefore not adequately mitigate the loss of biological functions and values, offsite mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed.

The DEIR should include measures to perpetually protect the targeted habitat values within mitigation areas from direct and indirect adverse impacts in order to meet mitigation objectives to offset project-induced qualitative and quantitative losses of biological values. Specific issues that should be addressed include restrictions on access, proposed land dedications, long-term monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.

5. *Habitat Revegetation/Restoration Plans*: Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant restoration techniques. Plans should identify the assumptions used to develop the proposed restoration strategy. Each plan should include, at a minimum: (a) the location of restoration sites and assessment of appropriate reference sites; (b) the plant species to be used, sources of local propagules, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) a local seed and cuttings and planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity. Monitoring of restoration areas should extend across a sufficient time frame to ensure that the new habitat is established, self-sustaining, and capable of surviving drought.

The Department recommends that local onsite propagules from the project area and nearby vicinity be collected and used for restoration purposes. Onsite seed collection should be initiated in the near future in order to accumulate sufficient propagule material for subsequent use in future years. Onsite vegetation mapping at the alliance and/or association level should be used to develop appropriate restoration goals and local plant palettes. Reference areas should be identified to help guide restoration efforts. Specific restoration plans should be developed for various project components as appropriate.

Restoration objectives should include protecting special habitat elements or re-creating them in areas affected by the project; examples could include retention of woody material, logs, snags, rocks, and brush piles.

6. *Mitigation Land Management and Endowments*: When the Department issues permits for a project, the project applicant may be required to transfer interest in real property to the Department to mitigate the impact that the project will have on fish and wildlife resources. The Department may authorize non-profit organizations,

governmental entities, and special districts to hold title and manage the mitigation lands (Gov. Code, § 65967). The Department is required to conduct due diligence when approving non-profit organizations, governmental entities, and special districts to hold and manage mitigation lands. Specifically, Government Code §65967 states, "[a] state or local agency shall exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources."

If the mitigation for the proposed project will include long-term management of mitigation lands, the Department requests that the County select an appropriate, CDFW-authorized conservation entity (for a list of appropriate entities, see: <https://www.wildlife.ca.gov/Conservation/CESA/Endowments>). We recommend that any measure requiring long-term land management also require a non-wasting endowment sufficient to cover the expected costs of any maintenance and monitoring activities required to manage the land.

7. *Nesting Birds and Migratory Bird Treaty Act*: Please note that it is the project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Migratory non-game native bird species are protected by international treaty under the federal Migratory Bird Treaty Act (MBTA) of 1918, as amended (16 U.S.C. 703 *et seq.*). In addition, sections 3503, 3503.5, and 3513 of the Fish and Game Code (FGC) also afford protective measures as follows: Section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by FGC or any regulation made pursuant thereto; Section 3503.5 states that it is unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by FGC or any regulation adopted pursuant thereto; and Section 3513 states that it is unlawful to take or possess any migratory nongame bird as designated in the MBTA or any part of such migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the MBTA.

The Department recommends that the DEIR include the results of avian surveys, as well as specific avoidance and minimization measures to ensure that impacts to nesting birds do not occur. Project-specific avoidance and minimization measures may include, but not be limited to: project phasing and timing, monitoring of project-related noise (where applicable), sound walls, and buffers, where appropriate. The DEIR should also include specific avoidance and minimization measures that will be implemented should a nest be located within the project site. If pre-construction surveys are proposed in the DEIR, the Department recommends that they be required no more than three (3) days prior to vegetation clearing or ground disturbance activities, as instances of nesting could be missed if surveys are conducted sooner.

8. *Moving out of Harm's Way*: The proposed project is anticipated to result in the clearing of natural habitats that support native species. To avoid direct mortality, the Department recommends that the lead agency condition the DEIR to require that a Department-approved qualified biologist be retained to be onsite prior to and during all ground- and habitat-disturbing activities to move out of harm's way special status species or other wildlife of low or limited mobility that would otherwise be injured or killed from project-related activities. Movement of wildlife out of harm's way should be limited to only those individuals that would otherwise be injured or killed, and individuals should be moved only as far as necessary to ensure their safety (i.e., the Department does not recommend relocation to other areas). Furthermore it should be noted that the temporary relocation of onsite wildlife does not constitute effective mitigation for the purposes of offsetting project impacts associated with habitat loss.
9. *Translocation of Species*: The Department generally does not support the use of relocation, salvage, and/or transplantation as mitigation for impacts to rare, threatened, or endangered species as studies have shown that these efforts are experimental in nature and largely unsuccessful. Translocation

### **California Endangered Species Act**

The Department is responsible for ensuring appropriate conservation of fish and wildlife resources including threatened, endangered, and/or candidate plant and animal species, pursuant to the California Endangered Species Act (CESA). The Department recommends that a CESA ITP be obtained if the project has the potential to result in "take" (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") of State-listed CESA species, either through construction or over the life of the project. CESA ITPs are issued to conserve, protect, enhance, and restore State-listed CESA species and their habitats.

The Department encourages early consultation, as significant modification to the proposed project and avoidance, minimization, and mitigation measures may be necessary to obtain a CESA ITP. Please note that the proposed avoidance, minimization, and mitigation measures must be sufficient for the Department to conclude that the project's impacts are fully mitigated and the measures, when taken in aggregate, must meet the full mitigation standard. Revisions to the California Fish and Game Code, effective January 1998, require that the Department issue a separate CEQA document for the issuance of a CESA ITP unless the Project CEQA document addresses all Project impacts to listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of a CESA permit.

Based on review of CNDDDB, and knowledge of the vicinity, the Department is aware that the CESA-listed species with the potential to occur onsite include, but are not limited to: southern mountain yellow-legged frog (*Rana mucosa*), and southern rubber boa (*Charina umbratica*).

### **Lake and Streambed Alteration Program**

Because the project involves alteration of Hook Creek, it is likely that the project applicant will need to notify the Department per Fish and Game Code section 1602. Fish and Game Code section 1602 requires an entity to notify the Department prior to commencing any activity that may do one or more of the following: Substantially divert or obstruct the natural flow of any river, stream or lake; Substantially change or use any material from the bed, channel or bank of any river, stream, or lake; or Deposit debris, waste or other materials that could pass into any river, stream or lake. Please note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water.

Upon receipt of a complete notification, the Department determines if the proposed project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources. CDFW may suggest ways to modify your project that would eliminate or reduce harmful impacts to fish and wildlife resources.

The Department's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code 21065). To facilitate issuance of an LSA Agreement, if necessary, the DEIR should fully identify the potential impacts to the lake, stream, or riparian resources, and provide adequate avoidance, mitigation, and monitoring and reporting commitments. Early consultation with the Department is recommended, since modification of the proposed project may be required to avoid or reduce impacts to fish and wildlife resources. To obtain a Lake or Streambed Alteration notification package, please go to <https://www.wildlife.ca.gov/Conservation/LSA/Forms>.

### **Additional Comments and Recommendations**

California is experiencing one of the most severe droughts on record. To ameliorate the water demands of this project, the Department recommends incorporation of water-wise concepts in project landscape design plans. In particular the Department recommends xeriscaping with locally native California species, and installing water-efficient and targeted irrigation systems (such as drip irrigation). Local water agencies/districts, and resource conservation districts in your area may be able to provide information on plant nurseries that carry locally native species, and some facilities display drought-tolerant locally native species demonstration gardens (for example the Riverside-Corona Resource Conservation District in Riverside). Information on drought-tolerant landscaping and water-efficient irrigation systems is available on California's Save our Water website: <http://saveourwater.com/what-you-can-do/tips/landscaping/>

### Further Coordination

The Department appreciates the opportunity to comment on the NOP of a DEIR for the Skypark at Santa's Village Project (SCH No. 2015091001) and recommends that the County address the Department's comments and concerns in the forthcoming DEIR.

If you should have any questions pertaining to the comments provided in this letter, or wish to schedule a meeting and/or site visit, please contact Gabriele Quillman at (909) 980-3818 or at [gabriele.quillman@wildlife.ca.gov](mailto:gabriele.quillman@wildlife.ca.gov).

Sincerely,

  
Leslie MacNair  
Regional Manager

### Literature Cited

Sawyer, J. O., T. Keeler-Wolf, and J. M. Evens. 2009. A manual of California Vegetation, 2<sup>nd</sup> ed. California Native Plant Society Press, Sacramento, California.  
<http://vegetation.cnps.org/>

# CRESTLINE-LAKE ARROWHEAD WATER AGENCY

A Public Agency  
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October 14, 2015

## **General Manager**

ROXANNE M. HOLMES

## **Assistant General Manager/Board Secretary**

JENNIFER A. SPINDLER

Kevin White  
Land Use Services  
County of San Bernardino

Re: Expansion of Santa's Village (Project No. P20150051)

Dear Mr. White:

The Crestline-Lake Arrowhead Water Agency has read newspaper reports of plans to expand Santa's Village, in the San Bernardino Mountains. Without expressing either opposition or support for such an expansion, the Agency wanted to at least express its concern about how water service and fire protection would be provided for the expansion being considered.

Santa's Village is located within the boundaries of the Agency, but currently does not receive water service directly from the Agency. The Agency does provide water service on a wholesale basis to Sky Forest Mutual Water Company, and we understand that Sky Forest may supply water on a retail basis to the existing development at Santa's Village. Sky Forest also owns and operates wells, and prefers to satisfy the demands of its customers from local well water supplies, if possible. However, well water supplies can diminish quickly in the mountains during periods of extended drought, such as the drought we are currently experiencing. During such periods, the demand for imported water from the Agency increases, and Sky Forest is currently taking more water from the Agency than what would normally be the case.

The problem is that the Agency itself is suffering from a greatly diminished imported water supply, due to extended drought conditions throughout the State. As a result, the Agency has adopted its own ordinance imposing mandatory water conservation. That ordinance also imposes a moratorium on new service connections from the Agency during the current water shortage crisis.

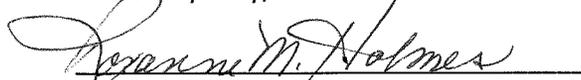
The Agency currently supplies water to Sky Forest through a two-inch diameter service connection at a maximum flow rate of 50 gallons per minute. The moratorium currently in place prevents the Agency from providing an additional connection to provide water service and fire protection to an expansion of Santa's Village. The Agency is concerned that the proponents of the expansion may be counting on a water supply that currently is not available, at least from the Agency.

Having read the newspaper reports about plans to expand Santa's Village, the Agency wanted to at least raise that concern so as to reduce the risk of false assumptions.

The Agency would urge the Planning Department to consider available water supplies when evaluating the proposal. Please keep us in the loop, especially if the plans assume an imported supply from the Agency.

Thank you.

Yours very truly,

A handwritten signature in cursive script, reading "Roxanne M. Holmes", written over a horizontal line.

Roxanne M. Holmes  
General Manager

## Lahontan Regional Water Quality Control Board

September 24, 2015

File: Environmental Doc Review  
San Bernardino County

Kevin White, Senior Planner  
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### **COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE SKY PARK AT SANTA'S VILLAGE PROJECT, SAN BERNARDINO COUNTY, STATE CLEARINGHOUSE NUMBER 2015091001**

The Notice of Preparation of a Draft Environmental Impact Report (DEIR) for the above-referenced project (Project) was prepared by the San Bernardino County Land Use Services Department (County) and circulated for public comment in compliance with provisions of the California Environmental Quality Act (CEQA). We received the notice on September 4, 2015. As a responsible agency, the California Regional Water Quality Control Board, Lahontan Region (Water Board) is providing these comments to specify the scope and content of the environmental information germane to our statutory responsibilities pursuant to CEQA Guidelines, California Code of Regulations, title 14, section 15096. Based on our review of the proposed Project, we recommend that several issues be considered in the preparation of the DEIR, particularly: 1) established numerical and narrative water quality objectives and standards should be used when evaluating thresholds of significance for Project impacts; (2) the County should consider eco-friendly alternatives to stabilize the banks and channel of Hooks Creek, for example willow stakes could be used in areas where existing conditions are favorable for willow growth; and 3) all potential downstream impacts to hydrology and water quality must be evaluated as a result of Project implementation. Our comments on the Project are outlined below.

### **WATER BOARD'S AUTHORITY**

All groundwater and surface waters are considered waters of the State. Surface waters include streams, lakes, ponds, and wetlands, and may be ephemeral, intermittent, or perennial. All waters of the State are protected under California law. State law assigns responsibility for protection of water quality in the Lahontan Region to the Lahontan Water Board. Some waters of the State are also waters of the U.S. The Federal Clean Water Act (CWA) provides additional protection for those waters of the State that are also waters of the U.S.

The *Water Quality Control Plan for the Lahontan Region* (Basin Plan) contains policies that the Water Board uses with other laws and regulations to protect the quality of waters of the State within the Lahontan Region. The Basin Plan sets forth water quality standards for surface water and groundwater of the Region, which include designated beneficial uses as well as narrative and numerical objectives which must be maintained or attained to protect those uses. The Basin Plan can be accessed via the Water Board's web site at

[http://www.waterboards.ca.gov/lahontan/water\\_issues/programs/basin\\_plan/references.shtml](http://www.waterboards.ca.gov/lahontan/water_issues/programs/basin_plan/references.shtml).

The Project site falls within the jurisdiction of two Regional Water Boards, the Lahontan and Santa Ana Water Boards. The portion of the Project site that drains to the Lake Arrowhead watershed (generally the area north of State Route 18) is under the jurisdiction of the Lahontan Water Board. The portion of the Project site that drains to the Santa Ana watershed (generally the area south of State Route 18) is under the jurisdiction of the Santa Ana Water Board.

### **SPECIFIC ISSUES TO BE CONSIDERED IN THE ENVIRONMENTAL REVIEW**

Based on our review of the information provided, we recommend that the following issues be considered in preparation of the DEIR. Our comments are germane only to those areas within the Lahontan Region.

1. The DEIR should identify the water quality standards that could potentially be violated by the Project and consider these standards when evaluating thresholds of significance for impacts. Water quality objectives and standards, both numerical and narrative, for all waters of the State within the Lahontan Region, including surface waters and groundwater, are outlined in Chapter 3 of the Basin Plan. Water quality objectives and standards are intended to protect the public health and welfare, and to maintain or enhance water quality in relation to the existing and/or potential beneficial uses of the water.
2. The Project area is located within the Upper Mojave Hydrologic Area of the Mojave Hydrologic Unit 628.00. The beneficial uses of water resources, including Hooks Creek, are listed in Chapter 2 of the Basin Plan. We request that the DEIR identify and list the beneficial uses of the water resources within the Project area, and include an analysis of the potential impacts to water quality and hydrology with respect to those beneficial uses.
3. The Notice of Preparation describes "expansion and preservation of the wetland" and that the existing onsite ponds and stream will be "improved." Hooks Creek originates on the site and supports a variety a wetland and riparian ecosystems. The DEIR will need to fully delineate all water resources on the site and evaluate potential impacts to these resources as a result of Project implementation. We recommend the County consider eco-friendly alternatives or combinations thereof to stabilize portions of Hooks Creek. For example, willow stakes have long been used as an effective tool to restore and stabilize creek banks. Their ability to withstand flooding, stabilize soils, and grow quickly in saturated areas makes them ideal for such uses. Hooks Creek currently supports willow stands in various areas; therefore, the existing conditions are favorable for willow

growth. As further incentive, the Water Board may consider the use of more eco- and bio-engineered bank stabilization alternatives as mitigation to offset the Projects permanent impacts to wetland and riparian areas.

4. Healthy watersheds are sustainable. Watersheds supply drinking water, provide for recreational uses, and support ecosystems. Watershed processes include the movement of water (i.e. infiltration and surface runoff), the transport of sediment, and the delivery of organic material to surface waters. These processes create and sustain the streams, lakes, wetlands, and other receiving waters of our region, including groundwater.

Hooks Creek is a headwater stream in the Upper Mojave watershed. The proposed Project has the potential to disrupt watershed processes and degrade the overall health of the watershed as a whole through increased peak flows, channel incision, and increased erosion and sediment transport in downstream reaches. These indirect, cumulative effects will need to be evaluated in the DEIR.

5. The DEIR should include a discussion of the proposed long-term maintenance plan that will be implemented to maintain the established baseline conditions for Hooks Creek, the adjacent wetlands, and the pond(s). Specific routine and non-routine activities should be identified, such as dredging/excavation and recontouring, and the thresholds that will trigger when maintenance activities are warranted.
6. All rock slope protection and energy dissipation rip-rap placed within stream channels should be **ungrouted** and the minimum amount necessary to provide scour protection.
7. Construction and post-construction storm water management must be considered a significant Project component, and best management practices (BMPs) that effectively treat storm water runoff should be included as part of the Project. The DEIR needs to specify those temporary sediment and erosion control BMPs that will be implemented to mitigate potential water quality impacts related to storm water. The temporary BMPs need to be implemented for the Project until such time that vegetation has been restored to pre-Project conditions. We request that vegetation clearing be kept to a minimum and, where feasible, existing vegetation be mowed so that vegetation could more readily reestablish post-construction.
8. The Water Board requires that impacts to water resources be avoided where feasible and minimized to the extent practical. Compensatory mitigation will be required for all unavoidable permanent impacts to ensure no net loss of beneficial use and wetland function and value. Water Board staff coordinate all mitigation requirements with staff from other federal and state regulatory agencies, including the United States Army Corps of Engineers (USACE) and the California Department of Fish and Wildlife. In determining appropriate mitigation ratios for impacts to waters of the State, Water Board staff considers Basin Plan requirements (minimum 1.5:1 mitigation ratio for impacts to wetlands) and utilizes

*12501-SPD Regulatory Program Standard Operating Procedure for Determination of Mitigation Ratios*, published December 2012 by the USACE, South Pacific Division.

9. All temporary impacts to water resource and upland areas should be restored (recontoured and revegetated) to match pre-Project conditions. A Restoration and Revegetation Monitoring Plan should be prepared that requires monitoring for some period of time (usually no less than 3 years), outlines a schedule with performance measures to be met in order for the restoration/revegetation to be deemed successful, and contains adaptive management criteria in the event performance measures are not being met.
10. Equipment staging areas, excavated soil stockpiles, and hazardous materials (i.e. oils and fuels) should be sited in upland areas outside surface waters and adjacent flood plain areas. We recommend that a comprehensive Spill Prevention and Response Plan be prepared that outlines the site-specific monitoring requirements and lists the BMPs necessary to prevent hazardous material spills or to contain and cleanup a hazardous material spill, should one occur.
11. Buffer areas should be identified and exclusion fencing used to protect water resources and to prevent unauthorized vehicles or equipment from entering or otherwise disturbing the surface waters. Equipment should use existing roadways to the extent feasible.

### **Permitting Requirements**

A number of activities associated with the proposed Project have the potential to impact waters of the State and, therefore, may require permits issued by either the State Water Resources Control Board (State Water Board) or Lahontan Water Board. The required permits may include the following.

12. Streambed alteration and/or discharge of fill material to a surface water may require a CWA, section 401 water quality certification for impacts to federal waters (waters of the U.S.), or dredge and fill waste discharge requirements for impacts to non-federal waters, both issued by the Lahontan Water Board.
13. Land disturbance of more than 1 acre may require a CWA, section 402(p) storm water permit, including a National Pollutant Discharge Elimination System (NPDES) General Construction Storm Water Permit, Water Quality Order (WQO) 2009-0009-DWQ, obtained from the State Water Board, or individual storm water permit obtained from the Lahontan Water Board.
14. Water diversion and/or dewatering activities may be subject to discharge and monitoring requirements under either NPDES General Permit, Limited Threat Discharges to Surface Waters, Board Order R6T-2014-0049, or General Waste Discharge Requirements for Discharges to Land with a Low Threat to Water Quality, WQO-2003-0003, both issued by the Lahontan Water Board.

Please be advised of the permits that may be required for the proposed Project, as outlined above. The specific Project activities that may trigger these permitting actions should be identified in the appropriate sections of the DEIR. The Project proponent should consult with Water Board staff early on should Project implementation result in activities that trigger these permitting actions. Information regarding these permits, including application forms, can be downloaded from our web site at <http://www.waterboards.ca.gov/lahontan/>.

Thank you for the opportunity to comment on the NOP. If you have any questions regarding this letter, please contact me at (760) 241-7376, [jan.zimmerman@waterboards.ca.gov](mailto:jan.zimmerman@waterboards.ca.gov) or Patrice Copeland, Senior Engineering Geologist, at (760) 241-7404, [patrice.copeland@waterboards.ca.gov](mailto:patrice.copeland@waterboards.ca.gov). Please send all future correspondence regarding this Project to the Water Board's email address at [Lahontan@waterboards.ca.gov](mailto:Lahontan@waterboards.ca.gov) and be sure to include the State Clearinghouse No. and Project name in the subject line.



Jan M. Zimmerman, PG  
Engineering Geologist

cc: State Clearinghouse (SCH 2015091001) ([state.clearinghouse@opr.ca.gov](mailto:state.clearinghouse@opr.ca.gov))  
Jeff Brandt, CA Dept. of Fish and Wildlife ([Jeff.Brandt@wildlife.ca.gov](mailto:Jeff.Brandt@wildlife.ca.gov))  
Wanda Cross, Santa Ana Water Board ([wanda.cross@waterboards.ca.gov](mailto:wanda.cross@waterboards.ca.gov))  
Bill Johnson, Sky Park ([bill@skyparksantasvillage.com](mailto:bill@skyparksantasvillage.com))

24 September 2015

by email : Kevin.White@lus.sbcounty.gov

Mr. Kevin White, Senior Planner  
County of San Bernardino  
Land Use Services Dept - Planning Division  
385 No. Arrowhead Avenue, First Floor  
San Bernardino, CA 92415-0187

Sub: Notice of Preparation of a Draft EIR : SkyPark at Santa's Village, #P201500051

The Save Our Forest Association, Inc. (SOFA), appreciates the opportunity to respond to the notice of preparation of a draft EIR and the holding of a scoping meeting at the Lake Arrowhead Resort on September 8, 2015. SOFA is the largest grass roots environmental organization in the San Bernardino Mountains focused on quality of life issues. SOFA has been engaged in analyzing and responding to projects in our communities since its inception in 1987.

SkyPark at Santa's Village has the unique potential of rehabilitating the now closed Santa's Village attraction and recreating a sense of history fondly remembered by many while adding elements that promote healthy physical activity as well as environmental education opportunities in a spectacular outdoor setting which includes camping and RV use. This project can also provide a positive economic stimulus in our local mountain communities including employment opportunities and tax revenues. The project applicant and Project Manager, Bill Johnson, has designed an environmentally thoughtful project that vastly improves the recent condition of the property, which had become a neglected tragedy and public safety fire hazard. The variety of recreational opportunities for both families and individuals is applauded along with the potential for outdoor education and cooperative programs with our Rim of the World Recreation and Park District, Rim of the World Unified School District and other agencies and organizations. The Draft EIR will identify potential environmental effects of concern including Aesthetics, which generally will be improved, although the extent of tree trimming/removal along SR-18 should be clarified. High levels of ozone already exist in our communities; will significant additional auto and bus traffic contribute to negative impacts to Air Quality? Are there considerations for encouraging use of shuttles preferably with low emissions and coordinating with Mountain Transit? Biological resources are highly significant here with wildlife migration throughout the property and likely finding of threatened or endangered species.

The County has already identified wildlife corridors nearby that should be reviewed for proximity to the project. It is important that Biological Studies be current and undertaken during significant times of the year, for example, during nesting, migrating, hibernating periods, especially for identified Threatened and Endangered Species. The Project includes Lady Bug Pond/Reservoir and watercourse with meadow proposed for expansion and preservation of the existing wetland. What is the nature of the geology, soils, hydrology and water quality involved in the design and intended rehabilitation ?

What Hazards for visitors will likely be encountered and are there any hazardous materials located on site that could require hazmat preparedness, treatment and/or removal?

Given the severe drought California is experiencing it seems that the project has its own ample water supply from historic wells on site. What are the projects water requirements, with consideration for fire flow, and are they sufficient without an external water supply?

In case an external water supply is required, coordination at this early stage with Sky Forest Mutual Water Company and Crestline-Lake Arrowhead Water Agency is critical.

While this location seems ideal in terms of its separation from nearby private residences, potential impacts from increase in noise and nighttime lighting pollution need to be evaluated and mitigated by directing downward all nighttime lighting and using motion-detector lighting. To What extent will features of SkyPark be lit after dusk?

The project's strong emphasis on non-motorized recreation is a welcome focus, particularly utilizing the many existing trails and dirt access roads. How will erosion and watershed protection be mitigated for existing and newly constructed trails ? The International Mountain Biking Association has trail building protocols that are highly effective for projects of this type, including trails in our national forests, and these protocols are an available resource that could be successfully utilized for SkyPark. Transportation and traffic with the necessary offsite improvements will pose challenges. How will through traffic on SR-18 be managed while allowing visitors to enter and exit the park safely ? Pedestrian and bicycle traffic from the northern and southern areas may be best managed by construction of a connecting tunnel. A pedestrian tunnel would provide safety for both visitors and employees and would also avoid impeding through-traffic on highly-traveled cross mountain SR-18. The use of solar generated electricity is mentioned in the notice of preparation. Given the site exposures that could be highly beneficial to solar power generation, to what extent is the overall power requirement likely to be generated by renewable energy, including wind-generated power?

The potential for the project to affect the existing drainage patterns of the site or to affect water quality for downstream waters will be evaluated in the EIR. The utilization of existing leach fields and construction of a new septic system for the campground area may be satisfactory for the waste water generated. Is the condition of existing leach fields satisfactory to manage the number of expected visitors? As a water-saving endeavor, are composting toilets under consideration by SkyPark? Where does any water run off from the site terminate and what might be its impact? Given the prediction for El Nino impacts in 2015-2016, how will SkyPark ensure water run off will not create erosion, debris flows and pollution to waters downstream? Will consideration be given to harvesting rainwater onsite?

Our local mountains have experienced two severe forest fires, in 2003 and 2007. What precautions will be taken to avoid the risk of fires generated from within the park, and what fire fighting capacity might be available within the project boundary ?

The Save Our Forest Association is enthusiastic about the very positive potential for this project going forward and supports having a comprehensive Draft EIR completed as efficiently as possible.

Hugh A. Bialecki, DMD  
President, SOFA



September 25, 2015

Mr. Kevin White, Senior Planner  
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Land Use Services Department – Planning Division  
385 North Arrowhead Avenue, First Floor  
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**RE: SCAG Comments on the Notice of Preparation of a Draft Environmental Impact Report for the SkyPark at Santa's Village [SCAG NO. IGR8593]**

**Main Office**  
818 West 7th Street  
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Los Angeles, California  
90017-3435  
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Dear Mr. White,

Thank you for submitting the Notice of Preparation of a Draft Environmental Impact Report for the SkyPark at Santa's Village ("proposed project") to the Southern California Association of Governments (SCAG) for review and comment. SCAG is the authorized regional agency for Inter-Governmental Review (IGR) of programs proposed for federal financial assistance and direct development activities, pursuant to Presidential Executive Order 12372. Additionally, SCAG reviews the Environmental Impact Reports of projects of regional significance for consistency with regional plans pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

SCAG is also the designated Regional Transportation Planning Agency under state law, and is responsible for preparation of the Regional Transportation Plan (RTP) including its Sustainable Communities Strategy (SCS) component pursuant to SB 375. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans.<sup>1</sup> Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of the regional goals and policies in the RTP/SCS.

SCAG staff has reviewed the Notice of Preparation of a Draft Environmental Impact Report for the SkyPark at Santa's Village in the San Bernardino County. The proposed project includes a General Plan Amendment to change the zoning to Lake Arrowhead/ Rural Commercial (LA/CR) on 152.92 acres. The southern portion of the project site would be developed into a campground that would accommodate both recreational vehicles and tent camping for visitors.

**When available, please send environmental documentation to SCAG's office in Los Angeles or by email to [sunl@scag.ca.gov](mailto:sunl@scag.ca.gov) providing, at a minimum, the full public comment period for review.** If you have any questions regarding the attached comments, please contact the Inter-Governmental Review (IGR) Program, attn.: Lijin Sun, Esq., Senior Regional Planner, at (213) 236-1882 or [sunl@scag.ca.gov](mailto:sunl@scag.ca.gov). Thank you.

Sincerely,

A handwritten signature in black ink that reads 'Ping Chang'.

Ping Chang  
Program Manager II, Land Use and Environmental Planning

<sup>1</sup> SB 375 amends CEQA to add Chapter 4.2 Implementation of the Sustainable Communities Strategy, which allows for certain CEQA streamlining for projects consistent with the RTP/SCS. Lead agencies (including local jurisdictions) maintain the discretion and will be solely responsible for determining "consistency" of any future project with the SCS. Any "consistency" finding by SCAG pursuant to the IGR process should not be construed as a finding of consistency under SB 375 for purposes of CEQA streamlining.

**COMMENTS ON THE NOTICE OF PREPARATION OF A  
DRAFT ENVIRONMENTAL IMPACT REPORT FOR  
THE SKYPARK AT SANTA'S VILLAGE [SCAG NO. IGR8593]**

**CONSISTENCY WITH RTP/SCS**

SCAG reviews environmental documents for regionally significant projects for their consistency with the adopted RTP/SCS.

**2012 RTP/SCS GOALS**

The SCAG Regional Council adopted the 2012 RTP/SCS in April 2012. The 2012 RTP/SCS links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations (see <http://rtpscsc.scag.ca.gov>). The goals included in the 2012 RTP/SCS may be pertinent to the proposed project. These goals are meant to provide guidance for considering the proposed project within the context of regional goals and policies. Among the relevant goals of the 2012 RTP/SCS are the following:

| <b>SCAG 2012 RTP/SCS GOALS</b> |  |
|--------------------------------|--|
| RTP/SCS G1:                    | <i>Align the plan investments and policies with improving regional economic development and competitiveness</i>  |
| RTP/SCS G2:                    | <i>Maximize mobility and accessibility for all people and goods in the region</i>  |
| RTP/SCS G3:                    | <i>Ensure travel safety and reliability for all people and goods in the region</i>   |
| RTP/SCS G4:                    | <i>Preserve and ensure a sustainable regional transportation system</i>  |
| RTP/SCS G5:                    | <i>Maximize the productivity of our transportation system</i>  |
| RTP/SCS G6:                    | <i>Protect the environment and health for our residents by improving air quality and encouraging active transportation (non-motorized transportation, such as bicycling and walking)</i> |
| RTP/SCS G7:                    | <i>Actively encourage and create incentives for energy efficiency, where possible</i>  |
| RTP/SCS G8:                    | <i>Encourage land use and growth patterns that facilitate transit and non-motorized transportation</i>   |
| RTP/SCS G9:                    | <i>Maximize the security of the regional transportation system through improved system monitoring, rapid recovery planning, and coordination with other security agencies</i>            |

For ease of review, we encourage the use of a side-by-side comparison of SCAG goals with discussions of the consistency, non-consistency or non-applicability of the policy and supportive analysis in a table format. Suggested format is as follows:

| SCAG 2012 RTP/SCS GOALS   |   |
|---|---|
| Goal  | Analysis  |
| RTP/SCS G1: <i>Align the plan investments and policies with improving regional economic development and competitiveness</i> | <i>Consistent: Statement as to why;<br/>Not-Consistent: Statement as to why;<br/>Or<br/>Not Applicable: Statement as to why;<br/>DEIR page number reference</i> |
| RTP/SCS G2: <i>Maximize mobility and accessibility for all people and goods in the region</i>                               | <i>Consistent: Statement as to why;<br/>Not-Consistent: Statement as to why;<br/>Or<br/>Not Applicable: Statement as to why;<br/>DEIR page number reference</i> |
| etc.  | etc.  |

### RTP/SCS STRATEGIES

To achieve the goals of the 2012 RTP/SCS, a wide range of strategies are included in SCS Chapter (starting on page 152) of the RTP/SCS focusing on four key areas: 1) Land Use Actions and Strategies; 2) Transportation Network Actions and Strategies; 3) Transportation Demand Management (TDM) Actions and Strategies and; 4) Transportation System Management (TSM) Actions and Strategies. If applicable to the proposed project, please refer to these strategies as guidance for considering the proposed project within the context of regional goals and policies. To access a listing of the strategies, please visit <http://rtpscs.scag.ca.gov/Documents/2012/final/f2012RTPSCS.pdf> (Tables 4.3 – 4.7, beginning on page 152).

### REGIONAL GROWTH FORECASTS

At the time of this letter, the most recently adopted SCAG forecasts, at the jurisdictional level, consists of the 2020 and 2035 RTP/SCS population, household and employment forecasts. To view them, please visit <http://scag.ca.gov/Documents/2012AdoptedGrowthForecastPDF.pdf>. The forecasts for the region and applicable jurisdictions are below.

|            | Adopted SCAG Region Wide Forecasts |            | Adopted County of San Bernardino Forecasts |           |
|------------|------------------------------------|------------|--|-----------|
|            | Year 2020                          | Year 2035  | Year 2020                                  | Year 2035 |
| Population | 19,663,000                         | 22,091,000 | 2,268,000                                  | 2,750,000 |
| Households | 6,458,000                          | 7,325,000  | 698,000                                    | 847,000   |
| Employment | 8,414,000                          | 9,441,000  | 810,000                                    | 1,059,000 |

### MITIGATION

SCAG staff recommends that you review the SCAG 2012 RTP/SCS Final Program EIR Mitigation Measures for guidance, as appropriate. See Chapter 6 (beginning on page 143) at: <http://rtpscs.scag.ca.gov/Documents/peir/2012/final/Final2012PEIR.pdf>

As referenced in Chapter 6, a comprehensive list of example mitigation measures that may be considered as appropriate is included in Appendix G: *Examples of Measures that Could Reduce Impacts from Planning, Development and Transportation Projects*. Appendix G can be accessed at: [http://rtpscs.scag.ca.gov/Documents/peir/2012/final/2012fPEIR\\_AppendixG\\_ExampleMeasures.pdf](http://rtpscs.scag.ca.gov/Documents/peir/2012/final/2012fPEIR_AppendixG_ExampleMeasures.pdf)



## San Bernardino Mountains Group San Gorgonio Chapter

PO Box 708  
Blue Jay, CA 92317

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September 25, 2015

Kevin White, Project Planner  
Planning Division County of San Bernardino Land Use Services  
385 N. Arrowhead Ave., First Floor  
San Bernardino, CA 92415-0187  
E-Mail: Kevin.White@lus.sbcounty.gov

### **Re: Notice of Preparation (NOP) of a Draft EIR, Project No. P201500051/ Skypark Santa's Village**

Dear Mr. White,

The San Bernardino Mountains Group of the San Gorgonio Chapter of the Sierra Club (Mtns Group) is based in the western region of the San Bernardino National Forest (SBNF). Our local 200 members are proud to identify with Sierra Club, our nation's largest and most effective environmental grassroots organization. We appreciate this opportunity to contribute to the development of a Draft EIR (DEIR) for the proposed Skypark project.

As we expressed to you in our earlier March letter, responding to the notice of Skypark's CUP application, our concerns revolve around not only the likely immediate impacts, but also the potential and reasonably foreseeable future impacts of approving this project. Our concern is about the *long-term* value, vitality and characteristics of our local communities and surrounding natural ecosystems.

We urge the County to take an encompassing and long-term point of view while preparing this DEIR, and to not focus solely on the constrained merits and issues of just the limited specifics of the proposed project. The challenge for responsible government and public review is to put proposals in a larger planning context and not on just the isolated and independent details of the project itself. In this case, among other important community contexts, the land and immediate area in question has extremely high value for wildlife, open-space and animal movement, as described in the County's General Plan. Preserving those functions is of paramount importance to the long-term vitality of the surrounding area's forest.

We urge the County to take a hard look at the potential growth inducing aspects for this area if the project is approved. We ask the County to take not only careful consideration of the immediate impacts of the project as it is presently defined, but to consider strong mitigation measures against

the types of likely and reasonably foreseeable expansion and development in the area based on the presence of this project as it is currently envisioned.

We do appreciate that the NOP included a relatively encompassing overview of the many types of concerns already identified for inclusion in the DEIR. We applaud those inclusions and look forward to seeing them in full detail and specifics. One important concern we have is the lack of a clear description of the project itself. Although there are many elements of the promoted “complex” of entertainments, facilities, and hoped-for environmental protections, there is little for us to specifically critique until we see more robust details of the actual project elements, boundaries, buffers, and planned services.

In no particular order, we have the following thoughts and suggestions:

The NOP does not identify water supply reliability for review. In light of the current drought and the long term impacts of creating a new “hard-demand” for water on our mountain, it is important for our communities to understand the expected requirements and availability of water. We note that although onsite wells may have been used in the past for the property, the efficacy of those wells is not assured, nor is the anticipated demand well-defined and if an auxiliary supply/supplier is identified to serve the project, that agency may also need to provide a water supply assessment, or at the least, a will-serve promise.

We are confident the County will ensure other basic service adequacy as well, such as power, fire flow, fire prevention access, sanitation service and the like, but mention it here for completeness.

We are intrigued by the NOP’s reference to a Nov-Dec peak season for the park. It is a counter-intuitive declaration (since most of the attractions seem to be based on “good-weather” activities and summer vacation opportunities. Project usage projections should be analyzed for accuracy as it has important ramifications for water consumption, traffic, parking, pedestrian movement, noise, wildlife movement, light disturbance and assuredly others. Winter daylight hours are shorter and light pattern impacts would need to be understood if the park intends to stay open after sunset. The NOP refers to operating hours of 8am to 10pm. An important related consideration is the level of activity “after-hours”. How long will park staff be onsite? When will maintenance occur and what levels of light and noise disturbances will that entail? Another consideration is the geographic and demographic expectations of the Park attendees. Will the majority be targeted as a day use adventure, or will there be efforts to keep attendees on the mountain overnight? Where will those accommodations be? What percentage of the attendance will be coming up from the Valley? Will peak traffic to the park occur during peak travel elsewhere on the mountain, or will it be staggered? If staggered, how? An accurate understanding of the expected occupancy and usage patterns of the proposed project is fundamental and critical to a reliable DEIR.

It may be useful to require some form of a financial feasibility study for the project. A concern of our organization is, “What will happen if Skypark as envisioned, cannot make a go of it?” What protections and mitigations will there be in place if the park does not succeed? Will it revert to its current status, or will it be the foundation of a more significant, dense, or complex project, without the original mitigations in place? We are confident it is not the intention of the current applicant, but the potential result of a Skypark that struggles

financially, would not be much different than a deliberately planned “bait and switch” development. It is one of the reasons why we suggest the county consider mitigations that require the assignments of conservation easements: they represent a reassurance that Skypark does not turn out to be the first of what amounts to a multi-phased development in the area. A financial study will also, of course, offer a reasonable insight into the accuracy and dependability of the described anticipated attendance. A useful question might be: “What are the comparable facilities in the region (or elsewhere) that might productively inform the public and decision-makers of what to expect from the proposed Skypark facilities.”

Highway 18 is a scenic byway in our forest and scenic and viewshed considerations should be included in the DEIR analysis. Impacts and restrictions on signage, building height, parking, etc should be evaluated and appropriately restricted and mitigated. Some aspects of the proposed project might have to be rejected after analysis and review.

We appreciate the need for an underpass or bridge allowing pedestrian traffic to cross Highway 18; we ask that the requirements for pedestrian safety be expanded to include the necessity of supporting wildlife movement across the highway as well.

It is probable the planned-for expansion of the park south of Highway 18 for RV and camping accommodations is critical to the financial feasibility of Skypark. As such, it will be important to evaluate the impacts of a “full-buildout” of the area, or to impose conditional restrictions on future expansion south of the highway. Evaluation of “buildout” capacity for planning purposes should similarly apply to any zoning changes proposed as part of the Skypark project.

As mentioned in our March letter, Skypark is being proposed, dead center in the middle of the most important north/south wildlife corridor in the western San Bernardino Mountains (as identified by the County in its Open Space Overlay). It also surrounds one of the most important remaining wetlands and habitat in the area. Skypark’s potential impacts to these critical resources are significant, and we are confident the immediate and foreseeable impacts will be fully disclosed and mitigated in the DEIR. Complete and accurate boundary and attribute delineations of the wetlands and other important habitats in the project area will be important informational prerequisites before the public and decision-makers can adequately decide on the merits of the project and/or its conditions and mitigations. Another specific concern is the characteristics and locations of any planned fencing on the project lands.

Listed species are known to be present on the project site, including, but not limited to, the southern rubber boa, flying squirrel, and the spotted owl. With average attendance expected to be at least 1000/day (and potentially at night?), what kinds of protections will be required with respect to such disturbances as light, noise, and access? In the case of unavoidable impacts to species, will habitat acquisition be required as mitigation? Mitigation for similar projects in the area have required acquisitions at a ratio of 3 to 1.

We appreciate the applicant’s expressed concern for protecting significant areas within the Skypark project itself from development and disturbance. When a reliable, more detailed mapping and description of the project is available, we are assured there will be areas identified and set aside for protection and conservation. We believe the County and the applicant should affirmatively consider and/or require as mitigation, the issuing of

conservation easements on these areas to ensure their ongoing protection. It is perhaps the best way of adequately addressing at least some of the project's more uncomfortable, but reasonably foreseeable impacts. Without easements, or some similar conditional "assurances", it is inevitable that the undeveloped "protected" areas of the project will be used in the future.

We see in the NOP, the County will consider Skypark's cumulative impacts. We will be looking for analyses of the combined impacts of such currently proposed projects as Church of the Woods in Rimforest, and the anticipated expansion of Cumberland Road to Highway 18 as currently articulated in the County General Plan. What are the likely cumulative impacts if Wiley Woods next door is restored? Or if the Blue Ridge housing project (of the late 00's) is reconsidered. What would the cumulative impacts be on the wildlife corridor of the western San Bernardino Mountains if the Rimforest Flood District project, Church of the Woods, Skypark and a revitalized Blue Ridge subdivision were to go forward.? Since the Skypark project includes rezoning, in the name of safety and other public-benefit considerations, might the County consider rezoning some of the surrounding area parcels in acknowledgement of these potential cumulative concerns?

For another cumulative effects example, what are the cumulative impacts to traffic and evacuation safety in the mountain area when Skypark is considered along with other projects currently being reviewed, planned and contemplated in the area? Will mitigations for the safety of the surrounding community be required as a result of the increased density and traffic to and from the project? How will evacuations off the mountain be handled during peak attendance?

The potential range and scope of the Skypark project remains wide and as yet undetermined. Early assumptions and descriptions of a project are often changed over time and as review progresses. We are cautiously optimistic about the potential of a successful, environmentally-sensitive Skypark within our community, but as we have expressed earlier, approval of a limited project can easily segue into a larger project with greater environmental impacts and less sensitivity, and we will be looking for assurances in the Skypark project description and proposed conditions in the CUP and DEIR that respect and protect the ecological and social importance of this area to our mountain.

In summary, we appreciate the helpful general descriptions in the NOP of Skypark's plans and features. However, until more reliable and detailed descriptions of the Skypark project and its CUP conditions are available, we remain neutral in our support of the project and look forward to receiving the DEIR.

Thank you,

Steven Farrell  
Conservation Chair  
San Bernardino Mountains Group – Sierra Club



James Chuang  
Environmental Specialist

Southern California Gas Company  
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09/22/2015

Mr. Kevin White  
Senior Planner  
County of San Bernardino  
Land Use Services Department- Planning Division  
385 North Arrowhead Avenue, First Floor  
San Bernardino, CA 92415-0187

Re: **SkyPark at Santa's Village**

Dear Mr. White:

Southern California Gas Company (SoCalGas) appreciates the opportunity to review and respond to the Notice of Preparation of a Draft Environmental Impact Report. SoCalGas understands that the proposed project would involve both the re-development and re-use of the existing Santa's Village attraction on the northern portion of the project area and a new campground development, complete with restrooms and shower facilities, on the southern portion of the project area. Nineteen original buildings currently onsite, totaling 24,104 square feet, would be restored and re-developed for a variety of uses upon project completion including: restaurants, wedding services, Santa's village/ winter attractions, and restrooms. For both the northern and southern project components, various beautification and restoration of natural resources are proposed by removing debris and trash from the site and restoring portions of Hook Creek. We respectfully request that the following comments be incorporated in the subsequent Draft Environmental Impact Report (DEIR).

- SoCalGas has a high pressure distribution pipeline bisecting the proposed project area from east to west alignment. SoCalGas recommends that the project proponent call Underground Service Alert at 811 at least two business days prior to performing any excavation work for the proposed project. Underground Service Alert will coordinate with SoCalGas and other Utility owners in the area to mark the locations of buried utility-owned lines.
- Should it be determined that the proposed project may require SoCalGas to abandon and/or relocate or otherwise modify any portion of its existing natural gas lines, SoCalGas respectfully requests that project proponent coordinate with us by calling (800) 427-2000 to follow-up on this matter. In addition, any potential impacts associated with this work should be appropriately considered and addressed in the DEIR.
- SoCalGas recommends that the DEIR include a discussion of activities associated with the extension of new natural gas service. At present, there is no mention of any existing facilities or new facilities that would have to be installed. This additional discussion should include:

- The presence and condition of existing utility infrastructure on the project site, including right-of-ways and/or easements.
- The number and description of any new natural gas facilities that will have to be constructed or installed, in order to provide natural gas service to the proposed project.
- Identification of any existing natural gas infrastructure that would need to be relocated and/or abandoned, in order to provide natural gas service to the proposed project.
- Identification and description of any temporary areas required for construction and/or staging of material related to new gas service relocation or construction.
- Identification of any actions that would require permitting or acquisition of new right-of-way or easements for natural gas service to the project.
- Any proposed grading and/or drainage improvements that would redirect drainage in a manner that would increase the potential for erosion around SoCalGas facilities.

A discussion of these issues with appropriate diagrams, including specific environmental impact analyses related to these activities, if necessary, may help to reduce the time and cost associated with the extension of new natural gas service to the project.

Once again, we appreciate the opportunity to comment on the Notice of Preparation. If you have any questions, please feel free to contact me at (213) 244-5817 or [wcchuang@semprautilities.com](mailto:wcchuang@semprautilities.com).

Sincerely,



James Chuang  
Environmental Specialist  
Southern California Gas Company

cc. Carli Ewert, SoCalGas



**County of San Bernardino**  
**EIR Public Scoping Meeting**  
**SkyPark at Santa's Village Project**  
**Lake Arrowhead Resort**  
**Tuesday, September 8, 2015 at 6:00 PM**

*Please Add to mailing list.*

This form may be used to submit comments and suggestions in regard to environmental issues that should be included in the Draft Environmental Impact Report (EIR) that the County is preparing for the proposed SkyPark at Santa's Village Project.

Name (please print) Susan Walker  
Mailing Address PO Box 94 LK. Arrowhead 92352  
Telephone No. (daytime) (909) 337-1279  
Fax No. \_\_\_\_\_  
E-mail address SVWalker@gmail.com  
Organization/Affiliation Sierra Club member

The Draft EIR for the proposed SkyPark at Santa's Village Project should address the following environmental topics or issues:

See 2 pp  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Signature Susan V. Walker

**Thank you for your assistance.**

Written comments will be accepted until **September 25, 2015** and may be directed to Kevin White, Senior Planner, at the Land Use Services Department, Planning Division, located at 385 North Arrowhead Avenue, First Floor, San Bernardino, CA 92415-0182, Fax (909) 387-3223 or E-mail [Kevin.White@lus.sbcounty.gov](mailto:Kevin.White@lus.sbcounty.gov).

Sue Walker  
P.O. Box 94  
Lk. Arrowhead, CA  
92351  
SVwalker@gmail.com

NOTICE OF PREPARATION/PUBLIC SCOPING MEETING NOTICE - SkyPark  
P20150051  
APN: 0332-211-02,04 & 0332-212-02

Aesthetics, - Since the Project will take down trees on Hwy 18 to improve safety, I am interested in what they will do to improve the area that is disturbed both aesthetically and to prevent erosion.

Agriculture and Forestry Resources,

Air Quality, - With the increase of hundreds of cars on the mountain will the air quality be affected? How will this be mitigated?

Is there any thought to a shuttle bus from down the mt. to SkyPark? Could Mt. Transit be involved?

Biological Resources, - I'd like this section to be thoroughly covered.

Cultural Resources,

Geology and Soils, - I am especially interested in the meadow. The scoping preparation document mentions a watercourse, wetland and water aeration system. Details on this are needed.

Greenhouse Gas Emissions, - Are there any functions of SkyPark that will generate GHG emissions on the property? As stated before, I am concerned about the addition of hundreds of cars with their emissions.

Hazards and Hazardous Materials, - Will SkyPark generate or store any hazardous materials and how will they be treated/stored and transported? Will employees receive training? How will hazardous spills be handled?

Hydrology and Water Quality, - It is my understanding that their water use will come from their own water supply and wells. Will this water use have any impact on the site? Describe the water quality.

Land Use and Planning, - CUP description Conditional Use Permit

Mineral Resources,

Noise, - The Park is to stay open until 10 pm. Will the noise affect any neighbors?

Population and Housing, - Will anyone be living on site?

Public Services, - The Project will be serviced by which fire and police stations? Is there adequate service for the size of the Project?

Recreation,

Transportation and Traffic, I see these two topics to be some of the biggest challenges. It would be good to have some public transit for peak hours.

Traffic could be a nightmare. The left turn lanes have to be long enough, so someone from Lake Arrowhead who wants to go to Running Springs or Big Bear is not unduly delayed due to traffic backups from the Park. Please spell out safety measures for those entering the Park and those driving through the area.

Utilities and Service Systems, - How much electricity will the Park use? I see some will be by solar energy which should be encouraged.

Cumulative Impacts - The map of the Park shows intense use. How will this affect air, water and soils over time?

The EIR will evaluate the Project's potential to generate additional traffic in the region, in particular on SR-18 and safety related to vehicles and pedestrians accessing the park and the campground.

The EIR will also evaluate the Project's potential to result in emissions from construction and operation activities that could affect air quality and climate change and noise from construction and operation activities that could affect nearby sensitive receptors. – This should be fully spelled out. ↵

The EIR will evaluate the Project's potential to affect any species identified as a candidate, sensitive, or special status, riparian habitat or other sensitive natural community, federally protected wetlands, or wildlife movement. Wildlife corridors are especially important to define. This section is of great importance. Please note all threatened and endangered species.

The EIR will identify if there are any archaeological, historic, or paleontological resources onsite that could be adversely affected by Project.

The potential for the Project to affect the existing drainage patterns of the site or to affect water quality for downstream waters will also be evaluated in the EIR.- Will the Projects use of water affect water quality for downstream waters?

Potential impacts to the forest, including forest fires, will also be evaluated. –Please give information on the potential for forest fires starting in the Park or how a wildfire from off the property would be handled by the Park.

Responses and Comments: Please send your responses and comments by September 25, 2015 to Kevin White, Senior Planner at [Kevin.White@lus.sbcounty.gov](mailto:Kevin.White@lus.sbcounty.gov) or at the following address:

Kevin White, Senior Planner  
County of San Bernardino  
Land Use Services Department - Planning Division  
385 North Arrowhead Avenue, First Floor  
San Bernardino, CA 92415-0187

Scoping Meeting: The County will hold a scoping meeting for the Project to receive comments on the scope and content of the EIR. You are welcome to attend the scoping meeting and present environmental information that you believe should be considered in the EIR. The scoping meeting is scheduled as follows:

Date:

Time:

Place:

Tuesday September 8, 2015

6:00 p.m.

Lake Arrowhead Resort, 27984 Highway 189, Lake Arrowhead,  
CA,92352

North Arrowhead



United States  
Department of  
Agriculture

Forest  
Service

San Bernardino National Forest  
Supervisor's Office

602 South Tippecanoe Ave  
San Bernardino, CA 92408  
Phone: 909-382-2600  
Fax: 909-383-5770  
TTD: 909-383-5616

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File Code: 1950  
Date: September 29, 2015

Kevin White  
County of San Bernardino Senior Planner  
Land Use Services Department- Planning Division  
385 North Arrowhead Avenue, First Floor  
San Bernardino, CA 92415-0187

Dear Mr. White:

The San Bernardino National Forest appreciates the opportunity to review and comment on the Notice of Preparation of a Draft Environmental Impact Report for the proposed SkyPark at Santa's Village Project. The proposed project is adjacent to the National Forest boundary and could have impacts to National Forest System lands. I would like to have the following issues considered throughout the project planning process and prior to the decision:

- 1) Hazardous Fuels- San Bernardino County adopted new fire safety regulations in April 2004 (Ordinance No. 3918). The regulations add new provisions including fuel modification. The state of California has also adopted new regulations which require 100 foot clearances of all hazardous fuels around all structures. The United States Forest Service would like to see these clearances and any proposed fuelbreaks or fuel modifications occur within the project boundary on private land and not on National Forest System lands, because Federal lands are outside the jurisdiction of state and local governments.
- 2) Water Extractions/Riparian Habitat - The Forest Service is concerned about the impacts of water extractions from wells on-site and off-site riparian habitats. As water availability for native habitats and fire-fighting is one of the most critical concerns in the mountains, the Forest Service would appreciate the Supervisors considering the long-term impacts of residential growth that will substantially increase demands on the limited water supply. Mitigation measures should require the use of xeric landscaping and other water conservation measures. Riparian habitats in the San Bernardino Mountains and southern California have been lost at very high rates. The proposed development surrounding Hooks Creek and the Hencks Meadow system could have significant effects on those riparian systems.

The Forest Service would prefer to see the new buildings and infrastructure connect to a municipal water system. If the proposed project results in construction of any new local groundwater wells or septic systems the Forest Service would like the County to require a Water Availability Study be prepared to identify the most appropriate locations for any wells and/or septic systems and potential impacts on existing ground water supplies. Since water extractions and leaching could have an impact to streams and riparian habitat the Forest Service would like to have our Forest Hydrologist involved with the study, and the study should also include the impacts of wells or additional septic systems on surface flows.

- 3) General - The Forest Service would like the decision to consider further reducing the size and scope of the development to try to reduce impacts to rare species/habitats on the adjacent NFS land as the development would increase use and impacts on NFS lands. NFS lands adjacent to residential and commercial developments experience much higher levels of impacts that are very



difficult to control.

There are no designated hiking/biking trails on NFS lands adjacent to the proposed development. Typically where private lands adjoin NFS lands, a network of hiking, biking, and equestrian trails develop on the NFS lands. These activities have the potential to directly affect animals and plants as well as to introduce or spread non-native plants into the forest. While these are public lands, development of trails that are used on a regular basis for organized purposes would need to be evaluated through an Environmental Review process and be placed under a special use permit.

- 4) Spotted Owls - The San Bernardino National Forest has mapped habitat for California spotted owl (a Forest Service Sensitive species that has experienced severe declines in the past two decades and for which the Forest Service has a concern about the long-term viability in southern California) throughout the mountain range. The project area supports known nesting habitat for this species. Habitat for this rare species has been affected by fire and development throughout the mountains of southern California.

The decision should also include consideration of the long-term impacts to this species and its habitat. Please consider adding protection measures to retain as much suitable habitat on site as possible, and off-site habitat acquisition/protection as mitigation for suitable habitat that would be permanently degraded. The Forest Service recently completed an effort to map all known and suitable spotted owl habitat on the SBNF and would be happy to share this mapping with the County to assist with the potential mitigation.

- 5) Rare Species – The project area supports known occurrences of southern rubber boa (a state-listed Threatened species) and may support the white-eared pocket mouse that was only ever known from sites within 1.5 miles from Strawberry Peak. The project will result in permanent loss of suitable habitat for these species. Additionally, suitable habitat remains on the site will experience very high levels of impacts from people (unless it is fenced or somehow otherwise protected from people using the open space). As such, the mitigation measure that requires off-site rubber boa habitat acquisition should be required for the entire project area. The meadow system may support Threatened, Endangered, or otherwise rare plants and should be surveyed for them. Appropriate mitigation should be included in the DEIR. Hooks Creek likely supported endangered mountain yellow-legged frogs at one time. This species is currently known from only one site in the San Bernardino Mountains.
- 6) Noise and Lighting – The DEIR should address the noise and lighting effects to adjacent National Forest lands. Noise and lighting impact animals on adjacent lands, including spotted owls nesting and foraging in the area. These impacts also affect the adjacent drainages that provide movement corridors for animals.

We request that the County consider development of effective and enforceable mitigation measures that can address these concerns. These should include: a restriction on amplified sound; use of fully-shielded low-light emitting lights at the site; use of timers and motion-sensors on outside lighting (*e.g.*, parking lot lights), etc. In addition, we suggest that the project proponent be required to conduct sound studies establishing baseline sound levels in the area and to determine how far sound would be heard off-site on adjacent NFS lands. The requirement should include development of mitigation measures to ensure that the baseline levels do not change on National Forest lands.

- 7) Encroachment - Where new developments border on National Forest, it is extremely important that the County require surveys and documentation of the land line locations prior to the development construction process to assure that no trespasses occur on National Forest System lands.

- 8) Erosion/Sediment – Ground-disturbance activities, including construction, grading, cutting, and filling, next to National Forest need to be set back from National Forest System lands boundaries such that any excavation and or earth work does not cause impacts to NFS lands (*e.g.*, vegetation impacts through root cutting, “back cutting” type erosion, sediment and erosion, etc.).
- 9) Roads/Trails- Any new roads, trails, or evacuation routes will need to be located off of National Forest System lands or proposed for use and/or expansion under the appropriate special uses permit.

In addition to these considerations, the San Bernardino National Forest would like to request a meeting with the San Bernardino County Land Use Services Department Planning Division regarding the proposed project in order to further discuss the Forest response with an interdisciplinary team of Forest specialists. We are happy to share any information and data that may improve the project planning efforts and minimize the impact to National Forest System Lands. If you should have any questions, or would like to set up a meeting please contact Tasha Hernandez, Forest Planner, at 909-382-2905.

Sincerely,



JODY NOIRON  
Forest Supervisor