

From: [Sandy Steers](#)
To: [COB - Internet E-Mail](#)
Cc: [Lovingood, Robert](#); [Rutherford, Janice](#); [Rowe, Dawn](#); [Hagman, Curt](#); [Supervisor Gonzales](#); [Rahhal, Terri](#); [Nieves, Tom](#); [Knox, Matt](#); [Willhite, Erika](#); [Sorenson, Jeff](#)
Subject: Moon Camp--Questionable, unethical, possibly illegal actions to obtain water service
Date: Monday, October 7, 2019 2:21:51 PM
Attachments: [bbl_dwp_lafco_map.pdf](#)
[dwp_minutes_031511.pdf](#)
[dwp_disc_0311.pdf](#)
[dwp_joel_dickson_email.docx](#)
[MWD_DWP_Grizzly_April27_2011.pdf](#)
[fobbv_MC_Foulkes_illegal_actions_to_get_water_service.pdf](#)

Please find my comments attached.
Thank you.
Sandy Steers
Executive Director, Friends of Big Bear Valley



Virus-free. www.avast.com



BLOOM RESEARCH, INC.

October 6, 2019

County Board of Supervisors
385 North Arrowhead Avenue 1st Floor
San Bernardino, California 92415

Via: (email: see bottom of letter)

Subject: RE, RE: Final Environmental Impact Report - Moon Camp 50-lot Residential Subdivision,
TT No. 16136 (Based on the Revised Site Plan) Big Bear Lake, San Bernardino County, California, SCH No.
2002021105

Dear Supervisors,

Thank you for the opportunity to comment on the Moon Camp developer's "Bald Eagle Long Term Management Plan" (LTMP). By way of introduction, I hold a PhD in Natural Resources, from the University of Idaho, and have been actively studying southern California raptors since 1970 (50 years), generally monitoring their status and publishing on numerous aspects of their ecology. Roughly 55,000 birds have been banded by me and collaborators on my permits. Approximately 800 are eagles banded in the western United States, and another 100 or so eagles of 4 species in India, Kazakhstan, Switzerland, and Sweden. Closer to home, I've also banded some of the Bald Eagle chicks at Fawnskin and in the surrounding California counties.

Not recognized or stated in the LTMP is the fact that the Bald Eagle (*Haliaeetus leucocephalus*) is a State endangered species, and in fact is one of the original species on the state endangered species list in 1971. The Bald Eagle is also federally protected under the Bald and Golden Eagle Protection Act and as a small southern California population is subject to "no net loss" in terms of the local southern California population. The Bald Eagle was originally listed by both the State and Federal governments because of the effects of organochlorine pesticides and habitat loss. While persistent organochlorines are still found in the environment, they do not pose the threat they did from 1950 - ~ 1980, however, habitat loss continues as a local threat and in some areas remains a serious issue. In this case, I have been asked by Friends of Big Bear Valley to review the report entitled "Long-Term Management Plan for Bald Eagle and Rare Plant Habitat", prepared for RCK Properties, Inc.

While a positive sounding title, the plan lacks any substance, and from a conservation perspective, has almost no value to this State of California endangered species. The proposed Moon Camp project is all about the loss of Bald Eagle foraging habitat which include both the perch site and the land and water that the pair is hunting or scavenging on. When considering habitat loss and degradation of the proposed

project, one needs to address both the loss of winter migratory Bald Eagle habitat as well as the resident Bald Eagle foraging and nesting habitat. Reductions in prey deliveries by this pair to their young resulting from the development of a marina could result in reduced productivity or a nest failure. The authors provide only cursory observations with no temporal or spatial quantification of the hours, days and locations of the resident and migratory individuals on or near, and exactly where on and off the Moon Camp property. Without that information, plans for homes and tree removal can only be damaging to the long-term persistence of either the resident pair or possibly the migratory eagles. This kind of question can only be answered by science, using what has recently become standard for assessing space use by eagles, that is, satellite transmitters on the resident adult pair and perhaps their young. The migratory population could best be studied by color marking of at least a subset of the wintering eagles and recording eagle locations on the lake, and surrounding landscape. If this were done, the authors would at least have the potential for a plan that might provide the basis for the conservation of the one current Big Bear Lake breeding pair. However, such a study would likely reveal that the marina vicinity is their primary hunting location, and loss of it could result in the loss of the pair, and or their annual productivity.

I have elected to be succinct as possible for this exercise and provide my commentary below in bullets as follows:

1. Some of my comments are from an historical context, a resource clearly not consulted by the authors of the LTMP. The most recent Draft Environmental Impact Report (2011) concluded there would be significant adverse impacts to Bald Eagles. It is my understanding that this conclusion has not changed. That analysis was based on Bald Eagles only wintering in the valley for a few months a year. Since the last time Bald Eagle use of this site was studied (2010) there have been significant changes that require another study before the true impact to eagles can be determined. Significant changes include that a pair of Bald Eagles began nesting less than one mile from the site in 2012 and some eagles, especially juveniles have remained to summer in the valley. The much more significant impacts this project would cause based on these key changes have never been evaluated. Any long-term management plan without proper analysis is simply erroneous speculation. In my opinion, the use of satellite telemetry on the resident pair of adults, a technique commonly used on both resident and wintering eagles will answer essentially all questions.
2. Exhibit 4 presents a “shoreline habitat conservation easement” that includes the marina parking lot, and marina area. A parking lot and a marina is not a viable conservation easement for loss of Bald Eagle habitat. The parking lot would eliminate the eagle perch trees now there. The business around the area of loading boats and people would likely preclude eagles from using the site, and by their presence, the marina docks filling the foraging bay would eliminate foraging in that portion of the lake front. Essentially, the LTMP does nothing to promote the conservation of Bald Eagles but does eliminate known occupied Bald Eagle hunting perches and adjacent foraging habitat. Because of the large number of people that would be coming and going from the location it would degrade occupied habitat over the vast area where the eagles hunt in Grout Bay and adjacent shorelines.
3. I found it interesting that the document frequently refers to “occasional perching in the trees along the lake shore”, but in my experience over about three decades Bald Eagles are regularly observable along the shoreline in the vicinity of the proposed Moon Camp development. Grout Bay and the inlets immediately east is the first place I take people at Big Bear Lake when I wish to

show them a Bald Eagle. Importantly, the eagles inhabiting Grout Bay have not been studied since 2010, and the conclusions of the authors are contrary to what is stated in the EIR analysis of 2010. In addition, their finding of “occasional perching” on site are contrary to the evidence provided by viewings and photographs of local residents (some who have observed the birds multiple times on the same day) of eagles on the site on a regular basis, with variations from year to year and differing lake water levels.

4. The author’s LTMP states that the proposed Moon Camp development will not have a direct or indirect impact on Bald Eagle pair’s nesting site itself, but documentation shows that nesting sites are based on proximity to food sources: (see page 140, 2nd paragraph of this document <https://sora.unm.edu/sites/default/files/journals/wilson/v104n01/p0136-p0142.pdf>) and the same page, 4th paragraph, which states “Overall, the most consistent differences we found between random and perch sites were related to foraging opportunities of the site and to distance to nest.” Thus, as planned, modification of Grout Bay that causes habitat loss, degradation and fragmentation resulting from Moon Camp could lead to the extirpation of this pair if Grout Bay is one of their most important foraging areas.
5. The document states that the marina and lakefront would be closed to the public from 1, December to 1, April. This is not a mitigation nor a benefit to the eagles as it is already required that all marinas and lake front open space is closed on Big Bear Lake during those months to accommodate wintering bald eagles. Most importantly, the proposed “closure” does not encompass the nesting season for this pair of eagles, which in 2019 was January to August. As a result, the only known important foraging area of this pair would be impacted most when they are caring both for themselves as well as their young. Additionally, they make no mention of how and when the public ban of this section of shoreline would be enforced. Creation of the docks for the marina would represent a direct and permanent loss of prime, near shore, and on shore foraging habitat. The plan does not address actual foraging habitat, only perch habitat (and not well). The foraging habitat includes the two bays east and west of the marina. The bays are shallow and somewhat sheltered and attract large numbers of ducks during fall, winter, and spring. The dredging required for the marina docks would ruin the shallow habitat most favored by fish and waterfowl. Same article as above, paragraph 5 “Because the locations of these fish were predictable, the most important criteria for perch selection was probably nearness to food rather than the most comprehensive view offered by a taller, more distant perches.” Section 1.3 states that the project was redesigned to avoid or substantially minimize impacts...in particular Bald Eagle perch trees used for perching and foraging..., but since they are planning to put a marina, a parking lot and a new road in exactly the portion of their parcel that is now used the most by the eagles, this statement is extremely misleading.
6. Importantly the LTMP does not address how the people from 50 + homes utilizing the marina and adjacent shoreline would be controlled. No mention is made, but between the direct loss of foraging habitat (open water, shoreline and hunting perches) resulting from the marina and homes in the vicinity, coupled with the degradation of the habitat by the predictable presence of people tending to their boats, it is genuinely plausible that the eagles would discontinue use of the site. Of interest, the same article previously referenced (link above) also states on page 140, 3rd paragraph: “The nest and foraging locations probably shifted to the undeveloped secondary inlet when human use of the main inlet increased several decades ago.” (article includes data for this summary) and at the bottom of the 4th paragraph, “Bald Eagles on the Columbia River avoided

avored foraging sites when boats were present (McGarigal et al, 1991)". In section 2.3.1 (Nesting Habitat), the LTMP states that nests are usually located within one mile of foraging areas, so this disruption within one mile of the nest, by the author's own description, would impact the eagles.

7. The plan's analysis in the "perching/foraging habitat" section is flawed. Relying on a 1981 study that is not provided for review is not acceptable. In the almost 40 years since that "study" was done, the shoreline development and winter visitation of humans and eagles has changed substantially. This plan does not include any discussion or opinion from the Forest Service Bald Eagle experts who have been studying the Big Bear population of eagles in the meantime. The supposition that glare from Big Bear Lake somehow prevents or inhibits successful foraging by Bald Eagles seems untenable. I am unaware of any published research on the subject. Bald Eagles regularly change hunting perches throughout the day, and if needed fly out directly over smooth or slightly choppy water, or ice, to seek their quarry (dead or alive) whether it be fish, waterfowl or mammal. As any resident of Fawnskin will tell you, the use of Moon Camp is not "only occasional perching habitat for Bald Eagles." During some seasons, Bald Eagles are observed multiple times each day. They often perch near the food supply and that changes seasonally. During the winter, the eagles appear to forage more on waterfowl; during the rest of the year, fish. When fish are spawning, they perch near those sites; when the ducks are in the bays near the proposed Moon Camp marina, they perch there. This "plan" prepared by the authors relies on 40-year old observations (Krantz and Malcom 1981) and ignores the local knowledge and daily observations of locals. (re: paragraphs 3, 4 and 1st half of 5 on page 9)
8. This project also ignores the cumulative losses and effects to perch and foraging habitat over the past 30-40 years in the Big Bear area. This project would add substantially to those cumulative effects and the effects are unmitigable for Bald Eagles. Removal from the plan of the marina, marina parking lot, the access road that would come out at the point with the eagle's favored perch trees and the houses above the highway that would be immediately adjacent to or higher than the perch trees is potentially critical to not losing this breeding pair. (As demonstrated by the Castle Glen development a few miles southeast, developed by the same developer), the eagles stopped perching/foraging in this previously popular area after houses were constructed that were all higher than the perch trees.) (Ref: Friends of Big Bear Valley comment letter)
9. Surprisingly, the plan provides no estimate of the funding required to perform the monitoring and maintenance tasks that are listed as a must for the eagles. Nor does it state how much the non-wasting fund would have, so there is no way to know whether it would be enough to do all that is listed as necessary to implement and maintain this plan "into perpetuity".
10. The project proponents have designated on a map a number of trees as potential perch trees that can be managed into being perch trees, but they have not done or referred to any studies showing why these trees would/could serve as perch trees. Of the trees shown, several on the east end would be directly over the planned marina (which they fail to point out) and so highly unlikely that eagles would use those. Several others are over the planned parking area, where again, it is unlikely that the eagles would consider them for perching, and they would no longer be viable for foraging because the foraging area they overlook would contain a very active new marina.
11. Most importantly, the project proponents have not studied or analyzed this proposed project based on current conditions, nor have they provided any data or proof that any of this would in

any way reduce impacts to Bald Eagles. Essentially, currently a very hollow LTMP. This means that accurate, focused field research of 2 years need to be performed, primarily on the known resident pair, and potentially, their young that dwell on the property, as well as the migratory population in the local vicinity.

Thank you again for the opportunity to provide comments on Bald Eagles at Big Bear Lake. My position on this project has not changed. As I stated in my October 3, 2018 comments to the County of San Bernardino, "Given that we are now aware that Bald Eagles not only hunt, perch and nest, but also produce young in the vicinity of Grout Bay, Big Bear Lake, California, and that the Moon Camp project offers essentially no realistic biological mitigation, this project must be denied".

Sincerely,

Bloom Research, Inc.



Peter H. Bloom

Zoologist/President

.....

Address/email info:

Clerk of the Board, COB@sbcounty.gov

cc: Supervisor Robert A. Lovingood, Robert.Lovingood@bos.sbcounty.gov

Supervisor Janice Rutherford, Janice.Rutherford@bos.sbcounty.gov

Supervisor Dawn Rowe, Dawn.Rowe@bos.sbcounty.gov

Supervisor Curt Hagman, Curt.Hagman@bos.sbcounty.gov

Supervisor Josie Gonzales, Supervisorgonzales@sbcounty.gov

County LUS Director, Terri Rahhal Terri.Rahhal@lus.sbcounty.gov

County Planner, Tom Nieves, tom.nieves@lus.sbcounty.gov

From: [MINHA HWANG](#)
To: [COB - Internet E-Mail](#)
Cc: [Lovingood, Robert](#); [Rutherford, Janice](#); [Rowe, Dawn](#); [Hagman, Curt](#); [Gonzales, Josie](#); [Nieves, Tom](#); [Rahhal, Terri](#)
Subject: Please DENY the detrimental zone change and project proposal for the Moon Camp development in Fawnskin.
Date: Monday, October 7, 2019 5:57:07 PM
Attachments: [letter_minhahwang.pdf](#)

Dear Supervisors:

I am asking you to DENY the detrimental zone change and project proposal for the Moon Camp development in Fawnskin. Increasing housing density in this area would cause major irreversible harm to the bald eagles that nest nearby and forage on the site.

The most recent Draft Environmental Impact Report (2011) concluded there would be significant adverse impacts to bald eagles. That analysis was based on bald eagles only wintering in the valley for a few months a year. Beginning in 2012, a pair of bald eagles began nesting within 1/2 mile of the project site. The much more significant impacts this project would cause based on this key change has never been evaluated. Project proponents have attempted to conceal the true impacts to bald eagles by creating what they call a 'Long Term Management Plan.' Without proper analysis, any management plan is invalid.

Planning staff cites the need for housing as more important than any harm caused to bald eagles. This area is in the heart of a National Forest, in a unique, rural area on the north side of the lake. The project site itself contains 3 species of plants and rare habitat that does not exist anywhere else in the world! Less than 1/3 of this special habitat is planned to be conserved. With over 600 homes currently for sale in this small valley (150 more than a year ago), there is no justification to declare that a need for housing overrides significant harmful impacts to bald eagles.

Any zone change, as this project requires, must be in the public interest. This area is already rated such a high fire risk that many local homeowners have had their insurance canceled. A housing density increase along the National Forest boundary would increase the fire risk. The area is already ranked in the top 1% as having the most hazardous, least adequate fire and emergency evacuation routes in the state. This zoning change would further aggravate that potentially dire evacuation deficiency.

To approve this project, County decision-makers would be saying they care more about adding luxury houses and a private marina than they care about preventing harmful impacts to the bald eagles, to our National Forest, to our residents and to our visitors. Please DENY the detrimental zone change and project proposal for the Moon Camp development in Fawnskin.

Most sincerely,
Minha Hwang

From: [Debbie Pasienski](#)
To: [COB - Internet E-Mail](#)
Cc: [Lovingood, Robert](#); [Rutherford, Janice](#); [Rowe, Dawn](#); [Hagman, Curt](#); [Gonzales, Josie](#); [Rahhal, Terri](#); tom.nieves@lus.sbcounty.gov
Subject: Please DENY the proposed zone change and Moon Camp project proposal
Date: Monday, October 7, 2019 9:08:11 PM
Attachments: [Mooncamp Development Hearing \(1\)-signed.pdf](#)

10/7/2019

Dear Supervisors:

I am asking you to DENY the detrimental zone change and project proposal for the Moon Camp development in Fawnskin. Increasing housing density in this area would cause major irreversible harm to the bald eagles that nest nearby and forage on the site.

The most recent Draft Environmental Impact Report (2011) concluded there would be significant adverse impacts to bald eagles. That analysis was based on bald eagles only wintering in the valley for a few months to a year. Beginning in 2012, a pair of bald eagles began nesting within ½ mile of the project site. The much more significant impacts this project would cause based on this key change has never been evaluated. Project proponents have attempted to conceal the true impacts to bald eagles by creating what they call a 'Long Term Management Plan'. Without proper analysis, any management plan is invalid.

Planning staff cites the need for housing as more important than any harm caused to bald eagles. This area is in the heart of a National Forest, in a unique, rural area on the north side of the lake. The project sit itself contains 3 species of plants and rare habitat that do not exist anywhere else in the world! Less than 1/3 of this special habitat is planned to be conserved. With over 600 homes currently for sale in this small valley (150 more than a year ago), there is no justification to declare that a need for housing overrides significant harmful impacts to bald eagles.

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To approve this project, County decision-makers would be saying they care more about adding luxury houses and a private marina than they care about preventing harmful impacts to the bald eagles, to our National Forest, to our residents and to our visitors. Please DENY the detrimental zone change and project proposal for the Moon Camp development in Fawnskin.

Respectfully,



Elizabeth A. Hawkins
412 Cedar Ridge Dr.
Lake Arrowhead, CA 92352

From: [Lisa S Shimamura](#)
To: [COB - Internet E-Mail](#)
Cc: [Lovingood, Robert](#); [Rutherford, Janice](#); [Rowe, Dawn](#); [Hagman, Curt](#); [Gonzales, Josie](#); [Nieves, Tom](#); [Rahhal, Terri](#)
Subject: Proposed Moon Camp development
Date: Wednesday, October 9, 2019 10:58:33 AM
Attachments: [San Bernardino County Board of Supervisors.pdf](#)

Please see my letter attached. Thank you

Lisa Shimamura

From: [Virginia Armbrust](#)
To: [Rahhal, Terri](#)
Subject: Proposed Moon Camp Development
Date: Monday, October 07, 2019 3:55:55 PM

Dear County LUS Director, Terri Rahhal:

I am writing to you today to ask that you DENY the detrimental zone change and project proposal for the Moon Camp development in Fawnskin. The Big Bear Eagle Nest project is followed nationally and internationally. Increasing housing density in this area would cause major irreversible harm to the bald eagles that nest nearby and forage on the site. People travel to Big Bear just to be part of this amazing Eagle nest project. It's hard to imagine that any elected official would want their legacy tied to harming the Big Bear Eagle's Nest or the eagle's abandonment of the region.

Peter Bloom, a zoologist and chief executive of Bloom Biological Inc., has assisted in monitoring the Big Bear eagles. Bloom reports that there is not adequate data on the Eagle's hunting areas and states: "If, for example, they're 100% in the vicinity of the marina then development of a marina will likely exclude the bald eagle from Big Bear Lake."

The most recent Draft Environmental Impact Report (2011) concluded there would be significant adverse impacts to bald eagles. That analysis was based on bald eagles only wintering in the valley for a few months a year. Beginning in 2012, a pair of bald eagles began nesting within 1/2 mile of the project site. The much more significant impacts this project would cause based on this key change has never been evaluated. Project proponents have attempted to conceal the true impacts to bald eagles by creating what they call a 'Long Term Management Plan.' Without proper analysis, any management plan is invalid.

Planning staff cites the need for housing as more important than any harm caused to bald eagles. This area is in the heart of a National Forest, in a unique, rural area on the north side of the lake. The project site itself contains 3 species of plants and rare habitat that does not exist anywhere else in the world! Less than 1/3 of this special habitat is planned to be conserved. With over 600 homes currently for sale in this small valley (150 more than a year ago), there is no justification to declare that a need for housing overrides significant harmful impacts to bald eagles.

Any zone change, as this project requires, must be in the public interest. This area is already rated such a high fire risk that many local homeowners have had their insurance cancelled. A housing density increase along the National Forest boundary would increase the fire risk. The area is already ranked in the top 1% as having the most hazardous, least adequate fire and emergency evacuation routes in the state. This zoning change would further aggravate that potentially dire evacuation deficiency.

To approve this project, County decision-makers would be saying they care more about adding luxury houses and a private marina than they care about preventing harmful impacts to the bald eagles, to our National Forest, to our residents and to our visitors. Please DENY the detrimental zone change and project proposal for the Moon Camp development in Fawnskin.

Please, consider the possible destruction of their habitat before you vote:



Most sincerely,

Virginia Armbrust & Dr. Steven Yerkes

Cardiff by the Sea, CA 92007

From: [Paul Mitchell](#)
To: [COB - Internet E-Mail](#)
Cc: [Lovingood, Robert](#); [Nieves, Tom](#); [Rutherford, Janice](#); [Rowe, Dawn](#); [Hagman, Curt](#); [Gonzales, Josie](#); [Rahhal, Terri](#)
Subject: Proposed Moon Camp development in Fawnskin
Date: Friday, October 4, 2019 12:42:38 PM

San Bernardino County Board of Supervisors

385 N. Arrowhead Ave., #2

San Bernardino, CA 92415

Clerk of the Board

Re: Proposed Moon Camp development, October 8 Supervisors' hearing

Dear Supervisors:

I am asking you to DENY the detrimental zone change and project proposal for the Moon Camp development in Fawnskin. Increasing housing density in this area would cause major irreversible harm to the bald eagles that nest nearby and forage on the site.

The most recent Draft Environmental Impact Report (2011) concluded there would be significant adverse impacts to bald eagles. That analysis was based on bald eagles only wintering in the valley for a few months a year. Beginning in 2012, a pair of bald eagles began nesting within 1/2 mile of the project site. The much more significant impacts this project would cause based on this key change has never been evaluated. Project proponents have attempted to conceal the true impacts to bald eagles by creating what they call a 'Long Term Management Plan.' Without proper analysis, any management plan is invalid.

Planning staff cites the need for housing as more important than any harm caused to bald eagles. This area is in the heart of a National Forest, in a unique, rural area on the north side of the lake. The project site itself contains 3 species of plants and rare habitat that does not exist anywhere else in the world! Less than 1/3 of this special habitat is planned to be conserved. With over 600 homes currently for sale in this small valley (150 more than a year ago), there is no justification to declare that a need for housing overrides significant harmful impacts to bald eagles.

Any zone change, as this project requires, must be in the public interest. This area is already rated such a high fire risk that many local homeowners have had their insurance cancelled. A housing density increase along the National Forest boundary would increase the fire risk. The area is already ranked in the top 1% as having the most hazardous, least adequate fire and emergency evacuation routes in the state. This zoning change would further aggravate that potentially dire evacuation deficiency.

To approve this project, County decision-makers would be saying they care more about adding luxury houses and a private marina than they care about preventing harmful impacts to the bald eagles, to our National Forest, to our residents and to our visitors. Please DENY the detrimental zone change and project proposal for the Moon Camp development in

Fawnskin.

Most sincerely,

Paul Mitchell
39737 Flicker Road
Fawnskin, CA 92333
imixsound@att.net

+1 213 399 5050 Mobile

From: [Jonathan Nourok](#)
To: [COB - Internet E-Mail](#)
Cc: [Lovingood, Robert](#); [Rutherford, Janice](#); [Rowe, Dawn](#); [Hagman, Curt](#); [Supervisor Gonzales](#); [Rahhal, Terri](#); [Nieves, Tom](#)
Subject: Proposed Moon Camp development in Fawnskin
Date: Monday, October 7, 2019 11:05:05 PM

San Bernardino County Board of Supervisors
385 N. Arrowhead Ave., #2
San Bernardino, CA 92415

Clerk of the Board, COB@sbcounty.gov
Re: Proposed Moon Camp development, October 8 Supervisors' hearing

Dear Supervisors:

I am asking you to DENY the detrimental zone change and project proposal for the Moon Camp development in Fawnskin. Increasing housing density in this area would cause major irreversible harm to the bald eagles that nest nearby and forage on the site.

The most recent Draft Environmental Impact Report (2011) concluded there would be significant adverse impacts to bald eagles. That analysis was based on bald eagles only wintering in the valley for a few months a year. Beginning in 2012, a pair of bald eagles began nesting within ½ mile of the project site. The much more significant impacts this project would cause based on this key change has never been evaluated. Project proponents have attempted to conceal the true impacts to bald eagles by creating what they call a 'Long Term Management Plan.' Without proper analysis, any management plan is invalid.

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To approve this project, County decision-makers would be saying they care more about adding luxury houses and a private marina than they care about preventing harmful impacts to the bald eagles, to our National Forest, to our residents and to our visitors. Please DENY the detrimental zone change and project proposal for the Moon Camp development in Fawnskin.

Anything other than a decision to DENY the zone change will clearly be seen as another effort by the County to increase its revenue in opposition to its own regulations which were put in place to protect all the public's interests.

Most sincerely,

Jonathan Nourok
Big Bear City
909-585-5355

cc: Supervisor Robert A. Lovingood, Robert.Lovingood@bos.sbcounty.gov
Supervisor Janice Rutherford, Janice.Rutherford@bos.sbcounty.gov
Supervisor Dawn Rowe, Dawn.Rowe@bos.sbcounty.gov
Supervisor Curt Hagman, Curt.Hagman@bos.sbcounty.gov
Supervisor Josie Gonzales, SupervisorGonzales@sbcounty.gov
County LUS Director, Terri Rahhal Terri.Rahhal@lus.sbcounty.gov
County Planner, Tom Nieves, tom.nieves@lus.sbcounty.gov

Supervisor Josie Gonzalez, supervisorgonzales@sbcountry.gov

From: [Sandy Steers](#)
To: [COB - Internet E-Mail](#)
Cc: [Lovingood, Robert](#); [Rutherford, Janice](#); [Rowe, Dawn](#); [Hagman, Curt](#); [Supervisor Gonzales](#); [Rahhal, Terri](#); [Nieves, Tom](#); [Knox, Matt](#); [Erica.Willhite@bos.sbcounty.gov](#); [Sorenson, Jeff](#)
Subject: Proposed Moon Camp Development, Oct. 8 BOS Hearing
Date: Monday, October 7, 2019 11:09:26 AM
Attachments: [fobbv MC insufficient infrastructure.pdf](#)
[Attachment 1 mtn road emergency capacity study 2012.pdf](#)

Please find the attached comments.
Thank you,
Sandy Steers
Executive Director, Friends of Big Bear Valley



Virus-free. www.avast.com

From: [Diane](#)
To: [COB - Internet E-Mail](#)
Cc: [Rutherford, Janice](#); [Rowe, Dawn](#); [Hagman, Curt](#); [Supervisor Gonzales](#); [Rahhal, Terri](#); [Nieves, Tom](#)
Subject: Proposed Moon Camp development, October 8 Supervisors" hearing
Date: Friday, October 4, 2019 2:43:19 PM
Attachments: [scan0027.pdf](#)

Please see attached letter in referance to Proposed Moon Camp development, October 8 Supervisors' hearing.

Thank you

From: [frank.guido](#)
To: [COB - Internet E-Mail](#)
Cc: [Lovingood, Robert](#); [Rutherford, Janice](#); [Rowe, Dawn](#); [Hagman, Curt](#); [Gonzales, Josie](#); [Rahhal, Terri](#); [Nieves, Tom](#)
Subject: Proposed Moon Camp development, October 8 Supervisors' hearing
Date: Wednesday, October 9, 2019 10:32:19 AM

San Bernardino County Board of Supervisors
385 N. Arrowhead Ave., #2
San Bernardino, CA 92415

Clerk of the Board, COB@sbcounty.gov

Re: Proposed Moon Camp development, October 8 Supervisors' hearing

Dear Supervisors:

Please deny the Moon Camp land use density change and associated project proposal in Fawnskin. California has a housing shortage, not a luxury housing shortage. Rewarding the owner's speculation, in seeking to parlay 1 dwelling per 40 acres to a higher density, would cause significant and irreversible adverse impacts to the environment. The County had the land use designation right the first time at 1 dwelling per 40 acres.

The most recent Draft Environmental Impact Report (2011) concluded there would be significant adverse impacts to bald eagles. That analysis was based on bald eagles only wintering in the valley for a few months a year. However since 2012 a pair of bald eagles has maintained, and continues to maintain, a nesting site within ½ mile of the project site. This represents significant new information come to light that requires, and has not received, due environmental impact review prior to considering a decision. Project proponents propose a 'Long Term Management Plan.' This smacks of deferring proper evaluation to a later date which if approved by the County is illegal under CEQA. Approval at this time equates to the County abdicating its role as responsible stewards of the environment under its purview and inexplicably reversing a wisely determined appropriate land use density of 1 dwelling per 40 acres.

Planning staff cites the housing need as priority over harming eagles. Perhaps a compact high density housing development making a significant dent in the shortage of low and middle income family housing could potentially justify a Statement of Overriding Considerations if no better alternatives exist. However this area is in the heart of a National Forest, far from concentrations of jobs for working low and middle income families. This project at this site also requires significant intrusions of roadways, utilities, impervious surfaces, lighting, noise, population density and related movements into an area that is rural and environmentally sensitive. The project site itself contains 3 species of plants and rare habitat that do not exist anywhere else in the world! With over 600 homes currently for sale in this small valley (150 more than a year ago), there is also no evidence to justify a need for housing as a rationale for

overriding significant and irreversible harmful environmental impacts.

Any housing density increase at this site would also escalate fire risk. The area is already ranked in the top 1% as having the most hazardous, least adequate fire and emergency evacuation routes in the state. Many local homeowners have had their insurance cancelled. This zoning change would further aggravate evacuation deficiency and fire hazard.

While the sentiment of providing needed housing is appropriate, this is not the type of housing needed and not by any stretch the appropriate location for increased density. Stick to 1 dwelling per 40 acres. Otherwise it would appear that County decision-makers care more about building luxury houses than about preventing significant and irreversible impacts to the environment, which includes specifically bald eagles, the symbol of our Nation that our National Forest houses. Please deny the land use change and project proposal for the Moon Camp development in Fawnskin.

Most sincerely,

Francis Leon Guido

cc: Supervisor Robert A. Lovingood, Robert.Lovingood@bos.sbcounty.gov
Supervisor Janice Rutherford, Janice.Rutherford@bos.sbcounty.gov
Supervisor Dawn Rowe, Dawn.Rowe@bos.sbcounty.gov
Supervisor Curt Hagman, Curt.Hagman@bos.sbcounty.gov
Supervisor Josie Gonzalez, jgonzales@sbcounty.gov
County LUS Director, Terri Rahhal Terri.Rahhal@lus.sbcounty.gov
County Planner, Tom Nieves, tom.nieves@lus.sbcounty.gov

From: [Debra Spear](#)
To: [Nieves, Tom](#); [Rahhal, Terri](#); [Gonzales, Josie](#); [Hagman, Curt](#); [Rowe, Dawn](#); [Rutherford, Janice](#); [Lovingood, Robert](#)
Subject: Proposed Moon Camp development, October 8 Supervisors' hearing
Date: Monday, October 7, 2019 8:30:33 PM

San Bernardino County Board of Supervisors
385 N. Arrowhead Ave., #2
San Bernardino, CA 92415
Clerk of the Board, COB@sbcounty.gov
Re: Proposed Moon Camp development, October 8 Supervisors' hearing

Dear Supervisors:

I am asking you to DENY the detrimental zone change and project proposal for the Moon Camp development in Fawnskin.

Increasing housing density in this area would cause major irreversible harm to the bald eagles that nest nearby and forage on the site. A 2011 draft Environmental Impact Report concluded there would be significant adverse impacts to bald eagles, based on the eagles only wintering in the valley for a few months a year. That changed beginning in 2012, when a pair of bald eagles began nesting within ½ mile of the project site and have been active in the area year round. This area is in the heart of a National Forest, in a unique and rural area of the north side of Big Bear lake. The site itself contains 3 species of plants and rare habitat that simply does not exist anywhere else in the world.

Big Bear currently has some 600 homes for sale, 150 more than just a year ago, contradicting any need for more housing. Ranked in the top 1% as having the most hazardous, least adequate fire and emergency evacuation routes in California, increasing housing density along the National Forest boundary only serves to escalate the fire risk. The proposal would eliminate what makes the area special. Please take a time to consider what you want to leave your children and their children.

A tourist goes to Big Bear to relax, play at the lake, and take in the natural habitat and experience the bald eagles ... not to drive around a busy neighborhood.

I sincerely request you prevent the harmful, irreversible impact to the bald eagles, our National Forest, and the residents and visitors by denying this detrimental zone change and project proposal for the Moon Camp development in Fawnskin.

Most sincerely,

Debra Spear
sdswmr@gmail.com

From: [Ana Parker](#)
To: [COB - Internet E-Mail](#)
Cc: [Lovingood, Robert](#); [Rutherford, Janice](#); [Rowe, Dawn](#); [Hagman, Curt](#); [Gonzales, Josie](#); [Rahhal, Terri](#); [Nieves, Tom](#)
Subject: Proposed Moon Camp development, October 8 Supervisors' hearing
Date: Friday, October 4, 2019 12:34:56 PM

San Bernardino County Board of Supervisors
385 N. Arrowhead Ave., #2
San Bernardino, CA 92415

Clerk of the Board, COB@sbcountry.gov

Re: Proposed Moon Camp development, October 8 Supervisors' hearing

Dear Supervisors:

I am asking you to DENY the detrimental zone change and project proposal for the Moon Camp development in Fawnskin. Increasing housing density in this area would cause major irreversible harm to the bald eagles that nest nearby and forage on the site.

The most recent Draft Environmental Impact Report (2011) concluded there would be significant adverse impacts to bald eagles. That analysis was based on bald eagles only wintering in the valley for a few months a year. Beginning in 2012, a pair of bald eagles began nesting within ½ mile of the project site. The much more significant impacts this project would cause based on this key change has never been evaluated. Project proponents have attempted to conceal the true impacts to bald eagles by creating what they call a 'Long Term Management Plan.' Without proper analysis, any management plan is invalid.

Planning staff cites the need for housing as more important than any harm caused to bald eagles. This area is in the heart of a National Forest, in a unique, rural area on the north side of the lake. The project site itself contains 3 species of plants and rare habitat that do not exist anywhere else in the world! Less than 1/3 of this special habitat is planned to be conserved. With over 600 homes currently for sale in this small valley (150 more than a year ago), there is no justification to declare that a need for housing overrides significant harmful impacts to bald eagles.

Any zone change, as this project requires, must be in the public interest. This area is already rated such a high fire risk that many local homeowners have had their insurance cancelled. A housing density increase along the National Forest boundary would escalate the fire risk. The area is already ranked in the top 1% as having the most hazardous, least adequate fire and emergency evacuation routes in the state. This zoning change would further aggravate that potentially dire evacuation deficiency.

To approve this project, County decision-makers would be saying they care more about adding luxury houses and a private marina than they care about preventing harmful impacts to the bald eagles, to our National Forest, to our residents and to our visitors. Please DENY the detrimental zone change and project proposal for the Moon Camp development in Fawnskin.

Most sincerely,

Ana M. Parker

cc: Supervisor Robert A. Lovingood, Robert.Lovingood@bos.sbcountry.gov
Supervisor Janice Rutherford, Janice.Rutherford@bos.sbcountry.gov
Supervisor Dawn Rowe, Dawn.Rowe@bos.sbcountry.gov
Supervisor Curt Hagman, Curt.Hagman@bos.sbcountry.gov
Supervisor Josie Gonzalez, jgonzales@sbcountry.gov
County LUS Director, Terri Rahhal Terri.Rahhal@lus.sbcountry.gov
County Planner, Tom Nieves, tom.nieves@lus.sbcountry.gov

From: [Shayne Figgins](#)
To: [COB - Internet E-Mail](#)
Cc: [Lovingood, Robert](#); [Rutherford, Janice](#); [Rowe, Dawn](#); [Hagman, Curt](#); [Gonzales, Josie](#); [Rahhal, Terri](#); [Nieves, Tom](#)
Subject: Proposed Moon Camp development, October 8 Supervisors' hearing
Date: Monday, October 7, 2019 4:02:29 PM

San Bernardino County Board of Supervisors
385 N. Arrowhead Ave., #2
San Bernardino, CA 92415

Dear Supervisors:

I am asking you to DENY the detrimental zone change and project proposal for the Moon Camp development in Fawnskin. Increasing housing density in this area would cause major irreversible harm to the bald eagles that nest nearby and forage on the site.

The most recent Draft Environmental Impact Report (2011) concluded there would be significant adverse impacts to bald eagles. That analysis was based on bald eagles only wintering in the valley for a few months a year. Beginning in 2012, a pair of bald eagles began nesting within ½ mile of the project site. The much more significant impacts this project would cause based on this key change has never been evaluated. Project proponents have attempted to conceal the true impacts to bald eagles by creating what they call a 'Long Term Management Plan.' Without proper analysis, any management plan is invalid.

Planning staff cites the need for housing as more important than any harm caused to bald eagles. This area is in the heart of a National Forest, in a unique, rural area on the north side of the lake. The project site itself contains 3 species of plants and rare habitat that does not exist anywhere else in the world! Less than 1/3 of this special habitat is planned to be conserved. With over 600 homes currently for sale in this small valley (150 more than a year ago), there is no justification to declare that a need for housing overrides significant harmful impacts to bald eagles.

Any zone change, as this project requires, must be in the public interest. This area is already rated such a high fire risk that many local homeowners have had their insurance cancelled. A housing density increase along the National Forest boundary would increase the fire risk. The area is already ranked in the top 1% as having the most hazardous, least adequate fire and emergency evacuation routes in the state. This zoning change would further aggravate that potentially dire evacuation deficiency.

To approve this project, County decision-makers would be saying they care more about adding luxury houses and a private marina than they care about preventing harmful impacts to the bald eagles, to our National Forest, to our residents and to our visitors. Please DENY the detrimental zone change and project proposal for the Moon Camp development in Fawnskin.

Sincerely, Shayne Figgins