

**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  
State Clearinghouse Number 2002021105**

Prepared for:  
**County of San Bernardino**  
Planning Division  
Land Use Services Department  
385 North Arrowhead Avenue  
San Bernardino, CA 92415-0182

Contact: Tom Nieves, Contract Planner

Prepared by:  
**FirstCarbon Solutions**  
650 E. Hospitality Lane, Suite 125  
San Bernardino, CA 92408  
909.884.2255

Contact: Kerri Tuttle, Project Director

July 10, 2020

THIS PAGE INTENTIONALLY LEFT BLANK

## Table of Contents

<b>Section 1: Introduction</b> .....	<b>1-1</b>
1.1 - Background and History .....	1-2
<b>Section 2: Responses to Comments on the Revised and Recirculated Draft EIR No. 1</b> .....	<b>2-1</b>
2.1 - List of Authors .....	2-1
2.2 - Responses to Comments .....	2-3
<b>Section 3: Responses to Comments on the Revised and Recirculated Draft EIR No. 2</b> .....	<b>3-1</b>
3.1 - List of Authors .....	3-1
3.2 - Responses to Comments .....	3-2
<b>Section 4: Errata</b> .....	<b>4-1</b>
4.1 - Revisions or Additions to the Text of RRDEIR No. 1 and RRDEIR No. 2 .....	4-1
<b>Appendix A: 2005 Final Environmental Impact Report (EIR), 2010 Revised and Recirculated Draft EIR No. 1, 2011 Revised and Recirculated Draft EIR No. 2</b>	
A.1 - 2005 Final Environmental Impact Report (EIR) and Appendices	
A.2 - 2010 Revised and Recirculated Draft EIR No. 1 and Appendices	
A.3 - 2011 Revised and Recirculated Draft EIR No. 2 and Appendices	
<b>Appendix B: Shute, Mihaly &amp; Weinberger LLP Letter Exhibits</b>	
<b>Appendix C: Sierra Club Letter Exhibit</b>	
<b>Appendix D: Friends of Fawnskin (2) Letter Exhibits</b>	
<b>Appendix E: Jurisdictional Determination Update Memo</b>	
<b>Appendix F: Thomas Harder Groundwater Consulting Letter</b>	
<b>Appendix G: Proof of Water Service</b>	
G.1 - LAFCO Water Service Approval	
G.2 - Bear Lake Department of Water—Service Letter	
<b>Appendix H: CalEEMod Modeling</b>	
H.1 - Memorandum	
H.2 - Data	
<b>Appendix I: ELMNT Biological Database Technical Review</b>	
<b>Appendix J: Habitat Assessment</b>	
<b>Appendix K: 2016 Ashy-grey Indian Paintbrush Survey Update</b>	
<b>Appendix L: 2018 Focused Traffic Impact Assessment Response to Comments</b>	
<b>Appendix M: Revised 2018 Focused Traffic Impact Assessment</b>	
<b>Appendix N: Revised Tentative Tract Map</b>	
<b>Appendix O: Cultural Resources Study</b>	

### List of Tables

Table 1-1: Comparison between the Original Project—2005, 2010 Project, and 2011 Project ..... 1-4

Table 2-1: Average Annual Precipitation ..... 2-63

Table 2-2: Precipitation Stations in the Big Bear Lake Watershed ..... 2-217

Table 2-3: Comparison of Project Emission—Construction (Unmitigated)..... 2-294

Table 2-4: Comparison of Long-Term Operational Project Emissions ..... 2-295

Table 2-5: Comparison of Project GHG Emissions..... 2-296



## SECTION 1: INTRODUCTION

In accordance with Section 15088 of the California Environmental Quality Act (CEQA) Guidelines, the County of San Bernardino (County), as the lead agency, has evaluated comments on environmental issues raised by persons and organizations who have reviewed the 2005 Final Environmental Impact Report (2005 Final EIR), 2010 Revised and Recirculated Draft EIR (RRDEIR No. 1), and the 2011 Revised and Recirculated Draft EIR No. 2 (RRDEIR No. 2). The County has prepared written responses to all such comments received during the notice and comment period. The 2005 Final EIR, 2010 RRDEIR No. 1, and 2011 RRDEIR No. 2 are located within Appendix A of this Final Environmental Impact Report (FEIR) document.

The 2005 Final EIR concluded that the Original Proposed Project analyzed therein would not result in any potentially significant impacts with regard to Recreation, Cultural Resources, and Geology and Soils. Considering the revised Project represents a development that is less intense compared to the Original Proposed Project analyzed in the 2005 Final EIR, the findings on Recreation, Cultural Resources, and Geology and Soils made in that document are adequate and show that the revised Project would have similar or less impact. Therefore, this FEIR document will not provide responses with regard to Recreation, Cultural Resources, and/or Geology and Soils.

This FEIR document is part of the 2020 Final EIR, which includes the 2005 Final EIR, 2010 RRDEIR No. 1, 2011 RRDEIR No. 2, and all associated technical appendices. These documents, and other information contained in the environmental record, constitute the 2020 Final EIR for the Moon Camp project.

This Final EIR document is organized as follows:

- **Section 1: Introduction.** This section discusses the relationship of this document to the Draft EIR. It also discusses the structure of this document.
- **Section 2: Responses to Comments on 2010 Revised and Recirculated Draft EIR No. 1.** This section includes a copy of all of the letters received during the 2010 RRDEIR No. 1, 45-day public review period, and provides responses to comments included in the letters on environmental issues describing the disposition of the issues, explaining the EIR analysis, supporting the EIR conclusions, and/or providing information or corrections as appropriate. Recirculated sections include Aesthetics, Air Quality, Biological Resources, Hydrology and Water Quality, Land Use and Planning, Noise, Public Services and Utilities, Traffic and Circulation, Cumulative Impacts, and Alternatives. The Biological Resources section was recirculated in 2011. Consequently, no responses will be prepared regarding biological resource comments provided on the 2010 RRDEIR No. 1. This section is organized with a copy of the comment letter followed with the corresponding responses.
- **Section 3: Responses to Comments on 2011 Revised and Recirculated Draft EIR No. 2.** This section includes a copy of all of the letters received during the 2011 RRDEIR No. 2, 45-day public review period, and provides responses to comments included in the letters on environmental issues describing the disposition of the issues, explaining the EIR analysis, supporting the EIR conclusions, and/or providing information or corrections as appropriate. Recirculated sections

include the Executive Summary and Biological Resources only. This section is organized with a copy of the comment letter followed with the corresponding responses.

- **Section 4: Errata.** This section summarizes changes or additions to the Draft EIR described in Section 3, as well as minor corrections.

Three separate public circulations of the Draft EIR for this project have occurred since 2005. In order to provide context for this current recirculation of limited portions of the EIR, a description of project evolution and environmental review process is provided below.

## 1.1 - Background and History

### 1.1.1 - Original Project EIR—2005

In 2005, the County circulated a Draft EIR evaluating the Original Project—a 92-lot residential subdivision on 62.43 acres with a minimum lot size of 7,200 square feet. Significant adverse and unavoidable impacts resulting from development of the Original Project—2005 included Aesthetics (loss of views of the lake and surrounding mountains due to the development of the 31 lakefront lots), Air Quality (short-term during construction and long-term), Biological Resources (noise and perch tree impacts on the bald eagle), and Water Supply (inconclusive groundwater supply). Partially in response to public comments received on the Original Project—2005 and accompanying Draft EIR, the Applicant revised the tentative tract map (see discussion of 2010 Project, below) to avoid or substantially reduce the identified significant impacts. The 2005 Final EIR, located within Appendix A of this 2020 Final EIR provides responses to all comments received on the 2005 Draft EIR; however, the 2005 Final EIR was not considered for approval at a public hearing.

### 1.1.2 - 2010 Revised and Recirculated Project EIR No. 1

Partially in response to comments received on the 2005 Draft EIR, the Applicant proposed an alternative to the Original Project—2005 that substantially reduced and in some cases completely avoided the significant environmental impacts that were identified in the 2005 Draft EIR. The revised project design/description (2010 Project) reduced the number of residential lots from 92 to 50 and seven lettered lots. The residential lots would have a minimum lot size of 20,000 square feet and be sold individually and developed into individual custom homes. In addition, the 2010 Project eliminated the realignment of State Route 38 (SR-38) and eliminated all lakefront residential lots. All 50 residential lots would be located to the north of SR-38. Of the seven lettered lots, one would be designated Open Space/Conservation (4.91 acres), one would be designated as Open Space/Neighborhood Lake Access (0.82 acre with 891 lineal feet of lakefront access), one would be developed as the marina parking lot for a 55-slip private boat marina (2.90 acres), three include the existing well sites, and the final lettered lot is a potential reservoir site. The marina parking lot is designed for the preservation of existing trees and eagle perch trees; however, because of the development of the parking lot, the lot would not be considered Open Space. A 10-acre off-site pebble plain habitat will also be purchased and preserved in perpetuity through a Conservation Easement.

In response to the development of the 2010 Project, the County prepared revisions to the 2005 EIR (RRDEIR No. 1). The following sections were revised:

1. **Aesthetics:** impacts to views of the site from adjacent residential uses and the state highway, and from the lake.
2. **Air Quality:** update air quality analysis to include consistency with 2007 Air Quality Management Plan (AQMP) and to address global climate change.
3. **Biological Resources:** conduct new surveys for sensitive species and to assess the pebble plain habitat on-site.
4. **Hydrology and Water Quality:** address potential water quality impacts to Big Bear Lake from runoff from the site.
5. **Land Use and Planning:** evaluate the 2010 Project using the 2007 General Plan and Development Code.
6. **Noise:** address construction noise and long-term residential noise from the 2010 Project site.
7. **Public Services and Utilities:** address emergency evacuation of the site; provide an analysis of water supply and wastewater treatment.
8. **Traffic and Circulation:** update the traffic study to address revisions to the 2010 Project's circulation plan and to capture the most recent cumulative projects in the vicinity.
9. **Cumulative Impacts:** evaluate potential environmental effects of the 2010 Project, in conjunction with other proposed or recently approved projects in the vicinity that together could result in significant and unavoidable cumulative impacts.
10. **Alternatives:** evaluate the 2010 Project, comparing the potential environmental effects to the Original Project—2005 and other alternatives identified in the 2005 Final EIR.

The RRDEIR No. 1 also included certain updated technical reports analyzing the impacts of the 2010 Project. These reports included an updated Traffic analysis, Biological Resources analysis, Hydrology and Water Supply analysis and Noise analysis. The RRDEIR No. 1 was circulated for public review from April 5, 2010, to June 3, 2010. The County received 109 comments on the RRDEIR No. 1.

The RRDEIR No. 1 concluded that the 2010 Project would have significant and unavoidable impacts related to Biological Resources. The unavoidable impacts were to the bald eagle. No additional significant impacts related to the 2010 Project were identified following implementation of mitigation measures and/or compliance with applicable standards, requirements, and/or policies by the County of San Bernardino. See Table ES-4 within the RRDEIR No. 1 for the 2010 Project mitigation measures and impacts.

### 1.1.3 - 2011 Revised and Recirculated Project EIR No. 2

Based on concerns raised in comments received on the RRDEIR No. 1, a Supplemental Focused Special Status Plant Species Survey, dated August 2010, was conducted to confirm the conclusion in the RRDEIR No. 1 that impacts to the ashy-gray Indian paintbrush (a Federally Listed Threatened

Species) would be less than significant. The survey analyzed the density of ashy-gray Indian paintbrush within the Project site and whether Project implementation would result in potential off-site impacts to the U.S. Forest Service (USFS) pebble plain habitat near the northeast portion of the Project site. The Supplemental Focused Special Status Plant Species Survey (dated August 29, 2010) showed the presence of high densities of ashy-gray Indian paintbrush plants on the westernmost Lots (Lots 1, 2 and 3) in the area west of “Street A”—the public roadway through the Project site.

In addition, the Supplemental Focused Special Status Plant Species Survey (dated August 29, 2010) determined that the area thought to be pebble plain habitat located within Lot A (as identified within the Supplemental Special Status Plant Species Survey, 2008), is not a true pebble plain habitat due to the lack of two key indicator species (*Arenaria ursina* and *Eriogonum kennedyi austromontanum*). The Supplemental Focused Special Status Plant Species Survey (2010) findings augment the Supplemental Focused Special Status Plant Species Survey conducted by Dr. Krantz, dated June 29, 2008, providing an above-average precipitation year for observation.

Based on the new finding regarding the presence of high densities of ashy-gray Indian paintbrush in areas occupied by significant ashy-gray Indian paintbrush occurrences, the Project Applicant redesigned the subdivision layout to minimize impacts to this species. The redesigned subdivision, which is depicted in Exhibit 1-4 (see Section 1, Project Description, for Exhibit 1-4) creates a new Lot “H” Open Space Conservation Easement over the area with the highest concentration of plants (Lots 1-3), with three replacement residential lots proposed to be created along the south side of Street “A,” an area with significantly lower concentrations of ashy-gray Indian paintbrush.

The redesign of the subdivision and the conclusions of the Supplemental Focused Special Status Plant Species Survey (2010) revealing the presence of high densities of ashy-gray Indian paintbrush on Lots 1-3 of the Project site constitutes “significant new information” as defined by Section 15088.5 of the CEQA Guidelines, and therefore required a partial recirculation of the RRDEIR No. 1 to fully disclose and analyze the potential impacts of the redesigned subdivision. See Table 1-1 for a comparison of the changes in project design between the three iterations of the Draft EIR.

**Table 1-1: Comparison between the Original Project—2005, 2010 Project, and 2011 Project**

Project Design	Original Project—2005	2010 Project	2011 Project
Circulated for Public Review	Draft EIR—March 30, 2004, to May 13, 2004 (2005 Draft EIR)	Revised and Recirculated Draft EIR No. 1—April 5, 2010, to June 3, 2010 (RRDEIR No. 1)	Revised and Recirculated Draft EIR No. 2—December 12, 2011, to February 7, 2012 (RRDEIR No. 2)
Site Size	62.43 acres	62.43 acres	62.43 acres
Proposed General Plan Designation*	BV/RS-1 (residential—minimum 7,200 sf lots)	BV/RS-20M (residential—minimum 20,000 sf lots)	BV/RS-20M (residential—minimum 20,000 sf lots)
Number of Lots	95	57	58
Residential Lots	92	50	50

**Table 1-1 (cont.): Comparison between the Original Project—2005, 2010 Project, and 2011 Project**

Project Design	Original Project—2005	2010 Project	2011 Project
Lettered Lots	3	7	8
	Lot A—proposed private street designed to provide access to the southernmost lots (lakefront sites)	Lot A—a 4.91-acre Open Space/Conservation (OS/C) easement to preserve pebble plain habitat and eagle perch trees	Lot A—a 3.4-acre Open Space/Conservation (OS/C) easement to preserve ashy-gray Indian paintbrush, pebble plain soil conditions, and eagle perch trees
	Lot B—a 1.4-acre strip of land between SR-38 and the private street south of the highway	Lot B—a 0.82-acre/891 lineal feet strip of land to remain OS/C between SR-38 and the lakefront for open space and Neighborhood Lake Access	Lot B—a 0.82-acre/891 lineal feet strip of land to remain OS/C between SR-38 and the lakefront for open space and Neighborhood Lake Access
	Lot C—a gated entrance, south of SR-38, a parking lot and access to the marina	Lot C—a 2.90-acre strip of land to be used as a parking lot and boat launch and open space	Lot C—a 2.90-acre strip of land to be used as a parking lot and boat launch and open space
	—	Lots D, E and F—well sites	Lots D, E and F—well sites
	—	Lot G—reservoir site	Lot G—reservoir site
	—	—	Lot H—a 1.9-acre Open Space Conservation Easement over the area with the highest concentration of ashy-gray Indian paintbrush
Common Areas	Common areas within lettered lots would be maintained by a homeowner’s association	Conservation Easements would be maintained by a Conservation Group and common areas within lettered lots would be maintained by a homeowner’s association	Conservation Easements would be maintained by a Conservation Group and common areas within lettered lots would be maintained by a homeowner’s association
Marina/Boat Dock	103 boat slips on the west side of the site	55 boat slips on the east side of the site	55 boat slips on the east side of the site
Lakefront Lots	31 lakefront lots	No lakefront lots	No lakefront lots
State Route 38	Realignment of SR-38 to provide a straighter alignment and to provided lakefront residential lots	No change in the alignment of SR-38	No change in the alignment of SR-38

**Table 1-1 (cont.): Comparison between the Original Project—2005, 2010 Project, and 2011 Project**

Project Design	Original Project—2005	2010 Project	2011 Project
Development Scenario	Lots would be sold individually and custom homes would be constructed by the individual property owners	Lots would be sold individually and custom homes would be constructed by the individual property owners	Lots would be sold individually and custom homes would be constructed by the individual property owners
Note: * Current General Plan Designation is BV/RL-40—Bear Valley Community Plan, Rural Living, minimum 40-acre residential lot size.			

### 1.1.4 - 2020 Final EIR

For transparency purposes and to provide the most up-to-date information on site conditions and the Proposed Project, the 2020 Final EIR includes the following appendices, which are referred to as part of the Responses to Comments:

- **Appendix A:** 2005 FEIR, 2010 RRDEIR No. 1 and 2011 RRDEIR No. 2
- **Appendix B:** Shute, Mihaly & Weinberger LLP Letter Exhibits
- **Appendix C:** Sierra Club Letter Exhibit
- **Appendix D:** Friends of Fawnskin (2) Letter Exhibits
- **Appendix E:** Jurisdictional Determination Update Memo
- **Appendix F:** Thomas Harder Groundwater Consulting Letter
- **Appendix G:** Proof of Water Service
  - G.1—LAFCO Water Service Approval
  - G.2—Bear Lake Department of Water—Service Letter
- **Appendix H:** CalEEMod Modeling
  - H.1—Memorandum
  - H.2—Data
- **Appendix I:** ELMNT Biological Database Technical Review
- **Appendix J:** Habitat Assessment
- **Appendix K:** 2016 Ashy-grey Indian Paintbrush Survey Update
- **Appendix L:** 2018 Focused Traffic Impact Assessment Response to Comments
- **Appendix M:** Revised 2018 Focused Traffic Impact Assessment
- **Appendix N:** Revised Tentative Tract Map
- **Appendix O:** Cultural Resources Study

## SECTION 2: RESPONSES TO COMMENTS ON THE REVISED AND RECIRCULATED DRAFT EIR NO. 1

### 2.1 - List of Authors

During the 45-day public review period for the Revised and Recirculated Draft Environmental Impact Report No. 1 (RRDEIR No. 1) from April 5, 2010, through June 3, 2010, 109 comment letters were received. A list of public agencies, organizations, and individuals that provided comments on the RRDEIR No. 1 is presented below. Each comment has been assigned a code. Individual comments within each communication have been numbered so comments can be cross-referenced with responses. Following this list, the text of the communication is reprinted and followed by the corresponding response.

**Author** **Author Code**

#### Federal Agencies

U.S. Forest Service (Betty Hartenstein) (June 4, 2010)..... USFS

#### State Agencies

California Department of Fish and Game (May 4, 2010)..... CDFG  
 Department of Toxic Substance Control (May 19, 2010)..... DTSC  
 California Department of Transportation, District #8 (May 11 2010) .....CALTRANS  
 California Department of Transportation, District #8 (July 9, 2018) .....CALTRANS.2  
 Office of Planning and Research (May 18, 2010) ..... OPR  
 State of California Regional Water Quality Control Board (May 20, 2010) .....RWQCB

#### Regional Agencies

Big Bear Municipal Water District (May 12, 2010) ..... BBMWD  
 Big Bear Watermaster (May 27, 2010) ..... BBW  
 County of San Bernardino, Special Districts Department (April 9, 2010)..... SDD

#### Organizations

Center for Biological Diversity (June 4, 2010)..... CBD  
 Friends of Big Bear Valley (Dan Foulks) (June 1, 2010)..... FBBV  
 Friends of Fawnskin (May 5, 2010).....FOF (a)  
 Friends of Fawnskin (Sandy Steers), (May 30, 2010)..... FOF (b)  
 San Bernardino Valley Audubon Society (Drew Feldman) (June 4, 2010) ..... SBVAS  
 Shute Mihaley & Weinberger, LLP (June 10, 2010).....SM&W  
 Sierra Club (Big Bear Group) (June 3, 2010) ..... SIERRA CLUB

#### Individuals

Alison Bates (June 4, 2010)..... ABATES  
 Bradley and Catherine Winch (April 16, 2010)..... WINCH (a)



Bradley and Cathy Winch (May 28, 2010).....	WINCH (b)
Carla and Roger Wilson (May 26, 2010).....	WILSON
Donald and Claudia Eads (June 3, 2010) .....	EADS
Dori Myers (June 3, 2010) .....	MYERS
Harold Allen (May 10, 2010) .....	ALLEN
Helen and Charles Stearns (May 31, 2010) .....	STEARNS
James and Barbara Finlayson-Pitts (April 9, 2010).....	PITTS (a)
James and Barbara J. Finlayson-Pitts (May 29, 2010) .....	PITTS (b)
James and Lola McGrew (May 27, 2010) .....	MCGREW
Joseph and Barbara Francuz (June 3, 2010).....	FRANCUZ
Karin Powell (June 2, 2010).....	POWELL
Kim MacDonald (May 24, 2010).....	DONALD
Loretta L. Gardiner (May 24, 2010).....	GARDINER
M. Hill (Undated-Received June 3, 2010).....	HILL
Marlene Thurston (May 24, 2010) .....	THURSTON
MJ Lilhan (Undated).....	LILHAN
Mr. & Mrs. John DeLandtsheer (June 10, 2010).....	DELANDTSHEER
Paul Lasky (May 30, 2010).....	LASKY
Peter Medellin (May 29, 2010) .....	MEDELLIN
Peter Tennyson (June 4, 2010) .....	TENNYSON
Raymond Shelden (June 2, 2010).....	SHELDEN
Richard Bates (June 4, 2010).....	RBATES
Robert Scott (June 4, 2010).....	SCOTT (A)
Robert Scott (June 7, 2010).....	SCOTT (B)
Robin and Scott Eliason (June 3, 2010) .....	ELIASON
Sandy Ellis (May 5, 2010) .....	ELLIS
Sheree Coates (May 30, 2010) .....	COATES
Susan Piestrup (April 16, 2010).....	PIESTRUP
Tom Brown (June 2, 2010) .....	BROWN
Victor Clotts (May 26, 2010) .....	CLOTTS
W. M. Hazewinkel &Co. (April 21, 2010) .....	HAZEWINKEL &CO
Wendy Bates (June 4, 2010).....	W. BATES

**Form Letters**

Alan Sharp (April 12, 2010)	John and Donna Ash (April 12, 2010)
Anton Nelsen (April 12, 2010)	Karin Rau (April 12, 2010)
Arthur Voltz (April 12, 2010)	Kent Besinque (April 12, 2010)
Bara and Joseph Francuz (April 15, 2010)	Leonard Chaidez (April 6, 2010)
Barbara Lasky (April 12, 2010)	Linda Stoll (April 23, 2010)
Betty Clark (April 6, 2010)	Lorene Nelsen (April 12, 2010)
Beverly Ornelas (April 16, 2010)	Lori Gardiner (April 12, 2010)
Bob Ybarra (April 6, 2010)	MacDonald Family Trust (July 8, 2010)
Carolyn Robinson (April 6, 2010)	Marlene Thurston (April 12, 2010)



Charles Wolfe, (April 6, 2010)	Martin Lypp (April 6, 2010)
Dan Fowlkes (April 6, 2010)	Michael Karp (April 6, 2010)
David Loltz (April 6, 2010)	Mr. and Mrs. Lorimor (April 12, 2010)
David Stoll (April 23, 2010)	Pat Hughes (April 12, 2010)
Dayton Gilleland (April 12, 2010)	Pat Meaglos (April 6, 2010)
Dean Strenger (April 17, 2010)	Patricia Dills (April 12, 2010)
Deborah Smith, (April 6, 2010)	Paul Hasty (April 12, 2010)
Dennis and Andrea Ruppert (April 12, 2010)	Peter and Diance Boss (April 13, 2010)
Diane Shattuck (April 19, 2010)	Peter Medellin (May 29, 2010)
Donald L. Eads (April 17, 2010)	Peter Tennyson (April 25, 2010)
Elaine Lasnik-Broida (April 19, 2010)	Rev. Elo Russell (April 6, 2010)
Gary Rexroth (April 19, 2010)	Richard Robinson (April 6, 2010)
Glynn A. Cornejo (April 6, 2010)	Robert S. Drake (April 7, 2010)
Golen Olson (April 6, 2010)	Rod Mercer (April 16, 2010)
Guy Tardif Jr. (April 6, 2010)	Roger Ronk (April 12, 2010)
Harold Allen (April 12, 2010)	Rousine Wolfe (April 6, 2010)
J. Hough (April 12, 2010)	Sarah Curtis (April 12, 2010)
James C. McGrew (April 12, 2010)	Susan Chaidez (April 6, 2010)
Jill Helms (April 12, 2010)	Thomas Brown (April 6, 2010)
JoAnn Mark (April 6, 2020)	Todd Murphy (April 12, 2010)

## 2.2 - Responses to Comments

### 2.2.1 - Introduction

In accordance with the California Environmental Quality Act (CEQA) Guidelines Section 15088, the County of San Bernardino, as the lead agency, evaluated the written comments received on the RRDEIR No. 1 (State Clearinghouse No. 2002021105) for the Moon Camp 50-Lot Residential Subdivision, TT No. 16136, and has prepared the following responses to the comments received. This Response to Comments document becomes part of the 2020 Final EIR for the Project in accordance with CEQA Guidelines Section 15132.

### 2.2.2 - Comment Letters and Individual Responses

The comment letters reproduced in the following pages follow the same organization as is used in the List of Authors. Responses to each of the comment letters are provided on the following pages. The comment number (e.g., USFS-1) is provided in the upper right-hand corner of each comment letter, and individual comment points within each letter are identified by index numbers located along the right-hand margin of each letter. The County of San Bernardino's responses immediately follow each letter, with each individual response referenced by the index number of each individual comment.

THIS PAGE INTENTIONALLY LEFT BLANK

*jc*

**Slowik, Matt - LUS - Advance Planning**

---

**From:** Betty\_Hartenstine/R5/USDAFS [bhartenstine@fs.fed.us] on behalf of Betty Hartenstine [bhartenstine@fs.fed.us]  
**Sent:** Friday, June 04, 2010 2:53 PM  
**To:** Slowik, Matt - LUS - Advance Planning; Scott R Tangenberg; Jeanne Wade; Thomas B Hall; Kim Boss  
**Cc:** Jeanne Wade; Thomas B Hall  
**Subject:** 1950-3-1; Draft Re-Circulated Environmental Impact Report for the Moon Camp Development Project  
**Attachments:** Moon Camp Input.doc; FS\_correspondence.doc

USFS-1

The following Correspondence is archived in the Records database. Any enclosures will follow the letter in this message.

To open this document in the Records database, click on this link ->[Link](#)

To access all documents in the National Records Database, click on this link ->[Link](#)



Jc



United States  
Department of  
Agriculture

Forest  
Service

San Bernardino National Forest  
Mountaintop Ranger District

P.O. Box 290  
Fawnskin, CA 92333  
909-382-2600 #2 (Voice)  
909-866-2867 (FAX)

File Code: 1950-3-1  
Date: June 4, 2010

Matthew W. Slowik, MURP, MPA  
Land Use Services Department, Advanced Planning  
Division – Senior Planner  
County of San Bernardino  
385 N. Arrowhead Avenue, First Floor  
San Bernardino, CA 92415-0182

Dear Mr. Slowik,

Thank you for the opportunity to comment on the Draft Re-Circulated Environmental Impact Report for the Moon Camp Development Project. The project is next to the National Forest boundary and would result in un-mitigated and undisclosed impacts to National Forest System (NFS) lands. I would like to have the following issues considered as the Supervisors make their decision:

1. Hazardous Fuels and Fire Services –The Forest Service appreciates that the project design includes a fuel modification zone on the private land and does not assume that the NFS lands will have fuel modification protection for the private land. According to State and County requirements, the slope of the hillside may require that the fuel modification zone be up to 300 feet, which would need to be entirely within the proposed development. The community of Fawnskin is within our direct protection area for response to fire. The proposed water alternatives are not evaluated with regard to hydraulic effects to the existing Fawnskin water system. We ask that the Supervisors consider the potential effects of this proposal on flow rates for hydrants in the Moon Camp and Fawnskin areas.
2. Rare Plants - The Forest Service remains concerned about impacts to Threatened, Endangered, and Sensitive species/habitats on the adjacent NFS land as the development would potentially increase use and impacts on NFS lands. There is Critical Habitat (as designated under the Endangered Species Act) and known occurrences for plants listed under the federal Endangered Species Act on Forest Service land adjacent to the Moon Camp parcel. Impacts to plants in and adjacent to the Moon Camp area would increase the value and sensitivity of pebble plain habitat on other NFS lands. This can reduce the flexibility and ability of the Forest Service to conduct management actions (such as hazardous fuel reduction) on these other NFS lands. The mitigation measures include a measure that says the NFS/private land boundary will be signed and that the signs and CC&Rs will include guidance about using “designated hiking/biking” trails. The County Supervisors should understand that there are no designated hiking/biking trails in the area (the nearest are Grey’s Peak and Cougar Crest trails, about one mile to the west and east, respectively). We do not believe that signing and CC&Rs alone will be effective in preventing an increase in dispersed recreation and associated impacts on adjacent Forest Service land. Therefore, we ask the Supervisors to consider additional mitigation

USFS-1

USFS-2

USFS-3



measures to reduce these impacts.

3. Spotted Owls - Parts of the proposed project site support suitable foraging and nesting habitat for California spotted owl. Habitat for this rare species has been affected by fire and development throughout the mountains of southern California. The Supervisor's 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.
4. Water - The Forest Service is concerned about the impacts of water extractions from the Moon Camp wells on adjacent and on-site riparian and wetland habitats. Some of the swales on the Moon Camp property support rare plants and rely on wet conditions. 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 increase demands on the limited water supply. While the Forest Service applauds the mitigation measures that encourage the use of xeric landscaping and other water conservation measures, the Forest Service asks that the Supervisors consider taking additional measures in order to lower the water-related demands on this limited resource.
5. Wildlife - While the Forest Service appreciates the mitigation measures to reduce the effects of night-lighting on wildlife (BF-9 and BR-10), we wonder about the need to have street lamps at all since no neighborhood on the north shore of Big Bear Lake (including the State Highway) has street lamps. We would like to suggest that the Supervisors consider further reducing the potential for night lighting impacts by not allowing street lamps in this project. A number of studies have shown the detrimental effects of night lighting on aquatic, riparian, and nocturnal (including night-time migratory birds) species. The EIR's analysis of impacts to wildlife from night-lighting states that the impacts may be significant when combined with other impacts (noise and habitat loss). For BF-10, the Supervisors could consider adding a requirement that residential outdoor lights to be motion-activated to further reduce the potential effects of night-lighting. Mitigation measure BR-3 states that flying squirrel nest boxes would be located on adjacent FS land. We ask that the County discuss such plans with our staff prior to implementing any measures on NFS lands.
6. Bald Eagles - We concur with the findings of in the DEIR that the project would cause significant unmitigated impacts to Bald Eagles. The Forest Service is concerned about long-term impacts to bald eagle perch/foraging habitat. We are concerned that as large perch trees die, they will be felled because they would pose safety hazards to people and improvements. Without the development, they would not be hazards and would remain standing for some period of time. Initial mitigations for removal of perch trees during construction through installation of artificial perch trees have not been maintained. As the artificial perch trees fall, no replacements occur; thus, mitigations have been temporary and limited. The Forest Service encourages the Supervisors to consider provisions that require long-term commitments to providing perch and foraging sites.

USFS-3

USFS-4

USFS-5

USFS-6

USFS-7



The mitigations for impacts to bald eagles are based on limiting impacts to wintering bald eagles. However, for the past two years, a pair of non-migratory bald eagles has remained in the Grout Bay area year-round and they have built a nest. At this point, they have not yet successfully produced offspring; however, it is conceivable that in the near future, they will. This pair of eagles is likely frequenting the Moon Camp area for perching and foraging. Therefore, we ask that the Supervisors consider potential impacts to nesting or resident bald eagles in terms of losses or degradation of year-round perch and foraging habitat.

USFS-7

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, during, and well after the development construction process to assure that no trespasses occur on National Forest System lands.

USFS-8

8. Erosion/Sediment - New development next to National Forest need to be set back at least 100 feet from National Forest System lands boundaries such that any excavation and or earth work does not cause "back cutting" type erosion; nor should sediment and erosion created as the by-product of constructing the new development impact the National Forest. In the absence of detailed soils erosion and sedimentation plan and geotechnical investigation of slope stability, it is not possible to determine whether significant impacts would occur. This is especially important in light of Big Bear Lake's impaired status regarding TMDL.

USFS-9

If you should have any questions please contact Tom Hall, Forest Planner, at 909-382-2905.

USFS-10

Sincerely,

*/s/ Scott Tangenberg*  
SCOTT TANGENBERG  
District Ranger

cc: Jeanne Wade

## 2.2.3 - Federal Agencies

### United States Forest Service (USFS)

#### *Response to USFS-1*

The commenter provides introductory remarks to preface the letter. No response is necessary.

#### *Response to USFS-2*

The commenter expresses concern regarding hazardous fuels and fire service.

See Response to WINCH (b)-5A for consistency with United States Forest Service (USFS)<sup>1</sup> fuel modification requirements. The USFS comment letter mentions a possible 300-foot fuel modification zone. Since the Proposed Alternative Project is located within an FS1-designated area, the Project is required to comply with the FS1 100-foot fuel modification zone, which is required for any development project that abuts USFS land. Ten of the residential lots are affected by this requirement and must abide by the Fuel Modification Plan required to be prepared for the Proposed Alternative Project.

In addition, see Response to SM&W-45 through 47 for water resource impacts.

#### *Response to USFS-3 through 4*

The USFS comment letter was received during the RRDEIR No. 1 45-day public review period. However, the Biological Resources Section of the RRDEIR No. 1 was recirculated within 2011 Revised and Recirculated Draft EIR No. 2 (RRDEIR No.2). Consequently, no responses will be prepared regarding biological resource comments provided on the RRDEIR No. 1. All biological resource comments are addressed within Section 3 of this Response to Comment document.

#### *Response to USFS-5*

The commenter expresses concern regarding water supply and recommends additional mitigation to preserve water use by the Project.

There are no indigenous riparian wetlands located on the Project site. Willows located along the lake shoreline are ruderal lacustrine (lake-related) and are not associated with the groundwater system. In addition, see Response to SM&W-45 through 47 for water resource impacts.

#### *Response to USFS-6 and USFS-7*

The USFS comment letter was received during the RRDEIR No. 1 45-day public review period. However, the Biological Resources Section of the RRDEIR No. 1 was recirculated within 2011 RRDEIR No. 2. Consequently, no responses will be prepared regarding biological resource comments provided on the RRDEIR No. 1. All biological resource comments are addressed within Section 3 of this Response to Comment document.

#### *Response to USFS-8*

The commenter requests no trespassing onto USFS designated lands. This comment does not raise an issue with the adequacy of the RRDEIR No. 1 and, therefore, no response is required.

---

<sup>1</sup> An agency of the United States Department of Agriculture.

Comment noted. There are no designated hiking/biking trails through the Project or on adjacent USFS property. The perimeter of the Project will be posted indicating the boundary between private and USFS property.

*Response to USFS-9*

The commenter requests a 100-foot setback for new development adjacent to USFS lands.

See Response to WINCH (b)-5A for consistency with the requested 100-foot setback requirements.





California Natural Resources Agency  
 DEPARTMENT OF FISH AND GAME  
<http://www.dfg.ca.gov>  
 Inland Deserts Region  
 3602 Inland Empire Blvd., Suite C-200  
 Ontario, CA 91764  
 (909) 484-0167

ARNOLD SCHWARZENEGGER, Governor

JOHN McCAMMAN, Director



CDFG

May 4, 2010

RECEIVED  
 MAY 19 2010

LAND USE SERVICES DEPT.  
 URBAN PLANNING DIVISION

Matthew Slowik, MURP, MPA  
 Senior Planner  
 Land Use Services Department  
 County of San Bernardino  
 385 North Arrowhead Avenue  
 San Bernardino, CA 92415-0182

Re: Recirculated Draft Environmental Impact Report – Moon Camp Development  
 SCH No. 2002021105

Dear Mr. Slowik:

The Department of Fish and Game (Department) appreciates this opportunity to comment on the Revised and Recirculated Environmental Impact Report for the Moon Camp Development in the County of San Barnardino. The Department is responding as a Trustee Agency for fish and wildlife resources [Fish and Game Code sections 711.7 and 1802 and the California Environmental Quality Act Guidelines (CEQA) section 15386] and as a Responsible Agency regarding any discretionary actions (CEQA Guidelines section 15381), such as a Lake and Streambed Alteration Agreement (Section 1600 *et seq.*) or a California Endangered Species Incidental Take Permit (Fish and Game Code Sections 2080 and 2080.1).

For this project the Department will be acting as both a Responsible and Trustee Agency. As per section 15096 of the California Environmental Quality Act statute, as a Responsible Agency the Department is obligated to focus its comments on any shortcomings in the Environmental Impact Report (EIR) or Negative Declaration (ND), the appropriateness of using a negative declaration, and additional alternatives or mitigation measures which the EIR should include.

The proposed project is located on the northwest shore of Big Bear Lake in the community of Fawnskin. State Route 38 currently bisects the project. The original project description was for 95 residential lots, re-alignment of State Route 38 (SR-38), removal of trees between the shoreline and SR-38, and 103 marina slips.

The Department commends the County for the proposed revisions, particularly removing residential development from the shoreline and minimizing the removal of

CDFG-1

trees between the shoreline and the road that are used as roosting sites for bald eagles. The project description has been revised and now consists of 50 residential lots, removal of all 31 lakefront lots, seven (7) lettered lots, two conservation areas along the Big Bear Lake shoreline, the purchase of 10 acres of pebble plains off-site habitat, a marina with 55 slips, and a marina parking lot. The seven lettered lots include: a pebble plain lot and open space conservation area of 4.95 acres; an open space/neighborhood lake access lot of 0.82 acres (891 lineal feet of shoreline); a marina parking lot for 55 boat slips and a boat ramp; three existing well sites, and a potential reservoir site.

↑  
CDFG-1

The Department responded with a comment letter on the 2004 proposed project. In that letter the Department recommended the following revisions. First, revision of the wetland delineation map to show the extent of State jurisdiction along the shoreline, and mitigation for the loss of State jurisdictional waters on a 3:1 or greater ratio (mitigation to impact) in the form of creation, restoration of in-kind habitat both either on-site or off-site. Second, replacement of lost habitat for the federally-listed as Threatened ash-gray Indian paintbrush on a 3:1 replacement-to-impact ratio. Provide for a conservation easement for conserved lands, as well as an endowment and long-term monitoring and management plan. Third, a reduction in the amount of development between the shoreline and SR 38 in order to protect roosting areas for American bald eagle.

#### Department Comments

The Department recommends that the Lead Agency clarify the issues raised below and provide a response to these comments in the Final Environmental Impact Report (FEIR).

CDFG-2

1. Inclusion of a map showing the delineation of State waters, including the lake shoreline and inland streams;
2. An analysis of proposed land uses in the shoreline area (including the parking lot) and a determination of impacts (temporary and permanent) to State jurisdictional shoreline area;
3. An analysis of the total amount of jurisdictional streams and impacts to those streams, both permanent and temporary;
4. An impact analysis of the sensitive plants, showing conservation versus take;
5. An impact analysis of potential impacts to the lake from construction of a marina and boat slips (i.e., dredging, turbidity, removal of vegetation and sedimentation, and future maintenance of the facilities), and mitigation for those impacts;
6. A habitat management plan for the protection of lands conserved on the project site and lands conserved off-site;
7. A graphic showing the location of the proposed off-site 10-acre mitigation site;
8. Graphic showing the known location of one candidate plant species (Big Bear Valley sandwort), one rare plant (Parish's checkerbloom) and any California

CDFG-3

CDFG-4

CDFG-5

CDFG-6

CDFG-7

CDFG-8

CDFG-9  
↓