



Interoffice Memo

DATE: January 22, 2020

PHONE: (909) 387-5036

FROM: TOM NIEVEZ, Contract Planner 
Land Use Services, Planning Division

TO: HONORABLE PLANNING COMMISSION

SUBJECT: PROJECT# P201700270: CHURCH OF THE WOODS (AGENDA ITEM #2)

Since the distribution of the staff report, Staff has received additional comments regarding the above-referenced project.

The correspondences are attached for your consideration.

From: [David Knudson](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods destruction
Date: Tuesday, January 21, 2020 10:36:51 AM

Dear Mr Nieves-

Please don't let the Church of the Woods ravage our mountains with their grossly overblown plans.

David Knudson
Executive Director
National Historic Route 66 Federation
909-372-1994
national66@national66.org
www.national66.org
Our 25th year

From: [Sue Walker](#)
To: [Rahhal, Terri](#); [Duron, Heidi - LUS](#); [Nieves, Tom](#); [Supervisor Rutherford](#); [Murray, Lewis](#)
Subject: Church of the Woods Hearing SCH2004031114
Date: Monday, January 20, 2020 8:24:18 PM
Attachments: [SVW Let. CA.doc 1.20.20.doc](#)

January 20, 2020

Tom Nieves, Planner
County of San Bernardino
Land Use Services Department
Planning Division
385 N. Arrowhead Avenue, 1st Floor

Comment letter on Church of the Woods 2004031114

Dear Tom Nieves:

I consider the Church of the Woods Project an overuse of this property due to threatened species and traffic concerns. It does not fit in with our mountain ambiance. The Project is too big and the property is too environmentally sensitive.

“The Project site is located within an area of “moderate to high” landslide susceptibility. Development of the Project would further disturb the subsurface environment and could potentially exacerbate the occurrence of landslides at the site. “(Draft Revised EIR, pgs. 3.D-10 to 3.D-12)

“Furthermore, the Project site is located in an area that is susceptible to landslides. The sloped areas of the Project site may potentially be susceptible to lateral spreading.”

46 of Staff Report. “ The Project site contains older alluvial soils, which is susceptible to collapse if left in place and exposed to weight. The Project has the potential to be located on geologic soil that is unstable.” P. 47 Findings of Staff Report

The Bible spoke to such plans:

Matthew 7:24-27 English Standard Version (ESV)

Build Your House on the Rock

²⁴ “Everyone then who hears these words of mine and does them will be like a wise man who built his house on the rock. ²⁵ And the rain fell, and the floods came, and the winds blew and beat on that house, but it did not fall, because it had been founded on the rock. ²⁶ And everyone who hears these words of mine and does not do them will be like a foolish man who built his house on the sand. ²⁷ And the rain fell, and the floods came, and the winds blew and beat against that house, and it fell, and great was the fall of it.”

Let's be wise.

311 parking spaces are an excessive amount. The church has not proved that they will attract such a large number of cars on Sundays. I suggest a smaller number of parking spaces with an area set aside for future parking, if needed.

For the proposed Church of the Woods Project, **significant unavoidable impacts** would occur in the areas of cumulative biological resources (southern rubber boa, California spotted owl, and San Bernardino flying squirrel), noise, and transportation/circulation.

The biological resources of the southern rubber boa, CA spotted owl and the San Bernardino flying squirrel must be protected. The rough grading over 60 days will frighten all wildlife due to the noise, machinery and chaos. I suggest a pre-catch program where a biologist captures the species and "replants" them to land that is forever preserved and purchased by Church of the Woods. In the past the Land Use Dept. has required a 4 to 1 ratio for disturbed habitat. Using the Project site itself as a habitat does not recognize the great disturbance that will take place during construction. We are losing our threatened species and must take steps to preserve our mountain wildlife.

TRAFFIC

The heaviest traffic would be on Sundays. This is a major day for tourists to be leaving the mountains. The additional traffic from the Project plus installation of two traffic lights (and the future of other signal locations) will cause traffic congestion on the mountain as tourists are leaving. Traffic will lead to an undesirable experience and cause tourists to decide to go to a location more favorable. There is a potential of economic loss for the mountain communities.

Volume of traffic fostered by this project would be better located off of Hwy 18 a major thoroughfare for tourists. This project is located to maximize traffic congestion for the entire mountain communities. It would be better relocated to an area that can handle such traffic volume and not to interfere with tourist traffic on Highway 18 which is already heavy on the weekends. The County has a planning responsibility to keep the roads at a Level of Service C or better.

Widening has an urbanized look. This project's is an inappropriate widening of Hwy 18 for the mountain communities.

A. Lake Arrowhead Community Plan

I appreciate the small town character of the Lake Arrowhead community. I do not want to see it turned into an urban traffic nightmare on Sundays.

I hope that CA Dept. of Fish and Game or US Fish and Wildlife protect our three species that are categorized as special status.

Thank you for the opportunity to express my grave concerns about this oversized and inappropriately placed development. Please try to find an alternative location where it will have fewer impacts on our mountain community.

Sincerely,

Susan V. Walker

**PO Box 94
966 Willow Creek Road
Lake Arrowhead, CA 92352**

Susan V. Walker

(909) 337-1279
svwalker@gmail.com

January 20, 2020

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County of San Bernardino
Land Use Services Department
Planning Division
385 N. Arrowhead Avenue, 1st Floor

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Sincerely,

Susan V. Walker

From: [Chris Del Ross-Risher](#)
To: [Duron, Heidi - LUS](#); [Hagman, Curt](#); [Rahhal, Terri](#); [Rutherford, Janice](#); [Nieves, Tom](#)
Subject: Church of the Woods Planning Commission comments
Date: Monday, January 20, 2020 9:54:42 PM
Attachments: [COW PI Commission 2020.doc](#)

Hello,

Attached please find comments for the Administrative Record for the Church of the Woods project. I am in opposition to this project. I also plan on attending the Thursday hearing.

Chris Del Ross-Risher, AICP

January 20, 2020

Heidi Duron, Director of Planning
County of San Bernardino
Land Use Services Department
385 North Arrowhead Avenue, First Floor
San Bernardino, CA 92415

Re: Church of the Woods Project Conditional Use permit (CUP) #P2017002270
Environmental Impact Report (EIR) State Clearinghouse No. 2004031114

Dear Ms. Duron,

I am providing these comments in opposition to the Church of the Woods project proposed for the Rim Forest community in the San Bernardino mountains. I am a 30 year resident of this area and I am a professional land use and environmental planner. This revised project is still huge, out-of-scale, and damaging to the environment as currently proposed.

I have reviewed several iterations of this project and the previous DEIR (2010), Final Environmental Impact Report (FEIR) (2011), DREIR (2019), FEIR (2020). These environmental analyses are inadequate, and the current FEIR cannot be legally certified under the requirements of the California Environmental Quality Act (CEQA).

CEQA requires several requirements for an agency's approval of a proposed project. The lead agency (County of San Bernardino or County) must certify the EIR as adequate for the analysis for the project. I have sent previous comments on separate environmental issues arising from the proposed implementation of the project and the inadequate analysis in the EIRs, as have over two hundred others within the community, responsible agencies, and the legal offices of Shute, Mihaly & Weinberger, LLP.

There are several identified areas of concern that by the project implementation will result in unavoidable significant impacts, and there are many areas of concern that the FEIR failed to adequately describe. Furthermore, the EIR failed to analyze or discuss the full potential environmental impacts or identify potential mitigation measures, thereby invalidating the entire EIR under CEQA.

There have been several project caused unavoidable significant adverse impacts in the EIR. These include:

- Cumulative impacts to biological resources
- Noise impacts
- Transportation/circulation impacts
- Land use impacts

There are other project caused impacts that were not adequately identified as impacts and therefore were not fully analyzed. Often these impacts were categorized as temporary or could be mitigated to a non-significant level. The analysis done for these potential project impacts did not fully describe the project setting, all potential project impacts, critical habitat, nor the connectivity and over reliance on the County's Rimforest Storm Drain Project.

These include:

- Aesthetics
- Air Quality
- Geology and Soils
- Hydrology and Water Quality
- Construction traffic/circulation
- Hazards

The EIR fails to identify feasible mitigation for the project's significant impacts. The primary goal of an EIR is to identify a project's significant environmental impacts and to identify ways to avoid or minimize these impacts through the adoption of mitigation measures or project alternatives. (CEQA Guidelines Sections 15002.1 (a), 21061). The lead agency (County) must adopt all feasible mitigation measures that can substantially lessen the project's significant impacts, and it must ensure that these measures are enforceable. (CEQA Guidelines Sections 21002 (a)(3), 15126.4 (a)(2)).

The mitigation for significant unavoidable impacts due to project traffic proposes the applicant make a "good faith effort" to "gain the approval of Caltrans. According to the County Planning Commission project Staff Report, page 50. "Specifically all of the impacted intersections are within the responsibility and jurisdiction of another public agency and not the agency making these findings, the County. Accordingly, the recommended mitigation measures needed to mitigate the identified impacts are NOT LEGALLY FEASIBLE".

The EIR's alternative analysis was also narrow in scope and very limited. The EIR analyzed just two alternatives, the CEQA required "No build" alternative and another Reduced Scope/Alternative site alternative. As the project is sited on an ecologically unique and irreplaceable resource area, the County should evaluate the project's components in other possible sites. Over the considerable time and money this project has expended, and controversy dividing a small community, exploration of other alternative sites was never attempted.

To conclude, the County cannot lawfully approve the Church of the Woods project. The EIR is not legally defensible and cannot support the determination of consistency with the General Plan and especially the Lake Arrowhead Community Plan or the project findings required by CEQA.

Sincerely,
Chris Del Ross-Risher, AICP

cc. Curt Hagman, Chairman San Bernardino County Board of Supervisors
Terri Rahhal, Director San Bernardino County Land Use Services
Janice Rutherford, San Bernardino County Board of Supervisors
Tom Nieves, project Planner

From: [David Caine](#)
To: [Nieves, Tom](#); [Supervisor Rutherford](#); [Murray, Lewis](#); [Sonick, Chrystale](#); [Duron, Heidi - LUS](#)
Subject: Church of the Woods Project and Hearing Jan.23
Date: Saturday, January 18, 2020 5:13:14 PM

On Sat, Jan 18, 2020 at 5:12 PM David Caine <drcline99@gmail.com> wrote:

**SAN BERNARDINO COUNTY
PLANNING COMMISSION MEETING**

County Government Center
Covington Chambers
385 N. Arrowhead Avenue, 1st Floor
San Bernardino, CA 92415

Re: PUBLIC HEARING

APPLICANT: Church of the Woods

COMMUNITY: Rim Forest /2nd Supervisorial District

PROJECT NO: P201700270

LOCATION: North side of State Route 18, west of Daley Canyon Road

STAFF: Tom Nieves, Contract Planner

PROPOSAL: Conditional Use Permit to construct a religious facility consisting of a 27,364 square-foot, two-story Youth Center/Gymnasium, recreational facilities, sports field, 41,037 square-foot, two-story assembly building with a maximum seating capacity of 600, and a 1,500 square-foot, two-story maintenance/ caretaker unit in two phases on a 13.6-acre portion of a 27.12-acre site.

CEQA RECOMMENDATION: Certification of Environmental Impact Report
(SCH No. 2004031114)

Dear Commissioners:

Before you is the difficult task of approving or disapproving the Church of the Woods Project; a project to construct buildings and grounds for the purpose of serving community residents and visitors to the San Bernardino Mountains.

I am certain you have been inundated with letters of opposition to the project as well as those of support. Most of the letters will focus on either the environmental change to a natural forest, or the spiritual benefit a church brings the community by approval of the project.

This letter is in support of the Church of the Woods project, but for pragmatic reasons.

Reasons to support this project:

1. The project serves the interest of people who actually live in this area of the San Bernardino Mountains and brings economic incentives through related construction and associated labor/materials and ancillary business benefits.

2. The project is environmentally friendly. Environmentalist in opposition to the Church of the Woods project, and not all are opposed, tend to consider a building project as desecration to the environment of natural forest, streams and habitat. Arguments range from technical scientific input portraying horrible destruction caused by construction and destruction to the natural habitat of the rare species never seen by anyone in life.

Generally, environmentalist will frame their input to you in terms that cast the members of the church as uncaring haters of nature, creatures and species, with a narrow focus and total disregard for the environment. Such a premise is completely without merit and in reflects total ignorance.

3. The project is a relatively small footprint on a mountain already bereft of failed larger projects that were blocked or run aground financially because of narrowly focused environmentalist financially backed by large organizations who exist for the sole purpose of blocking projects that touch the land.... Anywhere!

4. The project will provide relief to a neighborhood that faces constant traffic related risks because of the current location of Church of the Woods on Calgary Drive, in Lake Arrowhead. These people have endured for long enough! Approve this project and allow the people who attend Church of the Woods to relocate to a facility sited in an area actually zoned for commercial use. Clearly, the Church of the Woods EIR contains mitigation measures that will protect any downstream concerns.

5. The project serves the very people living on the mountain and does so in an area already zoned and serving commercial interests. This project is not simply a building and grounds approval, but is a means to serve the interest of the very people who live in the community. While activities of the church impact road traffic for moments of time, nothing in this project causes the adverse impact seen because of snow play, motorcycle clubs, bicycle races, concert goers, and other activities or events which impact the mountain communities nearly every week.

6. The project serves a greater Community of Responsible Stewardship than presented by the environmentalists who oppose it. Members of this church are respectful stewards of the creation God gave each of us to enjoy. It is the precise character of living in a national forest that draws people to move here and live in a wildland urban intermix.

Honorable Commissioners, the project has been delayed and obstructed long enough. I urge you to approve this project without further delays.

Signed letter attached. Thank you.

David R. Caine
970 Crest Estates Drive
P.O Box 1726
Lake Arrowhead, CA 92352-1726

From: [David Caine](#)
To: [Nieves, Tom](#); [Supervisor Rutherford](#); [Murray, Lewis](#); [Sonick, Chrystale](#); [Duron, Heidi - LUS](#)
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Signed letter attached. Thank you.

David R. Caine
970 Crest Estates Drive
P.O Box 1726
Lake Arrowhead, CA 92352-1726

From: [Marianne Gomes](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods Project, Lake Arrowhead
Date: Monday, January 20, 2020 9:32:11 PM

Dear Mr. Nieves,

I am writing to urge you to deny the ill-conceived Church of the Woods project in Rim Forest. In this plan, our community is faced with a grandiose development that will forever urbanize one of the last remaining undeveloped privately-owned parcels on Highway 18. As I understand it, the plan calls for 100% removal of all trees and vegetation on 16.9 acres, and for 60 feet of mountain top to be bulldozed away (45,000 cubic yards of dirt), some of which will be used to fill in the valley on the site, which is one of very few remaining undisturbed riparian areas left in the greater mountain area. In place of this pristine undisturbed forest, 310 parking spaces, church buildings and a sports field are to be constructed on a scale better suited for an urban development, not our rural mountain community.

In addition, the site contains the headwaters of Little Bear Creek, the largest tributary of Lake Arrowhead. The project will obliterate its headwaters in the riparian meadow as well as alter forever its natural flow. Recent water quality testing on the creek indicates it is already carrying an unusually high level of contaminants into Lake Arrowhead. Construction of this project, situated as it is on a site on which a majority of its slopes are up to as much as 40% in steepness, and on which 5 acres are over 40% in steepness, will only increase the load of sedimentation caused by erosion and additional contamination carried into Lake Arrowhead.

The DEIR itself lists many issues of concern, most of which it acknowledges are not able to be mitigated: increased traffic requiring seven signals to be constructed between Rim Forest and State Highway 173, site topography destruction, noise, detrimental impact to an existing San Bernardino County designated wildlife corridor, detrimental impact on vitally important down-slope riparian areas, stream-banks, stream-beds and associated ecotones, as well as numerous additional unavoidable harms to the community and environment.

And all of this for what? A large-scale development that is clearly not in keeping with the stated provisions and spirit of the San Bernardino County and Lake Arrowhead Community plans regulating development. These plans, developed with input from mountain residents, as well as the County codes specify that developments must preserve Highway 18 as a scenic byway, contain roads designed to follow natural contours, avoid clearing native vegetation, avoid cut-and-fill development, as well as maintain water quality and preserve native trees, vegetation and rare and endangered species. It concerns me that if it is allowed to go forward, this development will serve as a precedent for overriding the community plan. It will also alter forever the quality of life for those of us who live in the area, as well as traffic flow for all mountain residents and travelers on Highway 18.

As this project comes before the Planning Commission on Thursday, your vote to deny it is crucial to preserve our unique and beautiful mountain environment and

quality of life. As a 50+ year full-time Lake Arrowhead resident, I, along with many other concerned citizens, implore you to deny this inherently flawed project, on the basis that, however well-meaning its intentions may be, it's design and scope constitute an excessive and inappropriate use of this site, and as such are contrary to the County and Lake Arrowhead Community master plans as well as specific County development code.

Sincerely,

Marianne Gomes

P.O. Box 1376

696 Crest Estates Drive

Lake Arrowhead, CA 92352

From: [Sandy Ellis](#)
To: Heidi.Duran@lus.sbcounty.gov; [Nieves, Tom](#); Terri.Rahhal@sbcounty.gov; [Supervisor Rutherford](#); [Murray, Lewis](#)
Cc: [Hugh Bialecki](#)
Subject: Church of the Woods Project
Date: Tuesday, January 21, 2020 1:19:07 PM

We would like to strongly oppose the Church of the Woods Project soon to be considered but the Planning Commission for the following reasons:

1. The steep slopes and plan for so much soil to be removed would be an ecological disaster.
2. The removal of hundreds maybe even thousands of trees would make this beautiful, undeveloped site urban and would forever change the rural nature of our unique mountain communities.
3. Highway 18 has been designated as a Scenic Byway. Adding traffic lights will only make driving the mountain roads less safe in dense fog and in snowstorms and very problematic in case of evacuations.
4. Create new sources of light and glare which would disturb an otherwise dark, nocturnal environment.
5. This site is a riparian-habitat. This project would have an adverse effect on federally protected wetlands and on endangered, threatened or sensitive animal and plant species.
6. The proposed fencing and 10 foot retaining walls will obstruct wildlife movement in the wildlife corridors between Strawberry Creek and Grass Valley.
7. The project is inconsistent with the policies and goals of the San Bernardino County's General Plan and with the Lake Arrowhead Community Plan.
8. There is lack of clarity with the Storm Water Drainage Plan on 10 acres of this site and the Church of the Woods project. How are they working together? What are their plans?
9. There are other sites much more suited for this project.

We urge the Planning Commission and the Board of Supervisor to deny this project. Thank you.

Respectfully,
Sandy and Frank Ellis
PO Box 8542
Green Valley Lake, California 92341

From: [Carl Blank II](#)
To: [Rahhal, Terri](#); [Duron, Heidi - LUS](#); [Nievez, Tom](#); Supervisor.Rutherford@lus.sbcounty.gov; [Murray, Lewis](#)
Subject: Church of the Woods Sunrise Project
Date: Monday, January 20, 2020 6:56:45 PM

My husband and I reside in Twin Peaks. We have no credentials in geography, geology, hydrology or any other ologies nor do we have any legal degrees to raise legal objections to this ill conceived project. We can only object to this project as residents of our mountain communities. As such we find it hard to understand why this County always approves projects that threaten our communities on the mountain. By threaten we mean not only our mountain environment which we treasure but also the economy and health of our communities.

This project would possibly benefit only one group, the congregation of the church as well as it pastor. It will demean everything else about our communities. Most of us enjoy the wildlife that we share the mountains with. Although I have heard from members of Church of the Woods that they don't consider that important and, from what we heard, the FEIR concurs. The tourists who travel here might also enjoy knowing that this environment exists near them and that they can see natural scenery and wild animals in only one or two hours.

Then there is the effect this project will have on the major tourest attraction of our area, Lake Arrowhead. It is obvious that any change in the terrain of the area will have a very negative effect on the blue line stream that begins on this tract. We can see the flow of water through Agua Fria and Blue Jay directly into the lake. It has only been from learning of this project that we became aware that the headwaters of the stream is on the Church property that was given to them by a parishoner. Is it possible that person was unloading a property he couldn't develop because of the county plan for the mountain area?

Several traffic lights have been proposed because of this project. Whether or not all or some of them are installed, their presence will tarnish our scenic highway. The traffic will be severely impaired causing pollution from idling vehicles. It may also lead to residents taking Highway 189 through Twin Peaks in order to avoid all of the delays from the signals. Will we then need traffic control in Twin Peaks as well? A church member said that there will be only one traffic light at the entrance to the property. I must assume that is what they are being told which is at odds with the information put out by the county plan.

I heard a representative from the church state that they would not start the project until it is fully funded. They have no way of knowing what full funding would be since every project encounters unforeseen problems that put an end to construction and even lead to bankruptcy.

Have any of you from Land Use Services or the Planning Commission ever been up here or driven on Highway 18? Have you ever looked at the proposed site for this project? Would you like to have it next to your neighborhood? Time and time again the County imposes projects on our community without any thought about us. Time and time again information is sent to the County describing the damage that will occur to the mountain which has been proven to be true time and time again, e.g. Hawarden, Eagle Ridge, the Bridge to Nowhere off Cumberland, et al. Why is it that the Planning Commission and Supervisors don't learn from their mistakes? Why do you continue to okay projects that destroy the land and are abandoned.

There are State environmental regulations that must be followed which we have heard are not in the FEIR. There is a management program from the County for this area that has been

disregarded by this project. We ask that you look deeply into your souls and think about the destruction this will cause and the impact it will have on 9000 citizens to benefit 300 church members. In the long run it may not even benefit them. For once think about the damage this will cause for little to no benefit to the entire community.

I hope that this letter will be considered.

Sincerely,

Trudie and Carl Blank II

From: [Bob Sherman](#)
To: [Duron, Heidi - LUS](#)
Cc: [Nieves, Tom](#); [Rahhal, Terri](#); [Supervisor Rutherford](#)
Subject: Comments re Church of the Woods Project
Date: Tuesday, January 21, 2020 9:24:35 AM
Attachments: [Comments- Final- Robert Sherman.docx](#)
[KEEAC FINAL.pdf](#)
[RESUME- 1-2--2020.doc](#)

To: Mr. Nieves, Ms. Duron, Ms. Rahhal, Ms. Rutherford

Date: January 21, 2020

Please find (attached) my comment letter regarding the Church of the Woods Project (hearing scheduled for January 23, 2020). There are also two other attachments, my resume and a copy of **"KEEAC- Final- PDF"**. Hard copies will not follow. Please confirm your receipt of this message (and attachments) and reply that all have been received and will be entered into the official record for these proceedings. My email is silabob@gmail.com

Thank you-

Robert Sherman

From: Robert Sherman
To: San Bernardino County Planning Department & Board of Supervisors
Re: Comments for Church of the Woods hearing, scheduled for January 23, 2020
Date: submitted January 21, 2020

Preface- throughout the comments I am submitting today, I wish to emphasize the following:

(1) When I use the term “COTW Project” I refer, primarily, to its current formulation as articulated in the January 10, 2020 FEIR and the pending Land Use Services Department Planning Commission Staff Report. Also inherent are antecedent “EIR’s” that are foundational to the project as it is being considered now.

(2) When I use the term “riparian areas”, that is meant to include of all of the features that constitute these complexes, including- but not limited to- “Little Bear Creek” (inclusive of both perennial and intermittent flows, its banks, adjacent slopes, associated wetland and non-wetland plant communities, concomitant ecotones, habitat and wildlife corridor characteristics. This would include, but not necessarily be limited to, all jurisdictional areas within regulations and/or submittal guidelines promulgated by the CA Fish & Wildlife (in its Streambed Alteration Permitting process) and, similarly, permitting processes inherent to the requirements of the Lahonton Regional Water Quality Control Board.

(3) Though I have been actively involved with the Mountains Group of the Sierra Club in reviewing the COTW Project, these comments are my own. **My comments below (1-5) reflect major concerns related to deficient, erroneous, misleading and unfounded information and assertions throughout the chain of documents as the COTW project has moved through its various versions- see (1) above. Also, it should be noted these concerns are engendered by their relationship to (and analysis of) key elements in the COUNTY OF SAN BERNARDINO 2007 GENERAL PLAN (and the Lake Arrowhead Community Plan). These elements reflect environmental/ecological protective standards, goals and tenets of said GENERAL PLAN (see box below). Said analysis, includes definitions of the ecological principles that serve as the foundation of said standards, goals and tenets.) That analysis, attached to this submission as “KEEAC- Final- PDF”, was originally done for the Mountains Group of the Sierra Club (I was a co-author).**

The Protection of Public or Private Water Supply	The Protection of Our Native Forest Environment
The Protection of Groundwater	The Protection of Fisheries
The Enhancement of Flood Control	The protection of Biodiversity
The Prevention of Erosion and/or Sedimentation	The Protection of Wildlife Corridors
The Prevention of Storm Damage	The Protection of Rare and Endangered Species
The Prevention of Surface Water Pollution	The Prevention of Excessive Noise
The Protection of Wildlife Habitat	The Conservation of Energy Use
The Protection of Riparian Habitat	The Protection of Recreational Opportunities
The Protection of Buffer Zones	

(4) My resume is attached, as it demonstrates that I have had substantial education and professional experience that has provided me with the knowledge and skills to understand the ecological principles inherent to a comprehensive and well-founded review of the COTW Project.

COMMENTS:

(1) The COTW Project has promulgated a central premise that is both spurious and untenable- Namely:

“As such, implementation of the Project would have no impact on the existing on site riparian habitat, because such habitat would have been eliminated by, and mitigated for, by the County’s Rimforest Storm Drain Project. Accordingly, impacts to riparian habitat would be less than significant.” (p. 442 – Page FEIR-439)

That statement is pure conjecture:

(A) The County Rimforest Storm Drain Project (henceforth referred to as the CRFSDP) is subject to permitting requirements of the CA F&W and the Lahontan Regional Water Regional Water Control Board. It is possible that either of both permits will deny all or part of the proposed work, or, more likely, require preservation and/or restoration of riparian habitat. At any rate, it has not been demonstrated that there will be NO remnants of Riparian Areas, the loss of which would be significant and cumulative.

(B) In addition, the Land Use Services Department Planning Commission Staff Report, in its Conditions of Approval #37, states: *“Verification shall be provided that all components of the San Bernardino County Flood Control District’s Rimforest Storm Drain project, that would materially affect either the Church of the Woods project or property, have been installed and are operational. As an alternative, the development and grading plans shall be revised to not rely on the Rimforest Storm Drain Project.”*

(2) The COTW Project has ignored a primary feature of the topography of the site that portends an excessively high likelihood of harm to riparian areas..

Though the site’s “steep mountainous slopes” are mentioned in a few places in the FEIR, the implications for site development issues threatening riparian areas are not acknowledged, nor are explicit erosion-control measure described and/or depicted on site plans.

Numerous studies have linked slope steepness to propensity for erosion...

Slope class	Slope%	Risk of erosion
Flat	<3.5	Very low
Gentle	3.5-7.0	Low
Moderate	7.0-12.0	Medium
Steep	12.0-19.0	High
Very steep	>19.0	Very high

Source- researchgate.net

It is important to note that slopes on the COTW slope, just below the construction areas slated for clear-cutting and removal of ground cover, EXCEED (the above 19%/Very high risk of erosion) BY A FACTOR OF 2X !

Further, p. 46 of the Land Use Services Department Planning Commission Staff Report states “....The Project site is located within an area of “moderate to high” landslide susceptibility.”

(3)) The COTW Project has ignored a well-established principle, based on much research, that undisturbed/naturally vegetated buffer zones should be left between construction activities

and important natural resource areas, including riparian areas, and **ESPECIALLY WHERE STEEP SLOPES ARE ADJACENT** to such areas meriting these additional protection measures.

The United States Environmental Protection ***Aquatic Buffer Model Ordinance*** guidelines, as applied to site plans for the COTW project, would call for a minimum of 200-225 feet between areas of disturbance and riparian areas.

The following is excerpted from those guidelines:

The ordinance can identify the scale of maps to be included with the analyses in items 2) through 7). A 1"=50' to 1"=100' scale will generally provide sufficient detail.

.....

- 2) Field-delineated and surveyed streams, springs, seeps, bodies of water, and wetlands (include a minimum of 200 feet into adjacent properties)
- 3) Field delineated and surveyed forest buffers
- 4) Limits of the ultimate 100-year floodplain
- 5) Hydric soils mapped in accordance with the NRCS soil survey of the site area
- 6) Steep slopes greater than 15 percent for areas adjacent to and within 200 feet of streams, wetlands, or other waterbodies

Section VI. Design Standards for Forest Buffers

A) A forest buffer for a stream system shall consist of a forested strip of land extending along both sides of a stream and its adjacent wetlands, floodplains, or slopes. The forest buffer width shall be adjusted to include contiguous sensitive areas, such as steep slopes or erodible soils, where development or disturbance may adversely affect water quality, streams, wetlands, or other waterbodies

B) The forest buffer shall begin at the edge of the stream bank of the active channel.

C) The required width for all forest buffers (i.e., the base width) shall be a minimum of 100 feet, with the requirement to expand the buffer depending on

- 1) Stream order
- 2) Percent slope
- 3) 100-year floodplain
- 4) Wetlands or critical areas

E) When wetland or critical areas extend beyond the edge of the required buffer width, the buffer shall be adjusted so that the buffer consists of the extent of the wetland plus a 25-foot zone extending beyond the wetland edge.

Method B		
Percent Slope	Type of Stream Use	
	Water Contact Recreational Use	Sensitive Stream Habitat
0% to 14%	no change	add 50 feet
15% to 25%	add 25 feet	add 75 feet
Greater than 25%	add 50 feet	Add 100 feet

Adapted from : *Aquatic Buffer Model Ordinance (EPA)*

https://www.epa.gov/sites/production/files/2015-12/documents/2002_09_19_nps_ordinanceuments_buffer_model_ordinance1.pdf

It is a blatant omission that nowhere in the chain of EIR documents -see Preface (1)- are protective buffers called for on plans (nor in text) when the COUNTY OF SAN BERNARDINO 2007 GENERAL PLAN Clearly calls for them:

CI 13.2 c. Preserve wetlands, riparian corridors, and buffer zones; establish reasonable limits on clearing of vegetation from the project site; (Page III-40)
CO 1.2 The preservation of some natural resources requires the establishment of a buffer area between the resource and developed areas. (Page V-14)

(4) The FEIR, in its responses to the many letters received (in response to the DEIR) stated “Additionally, a comment that draws a conclusion without elaborating on the reasoning behind or, the factual support for, those conclusions does not require a response” (p. 5- Page FEIR-2)

The above amounts to an almost unfathomable level of Double Standard Sophistry. Should not the the same standard apply to “conclusions” that the COTW project proponents (and/or consultants on the project’s behalf) put forth, so often declaring (without “... reasoning behind or, the factual support for...”) so often declaring project impacts as non-existent and/or negligible? Throughout the COTW project (and all inherent documents – see Preface (1), above, these unsubstantiated assertions are pervasive: here are two examples:

(A) *“As previously discussed, during the field study conducted by ELMT, one drainage feature, tributary to Little Bear Creek containing riparian habitat was located on the Project site. Although the Project site contains a drainage feature, no wetlands or wetland vegetation was found within or adjacent to the existing drainage system.” (p. 442- page FEIR-439)*

In fact, an extensive Red Osier Dogwood wetland exists within the (acknowledged) Riparian areas. (Pictures of it were submitted in DEIR comments by botanist, Orchid Black.) This feature encompasses more than 1000 square feet. It provides important wildlife habitat, including cover, food, nesting areas and wildlife corridor attributes!

(B) *“The proposed Project would result in the loss of acreage for non-sensitive plant communities and numerous common plant and animal species within the region. These natural resources are found in abundance throughout the San Bernardino National Forest and are protected within public lands of the national forest. This impact is considered adverse but not significant on either a site-specific or cumulative level because it involves non-sensitive plant communities and common plant and animal species, and the approximately 13.6 acres area of impact is small relative to the larger forest area that provides regional protection.” (p. 490- Page 3.C-24)*

Are “non-sensitive communities” a legal and/or evaluative term for evaluating ecological significance? Because animal and/or plant species may be common in no way determines their ecological significance or habitat value. Where in the scientific literature is there evidence that “common” plants

and animals cannot and do not have ecological value and/or (not) play important roles in ecological systems, this one, notably, an established wildlife corridor. As a matter of fact, the assertion above, *"area of impact is small relative to the larger forest area that provides regional protection"* is fatuous! It totally ignores how the COTW site is significantly UNLIKE "the larger forest area", which is almost totally devoid of riparian areas - see preface (2)!

It should be noted here that letters (in earlier "EIR" submission)* from CA Fish & Game/CA Fish and Wildlife were submitted to the COTW project consultants, detailing further analysis was necessary. One such letter (June 2, 2010) specified that *"... Project impacts should be analyzed relative to their effects on habitats both onsite and offsite. Specifically, this should include nearby public lands, open space, adjacent natural habitats, and riparian ecosystems. Impacts to and maintenance of wildlife corridor/movement areas, including access to undisturbed habitat in adjacent areas, should be fully evaluated."* As of this time, it appears that none of this analysis has been done. THUS ANY "CONCLUSIONS" THAT IMPACTS ARE NON-SIGNIFICANT ARE NOT ONLY UNSUBSTANTIATED, BUT ARE, IN FACT, DISINGENUOUS!

(5) Please see the underlined text of Preface (3). It would seem in order that any approval of the FEIR (including the provisions of the Land Use Services Department Planning Commission Staff Report) by the County Agency issuing said (final) approval(s) should not be promulgated unless and until such approval is in accord with the cited provisions of the 2007 County General Plan.



**SIERRA
CLUB**

San Bernardino Mountains Group

Table of Contents

The Protection of Public or Private Water Supply	3
The Protection of Groundwater	3
The Enhancement of Flood Control	3
The Prevention of Erosion and/or Sedimentation	4
The Prevention of Storm Damage	5
The Prevention of Surface Water Pollution	5
The Protection of Wildlife Habitat	5
The Protection of Riparian Habitat	6
The Protection of Buffer Zones	6
The Protection of Our Native Forest Environment	6
The Protection of Fisheries	7
The Protection of Biodiversity	7
The Protection of Wildlife Corridors	7
The Protection of Rare and Endangered Species	8
The Prevention of Excessive Noise	8
The Conservation of Energy Use	8
The Protection of Recreational Opportunities	9

The following pages define the Sierra Club's San Bernardino Mountains Group Key Ecological and Environmental Areas of Concern and identify applicable San Bernardino County General Plan and Lake Arrowhead Community Plan references.

Protecting the Environment:

Our Guiding Principle: We believe our mountain environment is fragile and threatened. We work independently and in cooperation with agencies, groups and organizations to lawfully protect it.

Our Goal: Advocate and protect the natural spaces, wilderness and human community of the San Bernardino Mountains.

Our Strategy: Monitor developments and human impacts and communicate recommendations, concerns and objections.

Key Ecological and Environmental areas of concern (with definitions):

County of San Bernardino 2007 General Plan (relevance) and Lake Arrowhead 2007 Community Plan (relevance)

The Protection of Public or Private Water Supply - means preservation and conservation of water supply used by the community for drinking and/or other uses inherent to a livable community.

GOAL CI 11. - The County will coordinate and cooperate with governmental agencies at all levels to ensure safe, reliable, and high quality water supply for all residents and ensure prevention of surface and ground water pollution. (Page III-32)

GOAL M/CO 3. Conserve and protect surface and groundwater resources to meet the needs of a growing mountain population, to support the mountain environment and forest watershed and to preserve the quality of life for mountain residents and visitors. (Page V-41)

Goal LA/CO 4. *Enhance and maintain the quality of water from Lake Arrowhead and Grass Valley Lake, their tributaries and underground water supplies.*

The Protection of Groundwater - means the prevention of the draw-down, natural flow patterns and/or natural purity of groundwater

Goal CI 11. Same as Above

The Enhancement of Flood Control - means the ability of natural areas to absorb, store and slowly release flood waters, or the ability of said areas to block or deflect the flow of flood waters, so as to minimize the effects of flooding caused by precipitation, snow-melt, and/or a rising water table.

GOAL S 5 . The County will provide adequate flood protection to minimize hazards and structural damage. (Page VIII-17)

S 5.8 - Design flood control and drainage measures as part of an overall community improvement program that advances the goals of recreation, resource conservation, preservation of natural riparian vegetation and habitat, and the preservation of the scenic values of the County's streams and creeks. (Page VIII-21)

OS 4.2 - The County will preserve and encourage the management of suitable land for greenbelts, forests, recreation facilities and flood control facilities to assist the County's efforts to provide adequate water supply, achieve air quality improvement, and provide habitat for fish, wildlife and wild vegetation. (Page VI-12)

Key Ecological and Environmental areas of concern (with definitions):	County of San Bernardino 2007 General Plan (relevance) and Lake Arrowhead 2007 Community Plan (relevance)
<p>The Prevention of Erosion and/or Sedimentation - means the ability of any natural features (and/or technological measures) to buffer forces and/or processes which would threaten or cause to be threatened the stability of landforms and the soil and/or vegetation of said landforms.. (mention slopes, banks...) Erosion can be a wearing away of the surface soil or by undermining the interior portion of the landform.</p> <p>Sedimentation control includes protecting natural land features (such as natural vegetation and ground cover) and/or utilizing best-available technological measures, to settle out sediments and other waterborne materials by reducing water flow by passing it through vegetation or by other means to diffuse flow and reduce velocity of overland flow.</p>	<p>CI 13.2 - Promote the implementation of low impact design principles to help control the quantity and improve the quality of urban runoff. These principles include:</p> <ul style="list-style-type: none"> a. Minimize changes in; ensure that post development runoff rates and velocities from a site do not adversely impact downstream erosion, and stream habitat; minimize the quantity of stormwater directed to impermeable surfaces; and maximize percolation of stormwater into the ground where appropriate. b. Limit disturbance of natural water bodies and drainage systems; conserve natural areas; protect slopes and channels; c. Preserve wetlands, riparian corridors, and buffer zones; establish reasonable limits on the clearing of vegetation from the project site; d. Establish development guidelines for areas particularly susceptible to erosion and sediment loss; e. Require incorporation of structural and non-structural BMPs to mitigate projected increases in pollutant loads and flows. (Page III-40) <p>M/CO 3.6 - Minimize the runoff of surface water and establish controls for soil erosion and sedimentation through the following policies:</p> <ul style="list-style-type: none"> a. Through the development review process, require replanting of ground cover in denuded areas with re-vegetation, either indigenous to the area or compatible with the climate and soil characteristics of the region. b. When development occurs, provide for the retention of natural drainage channels and capacity of the site where feasible. c. When feasible, require developers, through the development review process, to maintain existing percolation and surface-water runoff rate by discouraging the paving of large surface areas. (Page V-42) <p>OS 7.6 - Require that hillside development be compatible with natural features and the ability to develop the site in a manner that preserves the integrity and character of the hillside environment, including but not limited to, consideration of terrain, landform, access needs, fire and erosion hazards, watershed and flood factors, tree preservation, and scenic amenities and quality. (Page VI-18)</p> <p>(Policies):</p> <p>LA/CO 2.3 - <i>Require the re-vegetation of any graded surface with suitable native drought and fire resistant planting to minimize erosion.</i></p> <p>LA/CO 4.2 - <i>Enforce grading and landscaping standards to reduce soil erosion.</i></p>

Key Ecological and Environmental areas of concern (with definitions):	County of San Bernardino 2007 General Plan (relevance) and Lake Arrowhead 2007 Community Plan (relevance)
<p>The Prevention of Storm Damage - means the ability of wetland soils, vegetation and/or physiography to prevent damage from storms, including, but not limited to: erosion and sedimentation, damage to vegetation, property or structures; alteration of naturally existing geomorphology*** and/or damage cause by flooding, waterborne debris or waterborne ice, and/or wind.</p>	<p>GOAL S 4 - The County will minimize damage due to wind and water erosion where possible. (Page VIII-16)</p> <p>CI 13.2 - Promote the implementation of low impact design principles to help control the quantity and improve the quality of urban runoff. These principles include:</p> <ul style="list-style-type: none"> a. Minimize changes in hydrology and pollutant loading; ensure that post development runoff rates and velocities from a site do not adversely impact downstream erosion, and stream habitat; minimize the quantity of stormwater directed to impermeable surfaces; and maximize percolation of stormwater into the ground where appropriate. b. Limit disturbance of natural water bodies and drainage systems; conserve natural areas; protect slopes and channels; c. Preserve wetlands, riparian corridors, and buffer zones; establish reasonable limits on the clearing of vegetation from the project site; d. Establish development guidelines for areas particularly susceptible to erosion and sediment loss; e. Require incorporation of structural and non-structural BMPs to mitigate projected increases in pollutant loads and flows. (Page III-40) <p>D/CI 3.10 Encourage the retention of natural drainage areas unless such areas cannot carry flood flows without damage to structures or other facilities. (Page III-56)</p>
<p>The Prevention of Surface Water Pollution - means measures to interdict the entry of ANY substances, materials, particulates, compounds, elements and/or debris into waterways and wetlands.</p>	<p>GOAL CI 11 - The County will coordinate and cooperate with governmental agencies at all levels to ensure safe, reliable, and high quality water supply for all residents and ensure prevention of surface and ground water pollution. (Page III-32)</p> <p>GOAL CO 5. The County will protect and preserve water resources for the maintenance, enhancement, and restoration of environmental resources. (Page V-26)</p>
<p>The Protection of Wildlife Habitat - means the preservation and/or enhancement of natural or constructed areas, that due to their plant community composition, soils, hydrologic characteristics, geomorphology, proximity to wetlands, waterways, and/or other characteristics, provide food, shelter, migratory or over wintering areas, breeding and/or rearing areas for wildlife.</p>	<p>GOAL M/CO 1 - Preserve the unique environmental features of the Mountain Region including native wildlife, vegetation and scenic vistas. (Page V-39)</p>

Key Ecological and Environmental areas of concern (with definitions):	County of San Bernardino 2007 General Plan (relevance) and Lake Arrowhead 2007 Community Plan (relevance)
<p>The Protection of Riparian Habitat - Riparian lands are comprised of the vegetative and wildlife areas adjacent to perennial and intermittent streams. Riparian areas are delineated by the existence of plant species normally found near freshwater. (Page XI-30)</p>	<p>CI 13.2 c. Preserve wetlands, riparian corridors, and buffer zones; establish reasonable limits on the clearing of vegetation from the project site. (Page III-40)</p> <p>3. RECOGNIZED IMPORTANT BIOLOGICAL AREAS - These include riparian woodlands. These areas are important biologically as they support flora or fauna that are limited in their distribution, or require or tolerate unusual conditions that occur there. (Page V-2)</p> <p>Goal LA/CO 3. <i>Protect streambeds and creeks from encroachment or development.</i></p> <p>(Policies): LA/CO 3.2 - <i>Require naturalistic drainage improvements where modifications to the natural Streamway are required.</i></p> <p>LA/CO 3.3 - <i>Prohibit exposed concrete drainage structures. Acceptable designs include combinations of earthen landscaped swales, rock rip-rap lined channels or rock-lined concrete channels. Property owners must provide for the maintenance of underground drainage structures.</i></p> <p>LA/CO 3.4 - <i>Streams shall not be placed in underground structures in any Residential, Neighborhood Commercial or public land use district or zone.</i></p> <p>LA/CO 3.5 - <i>Development that is found consistent with the Floodway (FW) land use district or zone shall neither alter the natural stream course alignment nor alter natural flows.</i></p>
<p>The Protection of Buffer Zones Definition - Buffer Zone - An area of land separating two distinct land uses that acts to soften or mitigate the effects of one land use on the other. (Page XI-4)</p>	<p>CI 13.2 c. Preserve wetlands, riparian corridors, and buffer zones; establish reasonable limits on clearing of vegetation from the project site; (Page III-40)</p> <p>CO 1.2 The preservation of some natural resources requires the establishment of a buffer area between the resource and developed areas. (Page V-14)</p>
<p>The Protection of our Native Forest Environment. Definition- Means the fostering and preservation of the ecological characteristics that sustain the health and vigor of our mountain forest community, including the following components: trees, shrubs, wildflowers, grasses (flora), animals (fauna, including fungi and micro-organisms), soils, nutrient cycling, hydrological systems, natural ecotone communities and those abiotic factors within management control.</p>	<p>GOAL M/CO 2. - Maintain the health and vigor of the forest environment. (Page V-40)</p> <p>GOAL M/LU 1. - Retain the existing alpine character of the Mountain Region. (Page II-42)</p> <p>GOAL M/OS 1. - Ensure the preservation and proper management of National Forest lands within the Mountain Region to maintain the alpine character of the region.</p> <p>(Policy) LA/CO 2.2 - <i>Work with the local Fire Safe Council and Fire agencies in the development of Community Wildfire Protection Plans (CWPP) for the mountain communities. As part of this effort, a study shall be prepared to determine appropriate forest management techniques and identify any necessary modifications to the County's Tree Preservation Ordinance to ensure the long term health of the forest.</i></p>

Key Ecological and Environmental areas of concern (with definitions):	County of San Bernardino 2007 General Plan (relevance) and Lake Arrowhead 2007 Community Plan (relevance)
<p>The Protection of Fisheries - means the protection of fish species, and the underlying ecological characteristics which sustain same.</p>	<p>OS 4.2 - The County will preserve and encourage the management of suitable land for greenbelts, forests, recreation facilities and flood control facilities to assist the County's efforts to provide adequate water supply, achieve air quality improvement, and provide habitat for fish, wildlife and wild vegetation. (Page VI-12)</p>
<p>The Protection of Biodiversity - means the variability among living organisms from all sources including, inter alia, terrestrial, and other aquatic ecosystems and the ecological complexes of which they are a part; this includes diversity within species, between species and of ecosystems. Convention on Biological Diversity 1992 ¹</p>	<p>V. CONSERVATION ELEMENT - Conservation is the planned management, preservation, and wise utilization of natural resources. Conservation is one of the most important strategies for managing the County of San Bernardino's resources. Resources include, but are not limited to, water, energy, land, biodiversity, minerals, natural materials, recyclables, view sheds and air. (Page V-1)</p> <p>1.BIOLOGICAL RESOURCES - GOAL CO 2. The County will maintain and enhance biological diversity and healthy ecosystems throughout the County. (Page V-15)</p> <p>LA5.1 - INTRODUCTION - A. Natural Resources and Historic Resources - <i>The plan area is covered with a diverse biotic community of trees and other vegetation, fish, birds, reptiles, mammals, and other natural resources such as streams and lakes. The plan area includes the following general habitat types and respective sensitive species associated with these habitats (for a detailed list of the sensitive species associated with the various habitats see the Conservation Background Report of the General Plan and the Open Space Overlay):</i></p> <ul style="list-style-type: none"> <i>i. Chaparral</i> <i>ii. Riparian</i> <i>iii. Oak Woodlands</i> <i>iv. Conifer Forest</i>
<p>The Protection of Wildlife Corridors - means the preservation and/or improvement of linked wildlife habitat, generally native vegetation, which joins two or more larger areas of similar ecological characteristics. Such corridors are crucial for the maintenance of fundamental ecological processes, including the movement of animals and the continuation of viable populations. Such corridors enable migration, colonization and maintenance of a viable gene pool for species of plants and animals that are adapted to endemic habitats. Corridors may consist of a sequence of similar habitats across the landscape, such as wetlands or congruous ecotones, or continuous lineal strips of vegetation and habitat (such as riparian strips, ridge lines etc.). They may also, be parts of a larger habitat area selected for its known or likely importance to local fauna.</p>	<p>OS 6.2 - Use open space corridors to link natural areas.</p> <p>POLICIES - CO 2.1 (3.) - The County shall coordinate with local, state, and federal agencies to create a specific and detailed wildlife corridor map for the County of San Bernardino. The map will identify movement corridors and refuge area for large mammal, migratory species..... The wildlife corridor and refuge area map will be used for preparation of biological assessments prior to permitting land use conversion within County jurisdictional areas. The mapping will be included in the Open Space and Biological Resource Overlays. (Page V-16)</p> <p>(Policy) LA/CO 1.1 <i>The following areas are recognized as important open space areas that provide for wildlife movement and other important linkage values. Projects shall be designed to minimize impacts to these corridors.</i></p> <ul style="list-style-type: none"> <i>a. Grass Valley Creek Wildlife Corridor</i> <i>b. Strawberry Creek Wildlife Corridor</i> <i>c. Dispersion Corridor - between Lake Arrowhead and Running Springs and south of Highway 18.</i>

Key Ecological and Environmental areas of concern (with definitions):	County of San Bernardino 2007 General Plan (relevance) and Lake Arrowhead 2007 Community Plan (relevance)
<p>The Protection of Rare and Endangered Species: Rare or Endangered Species - A species of animal or plant listed in: Sections 670.2 or 670.5, Title 14, California Administrative Code; or Title 50, Code of Federal Regulations, Section 17.11 or Section 17.2, pursuant to the Federal Endangered Species Act designating species as rare, threatened, or endangered. (Page XI-28)</p> <p>Endangered Species- A species of animal or plant is considered to be endangered when its prospects for survival and reproduction are in immediate jeopardy from one or more causes. (Page XI-11)</p>	<p>M/CO 1.4 - Designate and protect unique habitats supporting rare and endangered species. (Page V-39)</p> <p>CO 2.1 - The County will coordinate with state and federal agencies and departments to ensure that their programs to preserve rare and endangered species and protect areas of special habitat value, as well as conserve populations and habitats of commonly occurring species, are reflected in reviews and approvals of development programs.</p>
<p>The Prevention of Excessive Noise: Means to preserve and maintain a quiet environment so as have minimal adverse impacts on wildlife* and human aesthetic enjoyment for living and recreating in our mountain community.</p> <p>*reference- A Framework for Understanding Noise Impacts on Wildlife: an Urgent Conservation Priority Clinton D Francis and Jesse R Barber (Front Ecol Environ 2013; doi: 10.1890/120183)</p>	<p>GOAL M/N 1. The County will strive to preserve and maintain the quiet environment of the Mountain Region.</p>
<p>The Conservation of Energy Use: Means to employ, utilize, educate and promote energy conservation policies and practices to minimize local and regional adverse effects from pollution and climate change.</p>	<p>GOAL CO 8. The County will minimize energy consumption and promote safe energy extraction, uses and systems to benefit local regional and global environmental goals.</p> <p>GOAL CO 9. The County will promote energy conservation and encourage safe mining practices.</p>

Key Ecological and Environmental areas of concern (with definitions):	County of San Bernardino 2007 General Plan (relevance) and Lake Arrowhead 2007 Community Plan (relevance)
<p>The Protection of Recreational Opportunities - means any leisure activity or sport, including but not limited to noncommercial fishing, hunting, boating, canoeing, swimming, walking, painting, photography, birdwatching, aesthetic enjoyment, or any leisure activity. Said recreational opportunities are dependent on local natural resource areas, and derived from their values, directly or indirectly, for the conduct and enjoyment of said activities.</p>	<p>GOAL OS 1 - The County will provide plentiful open spaces, local parks, and a wide variety of recreational amenities for all residents. (Page VI-6)</p>

Robert B. Sherman

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Lake Arrowhead, CA 92352



Tel. 909-337-1279
E-Mail: silabob@gmail.com

PROFESSIONAL SKILLS:

- Familiarity with lake management issues, including erosion/sedimentation control, regulation of shoreline construction and land-use projects/activities, impacts of water-level management and pollution/run-off attenuation
- Experienced in wetlands regulatory process, including enforcement and permitting
- Technical writing and journalism experience (please see below)
- Excellent communication, educational and problem-solving skills
- As head of Conservation Department, effectively supervised three employees and coordinated with and advised seven-member Conservation Commission
- Former Science teacher at the elementary, secondary and Jr. College levels

EMPLOYMENT HISTORY

- Conservation Agent, Town of Mashpee, MA (1989 to 2005)
- Instructor in Environmental Science, Quincy College at Plymouth
(fall and spring semesters, 1992/1993)
- Reporter, Cape Cod Newspapers (1988 to 1989); Alpenhorn News (2007)
- Teacher, Town of Bourne, MA (1966 to 1988)

RELEVANT EXPERIENCE

- Former member of Board of Directors, Massachusetts Association of Conservation Commissions (MACC); author of newsletter articles and position papers for MACC; have helped develop and conduct numerous MACC workshops
- Coordinated with numerous state and federal Agencies, including FEMA, Dept. of Fish and Game, MA Dept. of Environmental Protection, N.R.C.S. and Defense Dept.
- As Mashpee Conservation Agent, responsible for research and environmental impact analysis; wrote all regulations pursuant to local wetlands protection bylaw
- Recipient of award from Mass. Executive Office of Environmental Affairs for development of regulations limiting nitrogen input to coastal embayments
- Former reporter for ***The Mashpee Messenger***, covering the gamut of issues affecting a small town on Cape Cod; included reporting on town, state and county government affairs, human interest stories, environment, recreation, sports, etc. Also published in a New England Magazine- ***On the Water***
- Former member Lake Operations & Fish Committee for ALA

EDUCATION and CERTIFICATION

- B.S. Wildlife Management, Univ. of Massachusetts-Amherst (1966)
- M.Ed. Education, Bridgewater State College (1969)
- Additional graduate-level courses: Coastal and Estuarine Ecology, UMass-Dartmouth (1981); Astronomy, Oceanography and Meteorology, Bridgewater State College (1986-1987); Wetland Identification and Delineation, UMass-Amherst (1991)
- Society of Wetland Scientists certification Program- Professional Wetland Scientist- Certification Number 000406 (now lapsed- retired)

From: [Brandi Lennertz](#)
To: [Nieves, Tom](#)
Subject: COW Project
Date: Tuesday, January 21, 2020 9:58:55 AM

Dear Tom Nieves,

I understand that you are a member of the San Bernardino Planning Commission and will be part of the decision whether to grant a conditional use permit Church of the Woods to develop a massive religious facility spanning .13.6 acres. I am a resident of Twin Peaks, California. I am writing to voice my concern and opposition to the development of this enormous project. My concerns include; Destroying hundreds of trees by leveling the mountain and filling in wetlands, destroying animal habitat and disrupting wildlife corridors, and adding more traffic along Hwy 18. I moved up here for the beauty of nature; the trees, quiet, animals, and hiking trails and this project supports none of these values.

Thank you for your time and consideration.

Brandi Lennertz

--

The future will depend on what we do in the present.--- Mahatma Gandhi

The ultimate measure of a person is not where they stand in moments of comfort and convenience, but where they stand in times of challenge and controversy.

Martin Luther King

From: [Jennifer D Alford](#)
To: [Murray, Lewis](#); [Supervisor Rutherford](#); [Duron, Heidi - LUS](#)
Subject: CSUSB Water Quality Research Data - Little Bear Creek COTW Proposed Development
Date: Tuesday, January 21, 2020 6:40:38 AM
Attachments: [Lake Arrowhead Tributary Trends .pdf](#)

Dear Supervisor Rutherford, Mr. Murray, and Ms. Duron,

I hope this email finds you all doing well. I am contacting you regarding to ongoing research funded by the Water Resources and Policy Initiatives (WRPI) related to water quality in Little Bear Creek; a headwater tributary to Lake Arrowhead located in the San Bernardino National Forest. As you likely know this tributary traverses a watershed drainage area that includes Blue Jay and the proposed Church of the Woods (COTW) project site.

Our research assesses stream physiochemical trends bi-weekly at two sites along Little Bear Creek (upstream of Blue Jay (LBC1) and at Blue Jay (LBC2)) and two additional tributaries entering Lake Arrowhead; Willow Creek and Orchard Creek. Testing has been conducted in both dry and precipitation events in situ since September 2019 to present for dissolved oxygen, turbidity, nitrate (NO₃-), ammonium (NH₄+), conductivity, pH, temperature, stream flow on a bi-weekly basis with additional lab-based testing for E. coli, total coliform and enterococcus on a monthly basis.

Observations include that episodic spikes in nutrients (NH₄+ and NO₃-) as well as bacteria are currently present in Little Bear Creek, as well as the other sites entering Lake Arrowhead. Collectively these trends indicate that there are already activities on the landscape related to transportation, tourism, infrastructure (i.e. septic and sewer) and impervious surfaces that are adversely impacting surface water resources in perennial streams entering Lake Arrowhead. More specifically, data to date indicates that LBC1 has exceeded regulatory standards 36% of the sampling periods for NH₄+, 63% for NO₃-, 20% for total coliform, 40% for E. coli and 67% for enterococcus. The second site, LBC2, has exceeded regulatory standards for 70% of the sampling periods for NH₄+, 40% for NO₃-, 50% for total coliform, 17% for E. coli and 50% for enterococcus with many of the exceedances occurring simultaneously across multiple metrics. These trends continue to contribute to algal blooms and, if not mitigated, could result in the harmful algal blooms associated with cyanobacteria (blue-green algal blooms) as experienced by Lakes Gregory and Silverwood. Such conditions impact the social, economic and environmental quality of all mountain communities since many of the communities are financially dependent on tourist activities year-round as well as public health and safety, especially as they related to recreational waters.

I would also like to share that recent field research also assessed water quality in the BMPs at SkyPark that were required as part of their CUP permitting process. Trends indicate that while the BMPs were effective in reducing some turbidity, they were ineffective in reducing nutrient loads to Hooks Creek. Consequently, the BMPs ability to effectively mitigate headwater impacts from stormwater flowing over impervious surfaces declined over time.

This is an important finding when considering if the BMPs proposed by the COTW will mitigate impacts related to the proposed development because not only will the excavation of a substantial amount of soil and removal of vegetation create changes to groundwater flows

needed to sustain both water quality and quantity entering Lake Arrowhead year-round, it will simultaneously impact surface hydrology. The proposed BMPs have also not been proven, empirically, under similar site and climatic conditions, that they are/can be effective in mitigating downstream impacts in the short or long term. Additionally, it is highly likely, based on numerous peer-reviewed studies and assessments by hydrologists and biological engineers, that the county's proposed, and now approved, stormwater project entering Little Bear Creek will impact water quality as indicated in over 30 years of academic research based on real-world assessments of BMP effectiveness. Simply put, any alterations to the natural landscape create some degree of adverse impacts to downstream water resources.

Given the already approved stormwater project flowing into Little Bear Creek, it does not seem reasonable based on the implementation of verified scientific research methods in this creek system, even comparing it to other, less developed tributaries, that the COTW project will benefit the community across social, economic and environmental metrics because the location, landscape and hydrological alterations of the proposed COTW project, by design, will create adverse impacts to water resources that characterize the mountain communities.

I hope and trust that your backgrounds and commitment to public health and safety will alert you to the danger in setting such precedent, not only in the communities located in a National Forest highly depended on tourism based on natural settings and pristine outdoor quality to support summer and winter activities, but how such decisions can impact communities across San Bernardino County including where you live and or work. Supporting a poorly design project largely based on site location and no inclusion of a comprehensive hydrologic assessments that goes beyond a "one size fits all" approach to stormwater management will allow 1.5% (i.e. the 350 members of the COTW congregation) to impact 98.5% of residents across three mountain communities directly now and for generations to come.

To illustrate the scientific findings related to current water quality, I have attached a presentation of my research findings and would welcome the opportunity to discuss ways to support healthy watershed initiatives using natural resource conservation while also supporting innovative design that benefits all community members and visitors alike.

I welcome an open dialogue and hope that you will fully consider the existing, scientifically verified, realities of the adverse water quality conditions already present in this community prior to the approval and potential development of the COTW project.

Please feel free to reach out to me to discuss this further.

Sincerely,

Jennifer B. Alford
(910) 547-4245
Jennifer.alford@csusb.edu

Jennifer B. Alford, PhD
Assistant Professor
Faculty Associate, CSUSB Office of Community Engagement
Co-Chair, Resilient CSUSB Sustainability Taskforce

Department of Geography and Environmental Studies
CSU San Bernardino
jennifer.alford@csusb.edu

Lake Arrowhead Area Tributary Trends

Jennifer B. Alford

Assistant Professor

CSUSB Geography and Environmental Studies

Study Sites

Sampling Locations

Little Bear Creek 1 (LBC1) -
Upstream from Blue Jay Business
District

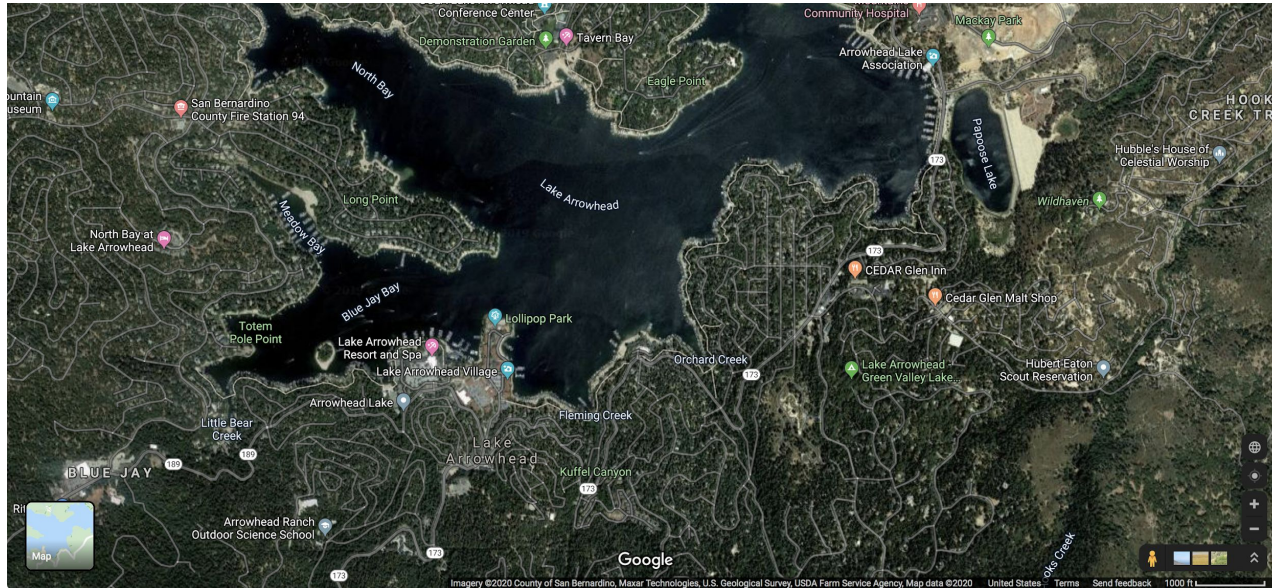
Little Bear Creek 2 (LBC2) -
Across from Jensens - prior to
entering Lake Arrowhead

Willow Creek (WC1) - Beach
Club/ Lake Arrowhead Resort.

Orchard Creek (OC) - Southwest
of Cedar Glen.

Sampling typically bi-weekly
unless unsafe conditions
September 2019 - Present

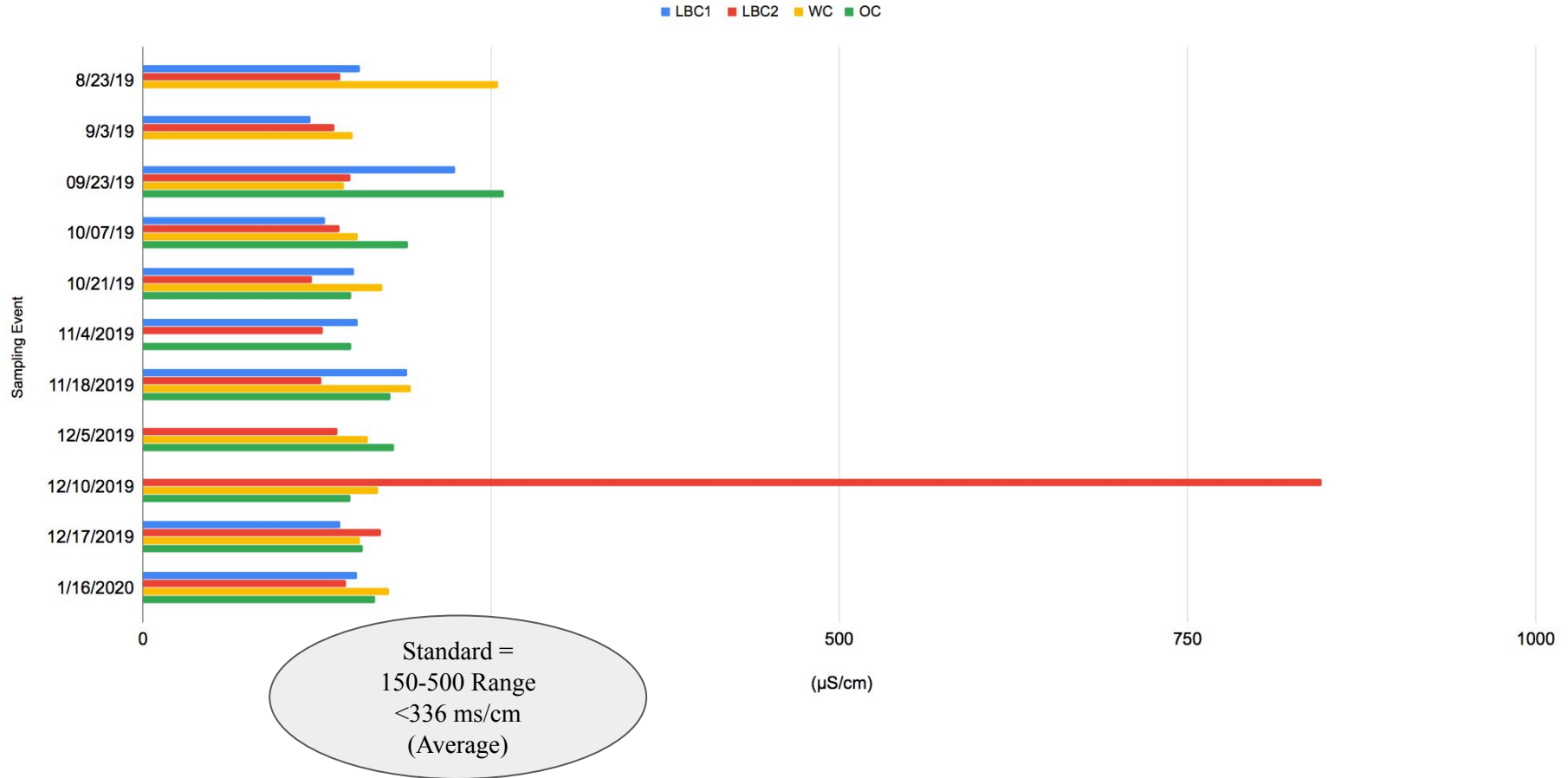
Capturing Dry and Wet
(stormflow/snowmelt) events



Federal, State & Regional Regulatory Standards

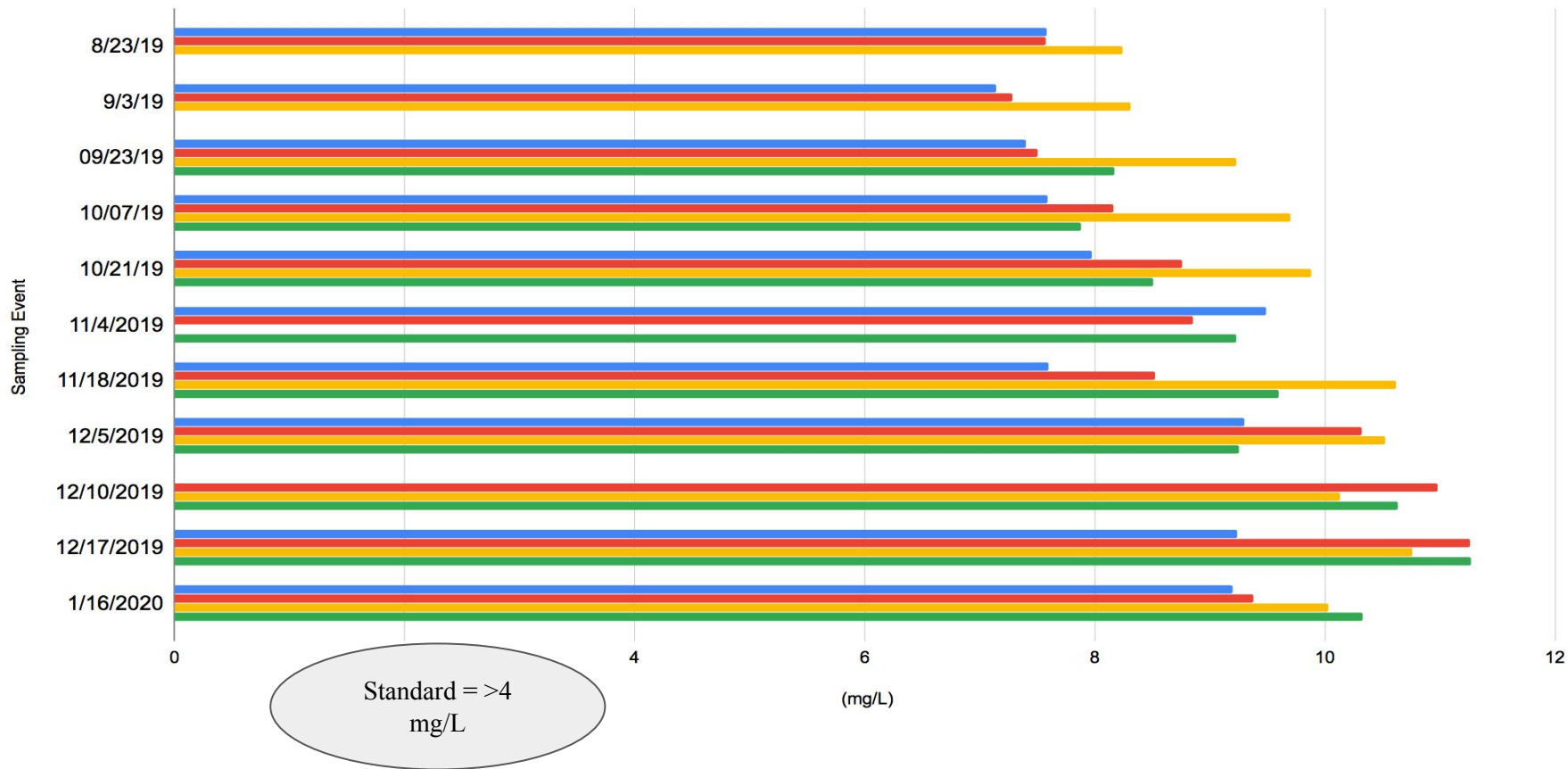
Water Quality Metric	Standard	Source
Temperature (C)	< 25C	CA State Water Board
Dissolved Oxygen (DO) (mg/L)	>4 mg/L	CA State Water Board, Lahontan Region
pH	6.5-8.5	CA State Water Board, Lahontan Region
Turbidity (NTU)	<100 NTU	CA State Water Board (Fact Sheet)
Conductivity (uS/cm)	150-500 Range <336 ms/cm (Average)	EPA (Range) CA State Water Board (Average)
Nitrate (NO ₃ -) (mg/L)	0.8-2.5 mg/L	San Bernardino Mountains Hooks Creek Objectives
Ammonium (NH ₄ ⁺) (mg/L)	0.02-0.4 mg/L	EPA Aquatic Life Criteria
Total Coliform (TC) (cfu/100mL)	1,000 cfu/100mL	CA State Water Board Objectives
e. Coli (cfu/100mL)	<126 cfu/100mL	EPA Recreational Standards
Enterococcus (cfu/100mL)	<35 cfu/100mL	EPA Recreational Standards

Conductivity ($\mu\text{S}/\text{cm}$) Trends

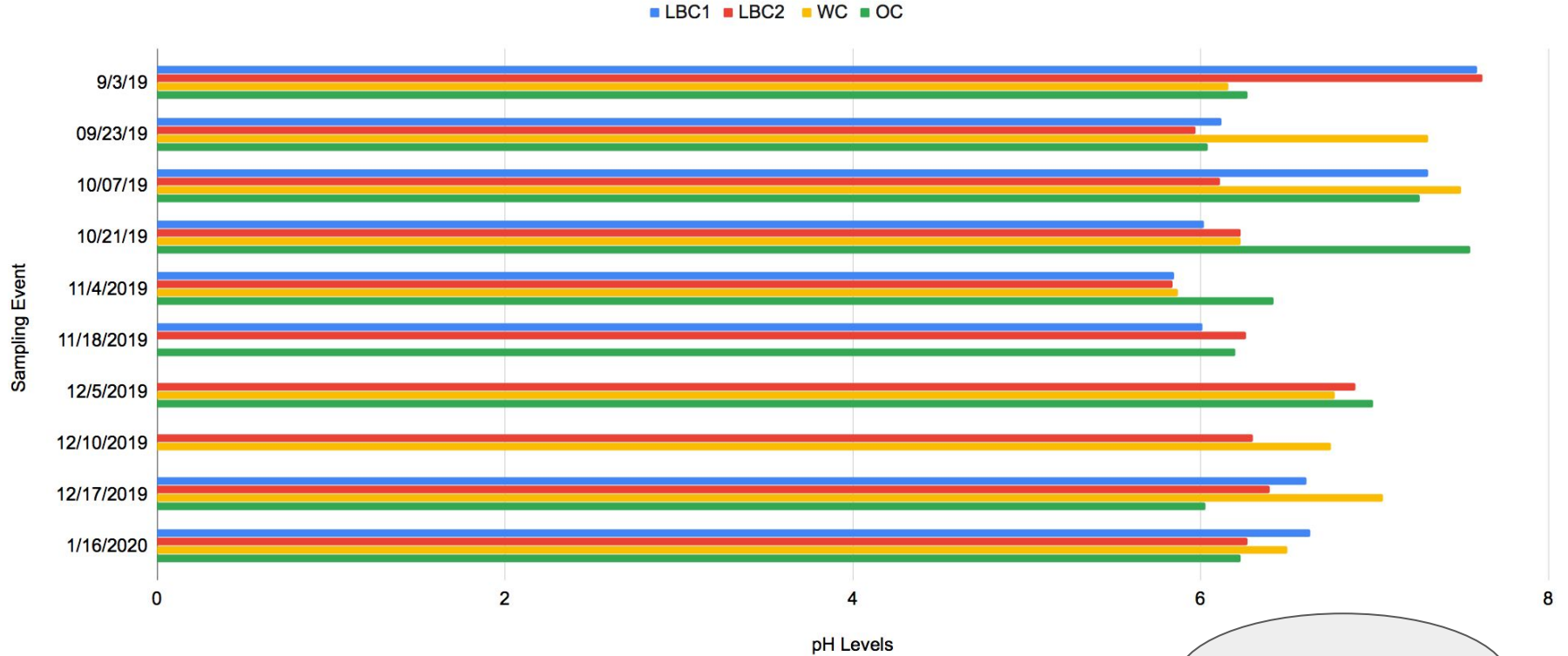


Dissolved Oxygen (DO) (mg/L) Trends

■ LBC1 DO ■ LBC2 ■ WC ■ OC

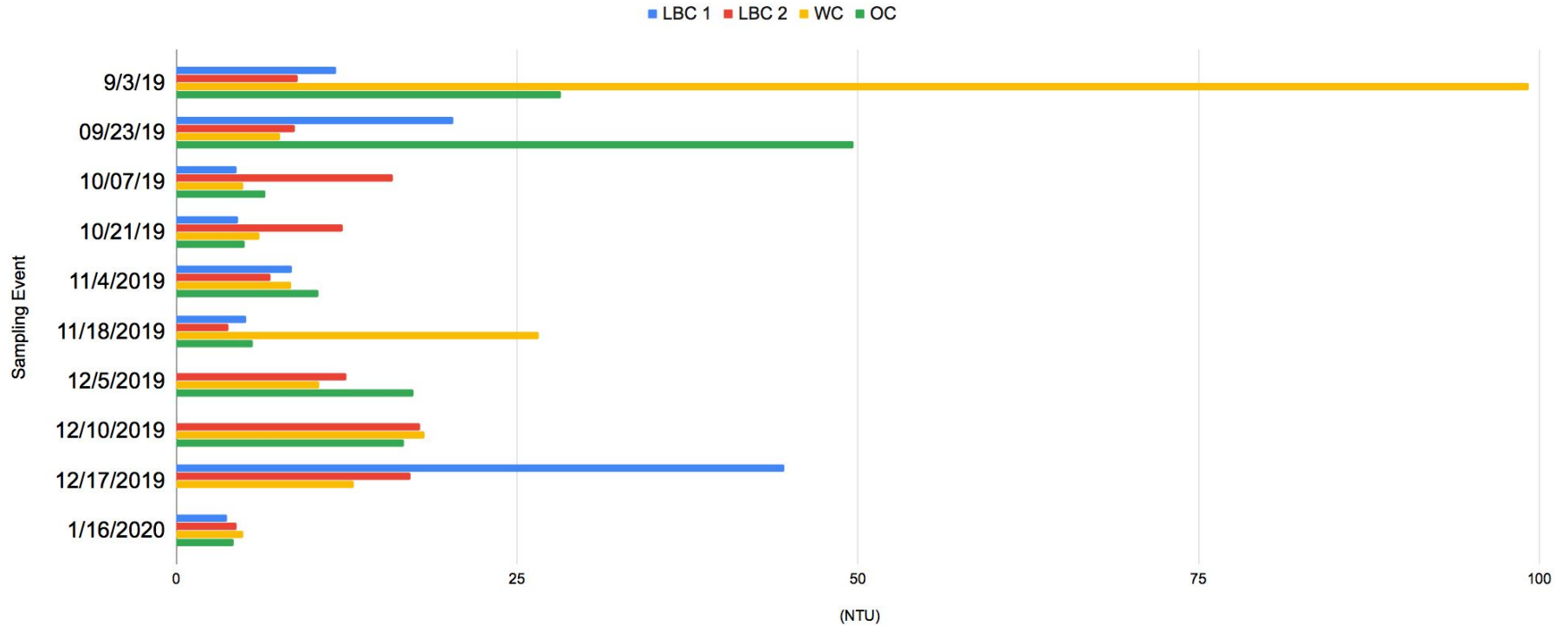


pH Trends



Standard = 6.5-8.5

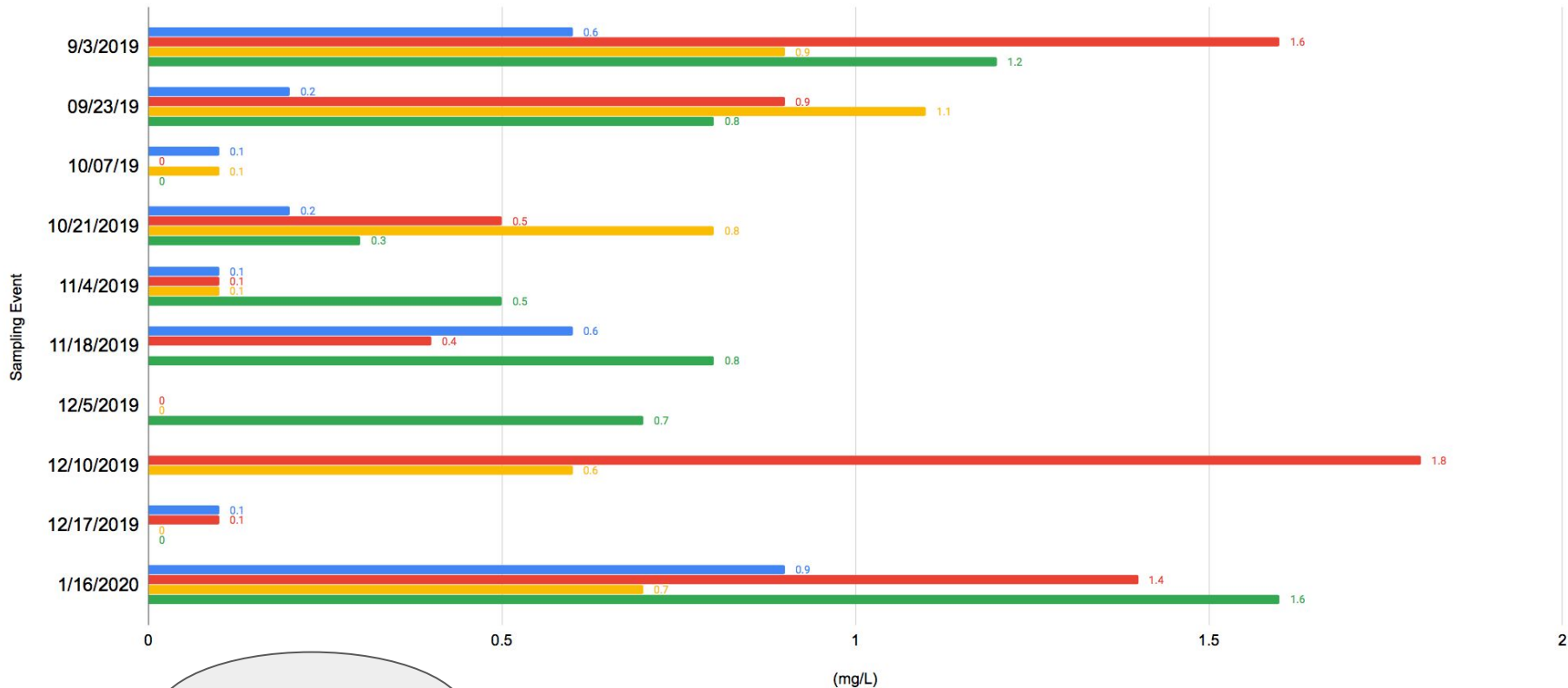
Turbidity (NTU) Trends



Standard = <100
NTU

Ammonium (NH4+) Trends

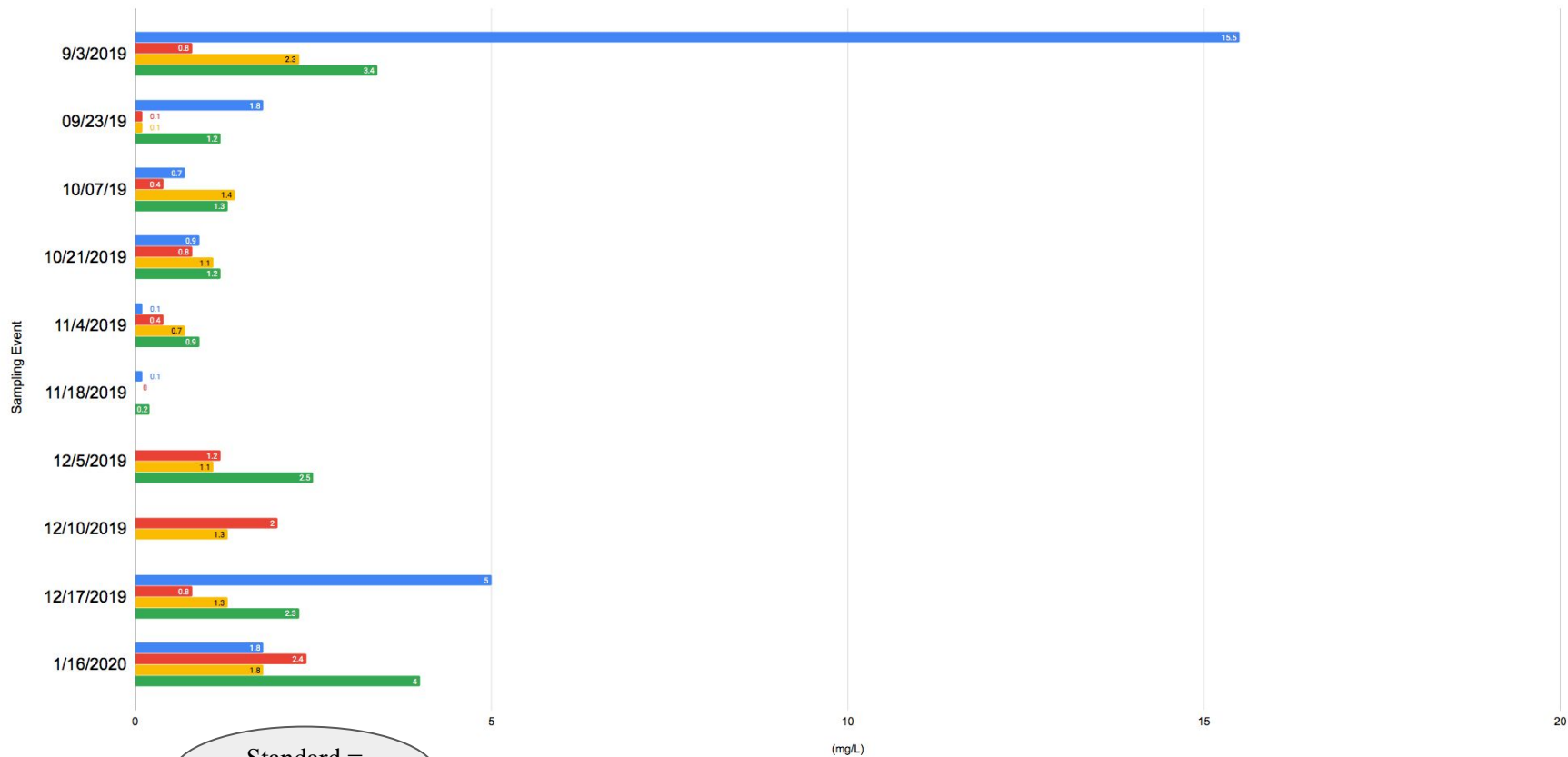
■ LBC 1 ■ LBC 2 ■ WC ■ OC



Standard =
0.02-0.4 mg/L

Nitrate (NO3) Trends

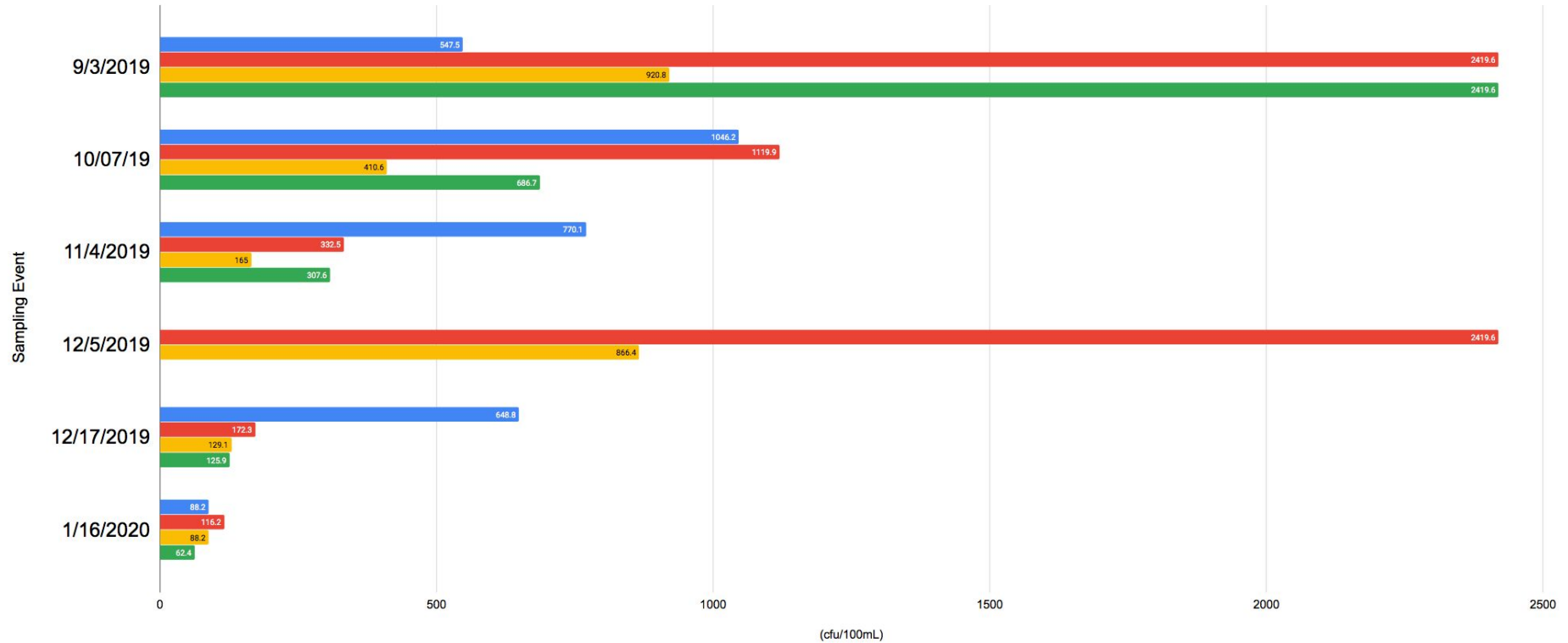
LBC 1 LBC 2 WC OC



Standard =
0.8-2.5 mg/L

Total Coliform (TC) Trends

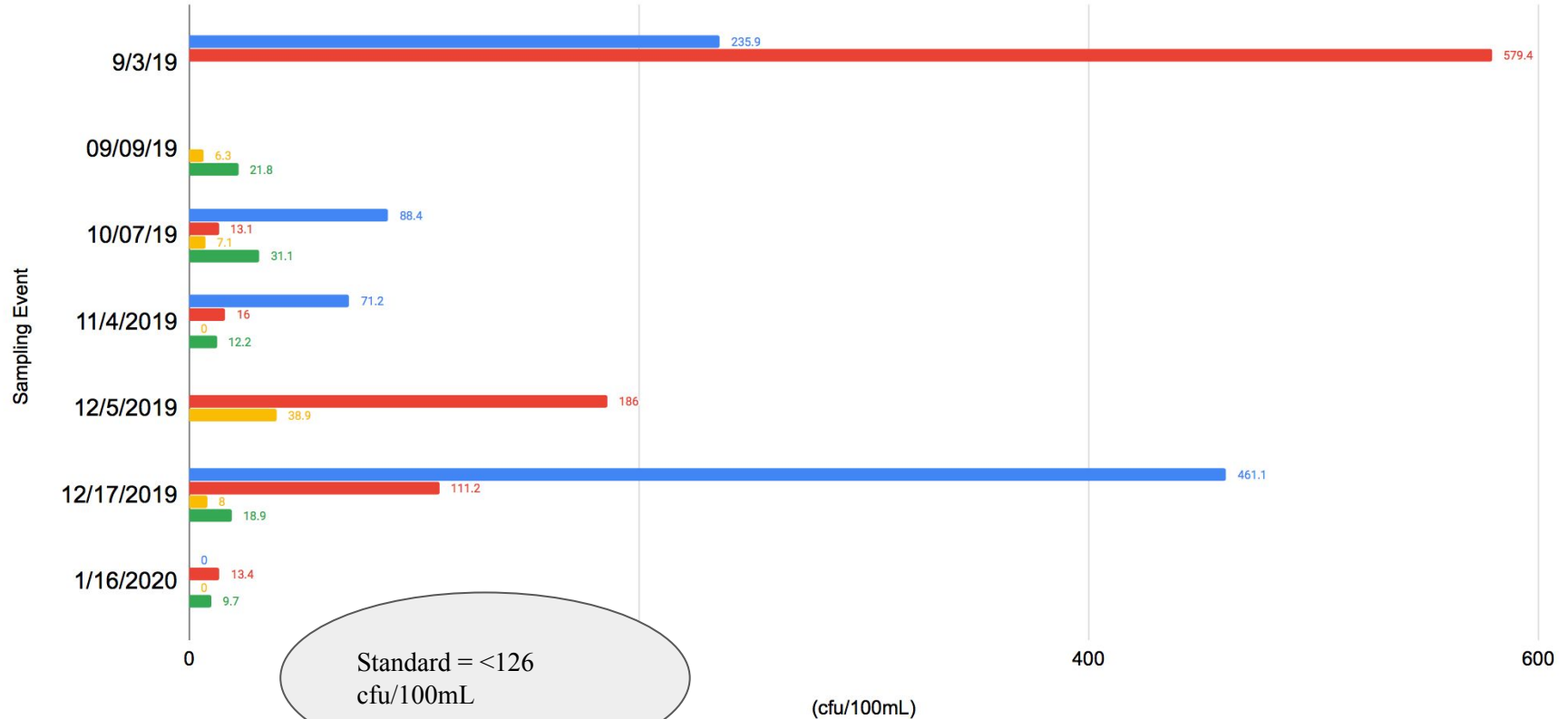
■ LBC 1 ■ LBC 2 ■ WC ■ OC



EPA Standard =
<1,000 cfu/100mL

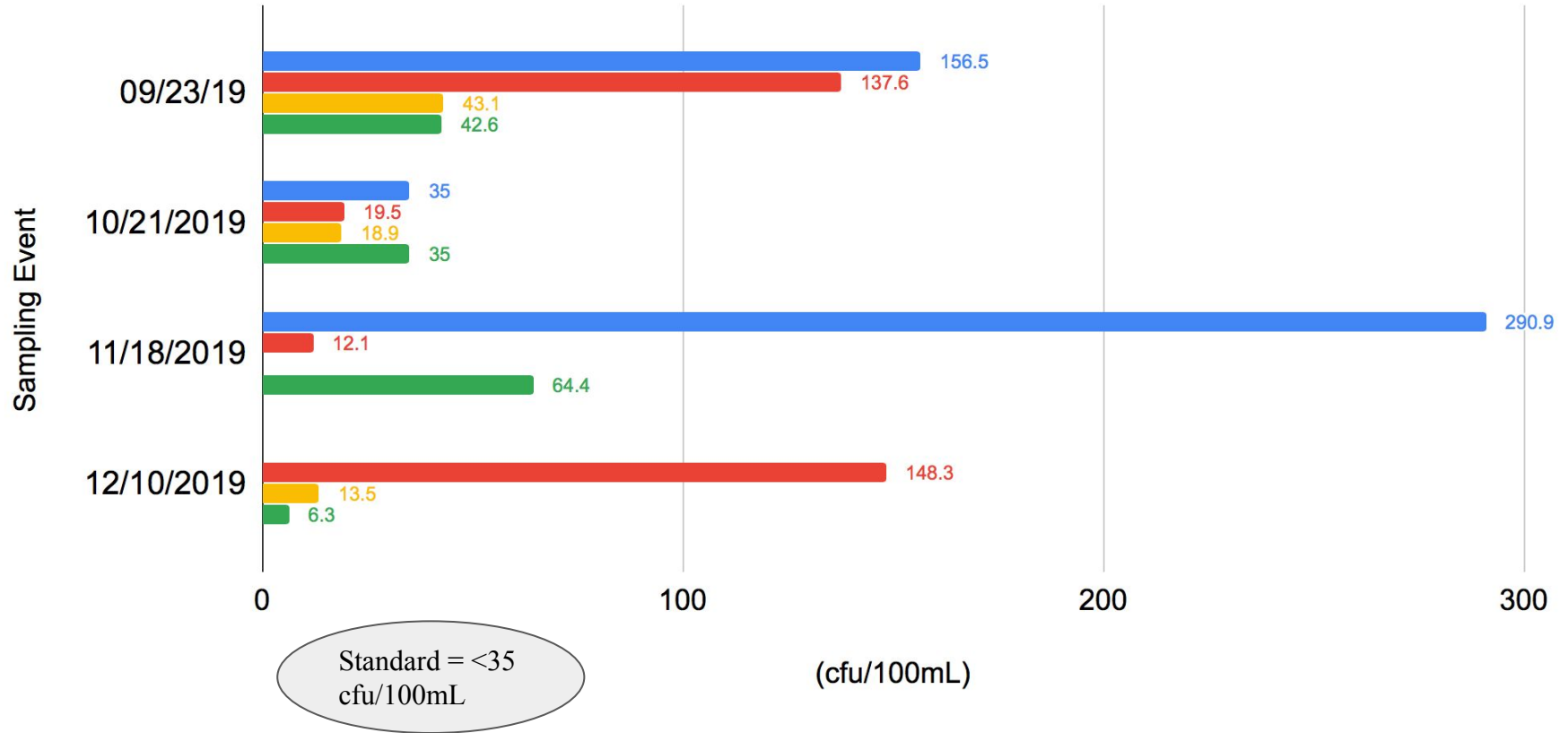
E. coli (cfu/100mL) Trends

LBC1 LBC2 WC OC



Enterococcus Trends

■ LBC 1 ■ LBC 2 ■ WC ■ OC





Eroded properties along Little Bear Creek (1/17/2020).



Subsurface algal present in Lake Arrowhead at Village suggests excessive nutrients and bacteria (1/17/2020).

Trends to Date

1. Multiple sampling periods with >1 metric/parameter exceeding regulatory standards.
 - a. Not just Little Bear Creek, but other tributaries = Impacts to Lake Arrowhead Water Quality
2. Spikes associated with precipitation events and during prolonged dry periods.
 - a. Suggests year-round impacts already exists.
3. Bioretention areas require constant management and monitoring to remain effective.
 - a. Widely accepted in literature (30+ years) that BMPs do not improve water quality vs. pre-development instead they mitigate, to a degree, development impacts.
4. Observations at SkyPark CUP NRCS designed BMPs do not suggests water quality improvements related to nutrients.
 - a. Downstream impacts to human health in recreational waterways.
 - b. Both this site and Lake Arrowhead contribute to surface waters in the Mojave Basin posting economic, social and environmental impacts to other communities.
5. High Quality Water Resources Essential to Community Resiliency
 - a. Social, Economic and Environmental Impacts need to be fully considered due to large % of Mountain Communities considered Disadvantaged by CA OEHA and DWR (based on census data)

No evidence from literature that the presence of impervious surfaces improves water quality...

Arnold, Chester J. Jr. and C. James Gibbons (1996). Impervious Surface Coverage: The Emergence of a Key Environmental Indicator. *Journal of the American Planning Association*, 62(2), 243-257.

Booth, Derek B. and C. Rhett Jackson. (1997). Urbanization of Aquatic Systems: Degradation Thresholds, Stormwater Detection, and the Limits of Mitigation. *Journal of the American Water Resources Association*, 33(5), 1077-1090.

Brabec, Elizabeth (2009). Impervious Surfaces and Water Quality: A Review of Current Literature and Its Implications for Watershed Planning. *Journal of Planning Literature*, 16(4), 499-514.

O'Driscoll, Michael, Sandra Clinton, Anne Jefferson, Alex Manda and Sarah McMillan. (2010). Urbanization Effects on Watershed Hydrology and Instream Processes in the Southern United States. *Water*, 2, 605-648.

Schiff, Roy and Gaboury Benoit (2007). Effects of Impervious Cover at Multiple Spatial Scales on Coastal Watershed Streams. *Journal of the American Water Resources Association*, 43(3), 712-730.

Schueler, TR (1994). The Importance of Imperviousness. *Watershed Protection Techniques*, 1(3), 100-111.

Tu, Jun, Zong-Guo Xia; Keith C. Clarke and Allan Frei (2007). Impact of Urban Sprawl on Water Quality in Eastern Massachusetts, USA. *Environmental Management*, 40, 183-200.

Walsh, Christopher J., Allison H. Roy, Jack W. Feminella, Peter D. Cottingham, Peter M. Goffman, and Raymond P. Morgan, II. (2005). The Urban Stream Syndrome: Current Knowledge and the Search for a Cure. *Journal of Benthology Society*, 24(3), 706-723.

From: [Ricardo G](#)
To: [Nieves, Tom](#)
Date: Saturday, January 18, 2020 3:22:20 PM

Church of the Woods proposed project. I vote for a denial of the land use proposed by this project for all the reasons long-term residents have articulated. These are: loss of animal habit, loss of forest, and increased traffic on Hwy 18. Less known is that the Church has increasingly lost congregation in this area over the years and now obviously hopes a large grotesque building and grounds will draw locals into the congregation. Your committee's consideration of these facts is appreciated. Ricardo Guajardo
Sent from [Mail](#) for Windows 10

From: [Kate Neiswender](#)
To: [Nieves, Tom](#); [Rahhal, Terri](#); [Duron, Heidi - LUS](#)
Subject: OPPOSITION -- Church of the Woods Project
Date: Monday, January 20, 2020 3:02:35 PM
Attachments: [County-Planning-1-23-20.pdf](#)

Please provide copies to the Planning Commissioners. I am sending the original by mail.
Thanks

Kate Neiswender
Law Office of K.M. Neiswender
PO Box 1225
Blue Jay CA 92317
909.744.9723
cel 805 320-2520

KATE M. NEISWENDER

Phone: 909.744.9723
Cel: 805.320.2520

Post Office Box 1225
Blue Jay, California 92317
email: KateLawVentura@gmail.com

January 20, 2020

To the Members of the Planning Commission
San Bernardino County Government Center
385 N. Arrowhead Ave.
San Bernardino, CA 92415

Sent via Email to Heidi.duron@lus.sbcounty.gov, Tom.nieves@lus.sbcounty.gov,
and Terri.rahhal@lus.sbcounty.gov

Re: Church of the Woods Project – Hearing Date January 23, 2020

To the Honorable Commission:

I am a resident of Lake Arrowhead and strongly oppose the Church of the Woods project. Many others will address the problems with the Final EIR and the CEQA analysis, so I will focus my comments on the inconsistency between the project proposal and the Lake Arrowhead Community Plan and the General Plan.

It is a legal maxim that a project cannot be inconsistent with a jurisdiction's general and specific plans. As the courts say, the "tail cannot wag the dog." The staff report glosses over many important policies in the general and specific plans, and the staff report claims consistency with the few policies it cites. What follows is a more detailed analysis of consistency between planning policies and this poorly thought-out project. This is not a comprehensive list, but highlights the most obvious problems with the County analysis.

Lake Arrowhead Community Plan: Section LA1.3.3 of the Community Plan lists two primary concerns: protection of the environment, and preservation of the community character. This project fails both those tests.

LA/LU 2.6 states:

Industrial land uses shall be located in areas where industrial uses will best serve the needs of the community, and will have a minimum adverse effect upon surrounding property with minimal disturbance to the mountain environment and the total community.

First of all, it should be remembered that Church of the Woods has only 300 members. They want to expand their membership, but where are the new coming from? If they are coming from down the hill (San Bernardino, Redlands, etc.), then the impacts on air quality, greenhouse gas and traffic are severely under-estimated. The Church has asked for 310 parking spaces. If you consider that there are usually 2-4 persons per vehicle, the number of persons expected on any given day is between 600 and 1200 persons. Again, the Church has only 300 members.

If LU 2.6 is followed, the project should serve the “needs of the community.” This is clearly going to be marketed as a convention site, not to serve the needs of the mountain communities, but rather to serve whomever can pay for the site as a convention location. According to press reports, the Church has already spent a million dollars on this project. Spread amongst its 300 members, that means each and every man, woman and child has invested more than \$3,300.00 on this project. Once construction has been completed, the 300 members of the Church will have to spend \$10,000.00 each on what is supposed to be a “community serving” use.

The numbers do not add up. This is a convention center, and is not aimed at serving the mountain communities. It is therefore a violation of LU 2.6.

Further, LU 2.6 requires a project such as this would “have a minimum adverse effect upon surrounding property with minimal disturbance to the mountain environment and the total community.” This project will cut off a ridge to fill a riparian habitat and destroy habitat for multiple endangered species and species of special concern. Almost 17 acres will be leveled, wiped clean of all native vegetation. Trees estimated to be hundreds of years old will be destroyed. A Dogwood community – not even identified in the EIR – will be destroyed. The run-off from the site will contaminate the creeks that lead into Lake Arrowhead, which is the primary drinking water for the mountain communities. The erosion alone will cause severe problems (a letter on this point is being presented from an expert in water quality). Even so, Goal LA/CO 4 requires a project “Enhance and maintain the quality of water from Lake Arrowhead and Grass Valley Lake, their tributaries and underground water supplies.” There are no provisions in the project description that would achieve this goal.

The mandates of LU 2.6 have simply been ignored by the staff report. You cannot, as a matter of law, make the findings necessary to approve the Conditional Use Permit, as the CUP requires you to find that the project is not in conflict with the governing land use plans.

The Conservation Element lists multiple policies and goals that are being violated by the Church of the Woods project.

LA/CO 1.1 states that three areas are to be recognized as important open space areas that provide for wildlife movement and other important linkage values. Projects shall be designed to minimize impacts to these corridors. Included is the Strawberry Creek Wildlife Corridor and the “Dispersion Corridor” between Lake Arrowhead and Running Springs. Both will be adversely impacted by the project before you. By way of example, the project plans multiple walls and fences, some only six feet high, others much higher. Those walls and fences will interfere with the use of the project site as a wildlife corridor. LA/CO 1.4 requires an applicant to work with federal and state agencies to protect significant wildlife corridors, but the project site cuts the wildlife corridors off and will harm the habitat.

Goal LA/CO 2 requires this Commission “Maintain the health and vigor of the forest environment. As noted, this project will scrape clean 17 acres of healthy and vital forest, plus fill in a riparian area – and that area is part of the wildlife corridor in question.

LA/CO 2.3 requires the re-vegetation of any graded surface with suitable native drought and fire resistant planting to minimize erosion. There is no requirement that the project will be re-vegetated with native plants. Nor is there a requirement to protect larger and older trees and tree communities. LA/CO 2.4 requires this Commission to establish a parking provision for the purpose of saving healthy trees in parking areas by giving parking credit for areas containing specimen trees. That did not occur in this project.

One of the biggest problems with the Church of the Woods project is the destruction of the riparian corridor on the site, filling it in by grading a ridgeline. The Lake Arrowhead Community Plan's Goal LA/CO 3 requires this Commission to "Protect streambeds and creeks from encroachment or development that detracts from their beauty." There is no provision in the CUP that would protect the streambed that runs through this site. There is no consideration of the Regional Water Quality Control Board or California Department of Fish & Wildlife regulations to protect the streambed. There is no analysis as to how the project could be modified to limit impacts to the riparian area that cross the project site.

LA/CO 3.2 requires "naturalistic drainage improvements" where modifications to the natural streamway are required. LA/CO 3.4 states that streams shall not be placed in underground structures in any Commercial or public land use district or zone. It would appear from the EIR that this policy is being violated without any explanation or mitigation. The same holds true for LA/CO 4.2, which requires this Commission to enforce grading and landscaping standards to reduce soil erosion. The only mitigation for the destruction of the streambed is a reference to future permitting from state and local agencies. Even the amount of mitigation is not discussed, saying that all that will be left to some future permitting process.

CEQA requires that mitigation be definite. The courts will not defer to this County's determination that mitigation measures will be effective when the efficacy of those measures are not apparent. Here, the efficacy of the future to-be-determined permitting by other agencies is not apparent and is not even known. Further, the agencies may well require modification of the project as a whole. If a mitigation measure is so undefined – as here – that it is impossible to gauge the effectiveness of the measure, the courts will void such measures. A mitigation measure is only sufficient if it identifies the methods used to mitigate the impact and sets out standards that the agency commits to meet. Neither of those elements is present here. The specific performance standard must be stated.

With the CEQA analysis so poor, and the mitigation measures so uncertain, it is not possible for this project to meet the goals and policies identified above. Thus, there is a conflict between the Lake Arrowhead Community Plan and the project before you. This conflict cannot be waived, and you cannot – as a matter of law – make findings that are in conflict with the Community Plan.

The County General Plan: As does the Lake Arrowhead Community Plan, the County's General Plan demands preservation of environmentally sensitive land uses.

“LU 7.2 Enact and enforce regulations that will limit development in environmentally sensitive areas, such as those adjacent to river or streamside areas, and hazardous areas, such as flood plains, steep slopes, high fire risk areas, and geologically hazardous areas.”

LU 7.2 should be read in conjunction with the Community Plan, especially those provisions that require protections of the creeks that lead into Lake Arrowhead for water quality purposes.

M/LU 1.6 requires this Commission consider whether the density and character of development will “detract from the beauty, character and quality of the residential alpine environment.” Multiple commentators on this project have stated that the clear-cutting of the 17 forested acres will damage the “character and quality” of this area, and will detract from its beauty. The removal of a ridgeline to fill the streambed that cross the property is also an issue under this policy.

As noted above, these are only a few of the conflicts that I found between the project and the County’s land use plans. I urge you to deny this project. It is too large for the location. It requires extreme grading – 250,000 cubic yards – and will cause erosion and subsequent damage to the watershed. It will impact endangered and special status species, all in violation of the goals and policies of the Community and General Plans.

Please deny this project.

Sincerely,

*Original to follow by mail
Signed electronically to
expedite delivery*

Kate M. Neiswender

From: [Mickey Laws](#)
To: [Rahhal, Terri](#); [Duron, Heidi - LUS](#); [Nieves, Tom](#)
Subject: public comment on Church of the Woods
Date: Tuesday, January 21, 2020 10:51:38 AM
Attachments: [COW final letter 1 18 2020.docx](#)

The attached letter below is not contain my hand written signature. I have sent letters on this issue with my signature via the postal service in the past. If you need my signature again, please let me know. I can scan it & resend if necessary. Or, I'm coming down today anyway, so I could drop it off in person.

Thank you,

Michele Laws

County of San Bernardino
Land Use Services Dept.
Dept Head, Terri Rahhal, Project Mng, Heidi Duron,
Tom Nieves, Planner
385 N. Arrowhead Ave. (1st Floor)
San Bernardino, CA 92415

Jan.18, 2020

Department Members,

I am writing in opposition to the Draft Revision of the Church of the Woods final EIR. Although there are several changes to the original, it is still in violation of a number of past documents and declarations of government and community agencies, i.e., the Arrowhead Community Plan, most of which was adopted by the county as a guide for future development, and the designation of a 10 mile portion of Highway 18 as a Scenic Byway by the US Forest Service.

A major change is now the 10 acre parcel purchased by the county for a flood control project that will be constructed to lie in close proximity and parallel to the back side of a hillside, the top of which is going to be removed and leveled to meet the elevation of the highway. The remaining slope on the backside will be steep, and once the mountain has been disturbed, it will continue to erode, with the material compromising the flood control project.

Engineering calculations & land use studies foresee this outcome. This is yet another reason to not approve this Church of the Woods project. The county's interest in solving a flooding issue will be rendered useless if it's filled with debris. Now it's taxpayer money that's involved for a solution that can't function properly without constant maintenance. That expense will add up over the years. It is not a wise use of taxpayer funds and one which will be looked at unfavorably as the costs accrue.

With the addition of this new county project to the list of existing issues: interruption of wildlife corridor, obliterating habitat of endangered species, noise pollution & tailpipe emissions from increased traffic on Highway 18, traffic congestion due to installation of traffic signals, and general degradation to the topography during construction, i.e., cutting all the trees on the 13.6 acre site, erosion, and water and air quality compromised, **none** of which are addressed in this current plan, I fail to see the merit of this project. It has been downsized, but doesn't ameliorate even **one** of the existing problems it will create if allowed to proceed, and **adds** a problem to the flood control channel that possibly wouldn't occur if they are **prevented** from leveling the mountain to build on a flat surface.

For all these reasons, taken in total, I urge you to deny a permit for this project. This parcel of land is unique with several characteristics that appear together in this location, and **nowhere** else in the mountain community. It contains the headwaters of Little Bear Creek which empties into Lake Arrowhead providing half-2/3rd's of the lake's capacity which is the community's primary water source, a riparian

environment that supports abundant vegetation which feeds the wildlife drawn to this site, including some endangered species. A County-mapped wildlife corridor is also included in this property allowing animal migration up and around to the Strawberry Peak area and back. And, as you leave Rim Forest traveling east on Hwy 18, it is thickly wooded right up to the edge of the highway, but allows a glimpse of a remarkable view to passing vehicles.

All of these unique characteristics along with the Scenic Byway designation are what visitors come up to experience. It's what attracts attention to the communities up here that encourages people to come up to visit once, and then to return and explore when they have more time. We are small communities with small service oriented businesses and a few attractions like the Village and Sky Park for dining, shopping, and sightseeing. But our major attraction up here **IS** the forest environment. The main purpose of the Community Plan was to guide future growth and development and protect sensitive mountain environment. And the county has adopted that plan.

Please do not undo those actions. To do so would not only severely impact the environment, but set a precedent which would threaten our quality of life up here. We depend on a healthy, sustainable, forest. Don't upset the balance that we've managed to establish so far. Don't allow this project to go forward. Deny the project.

Sincerely,

Michele Laws

From: [Shelby Reeder](#)
To: [Nievez, Tom](#); [Supervisor Rutherford](#)
Subject: Re: APN 0336-101-15 Church of the Woods Conditional Use Permit
Date: Monday, January 20, 2020 6:31:36 PM

January 20, 2020

To: San Bernardino County Planning Commission

Supervisor Janice Rutherford

Re: APN 0336-101-15 Church of the Woods Conditional Use Permit

The needs of the few do not outweigh the needs of the many.

I am writing to ask that you reject the conditional use permit for construction of the Church of the Woods religious facility on the grounds that the negative impacts to the environment and the Lake Arrowhead community greatly outweigh the benefits to the 300 people who attend Church of the Woods. Further, the EIR on which your decisions are based is deeply flawed, and is in direct conflict with County and Lake Arrowhead Community plans.

The benefits:

1. The 300 member congregation of Church of the Woods enjoys a new building, meeting rooms, and recreational facilities. Note that while marketing materials distributed by Church of the Woods implies that the facilities will be open to the public, this is highly unlikely, as the design shows that the area is fenced and gated, use of the facilities is restricted and must be approved in advance by Church of the Woods.

Negative Impacts and EIR Flaws and Omissions:

1. Increased Traffic: The multi-year construction process that includes diesel trucks and vehicles hauling dirt and debris from the construction site will slow traffic from the construction site to Heaps Peak, and, once completed, traffic will increase from the events expected to be held on the site. The Church of the Woods complex is approved for 310 parking spaces, and there has been discussion that the Church has requested an additional 200 spaces. (Their proposed events building seats 600). **The EIR did not address traffic impacts of 500 cars, nor did it address traffic impacts on weekdays.**

a. Increased traffic from cars and trucks means increased emissions and decreased air quality in an area that receives an F from the American Lung Association for ozone levels and particle pollution.[1]

b. The six proposed stoplights in an area spanning approximately 2 miles will increase congestion and slow traffic flow.

c. Heavy fog in Rim Forest will eventually require additional lighting, such as yellow flashing safety lights, increasing costs not included in the EIR.

d. Increased traffic will lead to increased traffic accidents in what is already a dangerous stretch of road due to inclement weather, lack of visibility, and the challenges of negotiating mountain roads, particularly for those unfamiliar with the area.

2. Fire Danger: The proposed project has only one entrance/exit and is surrounded on three sides by forest. A forest fire in the area could be disastrous to those in attendance at the facility, as well as those attempting to evacuate on Highway 18, as the increased congestion caused by an additional 300 – 500

vehicles exiting the facility at one time could trap people in the area.

3. Environmental Impacts: The building site disrupts an important wildlife corridor and increases habitat fragmentation; Riparian areas not properly identified in the EIR will be filled in with dirt, concrete and asphalt; the water quality in Little Bear Creek is further compromised by runoff from asphalt, pesticides and fertilizer used on the grounds; impacts to threatened and endangered species are ignored. Many of these negative impacts are summarily dismissed as “significant and unavoidable” when in reality, these impacts are easily avoided. DO NOT APPROVE THE PROJECT, AND THE NEGATIVE IMPACTS ARE AVOIDED.

The Church of the Woods Facility is not just another strip mall in an urban environment; this project fundamentally and permanently alters the character of the land by removing 14 acres of forest, leveling a hillside, filling in a valley/riparian area and paving over the whole thing with “improvements” – a church, meeting space, and recreation areas, all of which are already available in the area and are open to *all residents* to enjoy.

The needs of the few do not outweigh the needs of the many. Do not kick that can down the road and approve the project with the expectation that the courts will decide the outcome; doing so does not absolve you of your responsibility as county planners, and places an undue financial burden to those who must shoulder the cost of ensuring that national, county, and community plans and policies are met.

I ask that the Planning Commission and County Supervisor carefully consider the negative impacts of this project, and reject this project that does irreparable harm to the environment and negatively impacts the quality of life in Rim Forest, Blue Jay, Lake Arrowhead, and surrounding mountain communities.

“Where conflicting interests must be reconciled, the question shall always be answered from the standpoint of the greatest good of the greatest number in the long run.” Gifford Pinchot

Respectfully,

Shelby Reeder

Twin Peaks, California

[1] American Lung Association 2019 Rankings <https://www.lung.org/our-initiatives/healthy-air/sota/city-rankings/states/california/san-bernardino.html>

From: [Sarah Lemler](#)
To: [Nieves, Tom](#)
Subject: Re: Church of the Woods
Date: Saturday, January 18, 2020 1:55:19 PM
Attachments: [image001.png](#)

Mr. Nieves,

Thank you for your prompt response in returning my call the other day about the Church of the Woods Project (Project # P201700270) in Rimforest, CA. I have many concerns about this project and how it will effect my community as well as the surrounding communities, and the wildlife and forest itself. I voiced my concerns about the environmental impacts of this project the last time it came up for approval and after viewing the final EIN sent to me by the County of San Bernardino along with the Notice of Hearing, my worries were not assuaged. Upon viewing the EIN, I do not believe that the Church of the Woods has sufficiently addressed the environmental issues presented by the creek that would need to accounted for to prevent flooding of the surrounding areas, nor do I think it adequately accounts for the displacement of wildlife that would be caused by leveling such a large area of forested hillside.

Another concern that the EIN has brought to my attention is the traffic impact that could cripple mountain travel up and down State Highway 18 during peak hours for the church, which the traffic study included showed to be on Saturdays and Sundays which are also peak travel times for tourists. I question whether the addition of street lights would relieve this problem or just create a bottleneck effect that makes traffic move slower (albeit safer) as the light at the corner of State Highway 18 and Lake Gregory Drive does during peak tourist hours in Crestline.

I am further concerned about how a large building project like this would effect all mountain residents for the benefit of such a small portion of our community. Widening State Highway 18 for the benefit of this church would be a huge undertaking that would impact or negate resident street parking through a corridor of the town where many houses do not have off street parking and could also impact or delete parking for all of the businesses along State Highway 18, across the street from the proposed project site. The proposed project rendering are also not in keeping with the aesthetic of mountain communities and this project would forever change the look and landscape of a community that has long been known for it's rustic and scenic beauty.

Church of the Woods have stated that the completion of this project would benefit the whole community and not just their congregation as the facilities would be open to all, but I have not seen anyone outside of the congregation express any interest in doing so if this project commences. In fact, quite the contrary seems to be true as many people who live in the area seem to have the same concerns that I do and are opposed to this project.

Thank you for your time,

Sarah Lemler
(909) 528-0051
22947 Cedar Way / P.O. Box 6286
Crestline, CA 92325
maddasahatter@yahoo.com

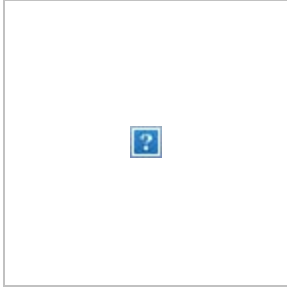
On Thursday, January 16, 2020, 03:58:39 PM PST, Nieves, Tom <tom.nieves@lus.sbcounty.gov> wrote:

Sarah,

Feel free to send your comments and concerns to me and I will get them to the Planning Commissioners.
Thanks.

Tom Nieves

Contract Planner
Land Use Services Department
Phone: [909-387-5036](tel:909-387-5036)
Fax: [909-387-3223](tel:909-387-3223)
[385 N. Arrowhead Avenue](#)
[San Bernardino, CA 92415](#)



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Save Our Forest Association, Inc.

Post Office Box 126 • Rim Forest, California 92378

20 January 2020

Mr. Raymond J. Allard
Planning Commissioner 2nd District
385 No. Arrowhead Avenue
San Bernardino, CA 92415

Sub: Church of the Woods Proposed Development, Project #P201700270
Planning Commission Public Hearing 23 January 2020.

Dear Mr. Allard,

Thank you for the opportunity to address the Planning Commission regarding the Certification of the Final EIR and consideration of its compliance with the California Environmental Quality Act. The following comments are submitted on behalf of the Save Our Forest Association, Inc. (SOFA), which since 1989 has focused on preserving the mountain quality of life in the San Bernardino Mountains. Our non-profit grass roots environmental organization has collaborated with Federal, State, County, and Local Agencies on land use actions impacting community residents and the natural environment throughout the San Bernardino Mountains.

Since the inception of this project in 2003, SOFA has participated in the review of all project proposals, environmental documentation, met with Church of the Woods and County representatives, and submitted comments on numerous EIR's while providing community updates when new information has been provided by the County Planning Department.

Our careful review of the Final EIR, released on January 10, 2020, leads us to the conclusion that it fails to comply with the requirements of the California Environmental Quality Act (CEQA) and also the County of San Bernardino General Plan, specifically the Lake Arrowhead Community Plan (LACP), adopted by the County Board of Supervisors on March 13, 2007. Our letter of February 24, 2019, is by this reference incorporated herein in its entirety.

The Phase 1 Scoping of the 2006 General Plan updated recommended that the community plan program be reinstated to help fulfill the need for development guidance of certain unique communities within the County. Twenty five individuals

in the Lake Arrowhead Community worked with County consultants for approximately two years to develop an updated community plan in conjunction with Phase II of the San Bernardino County General Plan update. The following comments are focused on the violations of the policies of the LACP by the proposed development either directly by statements in the Final EIR or in spirit by subverting the intent of the LACP.

The primary purpose of the Lake Arrowhead Community Plan is to guide the future use and development of land within the Lake Arrowhead Community Plan area in a manner that preserves the character and independent identity of the individual communities within the area. In public workshops, held to develop the General Plan and the Lake Arrowhead Community Plan, the public has identified the following principle planning issues and concerns to be addressed in the plan:

- A. A community in a forest - the natural environment prevails.
- B. Ensure no conflict in the interface between the natural forest and adjacent land uses.
- C. Conservation of natural resources and scenic beauty.

The public involved in developing the LACP has identified the following issues and concerns to be reflected and addressed in the community plan:

- A. Acknowledge service and infrastructure capacity and limitations of the area, particularly roads and water, to serve future development.
- B. Protect and preserve the rural mountain character of the community by maintaining primarily low-density residential development and compatible commercial development.
- C. Maintain the value of community's scenic and natural resources, including Lake Arrowhead, which are the foundation of the community character and quality of life.

SOFA is providing with this letter a copy of the LACP, adopted March 13, 2007, to each Planning Commissioner, identifying the specific policies that have been violated, or ignored, in this development proposal.

LACP Section 2. Land Use. With the continuing growth in many of the county's rural areas, the importance of protecting valuable natural resources, habitats and preserving the rural character of these unique areas has become increasingly important. Goal LA/LU 1. Retain the existing resort-oriented mountain character of the community.

Violation of Policies LA/LU 1.1; LA/LU 1.2; LA/LU 1.3.

Goal LA/LU 2. Ensure that commercial and industrial development is compatible with the forest and mountain character and meets the needs of local residents and visitors. Violation of Policies LA/LU 2.2; LA/LU 2.5; LA/LU 2.6.

LACP Section 3. Circulation and Infrastructure. The impact of land development on services must be managed to ensure a balance between providing for sustainable population growth, preserving the character of the community and protecting public health and safety. Goal LA/C1 1. Ensure a safe and effective transportation system that provides adequate traffic movement while preserving the mountain character of the community. Violation of Policies LA/C1 1.1; LA/C1 1.3; LA/C1 1.5; LA/C1 1.6; LA/C1 1.7; LA/C1 1.8; LA/C1 1.12; LA/C1 1.13.

Goal LA/C1 3. Protect the designed vehicular capacity of all mountain roads.

Violation of Policies LA/C1 3.3.

Goal LA/C1 4. Promote alternative modes of transportation.

Violation of Policies LA/C1 4.2.

Goal LA/C1 6. Encourage and promote water conservation.

Violation of Policies LA/C1 6.4; LA/C1 6.6.

Goal LA/C1 7. Ensure that infrastructure improvements are visually and physically compatible with the natural environment and mountain character of the community.

Violation of Policies LA/C1 7.1.

LACP Section 5. Conservation. Preservation and protection of the community plan area's natural and historic resources is extremely important to the residents of Lake Arrowhead. If the plan area's sensitive resources are not effectively protected and managed, they will be permanently lost.

Goal LA/CO 1. Preserve the unique environmental features of Lake Arrowhead, including native wildlife, vegetation and scenic vistas.

Violation of Policies LA/CO 1.1; LA/CO 1.2; LA/CO 1.4.

Goal LA/CO 2. Maintain the health and vigor of the forest environment.

Violation of Policies LA/CO 2.4; LA/CO 2.5.

Goal LA/CO 3. Protect streambeds and creeks from encroachment or development that detracts from their beauty.

Violation of Policies LA/CO 3.3; LA/CO 3.4.

LACP Section 6. Open Space. The area's natural features including lakes, streams, vegetation, wildlife, topography and rock formations are regional assets that are highly valued by residents of the area and by visitors.

Goal LA/OS 1. Ensure the preservation and proper management of National Forest lands within the Lake Arrowhead Community Plan Area.

Violation of Policies LA/OS 1.1; LA/OS 1.2.

Goal LA/OS 3. Establish a community wide trail system.

Violation of Policies LA/OS 3.4.

Goal LA/OS 4. Improve and preserve open space corridors throughout the plan area.

Violation of Policies LA/OS 4.2.

LACP Section 8. Safety. Fire protection and emergency services are among the most crucial of community needs.

Goal LA/S 2. Ensure that emergency evacuation routes will adequately evacuate all residents and visitors in the event of a natural disaster.

Violation of Policies LA/S 2.1.

LACP Section 9. Economic Development. It will be important to ensure that future development protects and enhances the natural resources, scenic beauty, and alpine character in order to continue to appeal to both residents and visitors.

Goal LA/ED 1. Promote economic development that is compatible with the mountain character of the Lake Arrowhead Community.

Violation of Policies LA/ED 1.2; LA/ED 1.3.

LACP Section 10. Implementation. The overarching goal in the Lake Arrowhead Community Plan is to maintain the character of the community. The most critical of these policies relate to two issues; a) maintaining the existing balance of land uses; and b) ensuring the adequacy of infrastructure and public services to attend to existing and future development.

In summary, the Environmental Impact Report released January 10, 2020, is structurally deficient in its analyses and legally inadequate with gross violations of the community developed Lake Arrowhead Community Plan. The Save Our Forest Association, Inc., respectfully requests that the Planning Commission recommend denial of this project.

Sincerely,


Hugh A. Bialecki, DMD
President, Save Our Forest Association, Inc.

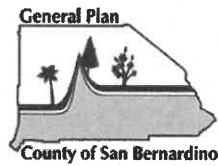
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Lake Arrowhead Community Plan

Adopted March 13, 2007
Effective April 12, 2007





Acknowledgements

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Lake Arrowhead Community Plan

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TABLE OF CONTENTS



TABLE OF CONTENTS

1	1	INTRODUCTION	7
	LA1.1	PURPOSE OF THE COMMUNITY PLAN	7
	LA1.2	COMMUNITY BACKGROUND	7
	LA1.2.1	Location	7
	LA1.2.2	History	11
	LA1.2.3	Description of the Plan Area	11
	LA1.3	COMMUNITY CHARACTER	12
	LA1.3.1	Unique Characteristics	12
	LA1.3.2	Issues and Concerns	12
	LA1.3.3	Community Priorities	12
2		LAND USE	15
	LA2.1	INTRODUCTION	15
	LA2.2	GOALS AND POLICIES	23
3		CIRCULATION AND INFRASTRUCTURE	27
	LA3.1	INTRODUCTION	27
	LA3.2	CIRCULATION – INTRODUCTION	27
	LA3.3	CIRCULATION – GOALS AND POLICIES	36
	LA3.4	INFRASTRUCTURE - INTRODUCTION	38
	LA3.5	INFRASTRUCTURE – GOALS AND POLICIES	49
4		HOUSING	51
5		CONSERVATION	53
	LA5.1	INTRODUCTION	53
	LA5.2	GOALS AND POLICIES	53
6		OPEN SPACE	57
	LA6.1	INTRODUCTION	57
	LA6.2	GOALS AND POLICIES	61
7		NOISE	65
8		SAFETY	67
	LA8.1	INTRODUCTION	67
	LA8.2	GOALS AND POLICIES	75
9		ECONOMIC DEVELOPMENT	77
	LA9.1	INTRODUCTION	77
	LA 9.2	GOALS AND POLICIES	77
10		IMPLEMENTATION	79
		APPENDIX	81



TABLE OF CONTENTS

LIST OF FIGURES

FIGURE 1-1, VICINITY/REGIONAL CONTEXT	9
FIGURE 2-1, LAND USE POLICY	17
FIGURE 3-1, CIRCULATION	29
FIGURE 3-2, WATER DISTRICTS.....	41
FIGURE 3-3, WASTEWATER SYSTEM	47
FIGURE 6-1, JURISDICTIONAL CONTROL.....	59
FIGURE 8-1, FIRE DISTRICTS	69
FIGURE 8-2, FIRE STATIONS.....	71

LIST OF TABLES

TABLE 1: DISTRIBUTION OF GENERAL PLAN LAND USE DISTRICTS.....	19
TABLE 2: LAND USE POLICY MAP MAXIMUM POTENTIAL BUILD-OUT.....	21
TABLE 3: POPULATION, HOUSEHOLDS AND EMPLOYMENT PROJECTION 2000-2030.....	22
TABLE 4: EXISTING AND FUTURE ROADWAY OPERATING CONDITIONS.....	33
TABLE 5: CMP FACILITY LEVELS OF SERVICE	35
TABLE 6: SUPPLY AND POLICY INFORMATION OF SERVICE PROVIDERS	43
TABLE 7: WASTE WATER AGENCIES/DISTRICTS.....	49
TABLE 8: FIRE STATIONS.....	73

1 INTRODUCTION

LA1.1 PURPOSE OF THE COMMUNITY PLAN

The primary purpose of the Lake Arrowhead Community Plan is to guide the future use and development of land within the Lake Arrowhead Community Plan area in a manner that preserves the character and independent identity of the individual communities within the area. By setting goals and policies for the Lake Arrowhead community that are distinct from those applied countywide, the Community Plan outlines how the County of San Bernardino will manage and address growth while retaining the attributes that make Lake Arrowhead unique.

Community plans focus on a particular community within the overall area covered by the General Plan of a jurisdiction. As an integral part of the overall General Plan, a community plan must be consistent with the General Plan. To facilitate consistency, the Lake Arrowhead Community Plan builds upon the goals and policies of each element of the General Plan. However, to avoid repetition, those goals and policies defined within the overall General Plan that adequately address the conditions of the community will not be repeated in this or other community plans. Instead, the policies that are included within the community plan should be regarded as refinements of broader General Plan goals and policies that have been customized to meet the specific needs or unique circumstances within individual communities. These unique goals and policies will facilitate the citizens of the mountain communities to have a ready reference to guide them.

LA1.2 COMMUNITY BACKGROUND

LA1.2.1 LOCATION

The plan area is located in the San Bernardino Mountains and is surrounded by the San Bernardino National Forest. The Lake Arrowhead plan area is bound to the southwest by the Crestline Community Plan area and to the southeast by the Hilltop Community Plan area. The Lake Arrowhead Community Plan area encompasses approximately 30 square miles and includes the communities of Agua Fria, Blue Jay, Cedar Glen, Crest Park – Meadowbrook Woods, Deer Lodge Park, Lake Arrowhead, Rimforest, Skyforest and Twin Peaks (see Figure 1-1, Vicinity, Regional Context).

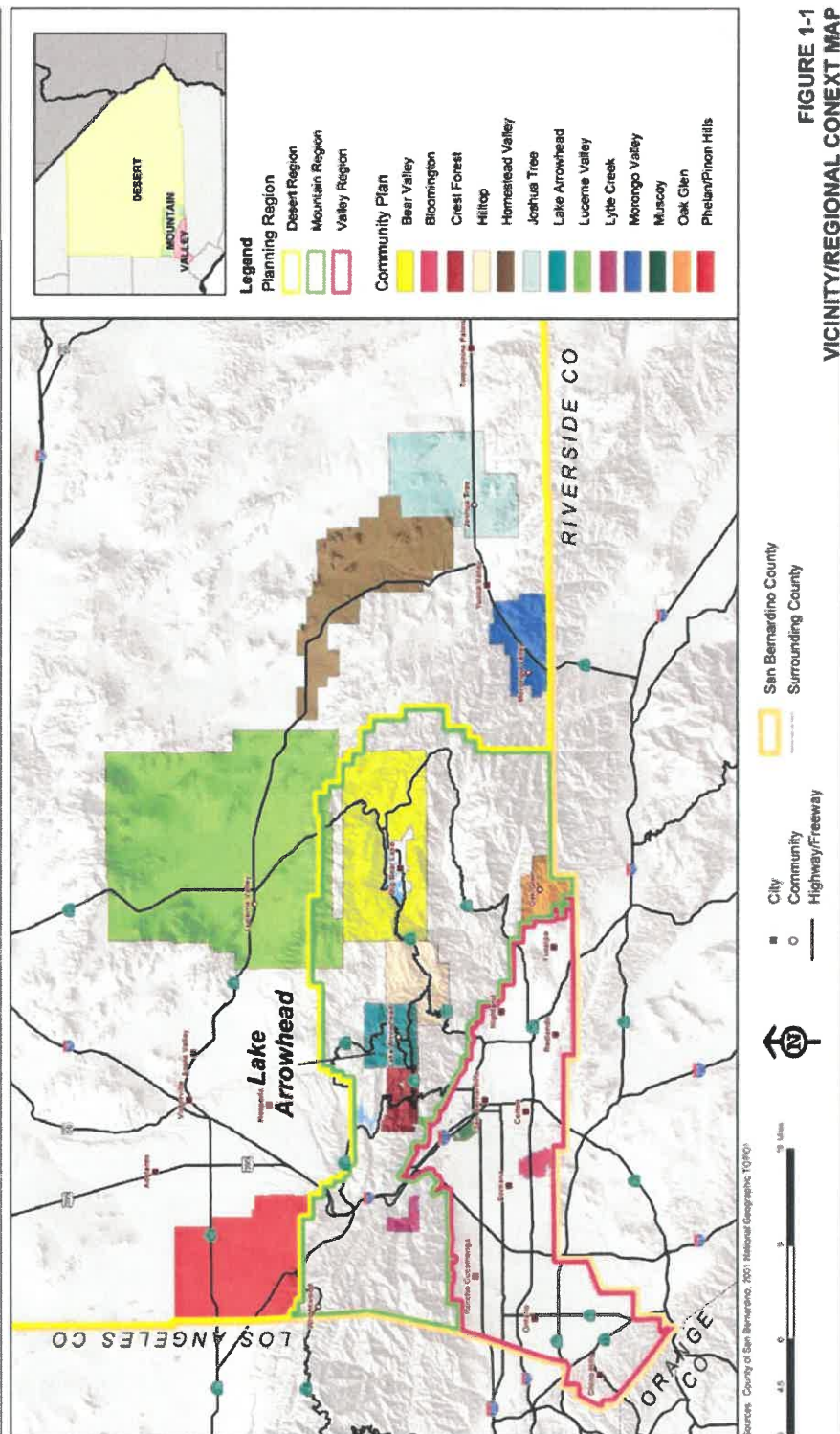
INTRODUCTION

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INTRODUCTION



LAKE ARROWHEAD - COMMUNITY PLAN



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INTRODUCTION



LA1.2.2 HISTORY

In 1851, when the Mormons purchased land from the early Spanish settlers and founded the City of San Bernardino, there was an immediate need for lumber to build homes, churches, stores, and civic buildings. During the 1860s, as the area attracted settlers into the valley, there was a heavy demand on the lumber mills that were scattered across the mountain top. During this period, the Lake Arrowhead area was opened to logging. At various times, there were mills in Twin Peaks, Blue Jay, Grass Valley, Cedar Glen and what is now Lake Arrowhead. By the late 1800s the value of the mountains as a watershed to protect and foster growth in the valley became apparent. In 1890, Congress enacted the Forest Reserve Act, and in 1893 the San Bernardino Forest Reserve was established.

Businessmen in the area organized the Arrowhead Reservoir Company and constructed Little Bear dam in 1904 to create a large reservoir in Little Bear Valley. In 1912, the plans were halted by a State Supreme Court decision that water from one watershed could not be diverted to another for irrigation. Later, the holdings of the Arrowhead Reservoir Company (which had been transferred to a new corporation, the Arrowhead Reservoir and Power Company) were purchased by the Lake Arrowhead Company, a syndicate headed by Benton Van Nuys, a prominent Los Angeles entrepreneur. The new owners completed the dam and developed the lake and adjacent lands into a resort.

Over the next thirty years, the area flourished as a fashionable summer resort for the rich and famous. Exclusive hotel and recreation facilities were constructed and lands adjacent to the lake were subdivided for private residences. In 1946, the property holdings of the Lake Arrowhead Company were sold to the Los Angeles Turf Club, which, in turn, sold out to the Lake Arrowhead Development Company in 1960. Since then, there have been several changes in ownership and most of the land has been subdivided into residential lots. The lake is now owned by the Arrowhead Lake Association, which has exclusive rights for use of Lake Arrowhead. Only property owners in the Arrowhead Woods area of Lake Arrowhead are eligible to pay a membership fee to utilize the various Lake Arrowhead recreational facilities.

The original Lake Arrowhead Community Plan was adopted in August, 1981. The plan was intended as a short range plan to implement those portions of the General Plan that directly affected the community of Lake Arrowhead. The 1989 General Plan update proposed that comprehensive community plans be incorporated into the General Plan and Development Code, however, full incorporation was not completed due to budget and staff constraints. The Phase I Scoping of the 2006 General Plan update recommended that the community plan program be reinstated to help fulfill the need for development guidance of certain unique communities within the County. The Lake Arrowhead community was selected as one of 13 areas that would have a community plan prepared in conjunction with Phase II of the San Bernardino County General Plan update.

LA1.2.3 DESCRIPTION OF THE PLAN AREA

Lake Arrowhead is located approximately 85 miles east of the City of Los Angeles and 23 miles north of the City of San Bernardino. The altitude of the Lake Arrowhead plan area averages over 5,000 feet. This provides for a mild climate and four distinct seasons. Average temperatures range from 37 degrees Fahrenheit in the winter months to 68 degrees Fahrenheit in the summer months. Precipitation averages 40 inches per year. Precipitation occurs mostly in the form of snow, with up to 3 to 4 feet at one time.

The plan area is a heavily wooded mountainous terrain with steep slopes and numerous ravines. Soil types range from outcropping and decomposing granites, to alluvial deposits on the valley floors. No major earthquake faults are located in the immediate area.

LA1.3 COMMUNITY CHARACTER

LA1.3.1 UNIQUE CHARACTERISTICS

The Lake Arrowhead Community Plan area is known as a charming, small-town mountain community that is attractive to tourists and residents alike for its climate, recreational amenities, scenic resources and sense of remoteness from urban life. The lake, after which the community is named, is a focal point of the area.

LA1.3.2 ISSUES AND CONCERNS

A series of public meetings for the preparation of the plan were held in 2003 and 2004. The issues and concerns identified in this section are based on input from those meetings. Several issues set Lake Arrowhead apart from other mountain communities suggesting that different strategies for future growth may be appropriate. Among these are preservation of community character, and infrastructure.

A. PRESERVATION OF COMMUNITY CHARACTER

Residents feel that the high quality of life experienced in their neighborhoods today should not be degraded by growth and the subsequent impacts of traffic congestion, strains on infrastructure and threats to natural resources. The clean air, ambient quiet, dark skies, abundant wildlife and rich natural vegetation are valued highly by residents as well as by the visitors who frequent the area. Residents are concerned about the conversion of natural open space to development and particularly to a type of development that detracts from the natural setting and the mountain character currently enjoyed by the community. The preservation of the community's natural setting, small-town atmosphere and mountain character becomes important not only from an environmental sustainability perspective, but from a cultural and economic point of view.

B. INFRASTRUCTURE

Like much of San Bernardino County, Lake Arrowhead faces the potential for significant growth. Residents are concerned with the impacts that future growth and development will have on an infrastructure system they sense is already strained. The community's primary concerns centered around water supply and traffic, circulation and public health and safety.

LA1.3.3 COMMUNITY PRIORITIES

The community's common priorities that have influenced the goals and policies included within this community plan are (a) the environment, and (b) community character.

ENVIRONMENT

A key consideration in developing this plan has been acknowledging the potential impacts that future development will have on the area's valued natural resources. The goals and policies included in this community plan emphasize protection of these sensitive resources, the integration of natural vegetation and open space, and development that is scaled and designed to sustain the natural surroundings. In public

INTRODUCTION



workshops held to develop the General Plan and the Lake Arrowhead Community Plan, the public has identified the following principle planning issues and concerns to be addressed in the plan:

- A. A community in a forest – the natural environment prevails.
- B. Ensure no conflict in the interface between the national forest and adjacent land uses.
- C. Conservation of natural resources and scenic beauty.

COMMUNITY CHARACTER

The Lake Arrowhead Community Plan area will continue to experience growth as a variety of factors continue to drive people to migrate from more urban areas to areas attractive for their rural nature. As the mountain develops, it will be imperative that adequate services and infrastructure are provided, that all improvements reflect the needs of local residents as well as visitors, that all development maintains a sense of connection to the natural environment, and that the small-town, mountain character of the community is preserved. Relating to community character, the public has identified the following issues and concerns to be reflected and addressed in the community plan:

- A. Acknowledge service and infrastructure capacity and limitations of the area, particularly roads and water, to serve future development.
- B. Protect and preserve the rural mountain character of the community by maintaining primarily low-density residential development and compatible commercial development.
- C. Maintain the value of community's scenic and natural resources, including Lake Arrowhead, which are the foundation of the community character and quality of life.

INTRODUCTION

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2 LAND USE

LA2.1 INTRODUCTION

The purpose of the land use element is to address those goals and policies that deal with the unique land use issues of the community plan area that are not addressed by the overall County General Plan. Land use, and the policies that govern it, contribute fundamentally to the character and form of a community. With the continuing growth in many of the county's rural areas, the importance of protecting valuable natural resources, habitats and preserving the rural character of these unique areas has become increasingly important.

The purpose of the Land Use Policy Map is to provide for orderly growth that will preserve the existing mountain character of the community and protect the plan area's natural resources. The Lake Arrowhead Land Use Policy Map is provided in Figure 2-1.¹

The Lake Arrowhead Community Plan area is contained within the San Bernardino National Forest. Approximately 53 percent, or 10,235 acres, of the National Forest comprises the plan area. Table 1 provides the General Plan land use district distribution for the Lake Arrowhead Community Plan area. As shown in Table 1, the most prominent land use district within the plan area is Single Residential (RS), which makes up approximately 67 percent or 6,050 acres, of the total land area that is under County jurisdiction. The second most prominent land use district within the plan area is Resource Conservation (RC), which makes up approximately 14 percent or 1,261 acres, of the land under County jurisdiction. The Lake Arrowhead plan area also contains Special Development (SD), Multiple Residential (RM), Office Commercial (CO), Neighborhood Commercial (CN), General Commercial (CG), Service Commercial (CS), Community Industrial (IC), Institutional (IN), and Floodway (FW) land use districts, however, these land use districts only make up a small percentage of the total plan area. The plan area is characterized primarily by residential and recreational uses. Most of the commercial land uses are concentrated in four nodes; one in the community of Blue Jay, the second in downtown Lake Arrowhead, the third in the community of Cedar Glen and the fourth in the community of Rim Forest.

Figure 2-1, the Land Use Policy Map, also depicts the boundary of the Cedar Glen Disaster Recovery Redevelopment Project Area (Project Area). The Project Area consists of 837 acres in the Cedar Glen community, which is located within the boundaries of the Lake Arrowhead Community Plan. The primary purpose of the Project Area is to help rebuild homes and businesses and to improve infrastructure (streets, water systems, etc.) in the Cedar Glen Community, which were destroyed in the October 2003 wildfires.

¹ For definitive mapping detail, please refer to the official Lake Arrowhead Land Use Policy Map.

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LAKE ARROWHEAD - COMMUNITY PLAN

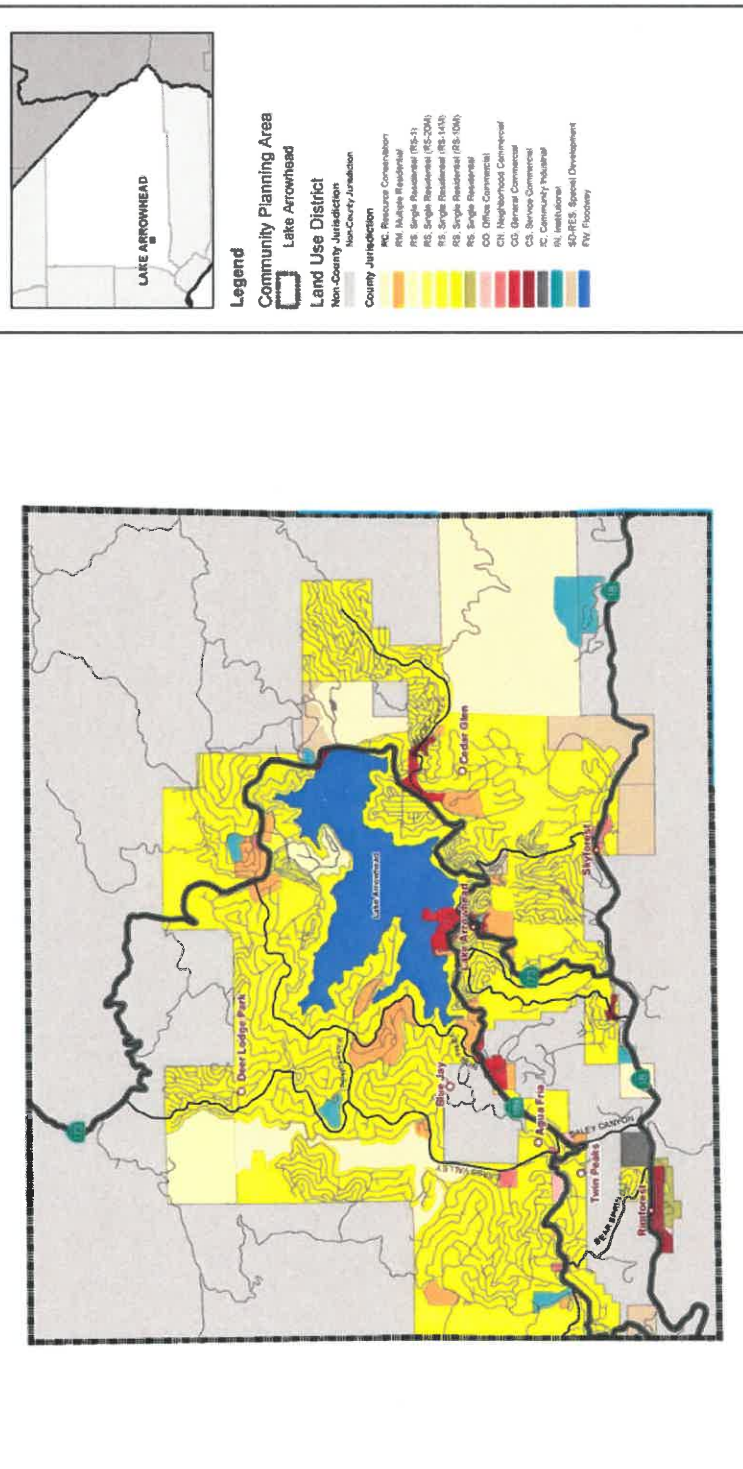


FIGURE 2:
POLICY LAND USE

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LAND USE



Table 1: Distribution of General Plan Land Use Districts

Land Use	Area (Acres) ²	(%) Of Total Land Area
Resource Conservation (RC)	1,261	14%
Single Residential (RS)	22	<1%
Single Residential 1 (RS-1)	398	4%
Single Residential 10,000 (RS-10M)	85	<1%
Single Residential 14,000 (RS-14M)	5,533	61%
Single Residential 20,000 (RS-20M)	12	<1%
Multiple Residential (RM)	310	3%
Special Development Residential (SD-RES)	326	3%
Office Commercial (CO)	27	<1%
Neighborhood Commercial (CN)	50	<1%
General Commercial (CG)	97	1%
Service Commercial (CS)	54	<1%
Community Industrial (IC)	39	<1%
Institutional (IN)	165	2%
Floodway (FW)	706	1%
Total Land Area Within Community Plan Boundary	9,085	

Source: URS Corporation.

A. Community Character (Land Use Issues/Concerns)

During public meetings held by the County, many of the residents expressed concerns regarding future growth respecting the unique natural amenities and characteristics of the area. The mountain character of the Lake Arrowhead community is defined in part by the prominence of single-family residential development on large lots, the placement of homes, varied setbacks and elevations, diverse architecture, natural vegetation, natural topography and open spaces around the homes. The character of the community is further defined by the recreational tourism opportunities, natural environment, and limited commercial and industrial uses.

² Non-jurisdictional lands within the Lake Arrowhead Community Plan area were extracted from the areas included within the table.

Input gathered from residents of Lake Arrowhead suggests that the primary land use concern is that the mountain character of the area is preserved. Residents of the Lake Arrowhead community emphasized that to preserve the type of community that exists today, future growth should be managed to preserve the same balance of land uses. The Lake Arrowhead community is predominately a single-family residential and recreational community. Residents would like to preserve the predominance of single-family residential uses and ensure that non-residential land uses, including recreational uses, are developed to serve the needs of local residents and limited tourist needs. Residents are concerned with the potential impacts of future growth, including potential strains on infrastructure and services, degradation of the natural environment, and loss of the existing small-town character. In addition, residents articulated concerns with the location of future industrial and commercial development and the development potential of existing large parcels of land.

Table 2 provides the Land Use Policy Map Maximum Potential Build-out for the Lake Arrowhead Community Plan area. This build-out scenario provides the maximum build-out potential of the community plan area based on the Land Use Policy Map. Table 2 does not account for constraints to the maximum build-out potential. However, all development within the Lake Arrowhead community plan area, in particular residential development, is limited by provisions of the Fire Safety Overlay. The maximum build-out potential is constrained substantially by the slope-density standards and fuel modification requirements of the Fire Safety Overlay.

Table 2: Land Use Policy Map Maximum Potential Build-Out

Land Use Designation	Land Use Policy Map Maximum Potential Build-Out		
	Area (Acres)	Density (D.U. Per Acre)	Maximum Policy Map Build-Out (D.U.'s)
		D.U. Per Acre	D.U.'s
Resource Conservation (RC)	1,261	0.025	32
RS-1	398	1	398
RS-10M	85	4	342
RS-20M	12	2	24
RS-14M	5,533	3	16,599
RS	22	4	87
RM	310	16	4,968
SD-RES	326	3	978
TOTAL RESIDENTIAL	7,947	-	23,419
		FAR	SQUARE FEET
CO-Office Commercial	27	0.5:1	588,060
CN- Neighborhood Commercial	50	0.25:1	544,500
CG - General Commercial	97	0.5:1	2,112,660
CS-Service Commercial	54	0.4:1	940,896
IC-Community Industrial	39	0.4:1	679,536
IR-Regional Industrial	0	0.4	0
IN-Institutional	165	0.5:1	3,593,700
Floodway	706	N/A	N/A
TOTAL NON-RESIDENTIAL	1,117	-	8,459,352
Source: Stanley R. Hoffman Associates, Inc. and URS Corp.			
Notes:			
(1) Floor Area Ratio (FAR) is a measure of development intensity. FAR is defined as the gross floor area of a building permitted on a site divided by the total area of the lot. For instance, a one-story building that covers an entire lot has an FAR of 1. Similarly, a one-story building that covers 1/2 of a lot has an FAR of 0.5.			
(2) The total square feet for the non-residential land use designations was calculated by multiplying the area (acres) by the FAR and then converting the total acres to square feet. 43,560 square feet = 1 acre			

Table 3 outlines the projected growth in the Lake Arrowhead Community Plan area over the period 2000 to 2030, and compares that growth to the maximum potential build-out shown in Table 2. The table includes population, households and employment projections based on the Land Use Policy Map Maximum Potential Build-out and a General Plan projection. The Land Use Policy Map Maximum Potential Build-out is a capacity analysis (with no specific build-out time frame) based on the County's General Plan land use and density policies. The General Plan projection provides estimates of population, households and employment from 2000 to 2030 based on an analysis of historic and expected growth trends. The historic and expected growth trends for population take into account the influx of new residents and shifts from part-time residents to full-time residents.

The comparison of the 2000 to 2030 projections to the maximum potential build-out provides a method for testing the projected growth against ultimate build-out. The projection and maximum potential build-out can be used to assess land use policies, existing infrastructure capacity and the need for additional infrastructure, particularly for roads, water and sewer facilities.

The General Plan projection is based on the assumption that the Lake Arrowhead Community Plan area will continue to grow. This would provide a population of 21,940 people by the year 2030. The Maximum Land Use Policy Map Build-out assumes a maximum population of 57,340 based on the Land Use Policy Map. The number of households is projected to reach 8,177 by the year 2030. The Maximum Land Use Policy Map Build-Out assumes a maximum of 22,054 households based on the Land Use Policy Map. These numbers imply that the plan area will reach 37 and 38 percent of its potential household and population capacity respectively, by the year 2030.

Table 3: Population, Households and Employment Projection 2000-2030

	1990	2000	Projection 2030	Average Annual Growth Rate: 1990-2000	Average Annual Growth Rate: 2000-2030	Maximum Policy Map Build-Out	Ratio of 2030 Projection to Land Use Policy Plan Build-out
Population	9,061	12,673	23,509	3.4%	2.1%	65,127	0.36
Households	3,257	4,554	8,445	3.4%	2.1%	23,419	0.36
	1991	2002		1991-2002			
Employment	2,728	3,068	5,215	1.1%	1.9%	9,864	0.53
Source: Stanley R. Hoffman Associates, Inc. Note: The population figures for 1990 and 2000 were based on the U.S. Census. The employment figures for 1991 and 2002 were based on data from the EDD (Employment Development Department).							

LA2.2 GOALS AND POLICIES

Goal LA/LU 1.	Retain the existing resort-oriented mountain character of the community.
----------------------	---

Policies

LA/LU 1.1 Require strict adherence to the land use policy map unless proposed changes are clearly demonstrated to be consistent with the community character.

LA/LU 1.2 In recognition of the community's desire to preserve the rural character and protect the area's natural resources, projects that propose to increase the density of residential land uses or provide additional commercial land use districts or zones within the plan area should only be considered if the following findings can be made:

- A. That the change will be consistent with the community character. In determining consistency, the entire General Plan and all elements of the community plan shall be reviewed.
- B. That the change is compatible with surrounding uses, and will provide for a logical transition in the plan area's development. One way to accomplish this is to incorporate planned development concepts in the design of projects proposed in the area.
- C. That the change shall not degrade the level of services provided in the area, and that there is adequate infrastructure to serve the additional development that could occur as a result of the change. Densities should not be increased unless there are existing or assured services and infrastructure, including but not limited to water, wastewater, circulation, police, and fire, to accommodate the increased densities.

LA/LU 1.3 Regulate the density of development in sloping hillside areas in order to reduce fire hazards, prevent erosion, and to preserve existing vegetation and the visual qualities of the plan area. One method this can be accomplished by is requiring adherence to the following hillside development standards required by the Fire Safety Overlay:

- A. Residential density: the density of development for any tentative parcel map or tentative tract map in sloping hillside areas shall be in accordance with the following criteria:
 - i. One to four (1-4) dwelling units per gross acre on slopes of zero to less than fifteen percent (0 - <15%)
 - ii. Two (2) dwelling units per gross acre on slopes of fifteen to less than thirty percent (15 - <30%)
 - iii. One (1) dwelling unit per three (3) gross acres on slopes of greater than thirty percent (30%) gradient
- B. When twenty-five percent (25%) or more of a subdivision project site involving five (5) or more lots is located on natural slopes greater than thirty percent (30%), the subdivision application shall be submitted concurrently with a Planned Development application to evaluate appropriate project design in consideration of topographic limitations of the site. This provision shall not apply if all of the areas on the site with natural ungraded slopes over thirty percent (30%) are permanently restricted from structural development.

- LA/LU 1.4 Establish locational criteria for future Multiple Family Residential (RM) districts or zones to areas that are:
- A. In close proximity to commercial areas;
 - B. Adjacent to a mountain secondary or greater width roadway;
 - C. Where adequate circulation exists;
 - D. Where services are available or assured;
 - E. Where average slopes are relatively flat;
 - F. Where compliance with fire safety standards can be met.
- LA/LU 1.5 All architecture and outside facades of commercial structures shall be in keeping with the mountain character. Natural woods and masonry shall be used as much as practicable, and shall be reviewed for conformance during the Land Use Services Conditional Use Permit approval process.
- LA/LU 1.6 Prohibit construction of new high density residential development along the shore of Lake Arrowhead and Grass Valley Lake in order to protect the scenic qualities. No additional Multiple Family Residential (RM) districts or zones shall be permitted in the following areas:
- A. Grass Valley Lake: between the shoreline and Golf Course Road north of Lake Arrowhead Country Club, Brentwood Drive north of Riviera Drive and Cumberland (beyond the Blueridge Development Project).
 - B. Lake Arrowhead: generally between the shoreline and North Shore Road.
 - C. Twin Peaks: along State Highway 189.

Goal LA/LU 2. Ensure that commercial and industrial development is compatible with the forest and mountain character and meets the needs of local residents and visitors.

Policies

- LA/LU 2.1 Concentrate future commercial development within existing commercial nodes, centralized areas, or neighborhood centers that are designed with the mountain character in mind to avoid strip commercial development along roads.
- LA/LU 2.2 In coordination with the community, develop site design standards for commercial development within the plan area to ensure that architectural detailing and signage are compatible with the mountain character of the community, to ensure that sites are designed to be more pedestrian-friendly, and to provide adequate parking and buffers between commercial and adjacent residential uses.
- LA/LU 2.3 Neighborhood commercial uses shall be buffered from adjacent residential uses through transitional land uses and/or design features such as enhanced setbacks and landscaping and/or other screening materials.
- LA/LU 2.4 Through the Land Use Services Conditional Use Permit process, all new commercial sites shall be reviewed to ensure that the site is large enough to accommodate required parking and access.

ARE
NONE

LAND USE



LA/LU 2.5 Limit future industrial development to that which is necessary to meet the service, employment and support needs of local residents, and does not adversely impact the mountain environment. This can be accomplished by:

- A. Fully screen all open storage activities with fencing and indigenous-landscaping and limit open storage to the rear 75 percent of any parcel.
- B. Require the architecture and appearance of all buildings to be compatible with the mountain character; natural wood and masonry shall be used.
- C. Requiring the architecture and appearance of all buildings to be compatible with the mountain character; natural wood and masonry should be used.

LA/LU 2.6 Industrial land uses shall be located in areas where industrial uses will best serve the needs of the community, and will have a minimum adverse effect upon surrounding property with minimal disturbance to the mountain environment and the total community.

LA/LU 2.7 Commercial recreation and tourist facilities should be located, designed, and controlled to protect the residential-recreation character of the area. This can be accomplished by: Limiting commercial tourist facilities to Lake Arrowhead Village, Blue Jay and Cedar Glen along State Highway 18.

NEIGHBORS ON SCENIC WAY / BEAR SPRINGS

LA/LU 2.8 New industrial uses which generate heavy truck traffic shall only be allowed in appropriately zoned areas located off of State Highway 18.

LA/LU 2.9 Any development proposal for any part of the old Santa's Village site in the Rimforest area should be done as part of a master plan for development for the entire Santa's Village site, or subsequent to a County-approved master plan for the old Santa's Village site.

Goal LA/LU 3.	Ensure the availability of convenient commercial services to residents and visitors to communities within the Lake Arrowhead Community Plan area.
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Policies

LA/LU 3.1 Provide for future establishment of Neighborhood Commercial (CN) zoning districts in close proximity to residential areas to provide convenient commercial services to residents and visitors. Possible locations for CN districts include:

- Highway 189 between Sierra Vista Drive and Fernrock Drive
- Highway 173 between Chapel Road and Rainbow Drive

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3 CIRCULATION AND INFRASTRUCTURE

LA3.1 INTRODUCTION

The quality of life and the mountain character of the community are dependent on the services that are provided. Residents in Lake Arrowhead expect that services such as schools, water and sewer, roads, fire and police protection, and park and recreation facilities are provided at levels that meet their needs. At the same time, it is understood that acceptable levels of service should be provided in accordance with the small-town character that is desired. Provisions of services in Lake Arrowhead should be commensurate with the mountain lifestyle and residential-recreational character of development. The impact of land development on services must be managed to ensure a balance between providing for population growth and preserving the character of the community. The impact of land development on services must be managed to ensure a balance between providing for sustainable population growth, preserving the character of the community and protecting public health and safety.

LA3.2 CIRCULATION – INTRODUCTION

A. Roadway System

One of the overriding goals expressed by residents of Lake Arrowhead is to maintain the mountain character of the community. The character of the community can be significantly impacted by roads and the traffic generated from the region and the community.

The existing street system in Lake Arrowhead is characterized by a combination of State Highways and local roadways (see Figure 3-1, Circulation). There is community interest in retaining existing road widths to maintain a quaint, mountain atmosphere in keeping with the community's overarching goal of maintaining the alpine character of the area. However, there is also interest in providing sufficient road improvements that meet future community needs for a safe and efficient traffic circulation.

Rim of the World Highway (SR-18) is a two-lane mountain major highway that provides access to the mountain region from both the valley region to the south and the desert region to the north. In the valley region, SR-18 originates as an interchange with SR-30, as Waterman Avenue in the City of San Bernardino. After passing through the communities of Lake Arrowhead, Running Springs, Arrowbear Lake and Big Bear Lake, it continues northeasterly into the desert region and through communities such as Lucerne Valley, Apple Valley and Victorville before terminating at its northern junction with SR-138 just west of the Los Angeles County line. This roadway operates as the primary access for the Lake Arrowhead community and other mountain communities such as Crestline and Big Bear Lake. It is considered to function as a mountain major highway under San Bernardino County roadway classification standards.

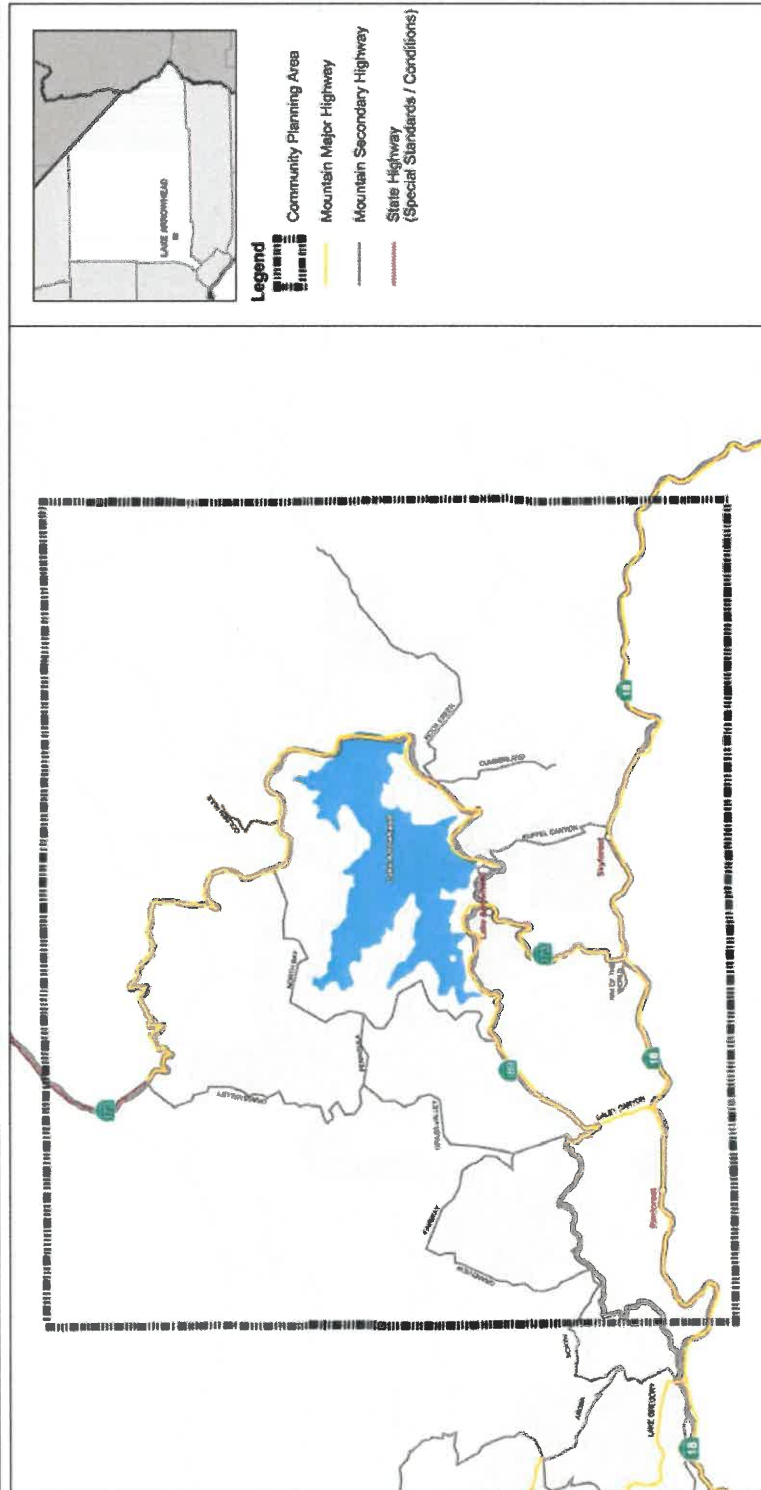
State Route 173 (SR-173) is a two-lane mountain major highway that extends north from Rim of the World Highway (SR-18) and continues counterclockwise around Lake Arrowhead before terminating at SR-138 just northwest of Silverwood Lake. It has been classified as a mountain major highway by San Bernardino County. The portion of roadway between Willow Creek Jeep Trail and Pacific Crest National Scenic Trail is unpaved.

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CIRCULATION AND INFRASTRUCTURE



LAKE ARROWHEAD COMMUNITY PLAN



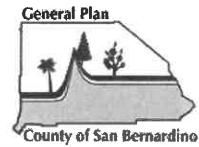
**FIGURE 3-1
CIRCULATION MAP**

Community
City Streets

Source: County of San Bernardino

CIRCULATION AND INFRASTRUCTURE

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State Route 189 (SR-189) is a two-lane mountain major highway that splits from Rim of the World Highway (SR-18) and continues east until it terminates at a junction with SR-173. The portion of this roadway between Blue Jay Cutoff and SR-173 has been classified as a mountain major highway by San Bernardino County. The segment between Rim of the World Highway (SR-18) and Blue Jay Cutoff is classified as a mountain secondary highway. This facility provides access to residential properties in the Twin Peaks and Blue Jay communities.

Cumberland Drive extends southward from Hook Creek Road, just south of SR-173, to Blue Ridge Drive. It currently has one lane in each direction and is classified as a mountain secondary highway under San Bernardino County standards.

Daley Canyon Road is a two-lane mountain major highway that extends northward from SR-18 for one-half mile to its intersection with SR-189. This facility provides an important north-south connection between these two state highways.

Fairway Drive is a two-lane mountain secondary highway that extends from Augusta Drive north and east to Club House Drive, just west of Grass Valley Road.

Golden Rule Lane is a two-lane facility which extends northward from SR-173 to Manitoba Drive and is classified as a mountain secondary highway.

Grandview Drive is a two-lane mountain secondary highway that begins at Fairway Drive and travels southward to North Road.

Grass Valley Road is a two-lane mountain secondary highway which extends northward from its intersection with SR-189 in the community of Twin Peaks and travels approximately four and one-half miles through the community of Blue Jay before terminating at an intersection with SR-173.

Hook Creek Road is a two-lane mountain secondary highway that begins at an intersection with SR-173 and extends two miles northeast to Poplar Lane. This facility operates as the primary access to the community of Cedar Glen. Kuffel Canyon Road is a two-lane secondary arterial which originates at an intersection with Rim of the World Highway (SR-18) and extends north one and one-quarter miles to SR-173. This facility is a major thoroughfare in the community of Lake Arrowhead.

Kuffel Canyon Road is a two-lane mountain secondary highway that originates an intersection with Rim of the World Highway (SR-18) and extends north one and one-quarter miles to SR-173. This facility is a major thoroughfare in the community of Lake Arrowhead.

North Bay Road is a mountain secondary which extends from SR-189 approximately three and one-half miles north and east before terminating at SR-173. This facility provides access to residents living along the western and northern shores of Lake Arrowhead.

North Road is a two-lane mountain secondary highway that extends from SR-189 approximately three and one-half miles north and east before terminating at SR-173. This facility provides access to residents living along the western and northern shores of Lake Arrowhead.

Peninsula Drive is a two-lane mountain secondary highway that extends eastward for one-half mile and provides a connection between Grass Valley Road and North Bay Road.

CIRCULATION AND INFRASTRUCTURE

Rim of the World Drive extends eastward from Burnt Mill Road to SR-173, just north of Rim of the World Highway (SR-18). It currently consists of two lanes and has been classified as a mountain secondary highway.

The Lake Arrowhead plan area relies on SR-18, SR-173, and SR-189 for access to the mountain from the valley and desert Regions and within and to the neighboring mountain communities. These highways not only accommodate traffic from the local population but from the visitors who travel to the mountains on weekends and during the busy holiday season. Identifying and implementing future improvements will be a challenge that will have to address: a) a lack of local control over State Highway improvements, b) improvements that may be in conflict with the community's desire to maintain the area's scenic and natural resources and mountain character and c) environmental constraints that will limit the feasibility of certain improvements to the road system.

During meetings held by the County, residents emphasized their concerns with traffic circulation on both State Highways and other major County roads within their community. They emphasized the need for improvements to the circulation system to be compatible with the community's goal of maintaining the area's character, scenic and natural resources and public health and safety.

The operating condition of the roadway system within the plan area was examined in terms of congestion and delay. Table 4 provides the existing and Future 2030 roadway operating conditions for the Lake Arrowhead Community Plan area. The operating conditions include: Average Daily Trips (ADT) data, Volume to Capacity (V/C) ratios and Level of Service (LOS) data. The Average Daily Trips (ADT) data was provided by the County Public Works Department. Most of the trips data was collected within the past one to two years. The Volume to Capacity (V/C) ratio was calculated using the traffic counts (or ADT) and is a standard tool for describing the typical operating conditions of a roadway. The Level of Service data is based on the V/C ratio and helps to categorize and describe the degree of congestion on the roadways.

CIRCULATION AND INFRASTRUCTURE



Table 4: Existing and Future Roadway Operating Conditions

		Existing 2004			Future 2030		
		Operating Condition			Operating Conditions		
Facility	Begin-End	ADT	V/C	LOS	ADT	V/C	LOS
Arterials							
Cumberland Drive	Hook Creek Rd – Blue Ridge Dr	1,350	0.117	A	1,626	0.141	A
Daley Canyon Rd	SR-189 – SR-18	7,650	0.665	C	8,010	0.668	C
Fairway Drive	August Dr – Club House Dr	4,450	0.387	B	5,359	0.466	B
Golden Rule Lane	SR-173 – Manitoba Dr	1,300	0.113	A	1,566	0.136	A
Grandview Drive	North Rd – Augusta Dr	2,400	0.209	A	2,890	0.251	A
Grass Valley Road	SR-173 – Jagerhorn Dr	2,050	0.178	A	2,635	0.229	A
	Jagerhorn Dr – Peninsula Dr	4,000	0.348	A	4,650	0.404	B
	Peninsula Dr- Club House Dr	5,500	0.478	B	7,337	0.638	C
	Club House Dr – Blue Jay Cutoff	7,500	0.652	C	9,210	0.801	D
	Blue Jay Cutoff – SR-189	9,000	0.783	D	10,839	0.942	E
Hook Creek Road	SR-173 – Pineridge Dr	5,100	0.443	B	6,142	0.534	B
	Pineridge Dr - Poplar Ln	600	0.052	A	723	0.063	A
Kuffel Canyon Rd	SR-173 – SR-18	2,850	0.248	A	4,245	0.369	B
North Road	Arosa Dr – SR-189	3,550	0.309	A	4,178	0.363	B
North Bay Road	SR-173 – Peninsula Dr	4,850	0.422	B	4,898	0.426	B
	Peninsula Dr – Cottonwood Ln	5,850	0.509	B	7,107	0.618	C
	Cottonwood Ln - SR-173	9,000	0.783	D	10,257	0.892	E
Peninsula Drive	Grass Valley Rd – North Bay Rd	3,800	0.330	A	5,637	0.490	B
Rim of the World Dr	Burnt Mill Rd – SR-173	400	0.035	A	482	0.042	A
State Highways							
Rim of the World Highway (SR-18)	SR-189 – Daley Canyon Rd	10,700	0.930	E	12,200	1.017	F
	Daley Canyon Rd – SR-173	10,200	0.887	E	13,900	1.209	F
	SR-173 – Kuffel Canyon Rd	8,200	0.713	D	8,850	0.770	D
	Kuffel Canyon Rd – SR-330	6,800	0.591	C	9,800	0.852	D
SR-173	Grass Valley Rd –North Bay Rd	650	0.057	A	3,400	0.296	A
	North Bay Rd – Hook Creek Rd	2,900	0.252	A	3,150	0.274	A
	Hook Creek Rd – Kuffel Cyn Rd	6,300	0.548	C	6,550	0.570	C
	Kuffel Cyn Rd-SR-189	8,500	0.739	D	10,000	0.870	D
	SR-189 – SR-18	5,300	0.461	B	8,500	0.739	D
SR-189	SR-18 – Bear Springs Rd	3,500	0.304	A	6,350	0.552	C
	Bear Springs Rd–Grass Valley Rd	5,000	0.435	B	7,850	0.683	C
	Grass Valley Rd – SR-173	7,400	0.643	C	8,700	0.725	D
Source: Myers, Mohaddes Associates							

Source: Myers, Mohaddes Associates

According to Table 4, most roadways within the plan area operated at acceptable Levels of Service in 2004. Most roads operated at a Level of Service “A,” “B” or “C.” A Level of Service “A” is described as a free flow low volume traffic condition with little or no delays. Levels of Service “B” and “C” are described as reasonably free-flow traffic conditions with reduced freedom to maneuver and select speeds. Segments of Grass Valley Road and North Bay Rd did not operate at acceptable Levels of

CIRCULATION AND INFRASTRUCTURE

Service. Grass Valley Road between Blue Jay Cutoff and SR-189 and North Bay Rd between Cottonwood Lane and SR-173 operated at Levels of Service "D," which is described as congested but stable traffic conditions with drivers' ability to select speed and maneuverability significantly affected.

Most segments of Rim of the World Highway (SR-18) did not operate at acceptable Levels of Service. Two of the four segments operated at a Level of Service "E," which is described as congested and unstable traffic conditions where drivers' ability to maneuver is severely restricted and travel speeds are low and uniform. One segment of SR-173 between Kuffel Canyon Road and SR-189 also operated at a Level of Service "E."

Future 2030 conditions for the Lake Arrowhead Community Plan area indicate that major County roads and State Highways within the plan area are projected to experience more congestion than 2004 conditions. All major arterials are projected to remain at acceptable Levels of Service except for Grass Valley Road between Club House Drive and Blue Jay Cutoff and between Blue Jay Cutoff and SR-189, and North Bay Road between Cottonwood Lane and SR-173. Portions of State Highways 173, and 189 are projected to operate at unacceptable Levels of Service. All segments of Rim of the World Highway (SR-18) are projected to operate at unacceptable LOS.

Since the LOS data provided in this analysis were based on ADT volumes they represent the "average" LOS at which the facility generally operates throughout the day. When peak-hour volumes are utilized, these scores are expected to worsen, as demonstrated under the Congestion Management Program methodology shown in the following section.

B. Congestion Management Program

Within San Bernardino County, the San Bernardino Associated Governments (SANBAG) is designated as the Congestion Management Agency (CMA). Through this program SANBAG can monitor regional transportation facilities and catalog their daily operating Levels of Service in an effort to identify existing travel patterns and better plan for future transportation improvements in response to shifting travel patterns. Rim of the World Highway (SR-18), SR-173 and SR-189 are roadways that have been designated as CMP facilities. As determined in the 2007 update, the operation Levels of Service for these facilities are shown in Table 5. The Levels of Service (LOS) for the CMP facilities reflect a peak period measurement.

Table 5: CMP Facility Levels of Service

Facility	No. of Lanes	Peak Hour Volume	Level of Service (LOS)
SR-18			
Jct. Rte 138-Rte 189	2	900	E
Jct. Rte 189 – Rte 330	2	930	E
SR-173			
Lake Arrowhead Rd. – Hook Creek Rd.	2	150	B
Hook Creek Rd. – Jct. Rte 18	2	700	E
SR-189			
Jct. Rte 18 – Jct. Rte 173	2	5,100	D

C. Pedestrian and Bicycle Circulation and Off-Street Parking

The current circulation system within the plan area does not safely and efficiently accommodate pedestrian and bicycle traffic. Many of the roads in the Lake Arrowhead area are narrow and lack enough visibility to safely accommodate non-motorized traffic. During the winter this problem is compounded by snow. Snow piled along the roadways or in parking lots reduces traffic capacity, available parking and non-motorized traffic circulation. Residents and visitors often park on the roads, which hinders snow removal and creates further difficulties for pedestrian and bicycle circulation.

D. Scenic Routes

Scenic highways play an important role in the preservation and protection of environmental assets. County Scenic Route designation recognizes the value of protecting scenic resources for future generations, and places restrictions on adjacent development including specific sign standards regarding sign placement and dimensions, utility placement, architectural design, grading, landscaping characteristics, and vegetation removal. The following streets are designated as scenic routes by the General Plan and are subject to the Open Space Overlay: Kuffel Canyon Road, Grass Valley Road, Rim of the World Highway (SR-18) and SR-173. In addition, both State Highways, SR-173 and SR-18, are eligible for designation as scenic routes by the State but have not been officially designated. The advantages of official designation are a positive image for the communities involved, preservation and protection of environmental assets and potential increase in tourism.