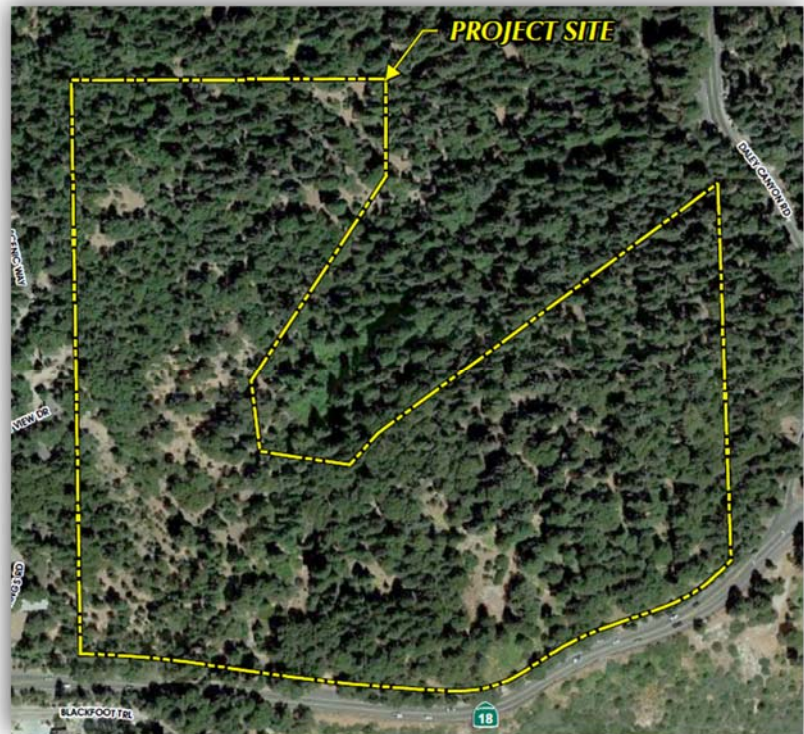


Church of The Woods Project

Rim Forest, California



Lead Agency
County of San Bernardino
385 N. Arrowhead Avenue
San Bernardino, CA 92415

January 10, 2020

Final Environmental Impact Report
SCH No. 2004031114

Church of The Woods Project

Rim Forest, California

Lead Agency

County of San Bernardino
385 N. Arrowhead Avenue
San Bernardino, CA 92415

CEQA Consultant

T&B Planning, Inc.
3200 El Camino Real, Suite 100
Irvine, CA 92602

Project Applicant

Church of the Woods
1410 Calgary Drive
Lake Arrowhead, CA 92352

Lead Agency Discretionary Permits

Conditional Use Permit No. P201700270

January 10, 2020



TABLE OF CONTENTS

<u>Section Name and Number</u>	<u>Page</u>
F.0 Final Environmental Impact Report	FEIR-1
F.1 Introduction	FEIR-1
F.2 Responses to Comments.....	FEIR-1
F.3 Additions, Corrections, and Revisions	FEIR-432
F.4 No Recirculation of the Draft Revised EIR	FEIR-449

FINAL EIR ATTACHMENTS

- A: Updated Foresters Report
- B: Revised Water Quality Management Plan Calculation and Site Plan
- C: Changes to the Draft Revised EIR

LIST OF FIGURES

<u>Figure Number and Title</u>	<u>Page</u>
Figure F-1 Revised Site Plan.....	FEIR-9
Figure F-2 Revised Proposed Physical Disturbances.....	FEIR-10

LIST OF TABLES

<u>Table Number and Title</u>	<u>Page</u>
Table F-1 Organizations, Persons, & Public Agencies that Commented on the DREIR	FEIR-3
Table F-2 Errata Table of Additions, Corrections, and Revisions.....	FEIR-432



F.0 FINAL ENVIRONMENTAL IMPACT REPORT

F.1 INTRODUCTION

This Final Environmental Impact Report (FEIR) was prepared in accordance with the California Environmental Quality Act (CEQA) as amended (Public Resources Code §21000 et seq.) and CEQA Guidelines (Title 14, California Code of Regulations, §15000 et seq.). According to CEQA Guidelines Section 15132, the FEIR shall consist of:

- a. The Draft Revised Environmental Impact Report (DREIR);
- b. Comments and recommendations received on the DREIR either verbatim or in summary;
- c. A list of persons, organizations, and public agencies commenting on the DREIR;
- d. The responses of the Lead Agency to significant environmental points raised in the review and consultation process; and
- e. Any other information added by the Lead Agency.

This Section contains responses to comments received on the Church of the Woods DREIR, and provides a summary of revisions made to the DREIR in response to public comments. These comments were received during the public review period for the DREIR, which commenced on January 9, 2019 and concluded on February 22, 2019. In accordance with the above-listed requirements, this FEIR for the proposed Church of the Woods project (hereafter, the “Project”) and associated discretionary and administrative actions consists of the following:

1. Comment letters and responses to public comment; and
2. The circulated Church of the Woods DREIR and Technical Appendices (SCH No. 2004031114) with additions shown as underline text and deletions shown as stricken text identified in Table F-2, *Errata Table of Additions, Corrections, and Revisions*.

This Final Environmental Impact Report (FEIR) document was prepared in accordance with the CEQA Statute and Guidelines and represents the independent judgement of the CEQA Lead Agency (County of San Bernardino). This FEIR and the DREIR comprise the Final Environmental Impact Report for the proposed Project, in accordance with CEQA Guidelines Section 15132.

F.2 RESPONSES TO COMMENTS

A. CEQA Requirements

CEQA Guidelines Section 15204(a) outlines parameters for submitting comments, and notes that the focus of review and comment of Draft EIRs should be:

...on the sufficiency of the document in identifying and analyzing the possible impacts on the environment and ways in which the significant effects of the project might be avoided or mitigated. Comments are most helpful when they suggest additional specific alternatives or mitigation measures that would provide better ways to avoid or mitigate the significant environmental effects. At the same time, reviewers should be



aware that the adequacy of an EIR is determined in terms of what is reasonably feasible... CEQA does not require a lead agency to conduct every test or perform all research, study, and experimentation recommended or suggested by commenters. When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.

CEQA Guidelines Section 15204(c) further advises that, “Reviewers should explain the basis for their comments, and should submit data or references offering facts, reasonable assumptions based on facts, or expert opinion supported by facts in support of the comments. Pursuant to Section 15064, an effect shall not be considered significant in the absence of substantial evidence.” CEQA Guidelines Section 15204(d) also notes that “Each responsible agency and trustee agency shall focus its comments on environmental information germane to that agency’s statutory responsibility.” CEQA Guidelines Section 15204(e) states that “This section shall not be used to restrict the ability of reviewers to comment on the general adequacy of a document or of the lead agency to reject comments not focused as recommended by this section.”

Pursuant to CEQA Guidelines Section 15088(b), the County will supply copies of the written responses to commenting public agencies at least ten (10) days prior to certifying the FEIR. The responses will be provided along with an electronic copy of this FEIR, as permitted by CEQA, that conform to the legal standards established for response to comments.

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. Under the CEQA Guidelines, the Lead Agency is obligated to respond to comments “raising significant environmental issues” with “good faith, reasoned analysis.” (CEQA Guidelines Section 15088(a) and (c)). These responses “shall describe the disposition of significant environmental issues raised ... [and] give reasons why specific comments and suggestions were not accepted” (CEQA Guidelines Section 15088(c)). To the extent that specific comments and suggestions are not made, a specific response cannot be provided and is not required. Per CEQA Guidelines Section 15088(c), the level of detail contained in the response may correspond to the level of detail provided in the comment; responses to general comments may be general.

B. Responses to DREIR Comments

CEQA Guidelines Section 15088 requires the Lead Agency to evaluate comments on environmental issues received from public agencies and interested parties who reviewed the DREIR and to provide written responses to any substantive comments received. This Section provides all comments received on the DREIR, the County’s response to each comment, and a summary of revisions made to the DREIR as part of the FEIR in response to the various comment letters and to correct any errors.

Comment letters were received during the DREIR public review period which began on January 9, 2019 and closed on February 22, 2019. A total of 212 comment letters were received by the County of San Bernardino regarding the DREIR for the proposed Project. A list of agencies, organizations, and persons that submitted comments regarding the DREIR is presented in Table F-1, *Organizations, Persons, & Public Agencies that Commented on the DREIR*. A copy of each comment letter and a response to each environmental issue raised in those letters is provided on the following pages. No comments submitted to the County of San Bernardino on the DREIR have produced substantial new information requiring recirculation or additional environmental review under State CEQA Guidelines Section 15088.5.



Table F-1 Organizations, Persons, & Public Agencies that Commented on the DREIR

Comment Letter	Commenting Organization, Person, or Public Agency	Date
1.	California Department of Forestry and Fire Protection (CalFire) – San Bernardino-Inyo-Mono Unit	02/07/19
2.	South Coast Air Management District (SCAQMD)	02/20/19
3.	California Department of Transportation – District 8	02/22/19
4.	State of California Governor’s Office of Planning and Research State (OPR) Clearinghouse and Planning Unit	02/25/19
5.	California Water Boards – Lahontan Regional Water Quality Control Board (WQCB)	03/01/19
6.	Save Our Forest Association, Inc.	02/24/19
7.	San Bernardino Valley Audubon Society	02/25/19
8.	Sierra Club San Bernardino Mountains Group	02/25/19
9.	Sierra Club San Bernardino Mountains Group	02/25/19
10.	Shute, Mihaly, & Weinberger, LLP	02/25/19
11.	Caldwell, Carola	01/21/19
12.	Craig, Debra	01/22/19
13.	McAllister, Carol	01/23/19
14.	Oebermann, Steven	01/23/19
15.	Overby, Waymon	01/24/19
16.	Miller, Ashley	01/25/19
17.	Wahl, Brad	01/27/19
18.	Richardson, Katherine	01/28/19
19.	Jahelka, Daniel	01/29/19
20.	Mark, John	01/30/19
21.	Brown, Gaylynn	02/01/19
22.	Herrmann, Bill	02/02/19
23.	Alexander, Teresa	02/03/19
24.	Gayle, Tamara	02/03/19
25.	Meers, Daniel	02/03/19
26.	Meshorer, Gwen	02/03/19
27.	Mansinon, Joshua	02/04/19
28.	Dick, Tessa	02/04/19
29.	Pelaez, Monica	02/04/19
30.	Gayle, Tamara	02/04/19
31.	Avila, Robert	02/05/19
32.	Holtzen, Angela	02/05/19
33.	Wurm, John	02/05/19
34.	Gayle, Tamara	02/06/19
35.	Stricker, Gary	02/06/19
36.	Tinucci, Terrence	02/06/19
37.	Metchis, David	02/09/19
38.	McCreary, Andrew	02/09/19
39.	Morgon, Greg	02/09/19



Comment Letter	Commenting Organization, Person, or Public Agency	Date
40.	Shelton, Margery	02/10/19
41.	Edwards, Kim	02/11/19
42.	Alexander, Jessica	02/11/19
43.	Stufknosky, Dean	02/11/19
44.	Andrews, Stephen	02/12/19
45.	Clevenger, Matthew and Wesley Lynn	02/12/19
46.	Dacks, Roberta	02/12/19
47.	Downer, Nina	02/12/19
48.	Dydo, Mary	02/12/19
49.	Gaw, Colleen	02/12/19
50.	Lain, Donna	02/12/19
51.	Marin, William	02/12/19
52.	Meers, Daniel	02/12/19
53.	Miller, David	02/12/19
54.	Myers, Amanda	02/12/19
55.	Selleck, Dawn	02/12/19
56.	St. John, Tamara	02/12/19
57.	Arriola, Joann	02/13/19
58.	Coombs, Cathleen	02/13/19
59.	Day, Noreen	02/13/19
60.	Hamilton, Joanna	02/13/19
61.	Hunter, Jennifer	02/13/19
62.	Lemler, Nancy	02/13/19
63.	Lemler, Sarah	02/13/19
64.	Lopez, Robert and Linda	02/13/19
65.	Macinka, Judie	02/13/19
66.	Nichols, Pam	02/13/19
67.	Simpson, Jeri	02/13/19
68.	Smiley, Gloriann	02/13/19
69.	Wahl, Brian	02/13/19
70.	Wehrle, Monica	02/13/19
71.	Welcome, Stacie	02/13/19
72.	Horsfield, Jane	02/14/19
73.	Lewis, Nancy	02/14/19
74.	Smiley, Christine	02/14/19
75.	DeBatte, Teri	02/15/19
76.	Marinaro, Tracy	02/15/19
77.	Martinez, Leanne	02/15/19
78.	Noble, Tom	02/15/19
79.	Pangan, Benjamin	02/15/19
80.	Weber, Judy	02/15/19
81.	Alexander, Travis	02/16/19
82.	Campbell, Julie	02/16/19
83.	DiGiovanni, Michael	02/16/19



Comment Letter	Commenting Organization, Person, or Public Agency	Date
84.	Walter, Iris	02/16/19
85.	Millette, Christie	02/16/19
86.	Whitesell, Mary Ann	02/16/19
87.	Arriola, Joann	02/17/19
88.	Smith, Jen	02/17/19
89.	Bennett, Patrick	02/18/19
90.	Thompson, Elizabeth	02/19/19
91.	Trúvillo-Lyons, Yolanda	02/19/19
92.	Laws, Michele	02/20/19
93.	McAfee, David	02/20/19
94.	Richardson, Helen	02/20/19
95.	Braund, Stella	02/21/19
96.	Buku, Marcy	02/21/19
97.	Ferges, Michael	02/21/19
98.	Gauthier, Jennifer	02/21/19
99.	Harrison, Trevor	02/21/19
100.	Horton, Jen	02/21/19
101.	Houll, John	02/21/19
102.	Livingston, Kirsten	02/21/19
103.	Martineau, Tricia	02/21/19
104.	Moore, Sarah	02/21/19
105.	Tanner, Michelle	02/21/19
106.	Rick & Mini	02/21/19
107.	Bendler, Robin	02/22/19
108.	Bloomer, Don	02/22/19
109.	Butler, Sharon	02/22/19
110.	Davis, Alise	02/22/19
111.	Davis, Marion	02/22/19
112.	Davis, Nichol	02/22/19
113.	Davis, Teresa	02/22/19
114.	Goodwin, Glenn and Tilda	02/22/19
115.	Griffiths, Holly	02/22/19
116.	Holeman, Debbie	02/22/19
117.	Jones, LA	02/22/19
118.	Kenaga, Aarin	02/22/19
119.	Lopez, Linda	02/22/19
120.	Meister, Klaus	02/22/19
121.	Meshorer, Gwen	02/22/19
122.	Myers, Lynn	02/22/19
123.	Pope, Brenda	02/22/19
124.	Salverda, Paul	02/22/19
125.	Schuljak, Jayne	02/22/19
126.	Smith, Mary	02/22/19
127.	Spaccia, Valencia	02/22/19



Comment Letter	Commenting Organization, Person, or Public Agency	Date
128.	Thiele, Ken and Rosemary	02/22/19
129.	Trulove, Nichelle	02/22/19
130.	Willcutt, Erin	02/22/19
131.	Willman, Cynthia	02/22/19
132.	Wolverton, Ryan	02/22/19
133.	Anderson, Carole	02/23/19
134.	Arack, Patricia	02/23/19
135.	Jochums, Bob and Shari	02/23/19
136.	Lewis, Dan	02/23/19
137.	Lowen, Steve	02/23/19
138.	McReynolds, John	02/23/19
139.	Merhar, Don	02/23/19
140.	Meyer, Ralph	02/23/19
141.	Pagel, Brad and Patricia	02/23/19
142.	Pazsitzky, Steven	02/23/19
143.	Peace, CYD	02/23/19
144.	Portnoy, Lynne	02/23/19
145.	Pratt, Richard	02/23/19
146.	Saunders, Chris	02/23/19
147.	Schafersman, Steven	02/23/19
148.	Wright, P.T.	02/23/19
149.	Alexander, Rhetta	02/24/19
150.	Allen, Doug	02/24/19
151.	Allen, Sandra	02/24/19
152.	Bates, Roy	02/24/19
153.	Bereschik, George	02/24/19
154.	Bolanos, Lisa	02/24/19
155.	Bolanos, Lisa	02/24/19
156.	Boydston, Steve and Shellie	02/24/19
157.	Carroll, Toni	02/24/19
158.	Chenoweth, Taylor	02/24/19
159.	Coates, Ron	02/24/19
160.	Daniels, Bruce	02/24/19
161.	Farrell, Michael	02/24/19
162.	Freeman, Harley	02/24/19
163.	Gray, Kenneth	02/24/19
164.	Gutta, Patricia	02/24/19
165.	Lamont, Debbie	02/24/19
166.	Loe, Steve	02/24/19
167.	Luna, Bleu	02/24/19
168.	Luna, Jaida	02/24/19
169.	Luna, Mario	02/24/19
170.	Luna, Rachel	02/24/19
171.	Luna, Ruby	02/24/19



Comment Letter	Commenting Organization, Person, or Public Agency	Date
172.	Luna, Yvonne	02/24/19
173.	Markovich, Janice	02/24/19
174.	McAllister, Daniel	02/24/19
175.	Motley, Douglas	02/24/19
176.	Ochart, Laure	02/24/19
177.	Schneider, Jeremy	02/24/19
178.	Smith, Janice	02/24/19
179.	West, Tim	02/24/19
180.	Williams, Barry	02/24/19
181.	Williams. C.J.	02/24/19
182.	Aberg, Amanda	02/25/19
183.	Adrian, Ben	02/25/19
184.	Black, Orchid	02/25/19
185.	Bialecki, Hugh	02/25/19
186.	Birge, Fletcher	02/25/19
187.	Brage, Ken and Darlene	02/25/19
188.	Burnette, Johnathan and Julie	02/25/19
189.	Chaparro, Gilbert and Lani	02/25/19
190.	Choi, Claudia	02/25/19
191.	Clay, Gary	02/25/19
192.	Cuthbertson, Lee	02/25/19
193.	Del Ross-Richer, Chris	02/25/19
194.	Grant, Theresa	02/25/19
195.	Lanzrath, Larry	02/25/19
196.	Lopez, R. Brian	02/25/19
197.	Luster, Kathleen	02/25/19
198.	Mann, Maureen	02/25/19
199.	Mullendore, Jennifer	02/25/19
200.	Muller, Desiree	02/25/19
201.	Tetley, Rhea	02/25/19
202.	Walker, Susan	02/25/19
203.	Weaver, Dana	02/25/19
204.	Weaver, Joseph (1)	02/25/19
205.	Weaver, Joseph (2)	02/25/19
206.	Weaver, Joseph (3)	02/25/19
207.	Young, Holly	02/25/19
208.	Dillard, Lawrence Jr.	03/05/19
209.	Craig, Richard	N.D.
210.	Taylor, Nancy	N.D.
211.	Thompson, Jerry	N.D.
212.	West, Tina	N.D.



C. Conditional Use Permit Site Plan & Preliminary Grading Plan Modifications

Since the time the DREIR was circulated for public review and in response to public comments, the Project Applicant made modifications to the Conditional Use Permit Site Plan & Preliminary Grading Plan. In summary, the revised Conditional Use Permit Site Plan & Preliminary Grading Plan relocates the caretaker/maintenance building from the northern boundary of the western parking lot to the eastern boundary of the central parking lot; identifies the easterly driveway as “emergency access only” and identifies the proposed gate at the easterly driveway; and identifies water quality best management practices (BMPs) along State Route 18 (SR-18) that will address the small areas within the site that will drain to the Caltrans right-of-way (ROW). Relocation of the caretaker/maintenance building was done in response to public comment, in order to reduce impacts to biological resources caused by fuel management.

A copy of the modified Conditional Use Permit Site Plan & Preliminary Grading Plan is shown as Figure F-1, *Revised Site Plan*. For comparison purposes, the version of the Conditional Use Permit Site Plan & Preliminary Grading Plan used in the DREIR is shown as Figure 2-7, *Proposed Site Plan*, in Section 2.0, *Project Description*, of the DREIR.

A copy of the modified limits of physical disturbance is provided as Figure F-2, *Revised Proposed Physical Disturbances*. For comparison purposes, the physical disturbance limits used in the DREIR is shown as Figure 2-9, *Proposed Physical Disturbances*, in Section 2.0, *Project Description*, of the DREIR.

Modifications made to Appendix I of the Project-specific Drainage Plan (DREIR *Technical Appendix F*) to show the water quality BMPs on the Water Quality Management Plan (WQMP) Site Plan along SR-18 that will address the small areas within the site that will drain to the Caltrans ROW are included as Attachment B of this FEIR. For comparison purposes, the WQMP Site Plan used in Appendix I of DREIR *Technical Appendix F* is shown in Attachment B of Appendix I of DREIR *Technical Appendix F*.

The modifications to the Conditional Use Permit Site Plan & Preliminary Grading Plan are not considered substantial and do not substantively change the Project Description of the DREIR, nor alter any of the environmental impact significance conclusions disclosed in the DREIR in any ways that would result in new or more severe environmental impacts. As such, the DREIR does not require recirculation under State CEQA Guidelines Section 15088.5.



NOTES:

- RECORD OWNER: CHURCH OF THE WOODS, A CALIFORNIA CORPORATION; P.O. BOX 2000; LAKE ARROWHEAD, CA; 92352; 909-337-5483.
- PUBLIC UTILITIES ARE AS FOLLOWS:
 - WATER: CRESTLINE LAKE ARROWHEAD WATER AGENCY; P.O. BOX 3880; CRESTLINE, CA. 92325; 909-338-1775
 - SEWER: LAKE ARROWHEAD COMMUNITY SERVICES DIST; P. O. BOX 789; LAKE ARROWHEAD, CA 92352; 909-337-8555
 - NATURAL GAS: SO. CAL. GAS CO.; P. O. BOX 6226; SAN BERNARDINO, CA; 909-889-9711
 - ELECTRIC: SO. CAL. EDISON CO.; P. O. BOX 96; RIM FOREST, CA; 92378; 909-337-2564
 - TELEPHONE: VERIZON; 1500 CRAFTON AVE.; MENTONE, CA; 92359; 909-793-7441
 - CABLE TV: FALCON CABLE; P. O. BOX 9; RIM FOREST, CA; 92378; 909-336-2457
- THE CURRENT AND PROPOSED GENERAL PLAN USE DISTRICT IS LA/IC.
- ENTRY SIGNS WILL BE SUBMITTED FOR REVIEW AT A LATER DATE.
- ALL PARKING AREAS WILL BE SURFACED WITH ASPHALT. THE MINIMUM PARKING SPACE WILL BE 9'x19' TYPICAL.
- TREES TO BE REMOVED ARE DISCUSSED IN THE FORESTERS REPORT PREPARED BY JOHN HATCHER DATED 3-25-03.

PROJECT SUMMARY:

BUILDINGS

PHASE 1	
YOUTH CENTER GYMATORIUM.	
FIRST FLOOR	18,305 SF
SECOND FLOOR	8,579 SF
SNACK BAR	480 SF
TOTAL SF= 27,364 SF	

PHASE 2	
ASSEMBLY BUILDING - CHILDREN'S MINISTRY	
FIRST FLOOR	27,254 SF
SECOND FLOOR	13,783 SF
TOTAL = 41,037 SF	

MAINTENANCE BUILDING & CARETAKERS RESIDENCE	
FIRST FLOOR	750 SF
SECOND FLOOR	750 SF
TOTAL SF= 1,500 SF	
TOTAL PH 2= 42,537 SF	

PROJECT SUMMARY

BUILDING COVERAGE (FOOTPRINT)	46,309 SF	3.9 %
DRIVEWAYS & PARKING	199,478 SF	16.9 %
CONCRETE WALKS & PATIOS	26,200 SF	2.2 %
SPORT COURTS	9,508 SF	0.8 %
SPORTS FIELD	54,000 SF	4.6 %
LANDSCAPE AREA	182,960 SF	15.5 %
LANDSCAPE SLOPES	66,133 SF	5.6 %
WATER QUALITY BASIN	7,838 SF	0.6 %
NATURAL AREA	1,013,670 SF	49.9 %
TOTAL PROJECT= (27.12 ACRES) 1,181,363 SF 100.0 %		

PARKING SUMMARY (9x19 TYPICAL)

	REQUIRED	PROVIDED
CHURCH OF THE WOODS (BUILD OUT)		
600 SEATS (1 space for 3 seats)	200	311

DISTURBED AREA EXHIBIT

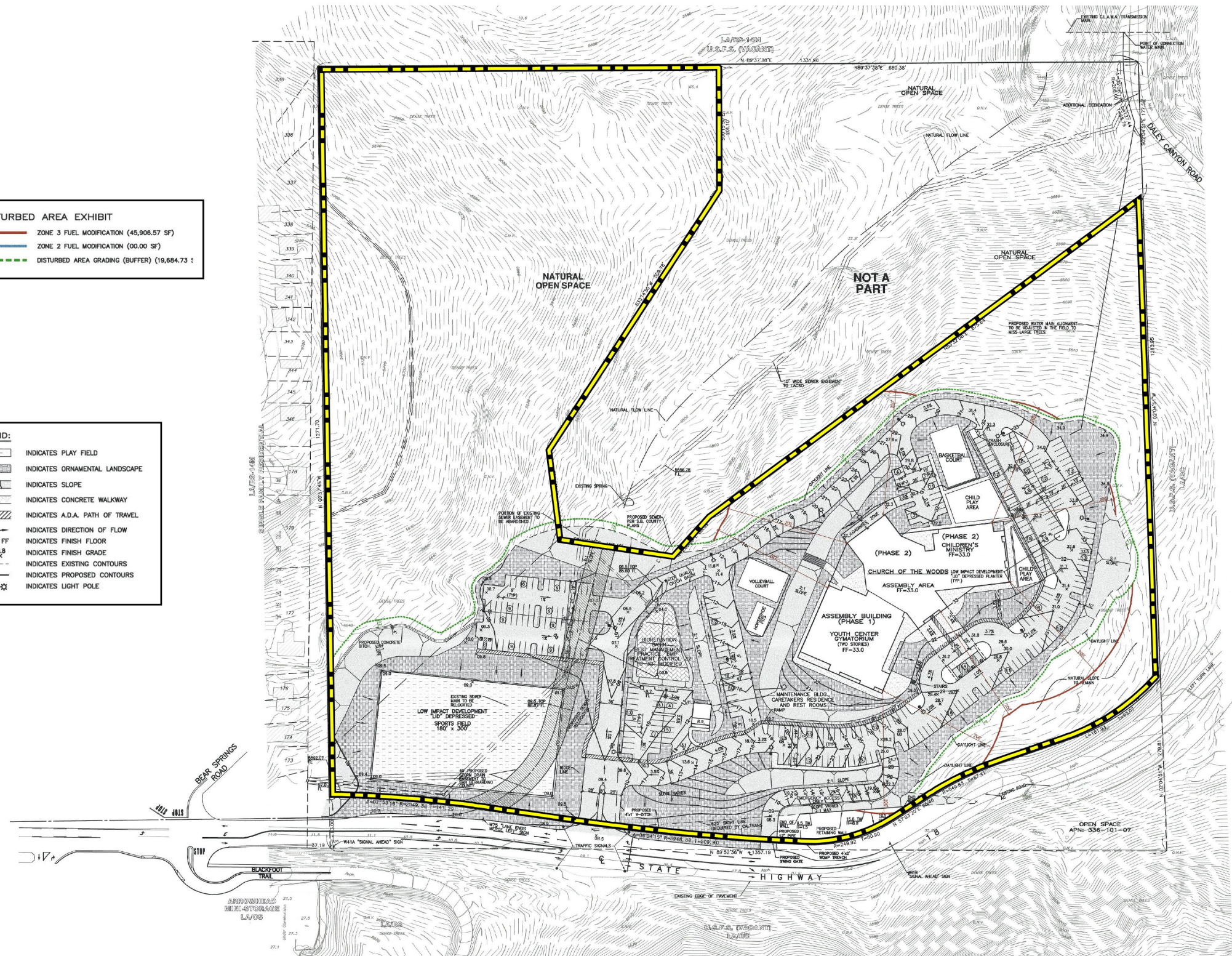
- ZONE 3 FUEL MODIFICATION (45,906.57 SF)
- ZONE 2 FUEL MODIFICATION (00.00 SF)
- DISTURBED AREA GRADING (BUFFER) (19,684.73 SF)

LEGEND:

- INDICATES PLAY FIELD
- INDICATES ORNAMENTAL LANDSCAPE
- INDICATES SLOPE
- INDICATES CONCRETE WALKWAY
- INDICATES A.D.A. PATH OF TRAVEL
- INDICATES DIRECTION OF FLOW
- FF INDICATES FINISH FLOOR
- INDICATES FINISH GRADE
- INDICATES EXISTING CONTOURS
- INDICATES PROPOSED CONTOURS
- INDICATES LIGHT POLE

IMPROVEMENT NOTES:

- DRIVE AISLES AND PARKING SPACES TO BE A.C. PAVEMENT AND BASE PER GEOTECHNICAL ENGINEERING RECOMMENDATIONS.
- ALL PAVED ACCESS AREAS TO BE BOARDED BY 6" CONCRETE CURB.
- SPORTS FIELD AND LANDSCAPE AREAS TO BE DEPRESSED AS PART OF STORM WATER RUNOFF MITIGATION PLAN.
- SEE WATER QUALITY MANAGEMENT PLAN FOR DETAILS ON MODIFIED BIORETENTION BASIN.
- BUILDINGS WITHIN CAMPUS ARE CONNECTED BY A.D.A. PATH OF TRAVEL. NO A.D.A. PATH OF TRAVEL IS PROVIDED TO ANY STATE HIGHWAYS BECAUSE PEDESTRIAN TRAFFIC IS NOT ALLOWED WITHIN STATE HIGHWAY RIGHT OF WAY.



Source(s): McKeever Engineering (01-09-2020)

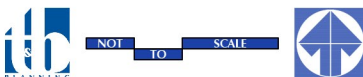


Figure F-1

REVISED SITE PLAN



Comment Letter #1

STATE OF CALIFORNIA—NATURAL RESOURCES AGENCY

Gov'n Newsom, Governor



DEPARTMENT OF FORESTRY AND FIRE PROTECTION
San Bernardino-Inyo-Mono Unit
3900 N. Sierra Way
San Bernardino, CA 92405
Phone: (909) 881-6800
Fax: (909) 881-6869
Website: www.fire.ca.gov

LAND USE SERVICES DEPARTMENT
FEB 07 2019
COUNTY OF SAN BERNARDINO



February 6, 2019

County of San Bernardino, Land Use Services Department
Tom Nieves, Planner
385 N. Arrowhead Ave., First Floor
San Bernardino, CA 92415

LAND USE SERVICES DEPARTMENT
FEB 07 2019
COUNTY OF SAN BERNARDINO

Via email to: tom.nieves@lus.sbcounty.gov

**RE: COMMENTS FOR THE CHURCH OF THE WOODS DRAFT ENVIRONMENTAL
IMPACT REPORT**

**PROJECT REVIEW INPUT
AS REQUIRED BY THE
CALIFORNIA ENVIRONMENTAL QUALITY ACT
AND
FIRE SAFE REGULATION**

Authority Cited

The above-referenced environmental document was submitted to CAL FIRE for review under the California Environmental Quality Act (CEQA) because the proposed project resides wholly, or in part, within State Responsibility Area (SRA), as defined in the Public Resources Code (PRC) § 4126-4127; and the California Code of Regulations (CCR) Title 14, Division 1.5, Article 1, § 1220-1220.5. In addition to Defensible Space, CAL FIRE has responsibility for enforcement of basic fire safety regulations on all proposed construction and development within SRA as defined under PRC § 4290 (Ref: PRC § 4290-4291 and CCR Title 14 Natural Resources Division, 1.5 Department of Forestry, Chapter 7 – Fire Protection, Subchapter 2 - SRA Fire Safe Regulations). These regulations, known as "SRA Fire Safe Regulations," constitute the basic wildland fire protection standards for all proposed construction and development within SRA. CAL FIRE also ensures compliance with the Z'Berg-Nejedly Forest Practice Act (FPA) of 1973 by enforcing the Forest Practice Rules (FPRs) CCR Title 14, Chapter 4.

1-1

General

CAL FIRE is not the lead agency in planning and development and project permitting. Each County's Board of Supervisors retains lead agency status and usually delegates this function to their planning departments. CAL FIRE cannot provide individual project map reviews and redesign orders as done by County Planning Department staff professionals. Under state law, only the county planning departments may provide professional planning services and charge fees for this function. CAL FIRE provides input as a contributing

1-2

"The Department of Forestry and Fire Protection serves and safeguards the people and protects the property and resources of California."



Church of The Woods Draft EIR
January 23, 2019

agency, generally limited to plan review, and is not the approving agency for these projects.

California Government code section (GC) 66474.02 within the Subdivision Map Act states, in part, that before approving a tentative map, or a parcel map for which a tentative map was not required, for an area located in a State Responsibility Area (SRA) or a very high fire hazard severity zone, as defined in Section 51177, a legislative body of a city/county shall, with certain exceptions, make the following specific findings:

1. A finding supported by substantial evidence in the record that the design and location of each lot in the subdivision, and the subdivision as a whole, are consistent with any applicable regulations adopted by the State Board of Forestry and Fire Protection pursuant to Sections 4290 and 4291 of the Public Resources Code.
2. A finding supported by substantial evidence in the record that structural fire protection and suppression services will be available for the subdivision through any of the following entities:
 - (A) A county, city, special district, political subdivision of the state, or another entity organized solely to provide fire protection services that is monitored and funded by a county or other public entity.
 - (B) The Department of Forestry and Fire Protection by contract entered into pursuant to Section 4133, 4142, or 4144 of the Public Resources Code.
3. A finding that to the extent practicable, ingress and egress for the subdivision meets the regulations regarding road standards for fire equipment access adopted pursuant to Section 4290 of the Public Resources Code and any applicable local ordinance.

1-2
CONT.

State Responsibility Areas

The State Board of Forestry & Fire Protection (Board) recognizes CAL FIRE's primary fire protection responsibilities are on lands declared by the Board to be SRA. The SRA Fire Safe Regulations were prepared and adopted for the purposes of establishing minimum wildfire protection standards in conjunction with building, construction, and development in SRA. These regulations apply to the perimeters and access to all residential, commercial, and industrial building construction approved after January 1, 1991. The regulations include minimum standards for the following:

- 1) Road standards for fire equipment access.
- 2) Standards for signs identifying streets, roads, and buildings.
- 3) Minimum private water supply reserves for emergency fire use.
- 4) Fuelbreaks and greenbelts.

1-3

These regulations do not supersede local regulations which equal or exceed minimum regulations adopted by the State. Additionally, exceptions to these standards may be allowed by the inspection entity listed in 14 CCR § 1270.05, where the exceptions provide



Church of The Woods Draft EIR
January 23, 2019

the same overall practical effect as these regulations. Exceptions granted by the inspection entity listed in 14 CCR § 1270.05 shall be made on a case-by-case basis only.

↑ 1-3
↓ CONT.

Forest Practice Rules

The Forest Practice Act regulates logging on privately-owned lands in California to ensure logging is done in a manner that will preserve and protect natural and cultural resources. The Forest Practice Rules apply whenever timber operations occur either for the commercialization of timber or the conversion of timberland to a non-timberland use. Your project fits the definition of a timberland conversion per the FPRs and therefore will require a Timberland Conversion Permit and a Timber Harvest Plan to be prepared by a Registered Professional Forester and filed with CAL FIRE for review and acceptance. Timber operations will need to be conducted by a Licensed Timber Operator (LTO).

← 1-4
←

Based on the aforementioned regulations and the authorities granted by the State, CAL FIRE requests that you address the following comment(s) in the Church of The Woods Draft EIR:

1. Please demonstrate, in the form of written evidence, compliance with established minimum wildfire protection standards as described under CCR Title 14 Natural Resources Division, 1.5 Department of Forestry, Chapter 7 – Fire Protection, Subchapter 2 - SRA Fire Safe Regulations.
2. Please demonstrate, in the form of written evidence, compliance CCR Title 14, Chapter 4-Forest Practice Rules.

← 1-5
← 1-6
←

Thank you for your consideration of these comment(s). CAL FIRE appreciates your efforts to address these critical issues.

Respectfully,

Henry Herrera
Unit Forester



RESPONSES TO COMMENT LETTER 1
California Department of Forestry and Fire Protection

1-1:

The commenter accurately states that the Project site is located within a State Responsibility Area (SRA). The County acknowledges that Cal Fire is responsible for the enforcement of basic fire safety regulations on all proposed construction and development within the SRA. This comment does not raise any concerns related to the DREIR. No revisions are required in order to respond to this comment.

1-2:

The County acknowledges Cal Fire's role and responsibilities with respect to the proposed Project. This comment does not raise any concerns related to the DREIR. No revisions to the DREIR are required in order to respond to this comment.

1-3:

The County acknowledges Cal Fire's responsibilities with respect to SRAs. This comment does not raise any concerns related to the DREIR. No revisions to the DREIR are required in order to respond to this comment.

1-4:

This comment summarizes the Forest Practice Act. The County acknowledges this comment; however, logging is not proposed as part of the Project evaluated in the DREIR. This comment does not raise any concerns related to the DREIR. No revisions to the DREIR are required in order to respond to this comment.

1-5:

The proposed Project's Fuel Modification Plan, included in the DREIR as *Technical Appendix E2*, provides written evidence of compliance with the established minimum wildfire protection standards as described under CCR Title 14 Natural Resources Division, 1.5 Department of Forestry, Chapter 7 – Fire Protection, Subchapter 2 – SRA Fire Safe Regulations. As stated in *Technical Appendix E2*, the objectives of fuel modification are to mitigate the effects of wildfire on people, their structures, and on environments that required protection. The proposed Project's Fuel Modification Plan identifies defensible space zones on the ground. As identified, fuel modification zone (FMZ) 1 is required to extend out 10 feet from the edge of the buildings and would be cleared of hazardous flammable material. FMZ 2 is required to extend out to 30 feet from the edge of the buildings and would be characterized by a highly modified natural area (i.e., thinning of trees, thinning of shrubs, pruning of trees). FMZ 3 is required to extend out to 200 feet from the edge of the buildings and would appear to be natural, but would not easily provide firebrands to the proposed structures. The boundaries of these FMZs are designated to stop at the boundaries of the Project site. On the Project site, FMZ 1 and 2 areas would not occur beyond the Project's limits of grading. FMZ 3 areas would all occur within the Project's limits of grading with the exception of approximately 0.66 acres that would extend into areas of the site beyond the limits of grading. In these areas, all dead logs, branches, litter, and decaying organic material (i.e., leaves, needles, and woody material) would be removed from the ground within FMZ 3. Standing dead material, stems, vines, and non-productive trees would also be removed from FMZ 3. Thinning and pruning of trees and shrubs would also occur within FMZ 3, and ongoing periodic maintenance would be required in the FMZ 3 area to ensure that the conditions of this zone are met.



CCR Title 14 Natural Resources, Division 1.5 Department of Forestry, Chapter 7 – Fire Protection, Subchapter 2 – SRA Fire Safe Regulations requires that all parcels 1.0 acre and larger shall provide a minimum 30-foot setback for buildings and accessory building from all property lines and/or the center of a road. The Project’s Fuel Modification Plan outlines the required setback specific for the proposed Project, which complies with the standard established in CCR Title 14, Division 1.5, Chapter 7, Subchapter 2. Refer to FEIR Subsection F.2.C, which explains that since the time the DREIR was circulated for public review, the Project Applicant made modifications to the Conditional Use Permit Site Plan & Preliminary Grading Plan to relocate the caretaker/maintenance building from the northern boundary of the western parking lot to the eastern boundary of the central parking lot, which reduces the need for fuel management in adjacent natural open space. A copy of the modified limits of physical disturbance (including fuel management) is provided as Figure F-2, *Revised Proposed Physical Disturbances*. For comparison purposes, the physical disturbance limits used in the DREIR is shown as Figure 2-9, *Proposed Physical Disturbances*, in Section 2.0, *Project Description*, of the DREIR. No revisions to the DREIR are required in order to respond to this comment.

1-6:

CCR Title 14, Division 1.5, Chapter 4 provides rules and regulations that govern the harvesting of commercial tree species. The Project, inclusive of on-site tree clearing as part of Project-related construction, does not propose to function as a tree harvesting operation or Timberland Production. Therefore, CCR Title 14, Division 1.5, Chapter 4 is not applicable to the Project and evidence of compliance is not necessary. No revisions to the DREIR are required in order to respond to this comment.



South Coast Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

SENT VIA E-MAIL AND USPS:

February 20, 2019

Tom.Nieves@lus.sbcounty.gov

Tom Nieves, Planner
County of San Bernardino, Land Use Services Department
385 North Arrowhead Avenue, First Floor
San Bernardino, CA 92415

Draft Revised Environmental Impact Report (DREIR) for the Proposed Church of the Woods Project (SCH No.: 2004031114)

South Coast Air Quality Management District (SCAQMD) staff appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the Final EIR.

SCAQMD Staff's Summary of Project Description

The Lead Agency proposes to construct a 69,901-square-foot church, consisting of a 27,364-square-foot gymnasium, a 41,037-square-foot assembly building/children's ministry, a 1,500-square-foot maintenance building, a 54,000-square-foot sports field, a 7,838-square-foot water retention basin, and a 1.5-acre park on 27.12 acres (Proposed Project). The Proposed Project will also include 13.5 acres of open space. The Proposed Project is located on the northwest corner of State Route 18 and Daley Canyon Road in the community of Rim Forest in San Bernardino County. Construction of the Proposed Project is expected to take place in two sequential phases over approximately 20 months¹.

2-1

SCAQMD Staff's Summary of Air Quality Analysis

In the Air Quality Analysis section, the Lead Agency quantified the Proposed Project's construction and operational emissions and compared those emissions to SCAQMD's recommended regional and localized air quality CEQA significance thresholds. Based on the analysis, the Lead Agency found that the Proposed Project's construction and operational air quality impacts would be less than significant, requiring no mitigation measures. Based on a review of the California Emissions Estimator Model (CalEEMod) modeling output, SCAQMD staff found that the Lead Agency would require the use of construction equipment that meets United States Environmental Protection Agency's (USEPA) Tier 2 emissions standard².

2-2

SCAQMD Staff General Comments

Upon a review of the Air Quality Analysis, SCAQMD staff found that the Lead Agency quantified construction emissions resulting from building approximately 47,809 square feet in the CalEEMod. It did not appear that construction emissions from a total of 69,901 square feet, including a 27,364-square-foot gymnasium, was quantified in CalEEMod to determine the level of significance. This may have led to an underestimation of the Proposed Project's construction emissions. Additionally, SCAQMD staff found that the Lead Agency did not include the use of Tier 2 construction equipment or better either as a project design feature or mitigation measure for the Proposed Project. Moreover, since the construction activities of the Proposed Project are expected to be sequential in two phases, the Lead Agency did not analyze a scenario in which operational activities from the first phase overlap with construction activities from the second phase. SCAQMD staff's detailed comments are provided in the attachment for more information.

2-3

¹ DREIR, Appendix B, *Air Quality and Greenhouse Gas Analysis*, CalEEMod Summer Run, 3.0 Construction Schedule. Page 59.

² *Ibid.* CalEEMod Output. Page 1.



Tom Nieves

2

February 20, 2019

Conclusion

Pursuant to California Public Resources Code Section 21092.5(a) and CEQA Guidelines Section 15088(b), SCAQMD staff requests that the Lead Agency provide SCAQMD staff with written responses to all comments contained herein prior to the certification of the Final EIR. In addition, issues raised in the comments should be addressed in detail giving reasons why specific comments and suggestions are not accepted. There should be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice (CEQA Guidelines Section 15088(c)). Conclusory statements do not facilitate the purpose and goal of CEQA on public disclosure and are not meaningful, informative, or useful to decision makers and to the public who are interested in the Proposed Project.

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2-4
←

SCAQMD staff is available to work with the Lead Agency to address these issues and any other questions that may arise. Please contact Robert Dalbeck, Assistant Air Quality Specialist - CEQA IGR Section, at RDalbeck@aqmd.gov, if you have any questions regarding these comments.

Sincerely,

Lijin Sun

Lijin Sun, J.D.

Program Supervisor, CEQA IGR

Planning, Rule Development & Area Sources

Attachment
LS:RD
SBC190115-02
Control Number



Tom Nievez

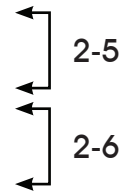
3

February 20, 2019

ATTACHMENT

Air Quality Analysis

1. Upon review of the Air Quality Analysis, SCAQMD staff found that the Lead Agency might have underestimated the Proposed Project’s construction emissions because of inconsistencies between the Project Description and the CalEEMod assumptions in the Air Quality Analysis (land use unit amount and construction equipment mitigation). Additionally, an overlapping construction and operation scenario is reasonably foreseeable and should be analyzed as a worst-case impact scenario in the environmental analysis to support a good-faith disclosure. Additional details are provided follow.



Land Use Unit Amount in the CalEEMod

- a. Upon review of the Project Description in the DREIR and the CalEEMod land use inputs in Appendix B, it is unclear to SCAQMD staff if the Lead Agency modeled emissions resulting from construction of the entire building being proposed, or only modeled the building footprint and construction activities for the maintenance building. For example, the Project Description states that the Proposed Project includes construction of a “two-story building consisting of a 27,364-square foot (sq. ft.) gymnasium and a 41,037-sq. ft. assembly building/children’s ministry” and an additional “1,500-sq. ft. two-story building that would serve as a maintenance building”.³ As seen in Figure 1 and Table 1 below, it is estimated that a total of 69,901 sq. ft. would undergo construction. However, the Lead Agency input a 47,810-sq. ft. “place of worship” for the land use in the CalEEMod. In Figure 1 and Table 1 below, the proposed site plan summary table identifies the square footage of phase one and phase two exactly as stated in the project description. Table 1 also identifies the “building coverage (footprint)” to be 46,309 sq. ft.⁴ SCAQMD staff is concerned that the Lead Agency has only accounted for construction air quality impacts from portions of the total square footage and the 1,500-sq. ft. maintenance building. Therefore, SCAQMD staff recommends that the Lead Agency revise the air quality analysis to quantify construction emissions from the total of approximately 69,901 sq. ft., or provide additional information to justify the use of 47,809 sq. ft. in CalEEMod in the Final EIR. In the event that the Lead Agency, after revising the land use unit amount assumptions in CalEEMod, finds that the Proposed Project’s air quality impacts would be significant, feasible mitigation measures will be required (CEQA Guidelines Sections 15126.2 and 15126.4).

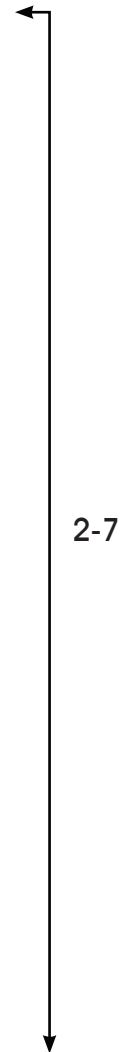


Figure 1: Screenshot of Summary Table in Figure 2-7, Proposed Site Plan

BUILDINGS		PROJECT SUMMARY		
PHASE 1		BUILDING COVERAGE (FOOTPRINT)	46,309 SF	3.9 %
YOUTH CENTER GYMATORIUM.		DRIVEWAYS & PARKING	199,478 SF	16.9 %
FIRST FLOOR	18,305 SF	CONCRETE WALKS & PATIOS	26,200 SF	2.2 %
SECOND FLOOR	8,579 SF	SPORT COURTS	9,508 SF	0.8 %
SNACK BAR	480 SF	SPORTS FIELD	54,000 SF	4.6 %
TOTAL SF: 27,364 SF		LANDSCAPE AREA	182,960 SF	15.5 %
PHASE 2		LANDSCAPE SLOPES	66,133 SF	5.6 %
ASSEMBLY BUILDING – CHILDREN’S MINISTRY		WATER QUALITY BASIN	7,838 SF	0.6 %
FIRST FLOOR	27,254 SF	NATURAL AREA	1,013,670 SF	49.9 %
SECOND FLOOR	13,783 SF	TOTAL PROJECT= (27.12 ACRES) 1,181,363 SF 100.0 %		
TOTAL = 41,037 SF				
MAINTENANCE BUILDING & CARETAKERS RESIDENCE				
FIRST FLOOR	750 SF			
SECOND FLOOR	750 SF			
TOTAL SF= 1,500 SF				
TOTAL PH 2= 42,537 SF				

³ DREIR. Chapter 2.0, *Project Description*, Section 2.2, Page 2-15.

⁴ *Ibid.* Page 2-18.



Table 1: Summary of Figure 2-7, Proposed Site Plan*

	First Floor (Footprint)	Second Floor	Total
Youth Center Gymnasium	18,305 sq. ft.	9,059 sq. ft. (8,579 sq. ft. + 480 sq. ft.)	27,364 sq. ft.
Assembly Building/ Children's Ministry	27,254 sq. ft.	13,783 sq. ft.	41,037 sq. ft.
Maintenance Building	750 sq. ft.	750 sq. ft.	1,500 sq. ft.
Total:	46,309 sq. ft.	23,592 sq. ft.	69,901 sq. ft.

*As stated above, the Lead Agency used 47,809 sq. ft. to model emissions in the CalEEMod and stated that "Church square footage includes the assembly building, gymnasium, and maintenance building." It appears that this unit amount was calculated using the footprint combined with the total sq. ft. of the maintenance building (including the first floor of the maintenance building twice, but not the second story of the gymnasium or assembly building).

2-7
CONT.

Overlapping Construction and Operation Scenario

- b. The Lead Agency states that the Proposed Project will be completed in two sequential phases. Phase one would include construction of the gymnasium and the sports field, and phase two would include the assembly building and children's ministry⁵. While the Lead Agency modeled emissions by combining both phases into one continuous phase of construction, SCAQMD staff found that the Lead Agency did not analyze a scenario in which the Proposed Project's construction and operational activities overlap. This means that operational activities from phase one would take place when phase two would be under construction. Since the Proposed Project's construction activities will occur in phases, an overlapping construction and operation scenario is reasonably foreseeable (e.g., the gymnasium and sports field may be operational at the same time the children's ministry and assembly building is under construction), unless the Lead Agency includes a requirement, as a project design feature, mitigation measure, or condition of approval that will avoid overlapping construction and operational activities from the implementation of project development phases. To conservatively analyze a worst-case impact scenario that is reasonably foreseeable at the time the DREIR is prepared, SCAQMD staff recommends that the Lead Agency revise the Air Quality Analysis to identify potentially overlapping years, combine construction emissions with operational emissions, and compare the combined emissions to SCAQMD's air quality CEQA *operational* thresholds of significance to determine the level of significance in the Final EIR (*emphasis added*). In the event that the Lead Agency, after analyzing an overlapping construction and operation scenario, finds that the Proposed Project's air quality impacts would be significant, feasible mitigation measures will be required (CEQA Guidelines Sections 15126.2 and 15126.4).

2-8

Recommended Change to Existing Requirement of Tier 2 Construction Equipment

Tier 4 Construction Equipment or Level 3 Diesel Particulate Filters

- 2. CEQA requires that all feasible mitigation measures go beyond what is required by law to minimize any significant impacts. In the DREIR, the Lead Agency modeled the Proposed Project's construction emissions by assuming that all equipment would be Tier 2 in CalEEMod. To further reduce construction emissions, particularly from NOx and PM and to ensure consistency between the modeling assumption and the environmental analysis in the main body of the Final EIR, SCAQMD staff recommends that the Lead Agency use off-road diesel-powered construction equipment that meets or exceeds the California Air Resources Board (CARB) and U.S. Environmental Protection Agency (USEPA) Tier 4 off-road emissions standards for equipment rated at 50 horsepower or greater during construction. Such equipment will be outfitted with Best Available Control Technology (BACT) devices including CARB certified Level 3 Diesel Particulate Filters (DPF). Level 3 DPFs are capable of achieving at least an 85 percent reduction in particulate matter

2-9

⁵ Ibid. Page 2-24



Tom Nieves

5

February 20, 2019

emissions⁶. A list of CARB verified DPFs are available on the CARB website⁷. Additionally, SCAQMD staff recommends that the Lead Agency include this requirement in applicable bid documents, and that successful contractor(s) must demonstrate the ability to supply such equipment prior to ground disturbing activities. A copy of each unit’s certified tier specification and CARB or SCAQMD operating permit (if applicable) should be available upon request at the time of mobilization of each applicable unit of equipment. Additionally, the Lead Agency should require periodic reporting and provision of written documentation by contractors to ensure compliance, and conduct regular inspections to the maximum extent feasible to ensure compliance.

2-9
CONT.

Enforceability

3. To ensure that Tier 4 construction equipment or Level 3 DPFs will be used during construction, SCAQMD staff recommends that the Lead Agency include this requirement as a project design feature, mitigation measure or a condition of approval for the Proposed Project in the Air Quality Section of the Final EIR rather than a mere modeling assumption in the CalEEMod. In the event that the Lead Agency finds that Tier 4 construction equipment is not feasible pursuant to CEQA Guidelines Section 15364, the Lead Agency should, at a minimum, specify in the Final EIR that using Tier 3 or newer construction equipment is a project requirement that contractor(s) must provide evidence to the Lead Agency for review and approval prior to the commencement of any construction activities.

2-10

Additional Recommended Mitigation Measures

4. In the event that the Lead Agency finds, after incorporating the above-mentioned revisions, that the Proposed Project’s construction and/or operational emissions would exceed applicable SCAQMD CEQA air quality significance thresholds, a list of feasible mitigation measures as suggestions and guidance to the Lead Agency that should be incorporated in the Final EIR for the Proposed Project includes the followings.

2-11

Haul Trucks during Construction

- a. Require zero-emissions or near-zero emissions on-road haul trucks, such as heavy-duty trucks with natural gas engines that meet the California Air Resources Board (CARB)’s adopted optional NOx emissions standard of 0.02 grams per brake horsepower-hour (g/bhp-hr). At a minimum, require that construction vendors, contractors, and/or haul truck operators commit to using 2010 model year or newer trucks (e.g., material delivery trucks and soil and aggregate import/export) that meet CARB’s 2010 engine emission standards of 0.01 g/bhp-hr of particulate matter (PM) and 0.20 g/bhp-hr of NOx emissions or newer, cleaner trucks.
- b. Maintain vehicle and equipment maintenance records for the construction portion of a project. All construction vehicles must be maintained in compliance with the manufacturer’s recommended maintenance schedule. All maintenance records for each facility and their construction contractor(s) will remain on-site for a period of at least two years from completion of construction.
- c. Enter into a contract that notifies all construction vendors and contractors that vehicle idling time will be limited to no longer than five minutes or another time-frame as allowed by the California Code of Regulations, Title 13 section 2485 - CARB’s Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling. For any vehicle delivery that is expected to take longer than five minutes, each project applicant, project sponsor, or public agency will

2-11A

2-11B

2-11C

⁶ California Air Resources Board. November 16-17, 2004. *Diesel Off-Road Equipment Measure – Workshop*. Page 17. Accessed at: https://www.arb.ca.gov/msprog/ordiesel/presentations/nov16-04_workshop.pdf.

⁷ *Ibid*. Page 18.



Tom Nievez

6

February 20, 2019

require the vehicle’s operator to shut off the engine. Notify the vendors of these idling requirements at the time that the purchase order is issued and again when vehicles enter the gates of the facility. To further ensure that drivers understand the vehicle idling requirement, post signs at the entry of the construction site and throughout the site stating that idling longer than five minutes is not permitted.

2-11C
CONT.

Off-Road Construction Equipment

- d. Encourage construction contractors to apply for SCAQMD “SOON” funds. The “SOON” program provides funds to applicable fleets for the purchase of commercially-available low-emission heavy-duty engines to achieve near-term reduction of NOx emissions from in-use off-road diesel vehicles. More information on this program can be found at SCAQMD’s website: <http://www.aqmd.gov/home/programs/business/business-detail?title=off-road-diesel-engines>.

2-11D



RESPONSES TO COMMENT LETTER 2
Southern California Air Quality Management District

2-1:

The commenter accurately summarizes the location and primary components of the proposed Project. This comment does not raise any concerns related to the DREIR. No revisions to the DREIR are required in order to respond to this comment.

2-2:

This comment accurately summarizes the conclusions of DREIR Subsection 3.B, *Air Quality*. This comment does not raise any concerns related to the DREIR. No revisions to the DREIR are required in order to respond to this comment.

2-3:

Please refer to Responses to Comments 2-5 through 2-11D.

2-4:

Responses to all of SCAQMD's comments are provided above and below and the County acknowledges the contact information provided by SCAQMD.

2-5:

The Project Applicant proposes to undertake site preparation in a single phase and site grading in a single phase. However, as explained in DREIR Subsection 2.5.1(B), construction of the buildings would occur in two phases, with 27,364 s.f. of the assembly building to be constructed as part of Phase 1 and a 41,037 s.f. addition to the assembly building and a 1,500 s.f. maintenance building/caretaker residence to be constructed as part of Phase 2. The two building construction phases are acknowledged in Section 1.7 of the Air Quality and Greenhouse Gas Analysis (DREIR *Technical Appendix B*). The air quality analysis conservatively evaluates a worst-case construction condition for the Project by assuming simultaneous construction of 47,809 s.f. of building area in a single phase. The 47,809 s.f. used in the CalEEMod modeling includes 46,309 s.f. of assembly building space (instead of 41,037 s.f., which is the most space that would actually be constructed in a single phase (Phase 2)) and 1,500 s.f. for the on-site caretaker's residence. Site preparation, grading, and building construction activities would not overlap. As shown in Table 5-1 on page 32 of the Air Quality Analysis (DREIR *Technical Appendix B*), the peak daily emissions are primarily associated with site preparation and not building construction. As shown in Table 5-1, even if the analysis considered the construction of the Project's full 69,901 s.f. of building area in a single phase, emissions associated with building construction still would not exceed the SCAQMD thresholds for any criteria pollutant. Accordingly, the DREIR made appropriate assumptions regarding the overlap of construction-related emissions, and such assumptions do not represent an inconsistency between the Project Description and the CalEEMod assumptions in the Air Quality Analysis.



2-6:

As discussed in Response to Comment 2-5, the Air Quality analysis evaluates the worst-case conditions associated with Project-related construction activities. The table below illustrates the peak daily construction emissions from Table 5-1 of the Air Quality and Greenhouse Gas Analysis (DREIR *Technical Appendix B*), combined with the total operational emissions from Table 5-3 of the Air Quality and Greenhouse Gas Analysis (DREIR *Technical Appendix B*), in comparison to the SCAQMD thresholds for construction emissions. Adding the operational emissions listed in Table 5-3 of DREIR *Technical Appendix B* to the construction emissions listed in Table 5-1 of DREIR *Technical Appendix B* would not result in any exceedances of the SCAQMD construction emissions thresholds. Furthermore, the table below assumes a worst-case scenario with construction activities overlapping with operation of the full 69,901 s.f. of building area, which would not occur in reality because construction activities would cease prior to operation of the full facility. Therefore, any potential overlap in the construction and operation of the Project would result in a less-than-significant impact.

Phase	CO	ROGs	NOx	PM ₁₀	PM _{2.5}	SOx
Construction						
Peak Emissions	44.3	14.8	89.8	9.3	5.0	--
Operational						
Total Emissions	20.9	3.2	8.9	5.1	1.4	5.1
Combined Emissions						
	65.2	18	98.7	14.4	6.4	5.1
SCAQMD Thresholds						
Construction	550	75	100	150	55	--
Exceedance	No	No	No	No	No	No

2-7:

Please refer to Response to Comment 2-5.

2-8:

Please refer to Response to Comment 2-6. Project operations would not overlap with the site preparation or grading phases of construction because site preparation and grading would be completed prior to the construction of any of the proposed buildings. Additionally, as shown in the table below, adding the operational emissions listed in Table 5-3 of the Air Quality and Greenhouse Gas Analysis (DREIR *Technical Appendix B*) to the building construction, paving, or architectural coating phases listed in Table 5-1 of DREIR *Technical Appendix B* would not result in any emissions exceeding the SCAQMD’s operational thresholds. Therefore, any potential overlap in the construction and operation of the project would result in a less-than-significant impact.



Phase	CO	ROGs	NOx	PM ₁₀	PM _{2.5}	SOx
Construction						
Peak Emissions ¹	33.1	14.8	36.3	4.4	1.9	--
Operational						
Total Emissions	20.9	3.2	8.9	5.1	1.4	0.1
Combined Emissions						
	54	18	45.2	9.5	3.3	0.1
SCAQMD Thresholds						
Operational	550	55	55	150	55	150
Exceedance	No	No	No	No	No	No

1. Excluding site preparation and grading emissions. These phases are anticipated to be completed prior to Phase 1 and Phase 2 of Project construction and overlap would not occur.

2-9:

Depending on the engine size, off-road equipment has been required by the United States Environmental Protection Agency (EPA) to meet Tier 2 requirements since between 2001 and 2006. Therefore, although newer Tier 3 and Tier 4 equipment is available and could be used onsite, Tier 2 was used as the default assumption for the off-road equipment to provide a conservative analysis of Project-related emissions. The Project construction emissions would not exceed any of the SCAQMD thresholds with the use of Tier 2 equipment, and under CEQA, mitigation measures are not required for effects which are found to be less-than-significant (*see CEQA Guidelines § 15126.4(a)(3)*). Notwithstanding the fact that the Project’s impacts would be less than significant, the mitigation described below (Mitigation Measure MM-3.B-1) has been added to Subsection 3.B.8.2 of the DREIR to ensure that the Project’s construction contractor(s) use no less than Tier 3 construction equipment for equipment pieces exceeding 150 horsepower.

MM-3.B-1 Prior to the issuance of a grading permit or a building permit, the County shall verify that the following notes are included on the construction document(s). These notes also shall be specified in bid documents issued to construction contractors. The Project’s construction contractors shall be required to ensure compliance with the notes and permit periodic inspection of the construction site by County of San Bernardino staff or its designee to confirm compliance.

- *“During construction, all construction equipment (>150 horsepower) shall be Environmental Protection Agency (EPA)/California Air Resources Board (CARB) Tier 3 Compliant or better. The construction contractor shall keep a log of all construction equipment greater than 150 horsepower demonstrating compliance with this requirement, and the log shall be made available for inspection by San Bernardino County upon request.”*
- *“Construction equipment engines (>150 horsepower) shall be maintained in good condition and in proper tune per manufacturer’s specification for the duration of construction. Maintenance records shall be made available for inspection by San Bernardino County upon request.”*
- *“All diesel-fueled trucks hauling materials to and from the construction site shall comply with CARB’s 2010 engine emission standards.”*



- “Signs shall be posted at the construction site entry and on the construction site stating that vehicle engine idling is limited to 5 minutes or less.”

The addition of MM-3.B-1 to Subsection 3.B.8.2 is indicated in Section F.3, *Additions, Corrections, and Revisions*, of this FEIR.

2-10:

Please refer to Response to Comment 2-9.

2-11:

Please refer to Response to Comment 2-9. As noted, the Project would not result in any significant impacts related to air quality, and under CEQA mitigation measures are not required for effects which are not found to be significant (*see CEQA Guidelines § 15126.4(a)(3)*). Refer also to the Responses to Comments 2-11.A through 2-11.D.

2-11.A:

Notwithstanding the fact that the Project’s air quality impacts would be less than significant, Mitigation Measure MM-3.B-1 has been added to Subsection 3.B.8.2 of the DREIR, to require that diesel-fueled trucks hauling materials to and from the Project site during construction shall comply with CARB’s 2010 engine emission standards.

2-11.B:

Notwithstanding the fact that the Project’s air quality impacts would be less than significant, Mitigation Measure MM-3.B1 has been added to Subsection 3.B.8.2 of the DREIR, to require that construction equipment engines be maintained per manufacturer’s specification, with maintenance records made available for inspection by San Bernardino County upon request.

2-11.C:

Notwithstanding the fact that the Project’s air quality impacts would be less than significant, Mitigation Measure MM-3.B1 has been added to Subsection 3.B.8.2 of the DREIR, to require that construction equipment engines be maintained per manufacturer’s specification, with maintenance records made available for inspection by San Bernardino County upon request.

2-11.D:

The County acknowledges the SCAQMD’s SOON Program; however, the County has no enforcement ability to encourage private enterprise participation in a voluntary program. For this reason, and the fact that the Project’s air quality impacts will be less than significant, no revisions to the DREIR are required in order to respond to this comment.



From: [Rivers, Ricky@DOT](mailto:Rivers.Ricky@DOT)
To: sandipan@translutions.com; Nievesz, Tom
Cc: Roberts, Mark B@DOT
Subject: Church of the Woods (File: 08-SBd-18-PM 22.95)
Date: Friday, February 22, 2019 2:22:50 PM
Attachments: [image001.png](#)
[CommentLetter_190222_Signed.pdf](#)

Good afternoon,

Thank you for your patience in our review of the Church of the Woods, located in the unincorporated community of Rimforest, San Bernardino County. We have completed our review and I have attached a copy of the letter to this message; the letter was also mailed today. Additionally, the letter can be found here:

<http://ld-igr-gts.dot.ca.gov/district/8/report/6595#> .

Please contact me or my supervisor Mark Roberts if you have any questions or comments regarding our letter.

Thank you,

Ricky Rivers

Transportation Planner
Office of Intergovernmental Review, Community and Regional Planning
P: (909) 806-3298



Caltrans, District 8
464 West 4th Street, 6th Floor (MS 722)
San Bernardino, CA 92401



Comment Letter #3

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

EDMUND G. BROWN Jr., Governor

DEPARTMENT OF TRANSPORTATION

DISTRICT 8
PLANNING (MS 725)
464 WEST 4th STREET, 6th FLOOR
SAN BERNARDINO, CA 92401-1400
PHONE (909) 388-7017
FAX (909) 383-5936
TTY 711
www.dot.ca.gov/dist8



Making Conservation
a California Way of Life.

February 22, 2019

File: 08-SBd-18-PM 22.95

Tom Nieves
Land Use Services Department
County of San Bernardino
385 North Arrowhead Avenue
San Bernardino, CA 92415

Subject: Church of the Woods (SCH# 2004031114) – Draft Revised Environmental Impact Report dated January 9, 2019

Dear Ms. Duron:

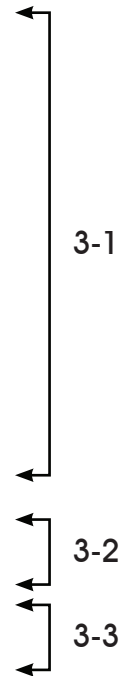
Thank you for providing the California Department of Transportation (Caltrans) the opportunity to review and comment on the Draft Revised Environmental Impact Report for the Church of the Woods Project, to be located on the north side of State Route 18 (SR-18), between Bear Springs Road and Daley Canyon Road in the unincorporated community of Rimforest in San Bernardino County. The proposed project consist of a 600-seat Church and Sports Field.

As the owner and operator of the State Highway System (SHS), it is our responsibility to coordinate and consult with local jurisdictions when proposed development may impact our facilities. As the responsible agency under the California Environmental Quality Act, it is also our responsibility to make recommendations to offset associated impacts with the proposed project. Although the project is under the jurisdiction of the County of San Bernardino, due to the project's potential impact to the State facilities, it is also subject to the policies and regulations that govern the SHS.

The Traffic Impact Study was reviewed by the Traffic Operations, Forecasting, Electrical Operations, and Design units. The Preliminary Drainage Study was reviewed by the Hydraulics unit. Please see the remaining and/or additional comments below:

TRAFFIC OPERATIONS

1. Verify the listed Opening Year for this project. The Opening Year is currently listed as Opening Year 2018.
2. Intersection #5 (Proposed Driveway/State Route 18 intersection) on the site plan on Page 3, the easterly driveway should be emergency access only with the gate always closed.



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Mr. Nieves
 February 22, 2019
 Page 2

- 3. Based on Figures 18 & 19 on pages 35 & 37, the installation of the new signal at New Driveway/State Route 18 intersection should be described under Sections 8.1 and 8.2 on page 33. 3-4
- 4. Coordinate the new signal for Intersections #4 and #5 (Bear Spring Road and driveway) on State Route 18. 3-5
- 5. Add Intersection #5 to Tables H, I, J, and K. 3-6
- 6. All intersections showing a need of new traffic signals (meeting CAMUTCD signal warrants) shall be installed and in operation prior to open for business at the proposed project. 3-7

FORECASTING & ELECTRICAL OPERATIONS

Address the previous comment:

- 1. Page 21: In the table for Opening Year (2018) intersection Level of Service (LOS), the project is labeled to have "NO" impact on the intersection of Bear Springs Road and State Route 18. However, the table shows both Saturday and Sunday peak hour LOS degrade to F and E respectively after opening year. Please revise label to show "YES" for all cases that show LOS E or worse. This applies anywhere in this report. 3-8

DESIGN

- 1. Ensure that the curve return design to accommodate STAA trucks. 3-9
- 2. Standard shoulder should be provided within the project limits. 3-10

HYDRAULICS

- 1. Please quantify the amount of drainage that is coming into Caltrans Right-of-Way (R/W) that is adjacent to the project for both pre- and post-construction conditions. Post-construction drainage must be equal to or less than pre-construction. 3-11
- 2. The proposed storm drain system will disrupt the historical drainage path. Please provide hydraulic calculations for the proposed storm drain. If the storm drain is not maintained or 3-12

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Mr. Nieves
February 22, 2019
Page 3

if its capacity is exceeded; the excess water may create a backwater condition on the highway or divert storm runoff onto Caltrans' R/W.

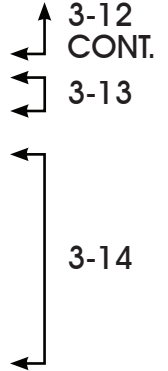
- 3. Please ensure that drainage from the project site is treated before it enters the Caltrans R/W.

All comments should be addressed and Response to Comments Memo submitted before proceeding to the Encroachment Permits Office.

These recommendations are preliminary and summarize our review of materials provided for our evaluation. If this project is later modified in any way, please forward copies of revised plans as necessary so that we may evaluate all proposed changes for potential impacts to the SHS. If you have any questions regarding this letter, please contact Ricky Rivers at (909) 806-3298 or myself at (909) 383-4557.

Sincerely,

MARK ROBERTS, AICP
Office Chief
Intergovernmental Review, Community and Regional Planning



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RESPONSES TO COMMENT LETTER 3
California Department of Transportation – District 8

3-1:

The commenter accurately describes the location and primary components of the proposed Project. The County acknowledges the statements made by the commenter regarding CalTrans' roles and responsibilities with respect to the proposed Project. The County acknowledges that the proposed Project's Traffic Impact Analysis was reviewed by CalTrans' Traffic Operations, Forecasting, Electrical Operations, and Design units. The County also acknowledges that the proposed Project's Preliminary Drainage Study was reviewed by Caltrans' Hydraulics unit. The comments received from each unit are addressed below in Response to Comments 3-2 to 3-13.

3-2:

The Opening Year analyzed in the Traffic Impact Analysis (TIA) is 2018. Based on the length of time it takes to prepare an Environmental Impact Report (EIR), it is not unusual for the estimated opening date to shift slightly during the review process. The Opening Year will now be assumed to be 2020. This minor change in the Opening Year, however, would not result in any new significant traffic impacts nor a change in the DREIR analysis or conclusions. Direct impacts are based on an Existing Plus Project scenario, which the Opening Year does not affect. Further, the TIA and DREIR analyze Buildout Year 2040, which would capture any reasonably foreseeable impact in the interim opening year condition because no major transportation system improvements were assumed to be in place in 2040 that would not be in place at the opening year. The TIA appropriately evaluates existing and existing plus Project conditions as well as cumulative and cumulative plus Project conditions as required under CEQA.

3-3:

The Project's proposed easterly driveway is for emergency access only and is proposed to be gated. The Project-specific TIA (DREIR *Technical Appendix H*) dated September 12, 2018, includes a description of the easterly driveway in Section 2.0, Project Description, page 5. Since the time the DREIR was circulated for public review and in response to public comments, the Project Applicant made modifications to the Conditional Use Permit Site Plan & Preliminary Grading Plan, including identification of the easterly driveway as "emergency access only" with a proposed gate. A copy of the modified Conditional Use Permit Site Plan & Preliminary Grading Plan, showing the emergency-only access label and gate is shown as Figure F-1, *Revised Site Plan*.

3-4:

The installation of a new traffic signal at Project Driveway/SR-18 is a Project Design Feature that will be constructed with the completion of the Project. Figures 18 and 19 of the TIA (DREIR *Technical Appendix H*) include intersection geometrics for the existing and opening year, with Project, with improvements conditions. Because the signal is a Project Design Feature, it is not included in the mitigation measures sections of the TIA, or the DREIR. Refer to DREIR Subsection 2.4.1(A)(3), which states "...the Project would install a traffic signal at the proposed driveway" (DREIR page 2-19). Also refer to Figure F-1, *Revised Site Plan*, which calls out the signal.



3-5:

The intersections of Project Driveway/SR-18 and Bear Springs Road/SR-18 were coordinated with Caltrans as part of preparation of the TIA (DREIR *Technical Appendix H*). Caltrans indicated that these signals are anticipated to be in place prior to occupancy of the Project. Appendix C of the TIA includes the Synchro worksheets for both locations.

3-6:

The intersection of Project Driveway/SR-18 is a Project Design Feature that will be constructed with the completion of the Project. Tables H, I, J, and K, of the TIA (DREIR *Technical Appendix H*) indicate intersection levels of service with improvements. Because the signal is a Project Design Feature, it is not included in the mitigation measures sections of the TIA, or the DREIR. Refer to DEIR Subsection 2.4.1(A)(3), which states "...the Project would install a traffic signal at the proposed driveway" (DREIR page 2-19). Also refer to Figure F-1, *Revised Site Plan*, which calls out the signal. The levels of service with the traffic signal at Project Driveway/SR-18 are included in Tables D, E, F, and G of the TIA.

3-7:

Refer to Responses to Comments 3-5 and 3-6. Also refer to DREIR Mitigation Measures 3.I-1 and 3.I-2 which obligate the Project Applicant work with Caltrans to install a signal at the intersection of Bear Springs Road/SR-18, and to pay fair share fees to Caltrans for traffic signal installations located further from the Project site and identified in Mitigation Measure 3.I-2 should a mitigation fee be established by Caltrans. At the time this response was prepared, Caltrans had not yet prepared a nexus study to establish the fair share mitigation fee payments. The installation of traffic signals on State routes is within the jurisdictional control of Caltrans and the timing of the improvements are outside of the control of the Project Applicant and the County of San Bernardino. As a result, the DREIR concluded that these mitigation measures would not be feasible for the County to assure, and that the impact would be significant and unavoidable.

3-8:

This comment identifies a typographical error in DREIR Table 3.I-2 (taken from Table D of DREIR *Technical Appendix H*) and Table 3.I-4 (taken from Table E of DREIR *Technical Appendix H*). DEIR Tables 3.I-2 and 3.I-4 and *Technical Appendix H* Tables D and E have been corrected in the Final EIR to show that Bear Springs Road/SR-18 indicate "Yes" in the Project Impact column, indicating that the Project would have a significant impact at this intersection location. The typographical corrections are indicated in Section F.3, *Additions, Corrections, and Revisions*, of this Final EIR. Notwithstanding the typographical corrections in the tables, the DREIR correctly concluded, on DREIR page 3.I-17, that the proposed Project would result in a significant direct impact to the Bear Springs Road/SR-18 intersection and the impact would require mitigation. The correction of the typographical error in the tables does not change the conclusions reached by the DREIR. The DREIR included Mitigation Measure MM 3.I-1 (see DREIR pages 3.I-18 and 19), to address the Project's significant impact to the Bear Springs Road/SR-18 intersection. However, as discussed under DREIR Subsection 3.I.9 and in Response to Comment 3-7, the County cannot assure timing of the implementation of Mitigation Measure 3.I-1, because installation of the needed traffic signal at this location falls under the jurisdiction of Caltrans and it is outside of San Bernardino County's authority to compel Caltrans to install the signal in any particular timeframe. As a result, the DREIR concluded that these mitigation measures would not be feasible for the County to assure implementation, and that the impact would be significant and unavoidable.



3-9:

As standard practice during County review of the Project's construction drawings (during the building permit plan check process), the County will require that a truck turning template be shown to accommodate the wide turning movements of trucks at the Project's entrance driveway. In addition, the construction drawings are required to show adequate turning movements for emergency vehicles, including fire trucks.

3-10:

As shown in the Project's application materials on file with the County, a standard shoulder is proposed to be provided within the Caltrans right-of-way along the frontage of Project site.

3-11:

According to the Project's civil engineer, W.J. McKeever Inc., there is an area in the southeastern portion of the Project site that, in its natural state, drains onto the Caltrans right-of-way. This area contains 129,197.00 s.f. or 2.97 acres. In the developed state of the Project, McKeever reports that there would be 91,560.42 s.f. or 2.10 acres draining to the Caltrans right-of-way. Of this area, 68,721.43 s.f. or 1.58 acres would remain in its natural condition. These post-Project undeveloped and developed conditions are shown in an Addendum to the Project's Drainage Study published by McKeever and appended to the FEIR as *Technical Appendix F1*. Also attached to the Drainage Study Addendum are rational method hydrology calculations using the 100-yr 1-hr storm event. The results are: 1) Pre-development $Q_{100} = 16.759$ cfs and 2) Post-development $Q_{100} = 15.192$ cfs. In summary, the amount of water directed to the Caltrans right-of-way will be less under proposed conditions that occurs under existing conditions. In addition, the Project Applicant added BMPs to the Project to address water quality in this area, as shown in Attachment B to this FEIR. The presentation of this numerical data and the addition of BMPs is not significant new information and does not change the conclusions reached by the DREIR. The Drainage Study appended to the DREIR circulated for public review was fundamentally and basically adequate, and as such, recirculation of the DREIR is not warranted due to the addition of the information presented in this response and in the Drainage Study Addendum as set forth in § 15088.5 of the State CEQA Guidelines.

3-12:

The storm drain referred to in this comment is planned by the San Bernardino County Flood Control District as part of a regional erosion control project called the "Rimforest Storm Drain Project," which underwent an independent CEQA review with EIR certification by the San Bernardino County Board of Supervisors on May 23, 2017 (SCH No. 2015051070). This regional storm drain project is designed to accept developed flows from the proposed Church of the Woods Project, but will be installed by the County Flood Control District completely independently from the Church of the Woods and regardless if Church of the Woods is developed or not. This storm drain will be installed and maintained by the San Bernardino County Flood Control District. For these reasons, this comment does not raise any concerns related to the DREIR. No revisions are required in order to respond to this comment.

3-13:

Refer to Appendix I of DREIR *Technical Appendix F* for a copy of the Project's Water Quality Management Plan (WQMP) prepared in compliance with the County's Stormwater Program. In response to this comment,



the Project Applicant added BMPs to the Project to address water quality for the small area draining to the Caltrans ROW, as shown in Attachment B to this FEIR.

3-14:

The County acknowledges the commenter's contact information and will contact CalTrans if there are any substantive Project updates and/or questions that may affect CalTrans facilities. As a commenting party on the DREIR, Caltrans will receive all pertinent public notices related to the Project.



Comment Letter #4



Gavin Newsom
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Kate Gordon
Director

February 25, 2019

LAND USE SERVICES DEPARTMENT

FEB 27 2019

COUNTY OF SAN BERNARDINO

Tom Nievesz
San Bernardino County Land Use Services Department
385 N. Arrowhead Ave., 1st Floor
San Bernardino, CA 92415-0182

Subject: Church of the Woods
SCH#: 2004031114

Dear Tom Nievesz:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on February 22, 2019, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,


Scott Morgan
Director, State Clearinghouse

←
4-1
↓

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL 1-916-445-0613 state.clearinghouse@opr.ca.gov www.opr.ca.gov



Document Details Report
State Clearinghouse Data Base

SCH# 2004031114
Project Title Church of the Woods
Lead Agency San Bernardino County

Type EIR Draft EIR
Description The proposed Church of the Woods Project proposes to develop and operate a Church of the Woods church campus, with associated infrastructure, on an approx 13.6-acre portion of a 27.12-acre property located within the Rim Forest Community in unincorporated San Bernardino County. The proposed church campus would include: one two-story building, consisting of 27,364 sf gymnasium and a 41,037 sf assembly building/children's ministry; one 1,500 sf two-story building which would serve as a maintenance building, caretaker residence, and contain lavatory facilities; one 54,000 sf sport field, sports courts, and one 7,838 sf water quality bioretention basin.

Lead Agency Contact

Name Tom Nieves
Agency San Bernardino County Land Use Services Department
Phone (909) 387-5036 **Fax**
email
Address 385 N. Arrowhead Ave., 1st Floor
City San Bernardino **State** CA **Zip** 92415-0182

Project Location

County San Bernardino
City
Region
Lat / Long 34° 13' 54.8" N / 117° 13' 07.6" W
Cross Streets Daley Canyon Rd and SR 18
Parcel No. 336-101-15
Township 2N **Range** 3W **Section** 29 **Base** SBB&M

Proximity to:

Highways 18
Airports
Railways
Waterways Little Bear Creek
Schools Rim of the World HS
Land Use LA / IC (Community Industrial)

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Noise; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; Department of Fish and Wildlife, Region 6; Cal Fire; Department of Parks and Recreation; Department of Water Resources; California Highway Patrol; Caltrans, District 8; Regional Water Quality Control Bd., Region 6 (Victorville); Department of Toxic Substances Control; Native American Heritage Commission

Date Received 01/09/2019 **Start of Review** 01/09/2019 **End of Review** 02/22/2019

4-1
CONT.

Note: Blanks in data fields result from insufficient information provided by lead agency.



RESPONSE TO COMMENT LETTER 4

California Office of Planning and Research – Clearinghouse and Planning Unit

4-1:

The County of San Bernardino acknowledges this letter, which confirms the close of the public review period for the DREIR as of February 22, 2019, and confirms no State agencies submitted comments by that date. (Regardless, it is noted that the County received comment letters from Caltrans and the California Water Boards, which are included as Comment Letter 3 and Comment Letter 5, respectively). The County further acknowledges that in relation to the proposed Project, it has complied with the State Clearinghouse review requirements for draft environmental documents.



Gavin Newsom
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Kate Gordon
Director

March 1, 2019

Tom Nieves
San Bernardino County Land Use Services Department
385 N. Arrowhead Ave., 1st Floor
San Bernardino, CA 92415-0182

Subject: Church of the Woods
SCH#: 2004031114

Dear Tom Nieves:

The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on February 22, 2019. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2004031114) when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures
cc: Resources Agency

LAND USE SERVICES DEPARTMENT
MAR 11 2019
COUNTY OF SAN BERNARDINO

5-1

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL 1-916-445-0613 state.clearinghouse@opr.ca.gov www.opr.ca.gov



late
2/22/19
E



Lahontan Regional Water Quality Control Board

March 01, 2019

File: Environmental Doc Review
San Bernardino County

Governor's Office of Planning & Research

Tom Nieves
San Bernardino County
385 N. Arrowhead Avenue
San Bernardino, CA 92415
Tom.Nieves@lus.sbcounty.gov

MAR 01 2019

STATE CLEARINGHOUSE

Comments on the Draft Revised Environmental Impact Report for Church of the Woods, San Bernardino County, State Clearinghouse Number 2004031114

The Lahontan Regional Water Quality Control Board (Water Board) staff received the Draft Revised Environmental Impact Report (DREIR) for the above-referenced project (Project) on January 14, 2019. The DREIR, prepared by San Bernardino County (County), was submitted in compliance with provisions of California Environmental Quality Act (CEQA) in order to solicit input on the potential impacts on the environment and ways in which those significant effects are proposed to be avoided or mitigated.

5-2

Water Board staff, acting as a responsible agency, is providing these comments to specify the scope and content of the environmental information germane to our statutory responsibilities pursuant to CEQA Guidelines, California Code of Regulations (CCR), title 14, section 15096. We thank the County for providing Water Board staff the opportunity to review and comment on the DREIR and for taking the initiative to develop the DREIR with considerations to potential effects on water quality. Based on our review of the DREIR, we recommend: (1) the impact analysis be revised to include sufficient detail of any impacts that result from having to build any portion of the Rim Forest Drainage Project; (2) the environmental document include specifications for the abandoned groundwater well in the southwest portion of the Project site to be properly destroyed according to California Well Standards; and (3) Section 3.F.1.2.A of the DREIR be revised to clarify that discharges of any constituent in excess of the applicable water quality standard into any waterway constitutes a violation of the *Water Quality Control Plan for the Lahontan Region* (Basin Plan). Our comments on the proposed Project are outlined below.

5-3

WATER BOARD'S AUTHORITY

All groundwater and surface waters are considered waters of the State. All waters of the State are protected under California law. State law assigns responsibility for protection of water quality in the Lahontan Region to the Lahontan Water Board. Some waters of the State are also waters of the United States. The Federal Clean Water Act (CWA) provides additional protection for those waters of the State that are also waters of the United States.

5-4

PETER C. PUMPHREY, CHAIR | PATTY Z. KOUYOUMDJIAN, EXECUTIVE OFFICER

2801 Lake Tahoe Blvd., So. Lake Tahoe, CA 96150 | 15085 Amargosa Road, Bldg 3, Ste 210, Victorville CA 92384
e-mail Lahontan@waterboards.ca.gov | website www.waterboards.ca.gov/lahontan





Tom Nieves

- 2 -

March 01, 2019

The Basin Plan contains policies that the Water Board uses with other laws and regulations to protect the quality of waters of the State within the Lahontan Region. The Basin Plan sets forth water quality standards for surface water and groundwater of the Region, which include designated beneficial uses as well as narrative and numerical objectives which must be maintained or attained to protect those uses. The Basin Plan can be accessed via the Water Board's web site at:
http://www.waterboards.ca.gov/lahtontan/water_issues/programs/basin_plan/references.shtml

5-4
CONT.

SPECIFIC COMMENTS

We recommend the following be included as part of the proposed Project and considered in the environmental review.

1. Section 3.C.8 of the DREIR states that Church of the Woods may have to build a portion of the Rim Forest Drain Project. Due to possible differences in drainage improvement design the environmental document should be revised to include the impacts from building any portion of the Rim Forest Drainage Project and identify how impacts to wetlands and other waters will be mitigated to a less than significant level.
2. The abandoned groundwater well in the southwest portion of the Project site should be properly destroyed according to California Well Standards, published as DWR Bulletin 74, prior to the site being graded. Please include this as part of the Project.
3. Section 3.F.1.2.A lists and describes standard water quality categories that typically impact water quality on construction sites, but fails to identify that a discharge from of any of the categories into any waterway would constitute a violation of the Basin Plan unless otherwise permitted. This section also provides the reader with a sense that it is acceptable to discharge small amounts from the categories listed since (1) neither Little Bear Creek nor Lake Arrowhead were identified as a water quality limited or "Impaired" waterbody where water quality standards and/or receiving water beneficial uses have not been met, and (2) receiving waters can assimilate a limited quantity of various constituent elements, before thresholds beyond which the measured amount becomes a pollutant and results in an undesirable impact. Section 3.F.1.2.A of the environmental document be revised to clarify that discharges of any constituent in excess of the applicable water quality standard into any waterway constitutes a violation of the Basin Plan.
4. The DREIR correctly identifies the hydrologic unit and hydrologic area for the Project site, but incorrectly identifies the Project as being under the prevue of the Santa Ana Regional Water Quality Control Board in multiple sections of the DREIR. Most of the Project site resides within the Lahontan Region with only a small portion in the Santa Ana Region. This should be corrected in the environmental document.
5. Table 2-5 Matrix of Project Approvals/Permits, fails to identify that 401 Water Quality Certification is required to alter any surface waters onsite. Additionally, Section 2.4.1 item No. 6 also fails to identify these same requirements.

5-5

5-6

5-7

5-8

5-9



Tom Nievez

- 3 -

March 01, 2019

PERMITTING REQUIREMENTS FOR INDIVIDUAL PROJECTS

A number of activities implemented by individual projects in accordance with the General Plan amendment have the potential to impact waters of the State and, therefore, may require permits issued by either the State Water Resources Control Board (State Water Board) or Lahontan Water Board. The required permits may include the following:

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

5-10

Thank you for the opportunity to comment on the DREIR. If you have any questions regarding this letter, please contact me at (760) 241-7305 (tiffany.steinert@waterboards.ca.gov) or Jan Zimmerman, Senior Engineering Geologist, at (760) 241-7376 (jan.zimmerman@waterboards.ca.gov). Please send all future correspondence regarding this Project to the Water Board's email address at Lahontan@waterboards.ca.gov and be sure to include the State Clearinghouse No. and Project name in the subject line.

5-11

Tiffany Steinert
Engineering Geologist

cc: State Clearinghouse (SCH 2004031114) (state.clearinghouse@opr.ca.gov)
Nancy Sansonetti, San Bernardino County (Nancy.Sansonetti@dpw.sbcounty.gov)

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RESPONSES TO COMMENT LETTER 5

California Water Boards – Lahontan Regional Water Quality Control Board

5-1:

The County received this comment letter following the close of the DREIR public review period. Although CEQA does not require Lead Agencies to respond to late comments, the County has opted to provide written responses to these comments.

5-2:

The County recognizes the Lahontan Regional Water Quality Control Board (RWQCB) as a Responsible Agency and acknowledges that the Lahontan RWQCB has provided comments pursuant to CEQA Guidelines § 15096.

5-3:

The County acknowledges the Lahontan RWQCB's recommended revisions to the DREIR. Following public review of the DREIR, the Project Applicant has agreed to delay construction of the Project until the County installs 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 Project site. Revisions to the DREIR to reflect this commitment of the Project Applicant are identified in Section F.3, *Additions, Corrections, and Revisions*, of the FEIR. Thus, no changes to the DREIR are required to address Project obligations to build any portion of the Rimforest Storm Drain. Additionally, and as described in DREIR Subsection 2.1.13 (at DREIR page 2-14), the groundwater well was abandoned and capped in the 1980s, and no changes to the capped well are proposed as part of the Project. Text has been added to DREIR Subsection 3.F.1.2 (at DREIR page 3.F-4) indicating that discharges of any water pollutants in excess of water quality standards would constitute a violation of the Basin Plan, unless otherwise permitted. This revision is indicated in Section F.3, *Additions, Corrections, and Revisions*, of the FEIR.

5-4:

The County acknowledges the Lahontan RWQCB's authority over the groundwater and surface waters located within the Lahontan Region. The County also acknowledges the general information regarding the Basin Plan included on the Lahontan RWQCB's referenced website.

5-5:

Please refer to Response to Comment 5-3.

5-6:

As described in DREIR Subsection 2.1.13 (at DREIR page 2-14), the groundwater well was abandoned and capped in the 1980s, and no changes to the capped well are proposed as part of the Project. For this reason, it is not necessary to further destroy the abandoned and capped well.



5-7:

In response to this comment, the DREIR has been clarified to state that that water pollutant discharges of any kind into any waterbody above applicable water quality standards would constitute a violation of the Basin Plan. The revisions made are indicated in Section F.3, *Additions, Corrections, and Revisions*, of this Final EIR. The addition of this statement is not significant new information and does not change the conclusions reached by the DREIR; as such, recirculation of the DREIR is not warranted as set forth in § 15088.5 of the CEQA Guidelines.

5-8:

In response this comment, the DREIR has been revised to identify the majority of the Project site as being under the jurisdiction of the Lahontan RWQCB. This revision is indicated in Section F.3, *Additions, Corrections, and Revisions*, of the FEIR. The authority of the Lahontan RWQCB pertaining to the Project site was disclosed in the DREIR and the amplification made in the Final EIR about the extent of jurisdiction is not significant new information and does not change the conclusions reached by the DREIR; as such, recirculation of the DREIR is not warranted as set forth in § 15088.5 of the CEQA Guidelines.

5-9:

In response to this comment, the County has revised the DREIR to identify the potential need for the Project to obtain a Section 401 Water Quality Certification in Table 2-5, *Project Approvals/Permits*, and DREIR Subsection 2.4.1 item No. 6. The revisions made are indicated in Section F.3, *Additions, Corrections, and Revisions*, of this FEIR. As stated in Response to Comment 5-3, the Project Applicant has agreed to delay construction of the Project until the County has installed the components of the Rimforest Storm Drain project that affect the Project and Project site, likely negating the need for the Church of the Woods Project Applicant to obtain a Section 401 Water Quality Certification.

5-10:

The County acknowledges the potential required approvals and permits issued by either the State Water Resources Control Board or Lahontan RWQCB in DREIR Table 2-5 located on page 2-30 of the DREIR. Also refer to Response to Comment 5-9.

5-11:

Responses to all of the Lahontan RWQCB's comments are provided above. The County acknowledges the contact information provided. As a commenting party on the DREIR, the Lahontan RWQCB will receive all pertinent public notices related to the Project.



Save Our Forest Association, Inc.

Post Office Box 126 • Rim Forest, California 92378

24 February 2019

County of San Bernardino, Land Use Services Department
Tim Nieves, Contract Planner
385 No. Arrowhead Avenue, Fifth Floor
San Bernardino, CA 92415

Sub: Draft Revised Environmental Impact Report Comments
Church of the Woods Project State Clearinghouse No. 2004031114

Dear Mr. Nieves,

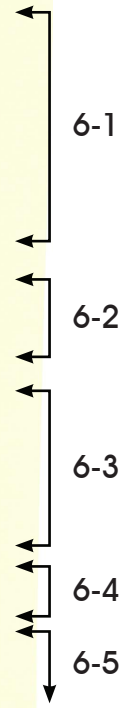
The Save Our Forest Association, Inc. (SOFA), is the largest, grass roots environmental organization in the San Bernardino Mountains dedicated to maintaining the quality of life for its inhabitants and conserving its natural resources for over thirty years.

The SOFA Board of Directors and its members will define the numerous specific areas where the Draft Revised Environmental Impact Report (DREIR) does not comply with the requirements of the California Environmental Quality Act (CEQA) and the policies of the Lake Arrowhead Community Plan (LACP) adopted by the San Bernardino County Board of Supervisors March 13, 2007.

LA1.3.1 Unique Characteristics. The Lake Arrowhead Community Plan area is known as a charming, small-town community that is attractive to tourists and residents alike for its climate, recreational amenities, scenic resources and sense of remoteness from urban life.

The mountain quality of life is directly related to its remoteness from urban life; that is, natural topography, lower traffic volumes and improved circulation, no stoplights, lesser noise, dark night skies, a national forest with abundant wildlife. Residents feel that the high quality of life experienced in their neighborhoods should not be degraded by growth and the subsequent impacts of traffic congestion, strains on infrastructure and threats to natural resources.

A significant frustration in reading this DREIR is that the project is so vaguely described that it is impossible for the reviewer to determine whether the project will comply with applicable standards. The project will negatively impact existing natural drainage courses and sensitive terrain in violation of Development Code section 82.13080(b)(3)(C),





82.13.080(D), and 83.08.040. The lack of identifying extensive tree removal without indicating how debris will be disposed violates Development Code section 88.01.090(b). Recent illegal removal of over 160 trees on the Blue Jay Village Project site, within two miles of the proposed project, led to an action by San Bernardino County Land Use Services/Code Enforcement, and involving the California Department of Fish & Wildlife, and the CA State Water Resources Control Board . That illegally deforested site is now a blighted area in downtown Blue Jay, with frontage along Little Bear Creek which provides 50-65% of the water supply to Lake Arrowhead. Coincidentally, the Church of the Woods proposed project on Hwy 18 lies at the headwaters of Little Bear Creek. The DREIR for the COW must describe the extent and severity of the impacts expected with this substantial tree removal.

The DREIR states in the Executive Summary 0.3 Areas of Controversy and Issues To Be Resolved : "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 the San Bernardino flying squirrel), noise, and transportation/circulation.

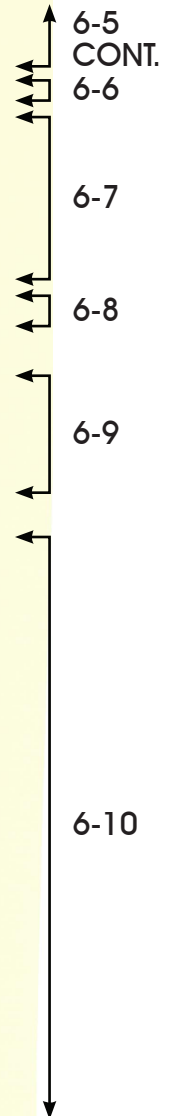
The traffic/circulation impacts of the proposed project violate the LACP Policies: LA/CI 1.3. Design roads to follow natural contours, avoid grid pattern streets, minimize cut and fills and disturbance of natural resources and trees whenever possible. The revised project would convert 50% of the undeveloped forested site to developed area, removing all the trees and vegetation.

LA/CI 1.4. Preservation and protection of sensitive habitats shall have priority over road location, relocation or realignment, when other practical alternatives are available.

LA/CI 1.6 Minimize the traffic load on mountain major highways and mountain secondary highways by requiring projects to minimize direct access to these main circulation roads.

LA/CI 1.7. ...use alternatives to the construction of new traffic signals where they can be shown to benefit roadway capacity and are compatible with the mountain character of the community. The proposed project stated traffic management plan is to install multiple stoplights along America's Scenic Byway Highway 18 violating the LACP Policy LA/CI 1.13. All other methods of traffic control shall be considered before adding a traffic light within the community plan area. The County shall coordinate with CalTrans to implement this policy on State Highways within the plan area.

LA/CI 3.3 Limit and control the location and extent of all land uses which generate increased levels of traffic beyond the designated capacity of the existing and planned highways. 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 segments of the Rim of the World Highway (SR-18) are projected to operate at unacceptable LOS. These conditions were identified in the LACP in 2007is it no wonder that the proposed Church of the Woods project located directly on Scenic Byway Highway 18 would cause "cumulatively considerable impacts to the State Highway facilities discussed above [that] would be significant and unavoidable."

6-10
CONT.

Page 0-16 of the DREIR Executive Summary, G. Land Use, states that "The Project would not be inconsistent with any of the policies of the San Bernardino County General Plan, Lake Arrowhead Community Plan, San Bernardino County Development Code, or the San Bernardino National Forest Management Plan, leading to a conclusion of no mitigation required. Again, LACP Policies are being violated as LA/LU 1.3 states, "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." The DREIR further states that under 3.A.5 Cumulative Impacts that "...the project site does not contain any scenic resources as defined in the Open Space Element of the San Bernardino County General Plan." Yet, as noted, Highway 18 is designated as a Scenic Byway by the United States Forest Service.

6-11

As described in <https://scenicbyways.info/byway/2595.html>, The Rim of the World Scenic Byway travels for 107 miles through some of the most naturally beautiful areas left in Southern California. Spectacular vistas and panorama exist everywhere along the route. "An island of mountains" in an arid landscape, the forest continues to provide pleasurable and needed escape from urbanization." With the loss of areas of forest due to fires in 2003 and 2007, along with tree loss due to bark beetles, this 37 acre site along the Scenic Byway becomes even more highly valued for its natural resource characteristics, including rare riparian habitat.

6-12

LACP Goal LA/OS 4. Improve and preserve open space corridors throughout the plan area and Policy LA/OS 4.2 Use open space corridors to link natural areas. Goal M/CO 1 of the San Bernardino County General Plan Conservation Element is to preserve the unique environmental features of the Mountain Region including native wildlife, vegetation and scenic vistas. This project site is within the northwest portion of, and is immediately adjacent to, the Strawberry Creek Open Space Corridor. The Conservation Element of the Lake Arrowhead Community Plan also identifies the Strawberry Creek Wildlife Corridor as an important open space area that provides for wildlife movement and other important linkage values. Projects should be designed to minimize impacts on this corridor. The on site State jurisdictional stream and riparian areas provide travel

6-13



routes for wildlife on and off the site, as well as habitat for species of special concern and threatened and endangered species.

6-13
CONT.

DREIR at 3.C-23 discloses that "wildlife movement would be impeded by Project-related disturbance", yet the document concludes that the impacts would be less than significant. There is, however, no documentary evidence of occurrence and location of sensitive species on the project site to allow for proper analysis of wildlife impacts from one part of the site to another. Failure to completely describe the project setting violates CEQA. See *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus*, 27 Cal. App. 4th at 724-25. The Rimforest Storm Drain Project Final EIR identifies a spring on site south of the proposed attenuation basin which is connected to the site drainage and the wetlands to the north. The DREIR fails to identify this spring and the potential impacts the project would have on the spring and associated wetlands.

6-14

Specific concerns relating to the DREIR 3.F Hydrology and Water Quality are addressed in the report prepared by Greg Kamman, PG, CHG, Principal Hydrologist, and is attached to the Shute, Mihaly and Weinberger, LLP, comments letter as Attachment C. A key concern is the failure of the DREIR to evaluate hydrological conditions created by the combination of the COW Proposed Project and the Rimforest Storm Drain Project.

6-15

6-16

In 2003 and 2007 San Bernardino Mountain wildfires forced the evaluation of the communities in and surrounding the proposed project site. Significant numbers of structures were burned to the ground with high velocity winds propelling embers far from the flame fronts. DREIR 3.E.8 states "The Project site is located within a "Very High Fire Hazard Severity Area" in a Local Responsibility Area. The Project would increase the potential to expose people and structures to wildland fire hazards on the site." Development in the wildland urban interface, where the proposed project is located, significantly exacerbates the human health and environmental damage caused by wildfires. Concentrating residents and visitors directly in a very high fire hazard severity areas increases ignition risks compared to the existing undeveloped property condition. As realized in the very recent Paradise Fire in Northern California, the ignition and spread of a wildfire may occur with little or no notice and even the best evacuation response operations can be futile, leading to loss of life and property.

6-17

The Save Our Forest Association, Inc., has previously detailed the inadequacies of the DEIR prepared for this project on 16 June 2010, and which remain relevant to the revised project and are incorporated herein in their entirety by this reference. The DREIR fails to meet CEQA's essential purpose of providing disclosure to the public of the proposed projects environmental impacts. To ensure that the public, the County Planning

6-18

6-19



Commission and the San Bernardino County Board of Supervisors have adequate and accurate information to consider the effects of the proposed project (as well as to comply with California law) the County must require revisions in the proposed project to make it compliant with the General Plan (including the adopted Lake Arrowhead Community Plan). A revised DREIR will then need to be recirculated that provides a complete and accurate project description, while identifying meaningful alternatives and mitigation where appropriate.

6-19
CONT.

Sincerely,

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

- cc: Drew Feldman, San Bernardino Valley Audubon Society
- Steve Farrell, Conservation Co-Chair, Sierra Club, San Bernardino Mtns Group
- Karla Kellems, Conservation Co-Chair, Sierra Club, San Bernardino Mtns Group
- Aruna Prabhala, Urban Wildlands Director, Center for Biological Diversity
- Terri Rahhal, Director of Land Use Services, County of San Bernardino
- Carmen J. Borg, AICP, Shute, Mihaly & Weinberger, LLP



RESPONSES TO COMMENT LETTER 6
Save Our Forest Association, Inc.

6-1:

The County acknowledges the Save Our Forest Association, Inc.'s (SOFA's) response to the DREIR. This comment does not raise any concerns related to the DREIR. No revisions to the DREIR are required to respond to this comment.

6-2:

This comment summarizes Lake Arrowhead Community Plan LA 1.31, *Unique Characteristics*. This comment does not raise any concerns related to the DREIR. No revisions to the DREIR are required to respond to this comment. The proposed Project's impacts related to community character are analyzed in Table 3.G-1 and Table 3.G-2 of the DREIR.

6-3:

While the County staff and the decision-makers within the County will take into consideration the commenter's position regarding the merits of the Project in consideration of Project approvals, the comment does not identify any specific deficiencies in the analysis disclosed in the DREIR. The Project's impacts to traffic, community character, and natural resources are addressed in DREIR Section 3.I, *Transportation and Circulation*, Section 3.G, *Land Use*, and Section 3.C, *Biological Resources*. No revisions to the DREIR are required in order to respond to this comment.

6-4:

While the County staff and the decision-makers within the County will take into consideration the commenter's position regarding the adequacy of the DREIR in consideration of Project approvals, the comment does not provide any evidence to support the claim that the Project was vaguely described. DREIR Section 2.0, *Project Description*, includes sufficient details regarding the Project site's environmental setting (Subsection 2.1), the Project's overall physical characteristics (Subsection 2.2), the Project's objectives (Subsection 2.3), and the Project's construction and operational characteristics (Subsection 2.5). No revisions to the DREIR are required in order to respond to this comment. Further, all of the Project's application materials on file with the County are part of the Project's public, administrative record.

6-5:

The proposed Project's effects to drainage and terrain are addressed in DREIR Section 3.F, *Hydrology and Water Quality*, and Section 3.D, *Geology and Soils*. The County has found that the Project is compliant with the Development Code Chapters cited in this comment. Chapter 82.13 addresses Fire Safety, Chapter 83.08 addresses Hillside Grading Standards, and Chapter 88.01 addresses Plant Protection and Management. The comment does not provide any information about why the commenter believes that the Project is non-compliant. Therefore, no revisions to the DREIR are required in order to respond to this comment.



6-6:

Development Code § 88.01.090 cited in this comment is titled “Tree Protection from Insects and Disease” and addresses felled trees that are cut and left exposed on a property for more than 15 days. The Project is required by law to comply with the County’s Development Code, inclusive of § 88.01.090, and the method(s) that the Project will employ to mandatorily comply with § 88.01.090 will be determined in conjunction with the issuance of grading permits.

6-7:

This comment is related to a project located within the Blue Jay Community that is unrelated to the proposed Project. This comment does not identify any specific deficiencies in the analysis disclosed in the DREIR. No revisions to the DREIR are required in order to respond to this comment.

6-8:

The DREIR describes the existing condition of the Project site as containing trees and indicates that tree removals will occur in the Project’s development footprint as part of Project-related construction. The removal of trees associated with the Project’s construction is an inherent part of the proposed Project evaluated in the DREIR and is evaluated as such throughout the environmental analyses contained DREIR, particularly but not exclusively in DREIR Section 3.C, *Biological Resources*.

6-9:

This comment is an accurate excerpt from the DRIER. No revisions to the DREIR are required in order to respond to this factual statement.

6-10:

The Project is a private development project proposed on privately-owned property. LACP Policies LA/CI 1.3 and 1.4 address road design, and the Project does not propose any roads other than internal private driveways on the privately-owned property. Related to LACP Policy LA/CI 1.6, SR-18 is the only public road that can provide access to the Project site and the Project is compliant by proposing only one driveway connection and a secondary gated emergency-access to SR-18. Related to LACP Policies LA/CI 1.7, 1.13 and 3.3, the Project includes the proposed installation of one traffic light at the Project’s driveway access with SR-18. The other SR-18 and SR-189 intersections in the Project’s study area that meet traffic signal warrants meet the warrants in long-term condition (buildout 2040) due to projected ambient growth in the area, with or without the addition of Project-related traffic. With the installation of signals, all SR-18 and SR-189 intersections in the Project’s study area will operate at acceptable levels of service. Regardless, because the installation of traffic signals on State routes is within the jurisdictional control of Caltrans and outside of the control of the County of San Bernardino, the County cannot assure that the signals planned by Caltrans will be in place before the Project is in operation and contributing traffic at these locations. As a result, the DREIR concluded that these mitigation measures would not be feasible for the County to assure, and that the Project therefore has the potential to cause (in the short-term at two intersections) and contribute (in the long-term at five intersections) significant and unavoidable traffic impacts.



6-11:

The Project's impacts to visual quality, terrain, fire hazard, and erosion are addressed in DREIR Sections 3.A, *Aesthetics*, 3.D, *Geology and Soils*, 3.E, *Hazards*, and 3.F, *Hydrology and Water Quality*. Based on the analyses presented, the DREIR correctly concludes that Project would not be in conflict with the plans and policies cited in this comment. Further, the DREIR repeatedly recognizes SR-18 (which occurs adjacent to the Project site and not on the Project site) as a Scenic Byway. DREIR Section 3.A, *Aesthetics*, Threshold b, specifically addresses the Project's potential impacts to the Scenic Byway and concludes based on substantial evidence that implementation of the Project as proposed would have a less-than-significant impact.

6-12:

The County acknowledges this comment describing SR-18. The proposed Project's effects to the scenic character of SR-18 are depicted in DREIR Figure 3.A-2 through Figure 3.A-4. As illustrated on Figures 3.A-2 through 3.A-4, the proposed Project would not significantly impact the prominent views looking south from SR-18. Views of the Project site from the surrounding areas are limited to intervening topography and tree cover. Accordingly, the Project site does not offer a distant vista that provides relief from less attractive views of nearby features. Additionally, ornamental landscaping that would be installed as part of the Project would partially screen portions of the proposed building. For these and the other reasons explained DREIR Section 3.A, *Aesthetics*, the County has determined that the proposed Project would not result in substantial adverse effects to scenic resources along SR-18. This comment does not raise any deficiencies within the analysis disclosed in the DREIR. No revisions to the DREIR are required in order to respond to this comment.

6-13:

The County acknowledges this comment regarding Lake Arrowhead Community Plan Goal LA/OS 4 and San Bernardino County General Plan Conservation Element Goal M/CO 1. The comment accurately describes the Project site's location in relation to the Strawberry Creek Open Space Corridor. The Project's effects to the Strawberry Creek Wildlife Corridor are adequately addressed on DREIR page 3.C-23 of Section 3.C, *Biological Resources*. This comment does not raise any deficiencies within the analysis disclosed in the DREIR. No revisions to the DREIR are required in order to respond to this comment.

6-14:

The Comment erroneously states there is "no documentary evidence of occurrence and location of sensitive species on the project." Section 3.C.8 of the DREIR (pages 3.C-20 & 3.C-21) includes detailed discussion the occurrence and location of Southern Rubber Boa, San Bernardino Flying Squirrel, California Spotted Owl and Nesting Birds. Additional analysis is included in *Technical Appendix C* of the DREIR. In addition, please refer to Response to Comment 6-13 regarding the wildlife corridor.

6-15:

Please refer to Response to Comment 5-3. Following public review of the DREIR, the Project Applicant has agreed to delay construction of the Project until the County installs all components of the San Bernardino County Flood Control District's Rimforest Storm Drain project that would affect either the Church of the Woods Project or Project site. As such, the Church of the Woods Project would have no impact to jurisdictional drainages or wetlands.



6-16:

The County acknowledges the report prepared by Greg Kamman attached as Attachment C to Comment Letter 10. Please refer to Responses to Comments 10C-1 through 10C-11.

6-17:

The comment accurately states that the Project site is located within a “Very High Fire Hazard Severity Area” within a Local Responsibility Area. While this statement is true, the proposed Project has been required to demonstrate compliance with State, regional, and local standard and non-standard conditions and regulatory requirements that reduce the risk of exposure to wildland fires. Please refer to Response to Comment 1-5. In addition, as a Project Design Feature, the proposed Project would install fuel modification zones (FMZs). To reduce fuel management impacts to biological resources, the Project Applicant has relocated the proposed location of the maintenance/ caretakers building, as shown on FEIR Figure F-1. Information regarding the proposed Project’s FMZs is provided on Page 3.E-5 of the DREIR, as revised by the Final EIR to reflect moving of the proposed maintenance/caretakers building. In addition, the San Bernardino County Fire Department will require the proposed Project to provide proof of compliance with applicable fire protection planning requirements prior to the issuance of building permits. In the event of a wildland fire in the area, the Project site would most likely be utilized as an evacuation center, as the Project’s expansive irrigated open space areas would provide opportunities for sheltering in place, similar to the high school or middle school. The proposed sports field and large open areas within the Project site could be used to stage people, cars, and fire trucks. Implementation of the proposed Project would result in less-than-significant impacts related to exposing people and structures to wildland fires. No revisions to the DREIR are required in order to respond to this comment.

6-18:

The County acknowledges that the commenter has previously commented on the adequacy of the Draft EIR prepared for the proposed Project on June 16, 2010. The County is exercising the discretion authorized by CEQA Guidelines § 15088.5(f)(1), specifically stating that it will not be responding to comments made during the public review of the 2010 Draft EIR. The DREIR was prepared in full compliance with the CEQA, State CEQA Guidelines, and the County of San Bernardino Guidelines, including project definition, foreseeable impacts, and feasible mitigation measures. No revisions to the DREIR are required in order to respond to this comment.

6-19:

This DREIR was prepared in full compliance with the CEQA, State CEQA Guidelines, and the County of San Bernardino Guidelines, including project definition, foreseeable impacts, and feasible mitigation measures. The DREIR’s conclusions are based on substantial evidence in the public record. No revisions to the DREIR are required in order to respond to this comment.



From: [Peter Jorris](#)
To: [Nieves, Tom](#)
Cc: drewf3@verizon.net
Subject: Church of Woods DREIR
Date: Monday, February 25, 2019 4:25:38 PM
Attachments: [Audubon Church of Woods DREIR comments 2-2019.pdf](#)

Attn. Tom Nieves
Project Planner, Church of the Woods Proposed CUP

Please find attached comments from Drew Feldmann (cc'd on this email), the Conservation Chair of the San Bernardino Valley Audubon Society, addressing the DREIR for proposed Church of the Woods Project in Rim Forest.

Thank you for your attention.

Peter Jorris
Mountain Region Liaison
Conservation Committee
San Bernardino Valley Audubon Society



San Bernardino Valley Audubon Society
P. O. Box 10973, San Bernardino, California 92423-0973

February 25, 2019

Tom Nieves, Project Planner
Land Use Services Department
County of San Bernardino
385 N. Arrowhead Ave., First Floor
San Bernardino, CA 92415-0182

By email: Tom.Nieves@lus.sbcounty.gov

RE: CHURCH OF THE WOODS *DRAFT REVISED* ENVIRONMENTAL IMPACT REPORT
SCH NO. 2004031114, CUP NO.#P201700270

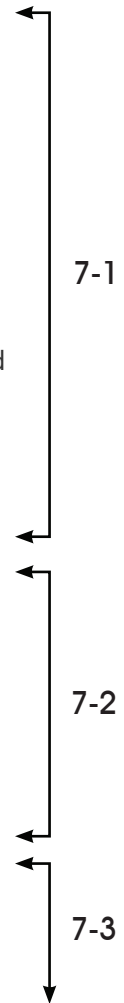
Dear Mr. Nieves,

The San Bernardino Valley Audubon Society appreciates the opportunity to comment on the Draft Revised Environmental Impact Report (DREIR) for the CHURCH OF THE WOODS PROJECT and the Conditional Use Permit required for establishing the proposed multi-use church campus, assembly buildings and recreational facilities in the community of Rim Forest in the San Bernardino National Forest.

The San Bernardino Valley Audubon Society ("Audubon") is a nonprofit all-volunteer conservation organization that represents some 2000 residents of the Inland Empire, who greatly enjoy the benefits of the San Bernardino Mountains as one of the most outstanding natural areas in Southern California. Many of our members reside in the mountain area, and our Audubon Society regularly schedules outings and field trips throughout the San Bernardino National Forest. We have consistently advocated for high standards in safeguarding the unique character and natural resources of the mountain environment in compliance with all the goals and policies of the County General Plan and the guidelines of the California Environmental Quality Act.

The oversized scale of the Church of the Woods' campus-type development project and its urban-oriented rationale are largely incompatible with the National Forest surroundings of the proposed site for the project, especially given the site's existing contour of a prominent natural hillock and a sunken riparian hollow in the native landscape. These topographical constraints are compounded by the rare and imperiled species that inhabit the site, for which the California Department of Fish & Wildlife (DFW) prescribes strict protection measures. The County's Biotic Overlay Maps, which identify these special habitats, significantly modify the site's use and zoning allowances.

The extravagant project as designed will almost double the size of the small business district of the tiny town of Rim Forest and adversely affect the larger surrounding resort community with added traffic and greater stress on multiple substandard intersections. Although the DREIR has pointed out several significant adverse impacts and inconsistencies





with the County General Plan, the overall severity of the impacts will be considerably more extensive than has been presently disclosed. The analysis of the DREIR does not adequately or accurately assess all the serious environmental conflicts of the project .

7-3
CONT.

The plan to clear-cut all trees of the entire 14-acre footprint of the actual project area and then carve off the top of the onsite knoll in order to fill-in the adjacent stream basin stands out in stark conflict with the county's policy of maintaining the natural contours of the mountain environment, which ought to be an inviolable policy in Southern California's premier National Forest. By downplaying this policy conflict, the DREIR fails to adequately acknowledge the full extremity of such a major topographical alteration directly adjacent to a cherished public forest landscape. A cut and fill of 315,000 cubic yards of earth is unprecedented in the local mountain area. Such massive destruction to the natural environment would have significant adverse repercussions on every unique feature of the site as well as on National Forest lands directly adjacent to the project on three sides, not to mention the quarter mile of US Forest Service-designated Scenic Byway which fronts the property.

The severity of this major landscape disruption and the resultant impacts to wildlife, habitat, and the natural aesthetics of the surrounding forest cannot be mitigated below a level of significance. The DREIR does not accurately assess the full scope and impact of such a major environmental upheaval and only proposes inadequate, unrealistic or no mitigation at all in many cases. The site also includes vital riparian vegetation and provides exceptional habitat for several rare species, while being located significantly within a major county-designated wildlife corridor. None of these attributes are given the serious consideration they warrant in the DREIR, where the chief aim appears to be that of minimizing the full significance of critical biological factors rather than accurately disclosing major impacts.

7-4

By minimizing the unique aesthetic and biological qualities of the site (and the surrounding public values of the National Forest setting), the DREIR fails to accurately identify the outstanding environmental values that will be severely compromised by the Church of the Woods' project. In turn, the full extent of the project's significant impacts are insufficiently analyzed and undervalued, resulting in inadequate disclosure or mitigation. For these reasons Audubon believes that the content of the Church of the Woods' DREIR does not meet the CEQA criteria for an accurate environmental report. We further anticipate that the project does not meet relevant policy guidelines in the county general plan or conform to state environmental protection standards. The church is trying to fit a square peg into a round hole. The whole scope of the problem stems from trying to superimpose an oversized urban project onto an ecologically sensitive and incompatible forest site. The problem is compounded by the DREIR seeking to misrepresent, dismiss or ignore critical wildlife, critical habitat and National Forest-related issues. The function of an environmental impact report should be to accurately identify, assess and disclose the true impacts. Audubon is disappointed by the faulty content of the Church of the Woods' DREIR, especially pertaining to the following issues.

Our main concerns are focused on the severe impacts the project will have on aesthetics, biology and land use.



AESTHETICS

The Aesthetics Section of the DREIR overly diminishes the threshold for “scenic” by ignoring the natural scenic integrity of a National Forest and the beauty of century-old oak trees and irreplaceable conifers that comprise a forested landscape. The unsupported opinion by the authors that “forested slopes” are not an aspect of scenic criteria is an example of the DREIR’s tendency to dismiss rather than evaluate. The failure to acknowledge that clear-cutting and leveling the entire 14-acre area abutting the scenic highway and substituting buildings and artificial landscaping would constitute a “significant” impact to the scenic resources of county’s premier National Forest is a major obfuscation by the DREIR. The consultants unduly fixate solely on “scenic vistas” or rock outcrops as noted in county policy (but not exclusively noted), ignoring the fact that those are examples of a set of scenic criteria and not the sole criteria. The consultants misinterpret the policy and use that faulty basis to minimize and ignore a critical aesthetic impact of the proposed project. The photographs presented in the DREIR of the existing viewshed of the project site as seen from the Scenic Byway versus simulated images of site after build-out reveal to an impartial viewer that there will be a major unmitigated loss of scenic attributes at the site, resulting from the massive urban development. The extensive alteration of the site will conflict with critical aesthetic goals and policies of the County General Plan. The impact should be disclosed as significant in the DREIR and realistic mitigation proposed. Without a re-design of the highway frontage area or a reduction of the project, it will not be able to mitigate against its major impact on one of the most prominent Scenic Byways in Southern California and the inherent aesthetics of a premier National Forest.

7-5

BIOLOGY

In respect to biological resources, Audubon includes an addendum on this topic at the end of our comments by Dave Goodward, a qualified biologist, pointing out specific errors and deficiencies in the DREIR’s Habitat Assessment that have resulted in inaccurate under-estimations, judgments and conclusions about the project’s significant impacts in this category. His input on Audubon’s Conservation Committee informs the summary below.

7-6

SOUTHERN RUBBER BOA

While the 2010 Draft EIR acknowledged cumulative significant impacts to the Southern Rubber Boa (SRB), it failed to accurately assess the full extent of SRB habitat on the project site. The primary boa studies were conducted back in 2002 by TLC and failed to comply with the Department of Fish & Wildlife’s (DFW) protocol for boa surveys. The same biologist employed by the Church of the Woods simultaneously conducted SRB studies for the nearby Hawarden Development site, a project which Audubon (and other conservation organizations) subsequently challenged in court for its faulty and unsubstantiated SRB analysis as part of that project’s environmental impact report.

7-7

Audubon prevailed at the final appellate court ruling, and the consultant’s flawed scientific evaluations were determined to be invalid for the Hawarden site, which is similar and within the same habitat range as the Church of the Woods site. For this reason Audubon believes that the simultaneous surveys at the Church of Woods site by the same consultant would be equally discredited and unreliable. In absence of three-year protocol studies, the alternative DFW option in areas of historic prime habitat (as applies to the Church of the Woods’ site) is



to acknowledge the entire site as occupied habitat. This conclusion is reinforced by the DFW letter submitted in comment to the 2010 Draft EIR, which is still valid today. Nothing has changed since that time, since the more recent biological surveys for SRB conducted by Element Consulting are equally inaccurate and misleading.

7-7
CONT.

Element Consulting made two site visits, one on November 29, 2017, and a second on February 8, 2018. These periods in the late fall and winter represent a timeframe when the southern rubber boas are deep in hibernation. It is the worst possible time to look for SRB, when it's guaranteed that no trace will be found. This fact indicates that the field surveys were not undertaken with serious intent to perform a thorough, competent or professional investigation.

Brian Leatherman, the principal biologist of Leatherman Bioconsulting, Inc., was also sent out by Element Consulting on January 25, 2018 to walk the property and map the location of rocks and logs. A seven page letter was then submitted by Leatherman, in which he delineates certain portions of the site as having a high, medium or low suitability as habitat for SRB. That assessment is based on his interpretation of certain literature he cites in his letter. However Leatherman's interpretation fails to account for any movement by southern rubber boas, a mistake that Audubon has encountered by several other consultants hired for cursory habitat assessments in cases, where developers seek to minimize the extent of SRB habitat on their property. Absent a truly qualified, thorough and legitimate biological survey, following full DFW protocol, the unavoidable fact is that the entire site qualifies as suitable and occupied SRB habitat.

7-8

The current Habitat Assessment needs to be amended to acknowledge that fact. Because the entire site is occupied habitat, it means that the 14 acres, which will be destroyed by the construction project, must follow the standard DFW requirement that offsite replacement habitat be purchased (at a multiple of 3 to 1) to offset the loss of this extremely rare habitat. The 2019 DREIR consultants and the project applicant need to acknowledge the full and actual mitigation requirement for offsite replacement habitat that is typically prescribed in cases like this (as outlined in DFW's 2010 letter). The severely limited habitat that exists for the southern rubber boa is found only in the San Bernardino National Forest and only within a limited elevation range that contains a specific vegetation type. None of these factors have been properly acknowledged in the DREIR. The dearth of accurate information greatly misrepresents the level of significance of this issue and severely underestimates the full extent of the necessary mitigation.

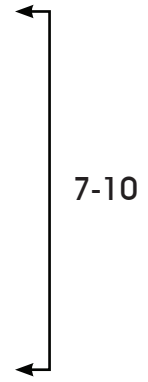
If, as the DREIR proposes, an unused 13.4-acre portion of the site is to be set aside as onsite conservation habitat for the SRB and other species, then that set-aside would fulfill one-third of the standard 3 to 1 replacement habitat requirement as generally required in cases like this. That would leave another 27 acres of offsite qualified habitat to be protected. Also the nature of the onsite conservation set-aside would need to be more fully disclosed and delineated in the DREIR. That would entail the identification of a qualified conservation entity and the outline of additional measures to be taken in order to ensure the permanent protection of the site. The current DREIR does not provide this necessary information, without which the proposal lacks sufficient detail or the validity to be fully considered as reliable mitigation.

7-9



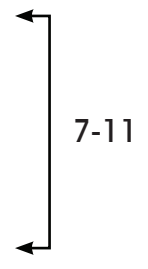
SPOTTED OWL

The DREIR misrepresents the significance of the California Spotted Owl, a federal species of concern known to forage on site and which is highly threatened in the San Bernardino National Forest. After citing the legal definition of what constitutes a "significant" finding and what qualifies as a rare species for special protective purposes, the DREIR proceeds to ignore its own guidelines in respect to the spotted owl.

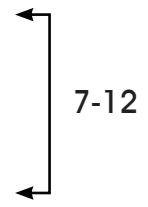


As a rare species classified by the Forest Service as being "of concern" and whose survival is seriously threatened within its limited range in the San Bernardino Mountains, the spotted owl habitat on the project site should be identified as warranting full protection. Also, adequate compensating mitigation should be identified for any part of its habitat (i.e. the entire site) that would be subject to destruction.

The project is surrounded on three sides by National Forest lands, a fact that the DEIR fails to properly disclose. Although it is noted plainly that the project is bounded on the north by National Forest land and sometimes briefly stated that the National Forest also borders on the south, nevertheless in the project description, the biological section and the land use section (where the information is particularly relevant) there is no indication that the project is also bounded by the National Forest on the east. The fact that the project is surrounded on three sides by the National Forest is a significant factor for both the biological and land use evaluations.

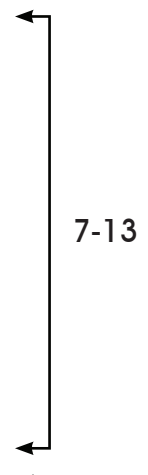


The DREIR needs to more accurately take into account the important issues that pertain to critical protected habitats. The failure to adequately acknowledge impacts to the California Spotted Owl as being of "significance" must be corrected. The full impacts need to be properly disclosed and analyzed accurately. Only then can appropriate mitigations be identified, where loss of habitat might occur.



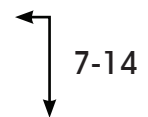
SAN BERNARDINO FLYING SQUIRREL

A similar problem exists in respect to the San Bernardino Flying Squirrel. In this case, the DREIR has noted the presence of the species on site and acknowledged its significance. However, the absence of any meaningful mitigation is inadequate and insufficient to reduce the impacts below a level of significance.



The DREIR merely proposes so-called paper mitigation, a set of requirements that masquerade as mitigation, but in reality only give the appearance of seeming to reduce the impacts. In the case of the flying squirrel, the mitigation is seen to be mostly optional "if convenient," when it is examined closely. These kinds of loopholes for largely evading necessary mitigation render it essentially non-existent. As such, the proposed mitigation should be considered unacceptable as a basis for reducing the level of impact to "less than significant." It should be re-drafted to include measures that can effectively and realistically reduce the adverse impacts.

WILDLIFE CORRIDOR





The fact that the site is located in a major county-designated wildlife corridor is improperly dismissed by the DREIR. Significant impacts are neither disclosed nor analyzed. Instead, the DREIR incorrectly dismisses this issue altogether by stating that the project site is only on the edge of the Strawberry Peak Corridor 20 as delineated by the county. That evasive gambit ignores the county’s intent for the map to stimulate further analysis of the actual functionality of the corridor, when a new project is proposed within the general route of the corridor. The argument is made that wildlife can go around the church campus complex and therefore there is no impact. But no studies or evidence are provided to substantiate this claim other than a map showing the general orientation of the corridor with the project site identified along the westerly edge. There are significant factors that ought to be addressed, such as where is the optimal point for large mammals like deer, bear, coyotes, bobcats and mountain lions to summit the steep ridge directly south of the project and then cross over State Highway 18. Evidence from road kill suggest that a popular spot is close to the proposed project site.

The county’s specifications for Wildlife Corridor 20 in the 1991 Open Space Plan notes that:

The wildlife corridor follows the alignment of Strawberry Creek from approximately the City of San Bernardino northward into the national Forest and ultimately connects across the national forest to Corridor 16. This area contains important riparian habitat. Substantial private ownership along the entire length. Open space should be maintained in this area to preserve habitat values.

Two of the east forks of Strawberry Creek and a west fork of City Creek form linkage routes directly south of the project site. The seasonal onsite stream, the spring and blue line tributary to Blue Jay Creek offer a superior route for wildlife to connect with Corridor 16 to the north as opposed to Daley Canyon Road, a primary county highway that impedes wildlife movement directly east of the project site. Directly west of the project site are homes and businesses. The Church of the Woods project apparently intends to fence its perimeter, restricting wildlife movement. Large buildings, parking lots and night lighting will also deter continued use of the site by the native wildlife. This represents a significant impact that the DREIR has failed to accurately identify, evaluate or mitigate. It is a critical deficiency of the disclosure document that needs to be corrected.

The DREIR’s perspective is inconsistent with the County General Plan. Inconsistencies with specific policies designed to protect the environment need to be acknowledged as significant impacts in themselves. The DREIR notes this rule, but does not apply or follow it in its analysis. The intent of the county’s policy is clearly to protect the natural movement of common wildlife in the National Forest. According to the definition of “significant” as outlined in the DREIR, the objective of a county policy automatically becomes a significant consideration by virtue of being codified as a county goal and policy. This is true regardless of the fact that common species are not identified on federal or state endangered species lists. Common species, such as foxes, bobcats, deer, coyotes, bear, raptors and others along with the wildlife movement corridors are important elements of the ecology of the local National Forest. Together they represent an environmental value protected by the County General Plan and therefore should not be dismissed as irrelevant based on unsupported criteria.

7-14
CONT.

7-15



A sample of county policies in the 2007 General Plan shows the emphasis on common species and open space corridors.

CO-2. The county will maintain and enhance biological diversity and healthy ecosystems throughout the county.

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.

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.

M/OS-2. Improve and preserve open space corridors throughout the Mountain Region.

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

LA/OS 4.2 Use open space corridors to link natural areas.

7-15
CONT.

Major Wildlife Corridors, such as the Strawberry Creek Wildlife Corridor 20, are critical to healthy ecosystems and the maintenance of biological diversity. They are essential for the proper management of National Forest lands within the mountain region. In order to follow the General Plan and “improve and preserve” Wildlife Corridor 20, the deficient analysis in the DREIR that ignores this significant impact should be corrected. The scale of the proposed project as described in the DREIR is too big, too urbanizing and out of proportion to the natural features and habitat values of the landscape. Unless design adjustments are made along with substantial offsite mitigation, the project will not be able to avoid conflict with critical wildlife elements like the corridor, the significant onsite riparian habitat and the special rare species onsite.

7-16

In view of the emphasis on wildlife values found in county policies, it is a mistake for the DREIR to ignore the importance of the Strawberry Creek Wildlife Corridor. In dismissing the significance of this designated major wildlife corridor, while neglecting to conduct any actual studies of wildlife movement, the DREIR irresponsibly evades the County’s prescription for actually improving corridors (or potentially adding new ones where needed). In this respect the DREIR analysis is plainly inadequate, while the proposed project fails to conform with the General Plan as well.

7-17

The DREIR errs by evading or downplaying county’s goals and policies, rather than properly analyzing and disclosing the significant impacts that the project will have on those policies. These impacts, which mistakenly have not been analyzed, are highly significant within the context of a National Forest. The natural contours and drainages of the site will be radically altered. Retaining walls and fences will be erected preventing animal movement. Cumulative impacts to optimum animal travel routes within the Strawberry Creek Wildlife Corridor 20 from other prospective projects may also be significant in limiting these already heavily-impacted remaining routes. Failure to fully analyze wildlife impacts is a serious oversight of the DREIR that needs to be corrected.

7-18

LAND USE



The Land Use section of the DREIR fails to give sufficient consideration to the fact that the project is bordered on three sides by undeveloped National Forest land rather than just one side on the north, which the DEIR misleadingly implies by this omission. The DREIR notes that the County General Plan elements governing the project are supplemented by various overlay maps for the area. One of the overlay maps, the Biotic Resources Overlay, has not been sufficiently taken into account in respect to SRB habitat and the Strawberry Creek Wildlife Corridor as pointed out in our discussion about biological impacts above.

7-18
CONT.

7-19

The DREIR lists General Plan policies that relate to the proposed project, but in several important instances fails to acknowledge the project’s significant inconsistencies with the relevant policy.

One example is:

LU 1.2. The design and siting of new development will meet locational and development standards to ensure compatibility of the new development with adjacent land uses and community character.

The DREIR incorrectly claims that “the proposed project would be compatible with adjacent land uses and community character.” By failing to point out that the project is surrounded on three sides by National Forest open space land in its natural habitat, the DREIR omits a critical piece of evidence that does not support its claim. Although it is noted that nearly 50 percent of the site will theoretically remain as open space, much of that is in the interior of the site flanking a riparian corridor. It is not divulged in the context of this policy that the remaining 50 percent of the site will be thoroughly flattened by massive landscape alteration that eliminates every native feature and natural contour of the area.

7-20

This fact reveals that the design and siting of the project will not be compatible with adjacent National Forest land uses (such as the existing wildlife corridor) or community character, which the local community plan emphasizes is based on the natural environment.

The excessive scale of the proposed project design, the extreme eradication of the natural contours and elimination of all native vegetation on 50 percent of the site, the nonconformance with all aesthetic criteria and the prospective imposition of multiple new traffic signals all combine to disqualify the site for meeting the necessary locational and development standards of this policy.

The same misinterpretation by the DREIR applies to Land Use Policy 7.2:

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.

7-21

The DREIR incorrectly states that “with implementation of mitigation measures project-specific impacts on development within environmentally sensitive areas, such as Southern Rubber Boa habitat and jurisdictional wetlands would be less than significant.” As Audubon has pointed out in our comments on the biological analysis of the DREIR and has also been pointed out by the Department of Fish & Wildlife, the DREIR’s claim that impacts within environmentally sensitive areas would be “less than significant” is not accurate. The



magnitude of the landscape alterations proposed by the project in connection with its failure to properly analyze impacts or identify adequate mitigation make it altogether indefensible to assert that it is "less than significant." In addition, the policy specifies limiting development in areas of steep slopes. The policy does not support eradicating the slopes altogether as a means to avoid the injunction to "limit development." On the contrary, the Church of the Woods project stands directly in conflict with this policy.

The policy clearly mandates the county to apply all regulations that will limit unsafe and environmentally detrimental projects like the Church of the Woods proposal. The proposed site is in an environmentally sensitive area that is fully identified as prime habitat for the state-threatened southern rubber boa. Based on an October 2008 county court case involving SRB habitat, it appears that the DREIR has grossly underestimated both the existing habitat and the necessary required mitigation for this critical mountain species. The site is also part of a county-designated major wildlife corridor. The Mountain Open Space policy mandates that these open space corridors not only be preserved but also "improved." The project makes no allowance for improving the corridor or even preserving it.

Insofar as the issue of traffic lights in the Lake Arrowhead community area is a major concern fraught with considerable controversy and local opposition, the cursory treatment of the Mountain Policy M/CI 1.5 for circulation and infrastructure appears to be inappropriately dismissed. (Lake Arrowhead Community Plan policies LA/CI 1.7 and LA/CI 1.13 reinforce the same objective from a local community standpoint).

M/CI 1.5 To the maximum extent possible, use alternatives to the construction of new traffic signals where they can be shown to benefit roadway capacity and are compatible with the character of the mountain region.

Although the policy emphasizes "to the maximum extent possible," such alternatives were dismissed as infeasible due to jurisdictional and geological constraints. Simply providing a cursory evaluation to an alternative and then readily dismissing it as infeasible without substantial evidence does not appear to constitute "maximum extent possible" conformance with this policy. The location of traffic signals at Daley Canyon Road & Highway 18, Daley Canyon Access Road & Highway 18 and Daley Canyon Access Road & Daley Canyon Road are three places where hazardous conditions are liable to be made worse by the addition of traffic signals. These intersections in close proximity with each other are uniquely hazardous due to excessive fog, slope gradient and a short line of sight due to severe curves. The site would be an ideal place for a creative alternative solution instead of traffic signals, which will not satisfactorily remedy the problems. In not conforming to this policy, the project further indicates it would be a significant detriment to the community rather than a benefit.

The DREIR Land Use section also incorrectly evaluates the project as being consistent with county policies on open space corridors, such as the following two Lake Arrowhead Community Plan policies.

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

LA/OS 4.2 Use open space corridors to link natural areas.

7-21
CONT.

7-22

7-23



The DREIR claims that “wildlife movement is not confined to this corridor,” but does not explain what alternative routes the wildlife might use. It further claims that the “corridor would be contiguous to natural areas within the project site,” but does not explain how wildlife will get over six foot fences, 10 foot retaining walls and other project impediments. Major Wildlife Corridors, such as the Strawberry Creek Wildlife Corridor 20, are essential for the proper management of National Forest lands within the mountain region. In order to follow the General Plan and “improve and preserve” Wildlife Corridor 20, the inaccurate analysis in the DREIR that sidesteps this issue must be amended. The scale of the proposed project is out of proportion to the natural features and habitat values of the landscape. As an impediment to the open space corridor, the project design causes a significant impact that need to be disclosed and realistically assessed. It also conflicts with county policies.

7-23
CONT.

Despite failing to accurately assess the above referenced policies, it is notable that the DREIR does identify six additional critical policies that the project is in conflict with. These are LU 1.4, M/LU 1.1, M/LU 1.12, M/LU 1.20, LA/CI 1.8, and LA/CO 2.

M/LU 1.20 Closely review development projects on private land adjacent to National Forest lands to ensure that development projects are capable of meeting all development requirements within the project boundaries or other non-federal land. Provide opportunities for the U.S. Forest Service to consult with the County on development of private land that may have an adverse effect on adjoining National Forest land.

7-24

The Land Use section of the DREIR concludes that even with implementation of the mitigation measures, “conflicts with land use plans and policies related to views and noise would remain significant and unavoidable.” Audubon would point out that the same conclusion equally applies to policies related to biological resources as well.

7-25

CONCLUSION

Audubon believes that the proposed Church of the Woods project is much too large and overly extravagant for the significant constrains of the given site. The proposal results in too many adverse significant impacts that cannot be adequately mitigated. With the shortcomings we have pointed out, the resultant impacts will be considerably greater than what has been disclosed in the DREIR. These problems also result in significant conflicts and noncompliance with the County General Plan and Development Code. In order to be acceptable the DREIR needs to be re-drafted in the sections on biology, land use, alternatives and growth-inducing impacts. As it stands the project should not be approved without major changes.

7-26

Thank you for your consideration of these comments.

Sincerely,

Drew Feldmann
 Conservation Chair



ADDENDUM

Southern Rubber Boa Analysis by Audubon Biologist David Goodward

May 28, 2010

(Considered by Audubon to remain relevant and up-to-date in view of the inadequacy of the input by the project's most recent biological consultants).

Biological Resources, Southern Rubber Boa Surveys:

We have closely analyzed the Biological Resources data in the Technical Appendices and have found serious problems, particularly with regard to Southern Rubber Boa (SRB). It is clear that sufficient protocol surveys for SRB were not completed, and the DEIR conclusion that this species is absent from the project site is baseless.

To be complete, three consecutive years of protocol surveys are required from the California Department of Fish and Game (CDFG). The reason for this is that SRB is very sensitive to weather conditions, and is often undetectable if the weather is too cold, wet, hot or dry in the springtime (R. Hoyer, pers. comm.). In a favorable year, it will come to or near the surface of the soil during a brief period in the spring, where it can sometimes be detected by searching rockpiles, under logs and stumps or under deliberately placed artificial cover such as plywood or carpet squares. If weather conditions are not optimal, it will be virtually undetectable even in the protocol time period. It spends most of the rest of the year underground. Three years of surveys are designed to give the greatest chance of encountering at least one season where the weather conditions are optimal for detection.

On page 5, the Biological Resources Report. Appendix C states protocol surveys were conducted in 2002 and 2003. This is in the PCR Services Corporation Habitat Re-Assessment for the Southern Rubber Boa, dated August 20, 2007, in a letter addressed to Mr. Matt Slowik, County of San Bernardino Land Use Services:

"In 2002 and 2003, Thomas Leslie Corporation (TLC) conducted protocol surveys and documented potentially suitable habitat encompassing 0.671 acre." "No SRB were found during the 2002 or 2003 surveys. A third year of protocol surveys was not performed due to the expiration of TLC's Scientific Collecting Permit and Memorandum of Understanding (MOU) from California Dept. of Fish and Game "(CDFG) for the SRB."

The two years of surveys reported by PCR are therefore insufficient to determine absence of SRB.

Upon closer analysis, we found that protocol surveys for SRB were in fact NOT conducted in 2003 as claimed in the Technical Appendix C. In the letter to Mr. Patrick Hopkins, ICON Inc., entitled "Opinion Regarding Absence of Southern Rubber Boa from TPM 16155", page 113- it is stated that no SRB were found in 16 biological Field Surveys, 2 diurnal and 14 nocturnal. This led to the conclusion that SRB "continues to be absent from TPM 16155." We found no record of 16 SRB protocol surveys in 2003. Instead, we found 16 survey dates for other species, 14 of which took place in the summer, well after the springtime SRB survey window. Two were habitat assessments for Mountain Yellow-legged Frog (June 21, July 9); eight were Spotted Owl surveys (April 4 and 27, June 27, July 3, 11, 18, and 24, and August 1); and six were small mammal trapping on June 30, July 1,2,3,4 and 5. This is justified in the above mentioned letter to Mr. Patrick Hopkins by revealing that no MOUs Authorizing the "Taking"



of State Listed Reptile Species” were issued by CDFG, making protocol surveys in 2003 impossible.

While we sympathize with TLC in their attempt to obtain an MOU for 2003, we find it reprehensible that PCR would claim protocol surveys were conducted in 2003 when in fact they were not. To summarize, only one year of protocol surveys were conducted, rather than the required three consecutive years. That is insufficient to conclude absence of the species on site.

Southern Rubber Boa habitat:

PCR Corporations 2007 habitat re-assessment states that the amount of suitable SRB habitat decreased from the previous surveys .067 acre to 0.54 acre. This is due to logging on the property due to tree losses from drought and bark beetles. Both suitable habitat estimates are calculated by adding the area of every stump, fallen log and rock outcrop on the property. The decrease is due to the fact that the loggers removed some fallen logs in addition to standing timber. There is also discussion of opening up the forest floor to more light, and the deposition of wood chips and vegetation both rendering the habitat less conducive to retaining soil moisture needed by SRB. However, this discussion is not logically consistent, in that wood chips on the forest floor would help retain soil moisture, partially off-setting any decrease in moisture from a more open canopy. Notwithstanding, the calculation of 0.54 acre is derived directly and solely from their summing of the area of stumps, logs and rock outcrops.

This highlights the second major flaw in the DEIR’s SRB analysis. The assumption that SRB are found only under logs, stumps and rocks is false and unsupported. We presume that their definition of suitable SRB habitat comes from the literature that states (correctly) that SRB use outcrops, stumps and logs as winter hibernacula, and that SRB are often found under these objects at other times of the year as well.^{1,2} While SRB are often found under these objects, they are also found on trails and crossing roads, particularly during summer rainfall that stimulates their movement.⁴ They are nocturnal, meaning they will not often be seen when they are out and about. During the day they will almost invariably be underground. It is also documented in the literature that they sometimes move to moist canyon bottoms and streambeds in the summer when the surrounding soil dries out.³ In one report, SRB were reported to exhibit strong site fidelity.⁵ However, a high percentage of the marked SRB in this study were not recaptured, suggesting at least some of the missing SRB dispersed away from where they were captured. In this study, the only two individuals found far from their hibernacula were males. This is consistent with the widespread pattern among many species of male dispersal for mating purposes, resulting in the important biological function of out-breeding, which maintains a diverse and healthy genome.

One estimate of dispersal comes from an Oregon study of Rubber Boas. This study documented dispersal up to 500 yards within one season. This figure has been used to estimate the dispersal needs of the Southern Rubber Boa.⁶ A local account of SRB dispersal ability comes from an individual seen to disperse 300 yards in one season.¹ This documented dispersal range would fully encompass the 37 acres of the project site.



All these studies point to the obvious fact that SRB do not simply hide under the same rocks, stumps or logs their entire life. Rather, they move about their habitat to find food, shelter and mates like any other animal species. Given that the rocks logs and stumps are scattered throughout the project site, and that a moist streambed runs through the center of the project site, it is safe to assume that any SRB on site could be found virtually anywhere on TPM 16155, and that the entire site is suitable for SRB. The entire project site contains prime habitat components for the SRB as described in the CDFG protocol.

Research shows that the main food of SRB is mice and other rodents, often nestlings, as well as snake and lizard eggs.⁸ These mice and other prey function under the same long-term biological rules of breeding and dispersal and occupying optimal habitat when it becomes available. Nobody knows how far away the boas food comes from, even in the short term, let alone in a biologically valid time scale. Nor do we know which plants those mice depend on, and the population dynamics of those plants. SRB habitat must include foraging and breeding areas for their prey, without which the snakes could not survive. This highlights how unreasonable and illogical the assumption is that the project site contains only 0.54 acre of suitable SRB habitat. We need to keep the entire food web intact if we are to ensure the long-term survival of SRB.

To conclude, the project site is within the range of SRB, is within the 10 mile swath of land between Twin Peaks and Green Valley that has produced the majority of SRB records, lies within the preferred plant community and elevation range, and has the essential features needed by SRB. All these factors reinforce the conclusion that the project site is suitable SRB habitat. Under such conditions, CDFG assumes presence, and it is up to the project proponents to prove otherwise with the required three consecutive years of protocol surveys.⁷ Given that only one year of protocol surveys was conducted rather than the required three years, the conclusion that SRB is absent from the project site is baseless. In addition, the assumption that only 0.54 acre is suitable habitat is unsupported by substantiating evidence, neither observational or from the scientific literature. The entire 37-acre should be considered suitable habitat.

□ □ □

1. Keasler, Gary . 1981. Rubber Boa Survey for the San Bernardino National Forest. USDA.
2. Stewart, Glenn. 1988. The Rubber Boa (*Charina bottae*) in California, with Particular Reference to the southern subspecies, *C.b. umbratica*. Proc. Conf. Calif. Herpetology. Eds: H.F. De Lisle, P.R. Brown, B. Kaufman, and B. M. McGurty. Southwestern Herpetologists Society.
3. Loe, Steve. 1985. Habitat Management Guide for Southern Rubber Boa (*Charina bottae umbratica*) on the San Bernardino National Forest. San Bernardino National Forest publication.
4. California Dept. of Fish and Game. 2001. Survey Guidelines for Southern Rubber Boas (*Charina bottae umbratica*): Draft Southern Rubber Boa Survey Protocol.
5. Hoyer, R.F. and G.R. Stewart. 2000. Biology of the rubber boa (*Charina bottae*), with emphasis on the southern subspecies (*Charina bottae umbratica*). Part II: Capture, size, sexual dimorphism, and reproduction. Journal of Herpetology 34: 348-354.



6. Dorcas, Michael. Unpublished data reported in the Draft EIR for the Hawarden Project at Blue Ridge, Lake Arrowhead; Tentative Tract No. 16185.
7. Rodriguez, Raul. 2002. California Dept. of Fish and Game letter to San Bernardino County Land Use Services, 1/14/02 RE: Conditional Use Permit: 02/10192CN1, Project Notice: The Church of Jesus Christ of LDS File/Index CUP/M306-16/01APN:0328-042-10.
8. Hoyer, R.F. and G.R. Stewart. 2000. Biology of the rubber boa (Charina bottae), with emphasis on the southern subspecies (Charina bottae umbratica). Part I: Diet, Antagonists, and Predators. Journal of Herpetology 34: 354-360.



RESPONSES TO COMMENT LETTER 7 San Bernardino Valley Audubon Society

7-1:

The County acknowledges the commenter's response to the DREIR. This comment summarizes the San Bernardino Valley Audubon Society's background. This comment does not raise any concerns related to the DREIR. No revisions to the DREIR are required in order to respond to this comment.

7-2:

While the County decisionmakers will take into consideration the commenter's position regarding the merits of the Project as part of their consideration of Project approvals, the comment does not identify any specific deficiencies in the analysis disclosed in the DREIR. The Project's impacts to biological resources are addressed in Section 3.C, *Biological Resources*, of the DREIR, while impacts to aesthetics are addressed in Section 3.A, *Aesthetics*. No revisions to the DREIR are required in order to respond to this comment.

7-3:

While the County decisionmakers will take into consideration the commenter's position regarding the merits of the Project in consideration of Project approvals, this comment does not identify any specific deficiencies in the analysis disclosed in the DREIR to support the statement that the DREIR does not adequately or accurately assess serious environmental conflicts. The DREIR is fundamentally adequate, complies with CEQA, and all conclusions within the DREIR are supported by substantial evidence provided in the DREIR or the Project's administrative record. No revisions to the DREIR are required in order to respond to this comment.

7-4:

Comments acknowledged. A detailed analysis of the proposed Project's consistency with all applicable San Bernardino County General Plan policies is provided in DREIR Section 3.G (refer in particular to Tables 3.G-1 and 3.G-2). As indicated in Table 3.G-1, the Project would be consistent with or otherwise would not conflict with all applicable General Plan policies, including policies related to grading and site design. Further, a detailed description of the proposed Project, including proposed changes to the site's topography, is included in DREIR Section 2.0, *Project Description*, and a detailed analysis of potential impacts resulting from such changes is included in DREIR Section 3.F, *Hydrology and Water Quality* (refer to the analysis of Thresholds c, d., and e.). Furthermore, impacts to biological resources were evaluated in detail in DREIR Section 3.C, *Biological Resources*, which identifies mitigation measures to reduce the Project's impacts to biological resources to below thresholds of significance. The DREIR discloses the full extent of the Project's impacts to biological resources, and concludes that impacts would remain significant and unavoidable on a cumulatively considerable basis following the implementation of mitigation measures. Impacts associated with aesthetics are evaluated in DREIR Section 3.A, *Aesthetics*. Where significant impacts have been identified, the DREIR includes mitigation measures to reduce such impacts to the maximum feasible extent in proportion to the extent of the Project's impacts. This comment does not specifically identify any deficiencies with respect to the DREIR's conclusions as to the significance of the Project's environmental effects, nor does this comment identify specific ways in which the DREIR understated the Project's potential impacts to the environment. Comments regarding the merits of the proposed Project are acknowledged, and will be considered by the



County decisionmakers in consideration of Project approvals. No revision to the DREIR is warranted by this comment. Refer also to the individual Responses to Comments identified in this letter, below.

7-5:

The DREIR contained a thorough analysis of the Project's impacts to aesthetics in DREIR Section 3.A. The analysis in DREIR Section 3.A includes three separate visual simulations that provide a realistic depiction of the Project's aesthetic impacts as compared to existing conditions. As such, the County disagrees with the commenter's assertion that the DREIR "diminished" the Project's potential aesthetic effects. Rather, as stated on DREIR page 3.A-9, although the Project site is undeveloped and is covered by montane coniferous forest, the Project site does not contain any unusual or unique features that comprise a dominant part of the viewshed from SR-18 (SR-18). The Project site does not contain any scenic resources as they are defined in the Open Space Element of the San Bernardino General Plan, and lands within the Project vicinity (and along SR-18) have been developed with commercial, residential, and school uses. The Project's impacts to aesthetics were analyzed against the Thresholds contained in Appendix G of the State CEQA Guidelines, and the DREIR provides substantial evidence that the Project as proposed would not result in significant impacts to scenic vistas, State scenic highways, or due to a substantial degradation in the visual character or quality of public views of the site. The commenter fails to identify other scenic criteria against which the DREIR should have analyzed the Project's aesthetic impacts. The Project's consistency with the County's General Plan Policies is addressed in DREIR Section 3.G, *Land Use* (refer to Table 3.G-1), which demonstrates that the Project would be consistent with or would not conflict with any applicable General Plan policies, including policies related to aesthetics and visual quality. This comment does not identify any alternative criteria against which to evaluate the Project's aesthetic impacts beyond what is already presented in the DREIR, and thus, no revisions to the DREIR are required in order to respond to this comment.

7-6:

Comment noted. Please refer to the individual Responses to Comments provided by Mr. Dave Goodward, below.

7-7:

The County has provided notice that it is exercising the discretion authorized by CEQA Guidelines § 15088.5(f)(1), specifically stating that it will not be responding to comments made during the public review of the 2010 Draft EIR. Additionally, this comment is related to another project, the Hawarden Development Site project. This comment does not identify any specific deficiencies in the analysis disclosed within the DREIR to support the statement that the Project's habitat assessment is inaccurate or misleading. The Project's impacts to the Southern Rubber Boa (SRB) are addressed in DREIR Section 3.C, *Biological Resources*, the conclusions of which are substantiated by the Project-specific Habitat Assessment appended to the DREIR as *Technical Appendix C*. No revisions to the DREIR are required in order to respond to this comment.

7-8:

Focused or protocol surveys for the Southern Rubber Boa (SRB) or any other species are used to determine the presence of absence of that species within the survey boundaries. There are several species where even a strict adherence to conducting protocol surveys may not provide a reasonable determination whether the species is present on a site or not. Such species as California tiger salamander and Mohave ground squirrel are seldom seen either during favorable years and USFWS and CDFW will often not accept negative surveys



as sufficient evidence of absence from a site. Instead, these agencies often require an assumption of presence of the species on the project site and determine mitigation based on the potential presence and the quality of the existing habitat for that species. Such is the case here with SRB, an extremely secretive species that seldom emerges into open habitat where it can be seen. Following this accepted practice of assuming presence of a species allows a CEQA Lead Agency and project applicants to work with the USFWS and CDFW to determine mitigation based on the suitability of onsite habitat based on the results of a habitat suitability assessment of the site by a biologist certified to conduct protocol surveys for that species. Using this methodology, areas with moderate or higher quality habitat will be assumed to be occupied by the species, with impacts mitigated as determined through the issuance of an incidental take permit (ITP) from CDFW. The approach of assuming presence is commonly-accepted methodology and has been used by San Bernardino and regulatory agencies for other projects in the area, including the deamination of potential impacts to the SRB at SkyPark at Santa's Village for which the County of San Bernardino certified an EIR (SCH No. 2015091001) and determined the extent of mitigation through the CDFW's ITP process. The same practice/methodology is appropriate for the Church of the Woods site and for determining mitigation for the loss of potentially occupied SRB habitat; SkyPark is located within the same vicinity (approximately 2.7 miles east of the Project site) and contains a similar environmental setting as compared to the Project site. As stated on FEIR page 3.C-20, only low-quality SRB habitat will be removed by the development of the Church of the Woods. The type of disturbance activities anticipated in FMZ 3 beyond the development footprint would be limited to the removal of dead or decaying vegetation and tree thinning and pruning. These types of fuel management activities in low-quality SRB habitat would not significantly impact the quality of the SRB habitat with the careful management of fuel management disturbance activities required through the CDFW's ITP process. Additionally, the DREIR identifies Mitigation Measure MM-3.C1(b) as a requirement of the Project, discussed in further detail on DREIR page 3.C-26, which requires that all high quality and moderate quality SRB habitat be permanently preserved onsite and managed in perpetuity by a CDFW-approved land management entity using a non-wasting endowment to fund management activities as reviewed and approved by CDFW through the ITP process. All management requirements are required to be documented in a Long-term Management Plan and submitted to CDFW as part of the application process for the ITP. Using this clearly defined, effective, and approved methodology, the Project's impacts to SRB (assumed to be present) will either be avoided or minimized, and a long-term management process put in place to provide permanent protection and in perpetuity management for potentially SRB-occupied habitat. No revisions to the DREIR or DREIR *Technical Appendix C* are required in order to respond to this comment.

7-9:

Appropriate mitigation, expected to consist of onsite permanent conservation, will be determined through the Project's ITP process with CDFW. Suitable habitat that is set aside as mitigation must be biologically equivalent or superior to the habitat that is lost. CDFW's ITP process requires that potential impacts to SRB be fully mitigated. It does not set a policy of a 3:1 mitigation ratio. At this time, it is expected that Church of the Woods would be able to fully mitigate its biological impacts onsite because only low-quality SRB habitat will be impacted by the Project and its fuel modification zone (FMZ) 3, and fuel modification would only consist of dead or decaying vegetation removal and tree thinning and pruning that would not significantly impact the quality of the SRB habitat with careful management of the fuel management disturbance activities. All 1.65 acres of high-quality habitat, 2.18 acres of moderate-quality habitat, and 9.57 acres of low-quality habitat will be permanently preserved and managed in perpetuity as directed by CDFW during the ITP process (refer to DREIR mitigation measure MM-3.C1[b]). Onsite conservation will require several steps—selecting and quantifying the proposed conservation area, placing a Conservation Easement (CE) over the area that will provide for its permanent preservation, preparing a Long-term Management Plan that will be used by a CDFW approved land management entity, and setting up a non-wasting endowment based on the required funding



needed for in perpetuity management as documented in a Property Action Report (PAR). All of these steps will be under the direct oversight and approval of CDFW as defined by § 2081 of the California Endangered Species Act. No revisions to the DREIR are required in order to respond to this comment.

7-10:

California spotted owl (CSO) is not federally or State listed as threatened or endangered and, therefore, it is not protected under the federal or State endangered species act (ESA and CESA, respectively). CDFW also has not designated CSO a fully protected species. CDFW considers the CSO a species of special concern and evaluates potential impacts and proposed mitigation under the California Environmental Quality Act (CEQA). CSO occupies the same plant community as the SRB within the Project site (old stands of Jeffery pine forests). The proposed mitigation for the SRB, discussed above in Response to Comment 7-9, was reviewed for its direct applicability for compensating for the loss of CSO habitat. Although the Project site is privately-owned land, most of the surrounding lands are part of the San Bernardino National Forest. As stated on FEIR page 3.C-21, only low-quality CSO habitat will be removed by the Project, and a small portion of moderate-quality habitat will be affected by the Project's fuel modification zone (FMZ) 3, which would only consist of dead or decaying vegetation removal and tree thinning and pruning that would not significantly impact the quality of the SRB habitat with careful management of the fuel management disturbance activities established during the CDFW's ITP process. All 1.65 acres of high-quality habitat, 2.18 acres of moderate-quality habitat, and 9.57 acres of low-quality habitat will be permanently preserved and managed in perpetuity as directed by CDFW during the ITP process (refer to DREIR Mitigation Measure MM-3.C1[b]). Impacts to CSO habitat will either be avoided or minimized, and a long-term management process put in place to provide permanent protection and in perpetuity management for this species as part of the onsite conservation of SRB habitat that largely overlaps with CSO habitat.

7-11:

The Project site's location is discussed in detail in DREIR Section 2.0, *Project Description*. Specifically, DREIR page 2-2, Subsection 2.1.2, *Local Setting and Location*, clearly discloses that the Project site is located within the San Bernardino National Forest. Additionally, under Subsection 3.G.1.1, the DREIR reiterates that the Project site is located within the San Bernardino National Forest. Subsection 3.G.1.1, further details the general surrounding land uses and development to provide context regarding the character of the Project area. Furthermore, DREIR Figure 2-3, *Surrounding Land Uses and Development*, illustrates that the Project site is located within the San Bernardino National Forest and is bordered to the west by residential uses, to the south by SR-18, to the north by undeveloped forest, and to the east by Daley Canyon Road. Furthermore, it is unclear from this comment how the jurisdictional boundaries of the National Forest relate to the Project's impacts to biological resources or land use, which are addressed in detail in DREIR Sections 3.C and 3.G, respectively. No revision to the DREIR are required in order to respond to this comment.

7-12:

Please refer to Response to Comment 7-10.

7-13:

The San Bernardino Flying Squirrel (SBFS) is not federally or State listed as threatened or endangered and, therefore, is not protected under the federal or state endangered species act (ESA and CESA, respectively). CDFW also has not designated SBFS a fully protected species, which would require full mitigation for any



identified impact. CDFW considers the SBFS a species of special concern and evaluates potential and proposed mitigation under CEQA. SBFS occupies the same plant community, old stands of Jeffery pine forests, as does the SRB and the CSO within the Project site. The proposed mitigation for SRB, discussed above in Response to Comment 7-8, was reviewed for its direct applicability for compensating for the loss of SBFS habitat. It should be noted that on April 5, 2016, the USFWS published its determination in the Federal Register (81 FR 19527) that SBFS should not be federally listed and found that it was abundant where it occurred, primarily the San Bernardino Mountains. Further, USFWS stated that the existing regulatory laws and implementing regulations for wildlife species in California were adequate for sustaining this species. Nearly 80% of its habitat in the San Bernardino Mountains is within San Bernardino National Forest. As stated on FEIR page 3.C-20, approximately 2.56 acres of low-quality and 4.61 acres of moderate quality SBFS habitat will be removed by the Church of the Woods development. The type of disturbance activities anticipated beyond the development footprint in FMZ 3 would be limited to the removal of dead or decaying vegetation and tree thinning and pruning. These types of fuel management activities in low-quality and moderate-quality SBFS habitat would not significantly impact the quality of the SBFS habitat with the careful management of fuel management disturbance activities required through the CDFW's ITP process. All 1.65 acres of high quality and 5.61 acres of moderate quality SBFS habitat will be permanently preserved onsite and managed in perpetuity by a CDFW approved land management entity using a non-wasting endowment to fund management activities as reviewed and approved by CDFW (refer to Mitigation Measure MM-3.C1(b)). Impacts to SBFS will either be avoided or minimized, and a long-term management process put in place to provide permanent protection and in perpetuity management for this species as part of the onsite conservation for SRB habitat and CSO habitat, both of which largely overlap with SBFS habitat. Finally, commenter's statement that Mitigation Measure MM-3.C1(b) and other are "paper mitigation" is specious and without merit. Courts have consistently held that it is sufficient to articulate specific performance criteria and make further approvals contingent of finding a way to meet them. (*Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 944-945) Mitigation Measure MM-3.C1(b), however, goes above and beyond even this standard, with thorough performance criteria with regard to high, moderate and low quality habitat, the requirement for conservation easements and the consultation, coordination and approval of CDFW.

7-14:

The wildlife movement corridor in question provides movement opportunities for small and large mammals to traverse the San Bernardino Mountains from north to south. This corridor, the Strawberry Creek Corridor as designated by the San Bernardino County General Plan Open Space Element, is outside of the boundaries of the Church of the Woods Project site. The eastern boundary of the Strawberry Creek Corridor abuts the western boundary of the Project site, indicating minimal overlap. Given that the Project is surrounded by natural plant communities and forest habitat, it would be expected for wildlife to occasionally utilize the Church of the Woods property and the off-site riparian corridor. The off-site riparian corridor, which was once part of the Church of the Woods property, was subsequently purchased by the San Bernardino Flood Control Department in 2018 to support the County's installation of the Rimforest Storm Drain project (SCH No. 2015051070). The Rimforest Storm Drain project has already completed the CEQA process and is fully entitled. The County, under their approved CEQA document for the Rimforest Storm Drain Project (SCH No. 2015051070, Draft Revised EIR page 3.3-41), analyzed potential impacts to wildlife movement that would be expected to occasionally traverse through the riparian corridor, determined that impacts would only be temporary and concluded that there would be a less-than-significant impact given the relatively small size of the disturbance areas, the limited timeline for storm drain construction activities, and the availability of surrounding habitat. The County's Rimforest Storm Drain Project DEIR and Final EIR are identified and discussed in multiple locations within the DREIR and are included in the Project's administrative record. Wildlife movement through the riparian corridor could be impeded by Project-related disturbances. However,



the northern portions of the Project site would remain undisturbed and would continue to provide relatively unimpeded movement opportunities for wildlife. As a result, the Project site and the surrounding open space will continue to provide opportunities for local wildlife movement and function as a corridor for highly mobile wildlife species. Furthermore, impacts due to lighting were evaluated under Threshold d) in DREIR Section 3.C, which found that while such impacts would be adverse, by themselves they are not reasonably expected to reduce common wildlife populations below self-sustaining levels in the region due to the region's abundance of suitable habitat for the common wildlife populations. As such, the DREIR found that lighting impacts to biological resources would be less than significant. No revisions to the DREIR are required in order to respond to this comment

7-15:

As noted in the Response to Comment 7-14, the DREIR concluded that impacts to wildlife movement corridors would be less than significant. As indicated in DREIR Tables 3.G-1 and 3.G-2, the Project would be consistent with or otherwise would not conflict with any applicable General Plan or Lake Arrowhead Community Plan policies or requirements, including policies and requirements related to wildlife movement corridors. This comment does not specifically identify how the Project as proposed conflicts with any of the General Plan policies cited. As such, no revisions to the DREIR are required in order to respond to this comment.

7-16:

Please refer to Response to Comment 7-14. As noted, the Project site is not located within the Strawberry Wildlife Corridor, the Project would preserve open space within the northern portions of the site that would continue to provide for wildlife movement, and the Project would not conflict with any applicable General Plan or Lake Arrowhead Community Plan policies or requirements. No revisions to the DREIR are required in order to respond to this comment.

7-17:

Please refer to Responses to Comments 7-7 through 7-16.

7-18:

The Project site's location is discussed in detail in DREIR Section 2.0, *Project Description*. Specifically, DREIR page 2-2, Subsection 2.1.2, *Local Setting and Location*, discloses that the Project site is located within the San Bernardino National Forest. Additionally, under Subsection 3.G.1.1, the DREIR reiterates that the Project site is located within the San Bernardino National Forest. Subsection 3.G.1.1, further details the general surrounding land uses and development to provide context regarding the character of the Project area. Furthermore, DREIR Figure 2-3, *Surrounding Land Uses and Development*, illustrates that the Project site is located within the San Bernardino National Forest and is bordered to the west by residential uses, to the south by SR-18, to the north by undeveloped forest, and to the east by Daley Canyon Road. No revisions to the DREIR are required in order to respond to this comment.

7-19:

The San Bernardino County Biotic Resources Overlay Map is included in the Project's administrative record. According to the Overlay Map, the Project site is located outside the boundaries of the Strawberry Creek Wildlife Corridor. DREIR Subsection 3.C.8, specifically DREIR page 3.C-20, provides a detailed discussion



regarding the Project impacts to SRB habitat located on site. Additionally, DREIR page 3.C-23 provides a detailed discussion regarding the Project's less-than-significant impacts to the Strawberry Creek Wildlife Corridor. No revisions to the DREIR are required in order to respond to this comment.

7-20:

As previously stated in Response to Comment 7-18, the DREIR discloses that the Project site is located within the San Bernardino National Forest. As shown on DREIR Figure 2-3, the Project site is in proximity to residential uses, commercial uses, recreational uses (Dogwood Campground), and an existing high school (Rim of the World High School). The Project's proposed Conditional Use Permit includes standards to ensure that implementation of the Project would be compatible with the character of these nearby land uses. The Project would include ornamental landscaping that would be compatible with the surrounding vegetation and would partially screen views of the proposed buildings. This comment accurately states that the northern portion of the Project site would remain natural open space. The open space in the northern portions of the site would connect to off-site open space areas to the north and would provide an appropriate buffer and transition from open space to proposed on-site developed areas, which would be clustered near SR-18. As such, the DREIR properly concludes that the Project would be consistent with General Plan Policy LU 1.2.

7-21:

General Plan Policy LU 7.2 provides direction to County staff and decisionmakers to enact and enforce regulations to protect environmentally sensitive areas, and is not applicable to individual developments such as the proposed Project. As such, the Project has no potential to conflict with General Plan Policy LU 7.2. Notwithstanding, the Project Applicant would be required to comply with all County regulations, including those that were adopted for the purpose of protecting environmentally sensitive areas. As indicated in the Responses to Comments 7-8 through 7-13, appropriate mitigation has been identified for the Project's impacts to habitat for the SRB, CSO, and SBFS, and Project-specific impacts would be reduced to less-than-significant levels. However, Section 3.C of the DREIR acknowledges that impacts to the SRB, CSO, and SBFS would remain significant and unavoidable on a cumulatively-considerable basis at the regional scale due to the reduction in habitat for these species. Additionally, the San Bernardino County Biotic Resources Overlay Map indicates that the Project site is located outside the boundaries of the Strawberry Creek Wildlife Corridor, and thus the Project site does not comprise an environmentally sensitive area. The Project also would preserve all of the on-site high-quality habitat for the SRB, which also includes most of the areas evaluated as high-quality habitat for the CSO and SBFS. Refer also to the Response to Comment 7-8 with respect to mitigation for impacts to habitat for the SRB, CSO, and SBFS and the required ITP process with the CDFW. No revisions to the DREIR are required in order to respond to this comment.

7-22:

The comment provides a description of San Bernardino County General Plan Policy M/CI 1.5. The commenter fails to identify any deficiencies in the analysis of the Project's consistency with General Plan Policy M/CI 1.5 as presented in DREIR Table 3.G-1. The commenter fails to provide feasible alternatives to the traffic signals that are planned by Caltrans along SR-18, toward which the Project would contribute funding. The traffic signals are required in order to achieve an acceptable Level of Service (LOS) as required by the General Plan and Caltrans. As such, it is not possible for the Project Applicant to use alternatives to the construction of new traffic signals, and the Project therefore would not conflict with General Plan Policy M/CI 1.5. Furthermore, this comment does not identify how the installation of traffic signals would result in increased hazardous conditions. All of the intersections that would be signalized as part of the Project would have to follow



Caltrans' guidelines and permitting process; this comment fails to identify any alternative intersection controls that would provide for an improved level of safety. No revisions to the DREIR are required in order to respond to this comment.

7-23:

The Project's less-than-significant impacts to wildlife corridors are addressed in DREIR Section 3.C, *Biological Resources*. As discussed in DREIR Section 3.C, the Project site is not located within the boundaries of the Strawberry Creek Wildlife Corridor. The corridor's eastern boundary abuts the Project site's western boundary. The Project site's western boundary would contain the Project's natural open space preserve area. Fencing and walls as proposed by the Project would be confined to the proposed development areas in the southern portions of the site, and the on-site open space areas would not be fenced or walled off from open space areas off site. Thus, any wildlife movement within the on-site open space areas would be unobstructed by fences, retaining walls, or other impediments to wildlife movement. The 10-foot retaining walls referenced by this comment would be located at the Project site's entrance, which would be located at the central portion of the Project site's southern boundary, along SR-18, and would not occur adjacent to on- or off-site open space areas. Thus, the DREIR properly concludes that Project impacts to wildlife movement corridors would be less than significant, and that the Project would therefore be consistent with General Plan Policies LA/OS 4 and LA/OS 4.2.

7-24:

This comment incorrectly implies that the DREIR found the Project would be inconsistent with General Plan policies LU 1.4, M/LU 1.12, M/LU 1.20, LA/CI 1.8, and LA/CO 2. The analysis contained in DREIR Table 3.G-1 demonstrates that the Project would not conflict with any of these policies. The commenter fails to provide evidence to support the assertion that the Project is inconsistent with these policies. The comment also provides a description of San Bernardino County General Plan Policy M/LU 1.20, but does not provide any substantive evidence that the Project would conflict with Policy M/LU 1.20. As indicated in DREIR Table 3.G-1, the Project would not conflict with Policy M/LU 1.20. No revisions to the DREIR are required in order to respond to this comment.

7-25:

The Land Use section of the DREIR (Section 3.G) did not conclude that the Project would result in conflicts with plans and policies related to views and noise, as asserted by this comment. Rather, the Land Use section of the DREIR concludes that the Project would result in a significant unavoidable impact due to a conflict with General Plan Policy M/CI 1.1 and Lake Arrowhead Community Plan Policy LA/CI 1.1 related to levels of service on Project area roadways, because mitigation for the Project's impacts fall under the jurisdiction of Caltrans and not the County of San Bernardino. Although the Project would result in significant and unavoidable cumulatively-considerable impacts to habitat for the SRB, CSO, and SBFS, the analysis presented in the DREIR demonstrates that the Project would not conflict with any policies, regulations, or requirements related to biological resources. No revisions to the DREIR are required in order to respond to this comment.

7-26:

This comment reiterates the commenter's position regarding the merits of the Project and the commenter's opinion regarding the adequacy of the DREIR. The DREIR was prepared in accordance with the CEQA Guidelines Sections 15120 to 15132 and the DREIR's conclusions are based on substantial evidence in the



public record. The Project's impacts to biological resources and land use are addressed in DREIR Section 3.C, *Biological Resources*, and Section 3.G, *Land Use*, respectively. As demonstrated therein, the proposed Project would not result in any significant conflicts or noncompliance with the County General Plan or Development Code, with exception of the Project's conflict with General Plan Policy M/CI 1.1 and Lake Arrowhead Community Plan Policy LA/CI 1.1 related to levels of service on Project area roadways. Impacts due to a conflict with these policies were fully disclosed by the DREIR. Additionally, the Project's alternatives and growth-inducing impacts are addressed in DREIR Section 4.0, *Alternatives*, and Section 5.0, *Other CEQA Considerations*, respectively. No revisions to the DREIR are required in order to respond to this comment.

ADDENDUM TO LETTER 7:

Please refer to Responses to Comments 7-8 and 7-9.



From: [Steven Farrell](#)
To: [Nieves, Tom](#)
Cc: [Sara L. Breckenridge](#); [Rahhal, Terri](#); habialeckidmd@gmail.com; ["aprabhala@biologicaldiversity.org"](mailto:aprabhala@biologicaldiversity.org); drewf3@verizon.net; [Carmen J. Borg](#); [Laurel L. Impett](#)
Subject: Re: Church of the Woods Project Draft Revised Environmental Impact Report – State Clearinghouse No. 2004031114
Date: Monday, February 25, 2019 4:27:26 PM
Attachments: [Mtns Group comments to COW RDEIR final.doc](#)

Mr. Nieves,

On behalf of the Sierra Club San Bernardino Mountains Group, please accept the attached comment letter regarding the Revised EIR for the Church of the Woods project. I am also sending separately our comments from the previous cycle as they remain for the most part, germane.

Thank you,

Steven Farrell
San Bernardino Mtns Group



San Bernardino Mountains Group

San Gorgonio Chapter

PO Box 651
Blue Jay, CA 92317

www.sierraclub.org/san-gorgonio/san-bernardino-mountains

February 24, 2019

County of San Bernardino
Land Use Services Department
Tom Nieves, Planner
385 North Arrowhead Avenue, First Floor
San Bernardino, CA 92415
Email: Tom.Nieves@lus.sbcounty.gov

Re: Comments on the Church of the Woods Project Draft Revised Environmental Impact Report – State Clearinghouse No. 2004031114

Dear Mr. Nieves:

The San Bernardino Mountains Group of the Sierra Club appreciates this opportunity to comment on the recently released draft of the Church of the Woods Revised EIR (the DREIR). As residents of the Rim of the World mountain area where the project is being proposed, our members will be directly impacted by this project if it is approved. Our members have long been committed to responsible land use planning, the promotion and protection of our natural resources and the preservation of the Rim of the World mountain communities' quality of life.

8-1

We believe this DREIR remains functionally insufficient, just as we explained in the prior EIR from 2010. We include those EIR comments by reference here, as still applying to the modified project, now reviewed in the DREIR.

8-2

Fundamental project information and predictable impact information is still missing, deliberately skipped or seemingly deferred until after the project is approved. Therefore any analysis of the project's environmental impacts and/or mitigations remains inadequate, in spite of the now almost burdensome complexity and detail of what has been provided.

A) Cumulative impacts of the related Rimforest Storm Drain/Flood Project

8-3

We have several several concerns about the cumulative effects and inter-related impacts of the now approved Rimforest Flood Control project on what was originally specified as COTW's "natural undisturbed" open space in the original project description. Now the two projects are inextricably related, and yet the cumulative



and concurrent impacts of the combined planned projects are not being evaluated as CEQA, the public, and our County decision-makers require.

Pasted below (Fig A) is an image of recent correspondence that was forwarded to us, an email from the County’s Dept of Public Works which highlights the interdependence and cooperation of the two projects. It clearly acknowledges the coordination between the two more-or-less simultaneous projects, but the DREIR evaluation of their combined impacts are not similarly evaluated or disclosed. Each project points to impacts from the other project as “not my issue.” We believe that is inappropriate to CEQA disclosure requirements.

Potential significant cumulative ramifications of the combined projects, in whatever sequence they are implemented on the ground, include the following (but not exhaustive list):

1. permit requirements, along with needed mitigations,
2. slope erosion, slope modification, slope support/reinforcement requirements, as well as the combined runoff impacts to both the immediate valuable habitat areas and downstream environment. This is especially a problem because the retardant basins of the Flood project have not yet been fully defined (see Fig A below) but what descriptions there are from the Feasibility studies, suggest a fairly wide, hard-bottomed series of basins that will require some grading into the already steep canyon slopes below the proposed COTW project.
3. combined net loss (without any apparent required mitigation) of the combined rare natural communities of Southern Arroyo Willow Riparian Forest and Southern Mixed Riparian Forest – see Fig B below pasted from the County’s Rimforest Flood project EIR,
4. constrained wildlife movement across the two (now separated) parcels in contradiction to the County’s General Plan policies, and
5. water quality impacts downstream from the combined parking hardscape runoff of the COTW project along with Rimforest’s street runoff after the Flood project is completed.

8-3
CONT.

8-3A
8-3B

8-3C

8-3D

8-3E



Figure A

The project is funded, plans are currently at 65% complete and final design is scheduled to be done in the fall of 2019. Construction is estimated to begin in spring 2020 and should be completed by the end of 2020. We are looking at constructing a portion of the storm drain that is under the Church of the Woods project concurrent with their project so as to not impact them.

Please let me know if you have any questions.

Kevin Blakeslee, P.E.
 Director
 Department of Public Works
 Phone: 909-387-7906
 825 E. 3rd Street
 San Bernardino, CA, 92415-0835

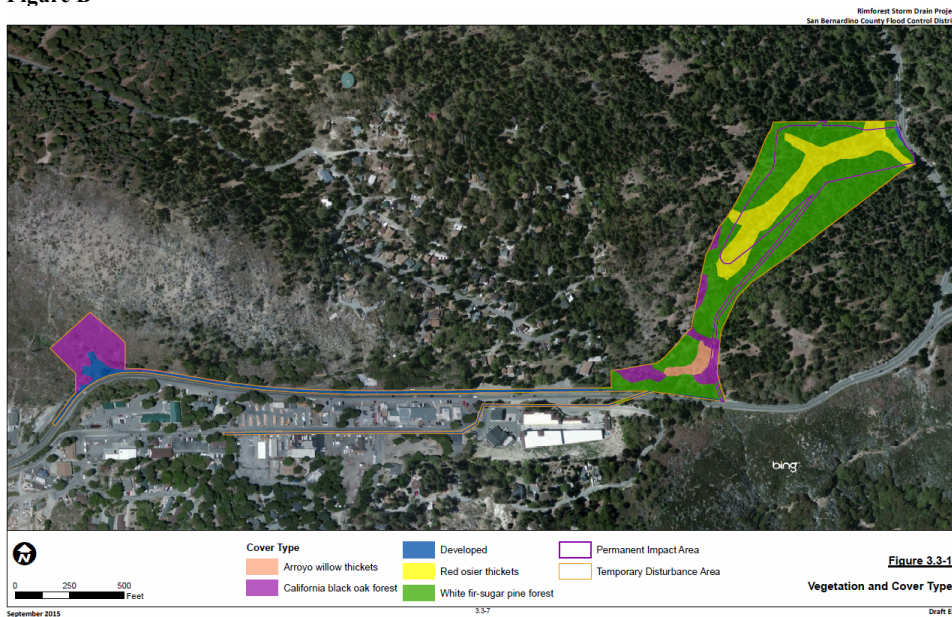


LITTLE BEAR CREEK

HEADWATERS
Church of the Woods

8-4

Figure B



8-5



Sensitive Natural Communities

Two sensitive natural communities are present on the project site: Southern Arroyo Willow Riparian Forest and Southern Mixed Riparian Forest. The areas mapped as Arroyo Willow Thickets meet the definition of the Southern Arroyo Willow Riparian Forest and the Red Osier Thickets meet the definition of Southern Mixed Riparian Forest. Both of these natural communities have a state rank of S2, indicating the community occupies between 2,000 and 10,000 acres in the state and is considered rare in California (CDFG, 2010). These vegetation communities are described above.

8-6

Biology:

As we have commented before, the COTW parcel is of special interest and qualities. Biologically speaking, this property is of special value to the forest and to the community. It is a rare and valuable habitat for both listed and common species.

The RDEIR continues to belittle the importance of this natural open space, forested, wetland parcel to the forest and wildlife community. The property functions as a critical link in a key County-recognized wildlife corridor. Wildlife access to and thru this parcel

8-7

provides a critical sustainable link to the Forest Service lands which border and surround the COW property on its north, east and south boundaries. The property's value to the North-South wildlife corridor is magnified even more because of the remarkable and rare perennial springs and wetlands area found in the center of the COW parcel. Moist habitat and a reliable water source is exceedingly important to wildlife and is exceedingly rare in the essentially "dry" mountain environment. But when these are constrained by development, surrounding them with urban structures, lighting, and noise, or just isolating them from their surrounding with fencing (still proposed for this project), it is a substantial loss to the general viability of the surrounding eco-system and the functioning viability of the wildlife corridor which passes through this site.

The entire parcel can easily be identified as prime Southern Rubber Boa habitat. (See Extract 1, pulled from our comments on the earlier EIR.) The fact that SRB's were not found onsite during the winter surveys of Nov 29 and Feb, is not at all surprising. The EIR is repeating a mistake made in a similar survey for the Hawarden housing development (abutting Skypark), when the

Extract 1.

As is frequently reported in the literature, Southern Rubber Boas migrate seasonally. Outcrops for warmth in the winter, and shady and/or moist areas in the summer.

On November 5, 2005, the San Bernardino County Board of Supervisors certified the final EIR for the Hawarden project which was a small acreage subdivision proposal a few miles east of the Church of the Woods property (identified in the COW EIR cumulative impacts section). This EIR firmly established that the seasonal habitat migration range of the SRB is a 500 meter radius area from any potential discovery or refuge. Even if the Church of the Woods project applicant wishes to forego or challenge California Fish and Game's required 3-year survey requirement to establish SRB habitat, any assumptions about "occupied" SRB habitat on the property *must* take into consideration the calculation already established by San Bernardino County that the range from hibernacula (or other "prime discovery" locations like downed logs etc) is 500 meters and the area of habitat is calculated as the circle described by the 500 meter radius. With this calculation, the entire COW property qualifies as occupied habitat, and the mitigation requirements at a 3:1 ratio are clear and mandatory

8-8



first attempts to establish prime habitat focused on rock outcrops only, ignoring the fact that SRB migrate seasonally from outcrops and logs, through the duff and loose debris and soil for considerable distances. The fact that the Fuel treatment protocol for Zone 3 requires removal of that duff, from the forest floor for 200 ft, is a critical loss of habit that is not recognized in the EIR, much less mitigated for. Furthermore, though important, the dedication of part of the COTW parcel for undeveloped open space is not an adequate compensation for the loss of the remaining habitat destroyed or impacted by the grading and construction of the rest of the parcel. Appropriate offsite mitigation is required.

8-8
CONT.

Aesthetics

We reiterate our still extant and appropriate concerns about the Aesthetic impacts of the project from our earlier comment letter (attached to this email)

We add our concerns about the promises of the EIR’s suggested landscaping effects to address and minimize the jarring introduction of acres of hardscape, artificial slopes, artificial turf, cement-lined drainages, fencing, etc. Mockups of the projects anticipated “views” from the road provided in the EIR are misleading at best, and likely completely unattainable. Trees that appear in the mockup will have been destroyed during excavation, and are unlikely to grow back to that scale for many many years, if ever.

8-9

Hydrology

Again, we refer the County to reread our original comments (attached) as most continue to be relevant.

At this time, we would simply add that because of climate change our historical norms for weather, especially precipitation no longer apply. Extremes in both drought and “flooding” need to be acknowledged. Just as we are no longer in a normal “fire regime” (as expressed by County Fire), precipitation patterns will also be affected. Only this month, we have seen relatively strong atmospheric rivers deliver intense, prolonged precipitation. In the interest of public safety, the County should be prepared to see 50 year, 100 year, and 500 year rain events more frequently.

8-10

Miscellaneous

Evacuation Planning

We are concerned about the quality and effectiveness of the prepared Evacuation Plan. Not only does it not involve any metric analysis of how the property will be evacuated, but the assumptions of occupancy are dramatically different than the occupancy plans for the project in the project description. The Sunday worship number in the Evac Plan is 400, while the EIR project description declares 600. A significant difference.

8-11

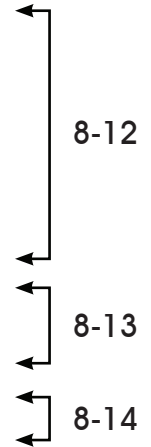


Further, there appears to be no consideration of the complications of only having two south-facing exits (one awkwardly steep and narrow), relatively close together.

Our communities have already experienced several dramatic evacuations in the mid-2000's, and in both cases, Highway 18 was excessively slowed. Merging up to 300 cars into that clogged highway will be challenging. From the County's point of view, introducing another bottleneck into our already limited evacuation route system should, in the interest of public safety, be seriously considered as inappropriate.

One other consideration is the fact that many of the site's occupants will want to return to their homes before leaving the mountain, creating cross traffic flows that will further the confusion and delays of evacuation.

We believe the current Evac Plan is insufficient, and needs to be re-done.



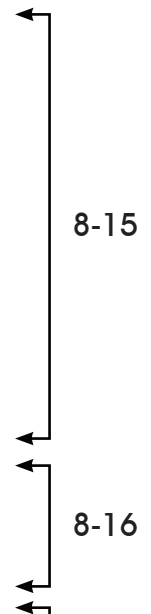
Water Supply

In addition to our earlier comments, we note that we have not seen a current will-serve letter from CLAWA to establish water supply.

One reason for that may be that with the significant estimates of water requirements for this project, a water agency may not be able to issue such a will-serve without having a current Urban Water Management Plan, which CLAWA does not. Having opted out of studying their water supply reliability for the required 2015 UWMP cycle, the water supply statistics cited in the DREIR are essentially outdated and moot.

We further question the project's estimates of water supply demand, as using a calculation based on generic IC projects (as was apparently done for this EIR iteration) seems insufficient. Particularly so, when you consider the ball field requirements which are not typical of IC projects.

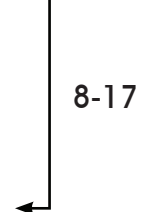
How strange it is that the applicant does not yet know enough about its own project to disclose the anticipated landscaping needs accurately. How much more disappointing for the public to not see a calculation based on water fixtures. The lack of architectural details of this project has long been an extant concern.



Tree Removal Plan

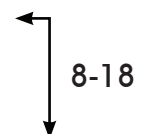
The Site has undergone bark beetle death, and extensive timber removal (in 2005), and anecdotally since then.

Are the Forester's conclusions still germane today?



Wetlands and Riparian areas

Personal visits to the project area from knowledgeable visitors with wetland and plant expertise prompted the identification of extensive wetlands and wetland indicators that



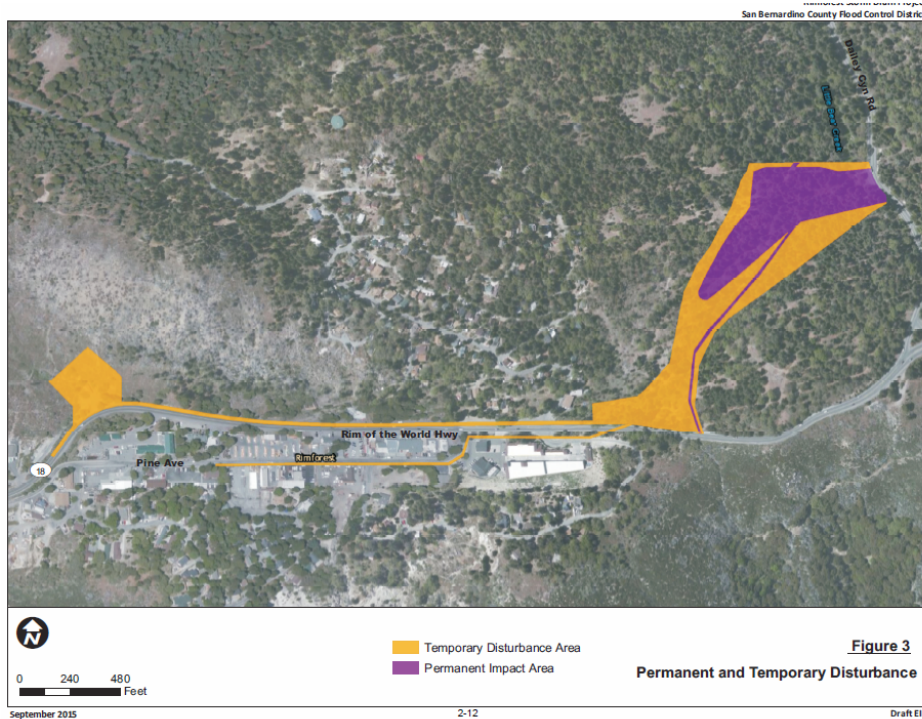


are not identified in the RDEIR. Red Osier Dogwood stood out as being particularly noticeable. As noted above, impacts to immediately surrounding environs, even if not present on the project footprint, or project property, need to be identified and impacts evaluated.

Disrupting, excavating, moving several hundred thousand cubic yards of material will have impacts beyond the immediate footprint. See Fig C (below) for the Rim Flood map of “permanent” impacts. How will the COTW project impact the other areas?

8-18
CONT.

Figure C



8-19

Thank you for your consideration and action.

Sincerely,

Steven Farrell
Conservation Chair
San Bernardino Mountains Group - Sierra Club

cc:



RESPONSES TO COMMENT LETTER 8 Sierra Club San Bernardino Mountains Group

8-1:

This introductory comment provides a description of the San Bernardino Mountains Group – Sierra Club. This comment does not raise any concerns related to the DREIR. No revisions to the DREIR are required to respond to this comment.

8-2:

The DREIR was prepared in full compliance with the California Environmental Quality Act (CEQA), State CEQA Guidelines, and the County of San Bernardino Guidelines including project definition, foreseeable impacts, and feasible mitigation measures. Additionally, The County is exercising the discretion authorized by CEQA Guidelines § 15088.5(f)(1), specifically stating that it will not be responding to comments made during the public review of the 2010 Draft EIR. Specific comments on the DREIR are addressed below in Responses to Comments 8-3 through 8-19.

8-3:

The proposed Project would not be implemented prior to the completion of the Rimforest Storm Drain project, and revisions have been made to the DREIR to remove any references to the Project being constructed prior to the Rimforest Storm Drain project. Revisions to the DREIR are identified in Section F.3, *Additions, Corrections, and Revisions*, of this Final EIR. Because the Project would not be implemented until after the Rimforest Storm Drain project is complete, Project-related construction and operational activities would not overlap with construction activities associated with the Rimforest Storm Drain project. The Rimforest Storm Drain project is not a direct consequence of the proposed Project, and would be implemented with or without the Project to resolve area drainage conditions. Impacts associated with the Rimforest Storm Drain project were evaluated in a separate EIR (SCH No. 2015051070), and there is no evidence in the public record to support the commenter's assertion that there would be cumulative ramifications associated with the two separate projects. Refer also to the Responses to Comments 8-3A through 8-3E.

8-3A:

Mitigation is determined based on a project's impacts. Although separate permits would be required for the Rimforest Storm Drain project and the proposed Project, both projects would be responsible for mitigating significant impacts to the environment, including impacts to sensitive habitats. Additionally, the Project would not be implemented prior to completion of the Rimforest Storm Drain project, and therefore there would be no potential for cumulatively-considerable impacts associated with construction of the Rimforest Storm Drain project and construction and operation of the proposed Project.

8-3B:

As previously noted, the proposed Project would not be implemented prior to the completion of the Rimforest Storm Drain project. The Project would be designed to take into consideration changed slopes and elevations on the site that would result from the Rimforest Storm Drain project. The proposed Project would not result in any impacts to jurisdictional waters or wetlands, nor would the Project result in erosion or other geologic hazards associated with slopes. While it is acknowledged that certain details regarding the Rimforest Storm



Drain project have not been finalized, the Rimforest Storm Drain project would be constructed in a manner consistent with the analysis presented in the Rimforest Storm Drain Project EIR (SCH No. 2015051070). Because the Project would not be implemented until after the Rimforest Storm Drain project is complete, there is no potential for cumulatively-considerable impacts associated with slopes.

8-3C:

As previously noted, the proposed Project would not be implemented prior to the completion of the Rimforest Storm Drain project. The County would be responsible for acquiring the necessary permits to include the jurisdictional waters in their impact footprint for the storm drain project. As disclosed in the Rimforest Storm Drain Project EIR (SCH No. 2015051070), approximately 0.05-acre of Corps/ RWQCB jurisdiction waters and approximately 0.10-acre of CDFW jurisdiction waters would be permanently impacted by development of the Rimforest Storm Drain project and mitigation would be the responsibility of the County. The proposed Project would not result in any impacts to riparian habitat, including Southern Arroyo Willow Riparian Forest and Southern Mixed Riparian Forest. As such, there is no potential for cumulatively-considerable impacts to these plant communities.

8-3D:

The Project site is not part of any designated wildlife movement corridors. The eastern boundary of the Strawberry Creek Corridor abuts the western boundary of the Project site, but does not encompass any portion of the Project site. Moreover, the Project as proposed would preserve the northern portions of the Project site as open space, including most of the western portion of the site that abuts the Strawberry Creek Corridor. As such, the DREIR concluded that Project impacts to wildlife movement corridors would be less than significant. Additionally, the Rimforest Storm Drain Project EIR concluded as follows: “[g]iven the relatively small size of the project disturbance areas, the limited timeline for project construction activities, and the availability of surrounding habitat east and west of the attenuation basin(s) for wildlife movement, the [Rimforest Storm Drain] project would have a less-than-significant impact on wildlife movement or the use of wildlife nursery sites, and no mitigation is proposed (Class III).” (SCH No. 2015051070, Rimforest Storm Drain Project Draft Revised EIR page 3.3-41.) The commenter does not provide any evidence that cumulatively-considerable impacts to wildlife movement corridors would occur beyond what is already identified in the DREIR and the Rimforest Storm Drain Project EIR.

8-3E:

As previously noted, the proposed Project would not be implemented prior to the completion of the Rimforest Storm Drain project. Construction and operational activities associated with the proposed Project would not commence until after construction of the Rimforest Storm Drain project is completed. As such, there is no potential for cumulatively-considerable water quality impacts associated with construction activities. Both the Project and the Rimforest Storm Drain project would be required to comply with applicable National Pollutant Discharge Elimination System (NPDES) permit requirements, including the preparation and implementation of a Water Quality Management Plan (WQMP) and Storm Water Pollution Prevention Program (SWPPP) that would include Best Management Practices (BMPs) to prevent and control erosion and sedimentation. Because both the Rimforest Storm Drain project and the proposed Project would be subject to NPDES requirements, cumulatively-considerable impacts to water quality would not occur.



8-4:

The County acknowledges the commenter's correspondence with the County Public Works Department regarding the proposed Project's intended timing for construction, which also provides figures depicting Little Bear Creek and its headwaters. This comment does not raise any concerns related to the DREIR. No revisions to the DREIR are required to respond to this comment.

8-5:

This comment contains a figure from the Rimforest Storm Drain Project EIR depicting the vegetation and cover type found in the Project area. This comment does not raise any concerns related to the DREIR. No revisions to the DREIR are required to respond to this comment.

8-6:

This comment is an excerpt from the Rimforest Storm Drain Project EIR which summarizes the sensitive natural communities that were found in the area. This comment does not identify any specific deficiencies in the analysis disclosed in the DREIR. The proposed Project's impacts to biological resources are addressed in Section 3.C, *Biological Resources*. No revisions to the DREIR are required in order to respond to this comment.

8-7:

Please refer to Response to Comment 7-14.

8-8:

Please refer to Response to Comment 7-8 and Response to Comment 7-9.

8-9:

The County acknowledges this comment. The County will take into consideration the commenter's position regarding the adequacy of the mock-ups prepared to the proposed Project into consideration. The proposed Project impacts to aesthetics are addressed in Section 3.A, *Aesthetics*, while proposed landscaping elements are described in DREIR subsection 2.4.1 and depicted on DREIR Figure 2-8. No revisions to the DREIR are required in order to respond to this comment.

8-10:

The County is exercising the discretion authorized by CEQA Guidelines § 15088.5(f)(1), specifically stating that it will not be responding to comments made during the public review of the 2010 Draft EIR. This comment does not identify any specific deficiencies in the analysis disclosed in the DREIR. The Project site's hydrological setting and the Project's impacts to hydrology and water quality are addressed in DREIR Section 3.F, *Hydrology and Water Quality*, and the analysis accounts for 100-year storm events in accordance with County of San Bernardino requirements. No revisions to the DREIR are required in order to respond to this comment.



8-11:

In response to this comment, a revised Evacuation Plan for Church of the Woods is provided in this FEIR as *Technical Appendix E1*. The revised Evacuation Plan anticipates 600 Sunday worshipers per service, consistent with the DREIR Project Description, Table 2-4.

8-12:

The County finds that the Project's revised Evacuation Plan, included in the FEIR as *Technical Appendix E1*, provides substantial evidence that emergency egress from the Project site and local area can be accomplished in a manner that provides for the safety of both Project occupants and the surrounding community. No revisions to the DREIR are required in order to respond to this comment.

8-13:

Vehicles existing the Project site during an evacuation would access SR-18 via the proposed signalized intersection at the Project's access driveway. Such orderly egress would preclude impacts to traffic along SR-18 and would not create substantial delays in evacuation of the community.

8-14:

In response to this comment, the County has listed the Project's revised Evacuation Plan in Section F.3, *Additions, Corrections, and Revisions*, of this Final EIR and attached the document as *Technical Appendix E1*. The revised Evacuation Plan provides updated Table 1, *On-site Uses – Phases I and II*, which reflects a 600 person per Sunday service opposed to a 400 person per Sunday service. The County finds the emergency Evacuation plan would provide an adequate level of safety during emergencies.

8-15:

In response to this comment, the Project Applicant has supplied an updated will-serve letter from the Crestline-Lake Arrowhead Water Agency dated February 13, 2019. The addition is indicated in Section F.3, *Additions, Corrections, and Revisions*, of this Final EIR and is included in *Technical Appendix J*. The updated will-serve letter confirms that the CLAWA has sufficient water supplies to serve the Project without the need for new or expanded entitlements.

8-16:

The County acknowledges the commenter's position regarding the merits of the Project. This comment does not any deficiencies in the analysis disclosed in the DREIR. The proposed Project components and characteristics are provided in Section 2.0, *Project Description*. No revisions to the DREIR are required in order to respond to this comment.

8-17:

An updated Foresters Report has been prepared for the Project site, prepared by Timothy D. Morin, RPF #2505, and is included as *Attachment A* to this response. The updated report does not affect the findings or conclusions of the DREIR with respect to the removal of trees from the site. As such, no revisions to the DREIR have been made pursuant to this comment.



8-18:

Refer to Response to Comment 8-3C. The wetlands referred to in this comment will not be impacted by the Project.

8-19:

Impacts associated with Project grading activities were evaluated throughout the DREIR, including potential impacts to off-site areas. This comment does not identify any specific deficiencies in the analysis disclosed in the DREIR. No revisions to the DREIR are required in order to respond to this comment.



Comment Letter #9

From: [Steven Farrell](#)
To: [Nieves, Tom](#)
Cc: [Rahhal, Terri](#)
Subject: Re: Church of the Woods Project Draft Revised Environmental Impact Report – State Clearinghouse No. 2004031114
Date: Monday, February 25, 2019 4:41:25 PM
Attachments: [Mtns Group comments to COW DEIR final.doc](#)

Following up, Mr. Nieves, I am attaching our prior comment letters. I understand that all correspondence about this project remains as part of the official administrative record, but for clarity here, I include them for this incarnation of the EIR.

Thanks you,

Steven Farrell
San Bernardino Mtns Group, Sierra CLub

On 2/25/2019 4:26 PM, Steven Farrell wrote:

- > Mr. Nieves,
- >
- > On behalf of the Sierra Club San Bernardino Mountains Group, please accept the attached comment letter regarding the
- > Revised EIR for the Church of the Woods project. I am also sending separately our comments from the previous cycle as
- > they remain for the most part, germane.
- >
- > Thank you,
- >
- > Steven Farrell
- > San Bernardino Mtns Group
- >

←
9-1
←



San Bernardino Mountains Group

San Gorgonio Chapter

PO Box 708
Blue Jay, CA 92317

www.sangorgonio.sierraclub.org/mountains

June 16, 2010

County of San Bernardino
Land Use Services Department
Advance Planning Division
385 N. Arrowhead Ave., 1st Floor
San Bernardino, CA 922415-0182
Attn: Matthew Slowik – Senior Planner

RE: **Comments on the Draft Environmental Impact Report for the Church of the Woods Project (SCH #2004031114)**

Dear Mr. Slowik:

The San Bernardino Mountains Group of the Sierra Club appreciates this opportunity to comment on the recently released Draft of the Church of the Woods EIR (the DEIR). As residents of the Rim of the World mountain area where the project is being proposed, our members will be directly impacted by this project if it is approved. Our members have long been committed to responsible land use planning, the promotion and protection of our natural resources and the preservation of the Rim of the World mountain communities' quality of life.

We believe this DEIR is functionally insufficient. Basic and predictable project information is missing and therefore any analysis of the project's impacts and/or mitigations is inadequate.

Until all concomitant and predictable project aspects are disclosed, satisfaction of CEQA's requirements for an EIR to define and review all the foreseeable impacts of a project and the appropriate mitigations required for its approval is not possible. In this case, this DEIR has ignored that mandate, it is premature, and has inappropriately deferred the definition and review of various important aspects of the project it purports to analyze. Informed public CEQA participation is not possible. When there is a better definition and understanding of the "full" project, a new Draft EIR will need to be re-circulated

Responsible agencies like Fish and Game, the Regional Water Quality Control Board, and even the local Sanitation District are acknowledged as needing consultation and guidance for their requirements, project conditions, and in some cases, permits. (See: p. 2-17 - We note that although the Army Corps of Engineers is missing from this list, elsewhere in the EIR it is identified as having jurisdiction on the property and requiring consultation and an application for a 401 Permit.)



When a project can be dramatically altered by agency conditions, or the infrastructure requirements for the project can be reasonably expected to be so significant, they engender a new “secondary” project with its own potential environmental impacts (like the requirements for the Church of the Woods project to extend a new water main, or expanding the current sewage transport facilities), then CEQA law requires this information to be disclosed in a reasonable way as part of the current project and to not defer the evaluation of these associated and required actions.

For example, it has come to our attention that there is a strong expectation that the County Flood District is expecting, as a condition of approval, to require easements on the COW property for the creation of flood basin or catch basins. Such a condition and requirement on the project for this type of construction on the Bear Springs Creek drainage on the COW property would obviously negate the current EIR claims of “the project will leave the NW section of Bear Springs Creek undisturbed and “natural” and that therefore there will be no significant environmental impacts which merit recognition or mitigation”. The lack of transparency and public disclosure that results from this EIR’s extensive use of deferring agency analysis and permit requirements for the project until after the release of the EIR is unacceptable. It prevents the County and the public from reviewing the true potential and probable impacts of the project in an informed way.

We also believe that the Lake Arrowhead Sanitation District will require expansion of their Sewage infrastructure. This is likely to have growth inducing impacts that need to be examined.

Biology:

The COW parcel is of special interest and qualities to many entities. Biologically speaking, this property is of special value to the forest and community. It is a rare and valuable habitat in the area for both listed and common species. This is improperly described in the EIR.

The property functions as a critical link in a key County-recognized wildlife corridor. Wildlife access to and thru this parcel provides the critical sustainable link to the Forest Service lands which border and surround the COW property on its north, east and south boundaries. The property’s value to the North-South wildlife corridor is magnified even more because of the remarkable and rare perennial springs and wetlands area found in the center of the COW parcel. Moist habitat and a reliable water source is desperately needed by wildlife and is exceedingly rare in the essentially “dry” mountain environment. When rare water “oases” like this are overwhelmed by development by simply paving them over, surrounding them with urban development structures, or just isolating them from their surrounding with fencing (all of which is proposed for this project), it is a substantial loss to the general viability of the surrounding eco-system and the functioning viability of the wildlife corridor which passes through this site..

This is not recognized in the EIR and needs to be. To gloss over this deep and fundamental loss as “Not Significant” is a grievous failure.



As is frequently reported in the literature, Southern Rubber Boas migrate seasonally. Outcrops for warmth in the winter, and shady and/or moist areas in the summer.

On November 5, 2005, the San Bernardino County Board of Supervisors certified the final EIR for the Hawarden project which was a small acreage subdivision proposal a few miles east of the Church of the Woods property (identified in the COW EIR cumulative impacts section). This EIR firmly established that the seasonal habitat migration range of the SRB is a 500 meter radius area from any potential discovery or refuge. Even if the Church of the Woods project applicant wishes to forego or challenge California Fish and Game's required 3-year survey requirement to establish SRB habitat, any assumptions about "occupied" SRB habitat on the property *must* take into consideration the calculation already established by San Bernardino County that the range from hibernacula (or other "prime discovery" locations like downed logs etc) is 500 meters and the area of habitat is calculated as the circle described by the 500 meter radius. With this calculation, the entire COW property qualifies as occupied habitat, and the mitigation requirements at a 3:1 ratio are clear and mandatory.

Aesthetics

The unprecedented scale of this project immediately frustrates any enforcement of the County and Community General Plans policies which mandate respect and preservation of the Highway 18 Scenic Byway status. Although this is recognized in the EIR for views from the immediate entrance to the site, the EIR has not addressed the impacts of the destruction and leveling of this natural hill from the perspective of driver's approach east of the property on highway 18. Currently, this perspective provides a dramatic overview of the natural and forested property, completely compatible with the intent of a scenic byway and the immediate surroundings. If this project is approved, it will be replaced with a view of around 10 acres of rooftops and parking areas.

The EIR needs to do more than describe and acknowledge the impacted views of the property only from the highway immediately in front of the parcel. Important potential impacts from various surrounding locations need to be adequately disclosed. A much more thorough analysis of the visual impacts of the project needs to be done. As another specific example, consider the impact to the enjoyment and appreciation of those citizens who visit our Natural Forest to camp at the USFS Dogwood campground just opposite the property across Daley Canyon. Instead of experiencing the remarkable sense of visiting a "natural" forested landscape as they approach and enter the campground, they will now be entering the "forest" in direct view of a massively artificial landscape of flattened natural contours, asphalt parking expanses and a discordant collection of urban structures.

The DEIR's structural description lacks three-dimensional accuracy. The project description is essentially a flat, "floor plan" or aerial view of the project. As is acknowledged in the DEIR, the project portrayal is "conceptual" only. Unfortunately for decision-makers and for the concerned public, this is not enough information to adequately evaluate such potentially significant impacts as aesthetics and particularly line-



of-sight views and disruption of the natural, scenic surroundings from Scenic Byway Highway 18 and nearby areas.

Without justification (and unlike other San Bernardino County required EIR's for nearby and recent mountain area projects), this DEIR has not evaluated the full extent of the likely and significant visual impacts of the project.

This lack is all the more surprising as only a few months ago, during the February 23, 2010 County Board of Supervisors hearing for the Royal Rangers Adventure Camp, Supervisor Biane strongly reiterated the County's and his personal intent to protect the scenic, natural values of the views from Highway 18. As the applicant and the County has been aware of the Royal Rangers project for some time (it is referenced in the DEIR), the DEIR should reflect the fact that this nearby similarly-sized proposal overlooking Highways 18 and 189 had to significantly redesign its original project to address (among other issues) the negative visual impacts of its original layout. There are remarkable similarities between the two projects (both want to build large capacity 35-40 foot high structures in a steeply sloped natural area bordering the National Forest) but only this applicant seems to be ignoring the County's natural environment protection policies.

It is distressing that the only physical description of the proposed COW facilities amounts to no more than square footage, and height descriptions (35-40 feet). The public cannot adequately judge visual impacts without a much better defined architectural and visual representation.

A recirculated DEIR with more fully evaluated visual impacts and a more complete project description is required.

Alternatives

The Alternatives Section assumes that the no-project alternative will result in the approval of an Industrial facility based on the parcel's current zoning. Although this is not a precluded possibility, it is very unlikely. Any proposal for this property will be facing the same environmental and development challenges of this location. If this project does not proceed, it is much more likely that the property will be acquired by the US Forest Service in order to protect the vitality of the surrounding National Forest lands and to solidify the wildlife corridor and natural access to the parcel's springs and wet areas. Another alternative and likely scenario would be an acquisition by a Land Trust organization in order to secure the same community and environmental benefits.

The analysis of the DEIR-identified environmentally superior alternative is inadequate. Broad strokes to define new and major "setbacks" from the road and a vague description of reduced structure sizes and quantity are not enough details to sufficiently describe an alternative project consideration and to allow for enough analysis to estimate its most likely impacts.



Hydrology

There is no slope analysis to describe the characteristics of the property that reflect the results of the proposed project. In spite of many acres of mapped “manufactured” slopes, there are precious few details and specifics of what the final project contours and elevations attributes will be.

Simply put, there is no discernable justification, or even explanation of the “assumptions” made about hydrology in the EIR’s purported hydrological analysis. Without a final grading plan, or engineering specifications, storm flow, or water main physical requirements, or even simple elevation details, it is impossible to rely upon the conclusions of this document which is essentially a work of fancy, ungrounded by fact or scientific analysis.

The EIR is woefully inadequate with respect to how the project will handle storm water runoff, or deal with the water quality and pollution problems of the runoff from the development’s parking and other hardscape areas.

Without accurate grading plans or elevation and slope information for the proposed project, it is impossible to review the adequacy of this report. Moreover, the information about proposed water quality solutions that *is* supplied in the EIR is inadequate all by itself.

There are only two identified potential features to address water quality runoff in the EIR (see Appendix F, pp. 211-221). Yet there is ***no*** evidence in the EIR record that evaluates the method or effectiveness of these very generic “solutions” to this project’s critical hydrologic challenges and the extensive negative environmental impacts they can cause.

There is no evidence that the swales described in the EIR (and identified in the hydrology report as one of the only two “permanent water quality management features” are viable for this project. First, there is no evidence that the kind of swale described have or can be used in the mountain regions. There is good reason to doubt the efficacy and reliability here of grassy swale features designed for lowland environments. (Notice that the swale parameters come from Ventura County) And second, there is no evidence to suggest that the proposed use of swales throughout the project hardscape are sufficient to meet the rather specific criteria needed to make them successful. *“Overall the effectiveness of a grass swale is limited and it is recommended that they are used in combination with other BMPs”*

We note that there are no other “BMP’s” defined for the project. The hydrology evaluation of this project is inadequate. It needs to be redone and recirculated in a new DEIR for informed public comment.

Below is extracted text of the description of the proposed: Notice that there are specific cautions for various environments and specific characteristics of these swales that must be met (for example, a 7 minute contact time and specific flow and capacity requirements). There is no evidence or analysis in the EIR that the swales proposed for the COW project meet, or can meet these characteristics. How can the public evaluate the effectiveness of these mitigation efforts?



Grassed Swales

General

A Grass swale is a wide, shallow densely vegetated channel that treats stormwater runoff as it is slowly conveyed into a downstream system. **These swales have very shallow slopes in order to allow maximum contact time with the vegetation.** The depth of water of the design flow should be less than the height of the vegetation. Contact with vegetation improves water quality by plant uptake of pollutants, removal of sediment and an increase in infiltration. **Overall the effectiveness of a grass swale is limited and it is recommended that they are used in combination with other BMPs.**

This BMP is not appropriate for industrial sites or locations where spills occur. Important factors to consider when using this BMP include: natural channelization should be avoided to maintain this BMP's effectiveness, large areas must be divided and treated with multiple swales, thick cover is required to function properly, impractical for steep topography, and not effective with high flow velocities.

Grass Swale Design Criteria:

ventura county's Technical Guidance Manual for Stormwater Quality control Measures City of Modesto
 Guidance Manual for New Development Stormwater Quality Control Measures **CA** Stormwater BMP Handbook
 for New Development and Significant Redevelopment Riverside County DAMP Supplement A Attachment

Design Parameter	Unit	Design Criteria
Design Flow	cfs	QBMP
Minimum bottom width	ft	2 ft ²
Maximum channel side slope	H:V	3:1 ²
Minimum slope in flow direction	%	0.2 (provide underdrains for slopes < 0.5) ¹
Maximum slope in flow direction	%	2.0 (provide grade-control checks for slopes >2.0)
Maximum flow velocity	ft/sec	1.0 (based on Manning n = 0.29) ¹
Maximum depth of flow	inches	3 to 5 (1 inch below top of grass)
Minimum contact time	minutes	7
Minimum length	ft	Sufficient length to provide minimum contact time
Vegetation	-	Turf grass or approved equal ¹
Grass height	inches	4 to 6 (mow to maintain height) ¹



The other water feature identified in the EIR is a “Flow-Guard Catch basin insert which is also not analyzed as to specifications or adequacy for the runoff from the proposed project.

Miscellaneous

One of the key intents of the California Environmental Quality Act is the complete and efficient disclosure *and* public access to information regarding proposed projects.

The Church of the Woods DEIR has not adequately satisfied that intent. First, two thirds of the material was unavailable in hardcopy format. Even at the community’s public libraries. Volumes II and III (or the Appendices B thru I) were only available in electronic form. Much of the critical details that distinguish a satisfactory EIR versus an inadequate or misleading EIR has been hidden behind this electronic wall.

Although it is true that electronic distribution and access is a great boon and benefit to some of the public, the fundamental truth is that there are many citizens who still need and rely upon access to a physical copy.

For citizens who wanted to review the documentation of this EIR who do not have a computer, or who are uncomfortable using one, it was not sufficient to even go to the local library to read the entire DEIR. Hardcopies of the Appendices, Volumes II and III were not available anywhere.

In this case, other constraints of the County’s electronic distribution were also reported. Although the cause is unknown, many citizens, including a reporter from a local newspaper were never able to even “open” all documentation. Volume II was identified as a problem to the County, but no action or correction was apparently taken.

Another problem was the inability to print the figures and maps from the electronic copies in a resolution that rendered them “readable”.

The problem of legibility is a serious one. For example, in the electronic version of the EIR’s Appendix F on Hydrology which discusses the various proposals and Best Management Practices of construction phase and permanent water quality and storm water runoff solutions, the maps and details of the project solutions are indecipherable because of the scale and quality of the “copy”. (See, for example, pages 219/221 of Appendix F, “Condition Use Permit Sit Plan – Showing Permanent Water Quality Management Features”.)

Unfortunately, this material is the best (and only) explicit information regarding the location and details of the proposed water quality plan infrastructure. It is useless. There is no legend or markup provided that identifies the very elements of the map for which this page is intended (or is so unreadable as to make it unreadable). How can the public review or adequately comment on the adequacy of this EIR if the pertinent and required disclosure (and mapping) of the proposed hydrology control and water quality elements of the project is unreadable?



This is a frustration of the public's ability to review the adequacy of the project description and proposed mitigations with respect to hydrology and is a strong basis and cause for the requirement for a new, more informative (that is, legible and accessible) DEIR to be developed and recirculated to the public.

Agency Service Requirements not addressed sufficiently in the EIR

On page 3.E-12 in the discussion of E-1. Fire Hazards, the DEIR makes repeated and false claims that "the vast majority of prospective site occupants already reside in the area and are served by CFFPD". There is no evidence to support this claim and in fact there is good reason to doubt it as the current Church of the Woods facility lies well within a separate fire district, in Lake Arrowhead, several miles away. The current church is not served by CFFPD. The proposed project demands for *new* service from the CFFPD for not only fire but emergency calls as well, will indeed be significant.

With the added presence and expected high usage of the project's new ball fields and skateboard park, emergency calls are quite likely. This new demand for added service will be a financial and a risk burden on the CFFPD and its constituents. As of this writing (June 2010), the CFFPD is financially challenged and struggling to meet its current service commitments. Substantial new demand for fire (and emergency) service as described in the EIR will be a *significant* impact to the community.

Widening of highway 18

The proposal includes plans for widening highway 18 at the entrance. One fervently hopes that the description on page 2-14 of the DEIR is wrong where it says "the project includes the widening of Highway 18 by approximately 300 feet". One believes the intent is to widen ALONG the highway FOR 300 feet.

Assuming this is true, the widening and setback of the mountain to accommodate 2 additional lanes is still a dramatic modification of the current conditions. The EIR is unclear as to how far back the mountain will be graded from its current boundary. This is not adequately discussed in the EIR.

Water Supply

Although the EIR includes project description details such as a broad line drawn on the project map to identify the requirement for a new extension of CLAWA's water main on Daley Canyon in order to provide service to the project, this simplistic view of the breadth of potential infrastructure needed to supply the project is inappropriate and inadequate.

An obvious unexamined and unanswered is how will water pressure be maintained? Will a new tank at a higher elevation than the project be required? Where will it go? The pipe connection at Daley appears to be several hundred feet below the major project buildings. (Of course that is only an estimate of the challenge as there are now exact elevation numbers in the EIR).



Insufficient Project Description:

Over all The COW DEIR inadequately discloses the current condition and attributes of the site. The public is frustrated in its attempt to evaluate the impacts of the proposal when there is not enough information disclosed about the current state of the property. Without the ability to make meaningful comparisons of “before” and “after”, the public and project decision-makers are unable to make an informed review. This needs to be corrected and a new Draft EIR needs to be recirculated before the project applicant and County can be judged as having met the requirements of CEQA.

Some examples of the inadequate CEQA review areas that are deficient from lack of disclosed information) are:

- 1) There is a well-known and productive perennial spring on the property, which creates a rare and critical resource and habitat for fauna and flora. The spring and its location are not identified in any project map or description in the DEIR.

Without such information, one cannot judge, for example, if the removal of 350,000 cubic yards of dirt or the dumping of 250,000 cubic yards of fill dirt will obstruct, inhibit or damage the spring or its related wetland and riparian areas.

Without such information disclosed and explained in an accessible, understandable way, the DEIR is insufficient in its analysis of potential impacts.

- 2) Significant information about the many infrastructure requirements for this project is missing or not described. Without the details (or at least a reasonable understanding) of the infrastructure projects that will logically and inevitably result from an approval of the Church of the Woods, the public and decision-makers are prevented from making an informed review. This is the purpose of an EIR. An EIR must include all reasonably predictable environmental results of a project application approval. In this case, the DEIR has failed to do so by first postponing the determination of required infrastructure and permit requirements and thereby failing to disclose the full potential impacts of the project.
- 3) It is impossible to adequately review the potentially significant environmental impacts of the Church of the Woods project without a reasonably accurate description of the totality of the anticipated physical, engineering, and infrastructure improvements that will be necessary to serve the project. Without that information, it is impossible to analyze impacts. The EIR inadequately attempts to address this lack by simply identifying public agencies that still need to approve project and the services or permit each will be expected to provide the project. Age
- 4) There is a significant inconsistency in the description of the 2ndary emergency access point that may be troubling to the public and safety agencies. On page 3.E-15, and elsewhere in project hazard analyses of secondary access requirements, the DEIR states, “A secondary emergency access, which would be limited to site egress, (i.e., exit only), would be provided along Highway 18 approximately **400** feet east of the proposed driveway by the volleyball courts.”



However, in the project description on p. 2-14 the DEIR states:

“A secondary emergency access, which would be limited to site egress, (i.e., exit only), would be provided along Highway 18 approximately **325** feet east of the proposed driveway by the volleyball courts.”

From a public safety standpoint, this discrepancy is important. In similarly-sized project proposals in the mountains, safety considerations have required more than 325 foot separation between access roads. Furthermore, it is our understanding that the secondary access road be accessible for ingress as well as egress for the use of emergency vehicles. From the project description text, maps and illustrations, it appears that the secondary road is not usable.

See: **General Plan Safety Element Policy**

S 9.2 Ensure that future development have no less than two points of access for emergency evacuation and for emergency vehicles, in the event of wildland fires and other natural disasters.

There is a conflict between County Safety policies and the project proposal that needs to be addressed:

The DEIR rightly recognizes that there are important County of San Bernardino Development Code standards for projects proposed in Fire Safety Area 1 (FSA1) locations. One of the relevant standards that apply to the COW project is:

“Each structure on a lot that was created after April 12, 2007 and abuts a boundary of the San Bernardino National Forest shall be set back at least 100 feet from the boundary” (identified on Page 3.E-10)

This standard applies to the Church of the Woods project because the applicant proposes to create 5 parcels out of the owned property.

The project description violates this standard. An obvious example is the proposed 35-40 foot high, 2500 square foot maintenance building/caretaker unit of Phase II on the eastern boundary of the project. This significant structure essentially “sits” on the boundary line abutting US Forest Land.

This is a violation of the County’s Public Safety standards and should not be permitted. The project needs to be modified in light of this violation, and reviewed anew in a new Draft (Recirculated) EIR.



Thank you for your consideration and action.

Sincerely,

Steven Farrell
Conservation Chair
San Bernardino Mountains Group - Sierra Club

cc:



**RESPONSES TO COMMENT LETTER 9
Sierra Club San Bernardino Mountains Group**

In DREIR Section 1.2, the County provided notice that it was electing to prepare a DREIR and to recirculate the entire document. The County also provided notice that it was exercising the discretion authorized by CEQA Guidelines § 15088.5(f)(1), specifically stating that it will not be responding to comments made during the public review of the 2010 Draft EIR. Accordingly, the County need not respond to any comments made in this letter.



From: [Sara L. Breckenridge](#)
To: [Nieves, Tom](#)
Cc: [Rahhal, Terri](#); [habialeckidmd@gmail.com](#); [stevenfarrell@gmail.com](#); ["aprabhala@biologicaldiversity.org"](#); [drewf3@verizon.net](#); [Carmen J. Borg](#); [Laurel L. Impett](#)
Subject: Church of the Woods Project Draft Revised Environmental Impact Report – State Clearinghouse No. 2004031114
Date: Monday, February 25, 2019 2:12:57 PM
Attachments: [SMW DREIR Comments Attachments A-D.PDF](#)
[SMW DREIR Comments 2-25-19.PDF](#)

Mr. Nieves,

Please find attached a letter from Carmen Borg and Laurel Impett, on behalf of Save Our Forest Association and Sierra Club, regarding the above-referenced project. Attachments A-D are also attached as a separate pdf. Hard copies will not follow. Please confirm your receipt of this message and contact our office with any questions. Thank you.

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February 25, 2019

Via Electronic Mail Only

Tom Nieves
Planner
County of San Bernardino
Land Use Services Department
385 North Arrowhead Avenue, First Floor
San Bernardino, CA 92415
Email: Tom.Nieves@lus.sbcounty.gov

Re: Church of the Woods Project Draft Revised Environmental Impact
Report – State Clearinghouse No. 2004031114

Dear Mr. Nieves:

We submit this letter on behalf of Save Our Forest Association (“SOFA”) and Sierra Club – San Bernardino Mountain Group (“Sierra Club”) to state our position that the Draft Revised Environmental Impact Report (“DREIR”) does not comply with the requirements of the California Environmental Quality Act (“CEQA”) and the CEQA Guidelines, for all of the reasons set forth below. Like the Draft EIR and Final EIR before it, this DREIR takes a blinkered approach to analyzing and mitigating the Project’s significant impacts and the DREIR’s evaluation of alternatives to the Project remains flawed.

CEQA places several requirements on an agency’s approval of a project. First, the agency must certify as adequate the environmental impact report (“EIR”) prepared for the project. We have detailed the inadequacies of the EIR¹ prepared for this Project in our previous submissions to the County dated September 22, 2010 and November 8, 2011, both of which remain relevant to the revised Project and are incorporated herein in their entirety by this reference. See letters attached as Attachments A and B. As those letters make clear, this EIR may not be certified as adequate under CEQA.

¹ When our comments refer to the Draft Environmental Impact Report (“DEIR”), the Final EIR (“FEIR”), and the RDEIR, they are collectively referred to as the “EIR”.

10-1



Tom Nievez
February 25, 2019
Page 2

This letter is submitted along with the report prepared by Greg Kamman, Hydrologist, attached as Attachment C. We respectfully refer the County to the aforementioned attached report, both here and throughout these comments, for further detail and discussion of the DREIR’s inadequacies. We request that the County reply to the comments in this letter and to the comments in the attached Kamman report.

10-2

I. Background

The applicant came before the County in 2010 with a proposal to develop the site similarly with thousands of square feet of building space and five and a half acres of playing fields and sports courts. The community voiced strong opposition to that development proposal because the project was out of scale and out of character with the surrounding community and would have resulted in significant fire hazard risk and traffic impacts as well as impacts to sensitive biological habitat. After extensive critical comments about the project, the applicant withdrew the application before it went to the Supervisors for County approval,

10-3

Now, the County is once again contemplating a similar project for the site, which is clearly incompatible with the County’s established priorities of preserving steep slopes and of conserving rural, biologically resource-rich areas. The Project has some changes from the 2010 proposal, but includes similar uses and would similarly result in significant impacts.

10-4

The Project site is located on steep, forested terrain. The revised Project would convert 50 percent of the site to developed area, necessitating the removal of all trees and vegetation and movement of approximately 315,000 cubic yards of soil. DREIR at 3.A-10 and 2-22. The Project would include construction of almost 70,000 square feet of buildings; 225,000 square feet of parking areas, driveways, walkways and patios; and approximately 64,000 square feet of sports fields and courts. DREIR at 2-18, Figure 2-7. The Project would also include drainage features, hiking trails, fuel modification zones and widening of State Route 18 (“SR-18”). DREIR at 0-1.

10-5

This Project will have serious long-term consequences, not only for the area residents, but for the region. Those consequences include impacts to multiple special status species and their habitats, loss of open space, visual impacts, and increased traffic congestion to name a few. Particularly alarming given the state’s recent catastrophic wildfires, the Project would bring hundreds of people to a site classified by the California State Fire Marshal as a high hazard fire severity zone—without adequate means of evacuation.

10-6



Tom Nieves
February 25, 2019
Page 3

But none of these impacts or inconsistencies of the Project can be discerned from reading the DREIR. With regard to each of CEQA’s substantive requirements—a complete and stable project description, a thorough analysis of significant impacts, identification of feasible and enforceable mitigation measures, an analysis of a reasonable range of alternatives—the DREIR falls woefully short. Moreover, as explained in detail in our comment letters on the DEIR and FEIR (see Attachments A and B to this letter), the Project is inconsistent with applicable plans and ordinances, and the EIR’s analysis of these inconsistencies is deeply inadequate. The DREIR’s analysis fails to remedy this failure. For example, the Project continues to ignore the fact that the proposed uses (i.e., sports fields and courts) are not allowed on the site under the County Zoning Code. *See*, SMW Comment Letter on the DEIR, Attachment A to this letter, at 3 and 4.

10-6
CONT.

10-7

Finally, the DREIR fails to describe and analyze a reasonable range of feasible alternatives to the Project that would substantially lessen its environmental impacts. This failure defeats CEQA’s purpose of creating a process by which the public and decision-makers can fully appreciate the consequences of Project approval.

10-8

As a result, the DREIR, like its predecessors, fails to meet CEQA’s fundamental purpose of providing disclosure to the public of the Project’s environmental effects. To ensure that the public and the County’s decision-makers have adequate information to consider the effects of the proposed Project—as well as to comply with the law—the County must require revisions in the Project to make it compliant with the General Plan and then prepare and recirculate a revised EIR that properly describes the Project, analyzes its impacts, and considers meaningful alternatives and mitigation measures that would help ameliorate those impacts.

10-9

II. The Project’s Inconsistency with the County’s General Plan and Zoning Code Violates California Planning and Zoning Law.

A. General Plan Consistency

As explained in our previous comments, a Project’s consistency with applicable Plans and ordinances plays two separate and distinct roles in the environmental review and project approval process. The State Planning and Zoning Law requires that development decisions, including conditional use permits, be consistent with the jurisdiction’s general plan. *See Neighborhood Action Group v. County of Calaveras* (1984) 156 Cal.App.3d 1176, 1184. And under CEQA, an inconsistency or conflict between a plan or ordinance and the Project is a significant impact that must be disclosed and analyzed. Once again, the EIR misses the mark in its evaluation of these issues.

10-10



Tom Nieves
February 25, 2019
Page 4

In many cases, the DREIR relies on compliance with existing regulations or standards to conclude that the Project would not conflict with General Plan policies. For example, Policy M/LU1.1 calls for limiting development in sloping hillside areas in order to reduce fire hazards, prevent erosion, and preserve the forest character of the region. The DREIR concludes that the Project will be consistent with this policy because it is required to comply with the zoning code development standards for the IC District and for the Fire Safety Overlay. DREIR at 3.G-24. However, the RDEIR fails to provide evidence to support the conclusion that the Project would be compliant. As explained in our previous comments, the Project violates the applicable development standards and is therefore inconsistent with the County Code and with this policy. See Attachment A at 2-11.

10-10
CONT.

In another example, the DREIR concludes that the Project would not conflict with General Plan Policy OS 7.5, which requires that natural landforms and ridgelines be preserved through minimum cut and fill, natural contour lines and other provisions. RDEIR at 3.G-38. The DREIR once again points to compliance with existing standards (e.g., grading requirements, water quality provisions, design standards, and standards related to tree and vegetation removal). DREIR at 3.G-38. However, as discussed throughout this letter, the DREIR fails to describe the details of how the Project will actually comply with the standards.

10-11

In other cases, the DRIER manufactures a spurious rationale to explain plain inconsistencies with General Plan policies. In one example, Policy M/LU1.6 calls for the density and character of development to not detract from the beauty, character and quality of the residential alpine environment. RDEIR at 3.G-24. Here the RDEIR concludes that the Project’s density and character would be “more compatible with the residential alpine environment than the more intense industrial uses that could be developed with the existing IC District zoning.” *Id.* However, the issue at hand is whether the Project complies with the General Plan policy and not how it measures up to a fabricated project that may or may not ever be proposed for the site in the future.

10-12

These flaws have two legal results. First, the EIR’s analysis of land use impacts is profoundly flawed, and its conclusion that impacts will be less than significant is not supported by substantial evidence. Second, the County may not approve a conditional use permit that is inconsistent with the General Plan. Thus the County may not legally grant the requested permit.

10-13



Tom Nievez
February 25, 2019
Page 5

B. Zoning Code Consistency

As an initial matter, and as discussed above, the proposed Project remains inconsistent with the zoning designation for the site. The land use zoning district for the Project site is “Community Industrial”, which does not allow parks, playgrounds, or sports fields. See, Development Code Table 82-17 and Sections 810.01.180 (bb) and 84.01.020(d).

10-14

In addition, the Project remains inconsistent with applicable Code standards related to several overlay areas. The RDEIR omits any analysis of the Project’s consistency with these standards and instead assumes compliance. However, as discussed below, the Project is so vaguely described as to make it impossible to know whether the Project will comply with applicable standards or not. Moreover, what description is provided makes clear that the Project will violate Code provisions. For example, the Project will impact sensitive natural terrain and natural drainage courses in violation of Development Code section 82.13080(b)(3)(C), 82.13.080(D), and 83.08.040; and it will result in substantial, but undisclosed, tree removal with no indication of how the debris will be disposed in violation of Development Code section 88.01.090(b).

10-15

In another egregious example, the DREIR continues to disregard the Project’s inconsistency with the slope density locational criteria for the IC District, which specifies uses should be located on areas of stable soil with average slope of 10% or less. DREIR at 3.G-5. As the DREIR itself points out in the Alternative 2: No Project/Feasible Development Alternative:

“the majority of the Project site consists of slopes greater than 10%. Therefore, only two areas within the Project site would have slopes less than 10%, thereby meeting the minimum lot size requirements of the IC District. Both areas within the Project site that would have a slope of less than 10% occur along the southern boundary of the Project site, just north of Highway 18.”

10-16

DREIR at 4-5. The DREIR alternatives analysis assumed that the maximum building area would not exceed 10,000 square feet of manufacturing or warehouse use and that the development would occur within 5.0 acres in the southern/central portion of the Project site, presumably because that is all the area available with slopes that are developable under the Code. *Id.* Thus, the DREIR provides evidence that the size and scale of the proposed development render it inconsistent with zoning criteria for the site. The EIR must evaluate the Project’s consistency with these and other applicable Code provisions.



Tom Nievez
February 25, 2019
Page 6

III. The DREIR Mischaracterizes the Project Setting.

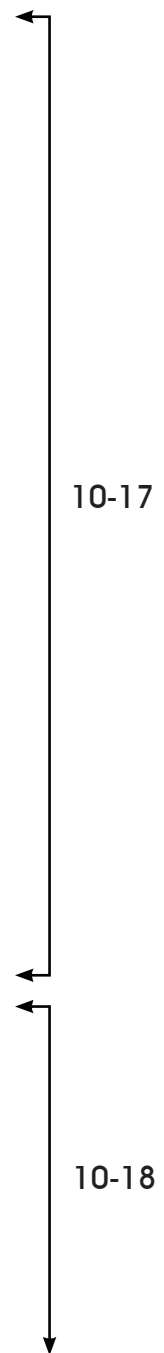
Accurate and complete information pertaining to the setting of the project and surrounding uses is critical to an evaluation of a project’s impact on the environment. *San Joaquin Raptor/Wildlife Center v. Stanislaus County*, 27 Cal.App.4th 713, 728 (1994); *see also Friends of the Eel River v. Sonoma County Water Agency*, 108 Cal.App.4th 859, 875 (2003) (incomplete description of the Project’s environmental setting fails to set the stage for a discussion of significant effects). Here, the DREIR’s deficiencies in describing the Project’s setting undermine its adequacy as an informational document.

As discussed in detail below, the DREIR fails to present important contextual information related to biological resources on the Project site. For example, the DREIR fails to describe jurisdictional waters and wetlands on-site and on adjacent lands that would be impacted by the Project. The DRIER also fails to include appropriate, current surveys of special status species despite the fact that the site has suitable habitat and species are known to occur on site. The DREIR also dismisses the Project’s acknowledged potential to impede wildlife movement. Together, these flaws undermine the description of the existing biological setting at the site.

Perhaps most egregiously, the DREIR fails to adequately describe the existing hydrologic setting of the site and the vicinity. Specifically, the DREIR fails to describe baseline conditions for surface waters (i.e., a perennial stream, a spring, and jurisdictional waters) that would be impacted by the Project. Kamman at 2 and 3. Moreover, the DREIR fails to describe groundwater conditions at the site. Kamman Report at 3 and 4. This is important information from which to establish a baseline. As explained in the Kamman report, without a proper description of baseline conditions, the DREIR is unable to provide an adequate analysis of Project-related increases or decreases in groundwater recharge relative to existing conditions. *Id.* A revised analysis must include a Hydrology and Water Quality section that adequately describes the hydrologic setting.

IV. The DREIR’s Flawed Project Description Does Not Permit Meaningful Public Review of the Project.

In order for an EIR to adequately evaluate the environmental ramifications of a project, it must first provide a comprehensive description of the project itself. “An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR.” *San Joaquin Raptor*, 27 Cal.App.4th 713, 730, (quoting *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 193). As a result, courts have found that even if an EIR is adequate in all other respects, the use of a “truncated project concept” violates CEQA and mandates the conclusion that the lead agency did not





Tom Nieves
February 25, 2019
Page 7

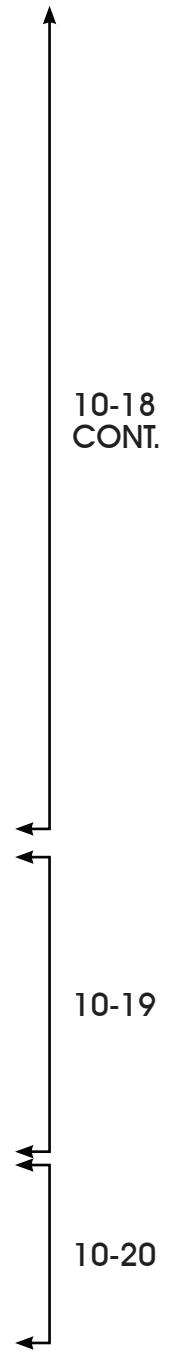
proceed in a manner required by law. *San Joaquin Raptor*, 27 Cal.App.4th at 729-30. Furthermore, “[a]n accurate project description is necessary for an intelligent evaluation of the potential environmental effects of a proposed activity.” *Id.* at 730 [citation omitted]. Thus, an inaccurate or incomplete project description renders the analysis of significant environmental impacts inherently unreliable.

Here, the DREIR’s project description continues to omit significant details necessary to understand the Project. For example, the DREIR fails to describe the Project design. Any reasonably complete description of the Project would give the public and decision-makers a sense of what this Project would look like, how it would operate, and how it would mesh with the surrounding uses. The DREIR’s project description does none of this. It is merely a general conceptual scheme for the site.

The DREIR should have provided extensive detail, both through textual description and detailed simulations, more accurately depicting exactly the appearance of the proposed building. There is no description or rendering of the proposed buildings, no description of the building height, no discussion of the architectural styles, the types of building materials to be used or the color schemes, the landscaping design, or visual screening methods. Instead, the DREIR simply refers to the Development Code development standards for the Community Industrial District within the Mountain Region and states that the Project would comply with the standards. DREIR at 3.G-2. The DREIR cannot rely on compliance with applicable standards in lieu of a description of the Project. This approach would especially be unacceptable given that, as acknowledged by the DREIR, “exceptions to the development standards may be requested through the development process.” DREIR at 3.G-3.

In another example, the DREIR indicates that the Project proposes to convert 50 percent of the Project site from undeveloped forested area to development. DREIR at 3.A-11. However, the DREIR never discloses the number of trees that would be removed, their size, or their condition. The DREIR indicates that the “overall condition of the (forest) community on the site is good and mostly undisturbed.” DREIR at 3.C-4. Therefore, the DREIR must not only describe the existing condition of the trees and the proposed Project’s removal of them, but also the extent and severity of the impacts associated with this substantial tree removal.

In some cases, the DREIR indicates certain site uses that are not described or shown on the site plan. For instance the DREIR refers to on-site hiking trails (DREIR at 0-1) and an amphitheater (DREIR at 0-4: indicates that the Project, in contrast to the Reduced Project Alternative, would include an amphitheater), neither of which are mapped.

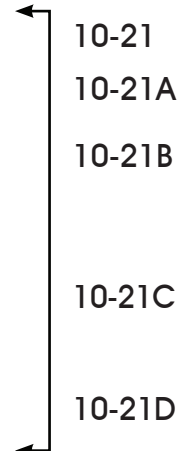




Tom Nieves
February 25, 2019
Page 8

The DREIR also fails to provide information on the following Project elements:

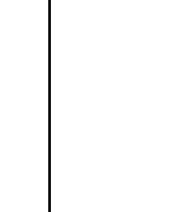
- description of method for tree removal and disposal of debris;
- a description of special events that might take place at the project site, such as weddings, sports tournaments, or other gatherings (see, Objectives Statement E, which provides that Project facilities would be “available for use by local public and private organizations.”);
- plans relied upon to reduce project impacts, including but not limited to: a construction hauling plan, an erosion control plan, a storm water plan, a tree removal plan, and a landscaping plan;
- other Project features such as fences, gates, or other proposed improvements.



The inadequate project description implicates other sections of the DREIR. For example, given the lack of information about what the community will experience once the Project is built, the analysis does not convey the extent or severity of the impacts on visual resources and community character. In short, because it fails to adequately describe the Project, the DREIR fails to identify, analyze and mitigate its potential impacts.



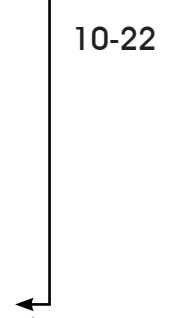
The failure to describe the whole of the Project is a serious and pervasive deficiency, as it renders faulty the EIR’s environmental impact analyses as well as the discussion of potential mitigation measures and alternatives to minimize those impacts. Moreover, these omissions skew the DREIR’s analysis of impacts and, thus, undercut the validity of the entire document under CEQA. Without a complete and accurate project description, an agency and the public cannot be assured that all of a project’s environmental impacts have been revealed and mitigated. This information is necessary to allow decision makers, the public and responsible agencies to evaluate potential environmental impacts.



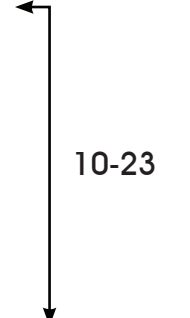
10-22

V. The DREIR’s Analysis of and Mitigation for the Impacts of the Proposed Project Are Inadequate.

Even if the Project were permissible under state and County law, it would still require thorough, comprehensive environmental review. The EIR for this proposal should be of the highest quality, giving both decision-makers and the public a full opportunity to understand and analyze environmental repercussions of the Project. An EIR is “the heart of CEQA.” *Laurel Heights Improvement Ass’n v. Regents of University of California* (1988) 47 Cal.3d 376 at 392 (“*Laurel Heights I*”). In particular, the County “should not



10-23





Tom Nieves
February 25, 2019
Page 9

be allowed to hide behind its own failure to gather relevant data.” *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 311. “The EIR is also intended ‘to demonstrate to an apprehensive citizenry that the agency has, in fact, analyzed and considered the ecological implications of its action.’ Because the EIR must be certified or rejected by public officials, it is a document of accountability.” *Laurel Heights I*, 47 Cal.3d at 392 (citations omitted). Unfortunately, the DREIR fails entirely to live up to this mandate.

An EIR must provide enough analysis and detail about environmental impacts to enable decision-makers to make intelligent judgments in light of the environmental consequences of their decisions. The County, in its role as lead agency, must make a good faith effort to disclose the impacts of the Project, both at the Project level and at the cumulative level. The Project’s large size and its location on a site underlain by complex hydro-geologic conditions and blanketed by sensitive and unique biological values mandate particularly careful analysis and public disclosure of its many significant impacts. Unfortunately, as described in detail in the following sections, the EIR for the Church of the Woods Project fails to meet even the most basic objectives of CEQA, and utterly deprives the public and decision-makers of any opportunity to understand the environmental repercussions of the Project.

The evaluation of a proposed project’s environmental impacts is the core purpose of an EIR. *See* CEQA Guidelines § 15126.2(a) (“An EIR shall identify and focus on the significant environmental effects of the proposed project”). It is well-established that the County cannot defer its assessment of important environmental impacts until after the project is approved. *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 306-07.

As explained below, the EIR fails to analyze the Project’s numerous environmental impacts, including those affecting transportation and circulation, public health and safety, biological resources, and hydrology. In addition, in numerous instances, the EIR also fails to adequately analyze the Project’s cumulative impacts. These inadequacies require that the EIR be revised and recirculated so that the public and decision-makers are provided with a proper analysis of the Project’s significant environmental impacts and feasible mitigation for those impacts. *See* CEQA Guidelines §15002(a)(1) (listing as one of the “basic purposes” of CEQA to “[i]nform governmental decision makers and the public about the potential, significant environmental effects of proposed activities”).

A. The DREIR Fails to Adequately Analyze and Mitigate the Project’s Operational Transportation Impacts.

10-23
CONT.

10-24



Tom Nieves
February 25, 2019
Page 10

1. The DREIR Ignores the Project’s Impact on Traffic During Weekdays.

The DREIR identifies the Project’s operational trip generation for Saturdays and Sundays but it fails to identify the Project’s operational trip generation during weekdays. This is important because the Project would include an array of activities, many of which would generate traffic during the week. Weekday activities include, for example, ancillary religious-oriented and family-oriented events for the congregation such as group bible study, choir practices, fellowship breakfasts and dinners, funeral/memorial services, seasonal/holiday program events and a variety of sporting events. DREIR at 2-27; 2-28. Some of these events will be quite large and therefore generate a substantial amount of traffic. For example, Wednesday Night Service is anticipated to draw 600 participants. On Tuesday evenings, a Women’s Bible Study is expected to have 200 participants, a Senior High Youth Group would have up to 150 participants, and a Choir Practice would have up to 40 participants. DREIR Table 2-4.

Because the DREIR fails to identify weekday trip generation, it also fails to provide *any* analysis of the Project’s weekday traffic impacts. Clearly, the Project has the potential to impact roadways and intersections during the week, just as it does on Saturdays and Sundays. Weekday ambient traffic congestion, especially during the am and pm peak hours, can be far more severe than weekend traffic congestion. Consequently, the DREIR’s failure to provide an analysis of the Project’s traffic impacts during the week is a fatal flaw requiring that the DREIR be revised and recirculated for public review.

The revised EIR must identify the Project’s weekday trip generation and evaluate how this increase in traffic would affect streets and intersections during the weekday peak hours. This revised analysis must also assess cumulative weekday traffic impacts, as the cumulative land use projects are projected to add a sizable number of trips (1,340 Saturday daily trips and 1,111 Sunday daily trips) to roadways in the area. DREIR Appendix B at 10. Moreover, the revised analysis must address how the weekday trip generation will affect emergency evacuation since emergencies could occur during the week as well.

The revised EIR must also evaluate the Project’s potential to impact regional highways. Regional access to the site is provide by SR 330 (located about 4.1 miles to the southeast) and SR 138 (located approximately 4.0 miles to the west). The DREIR did not, however, analyze impacts to these regional highways purportedly because the Project was not expected to add 50 or more peak hour trips to these roads on weekends DREIR at 3.I-1; 3.I-2. The Project’s weekday activities, however, may generate more than 50 peak

10-24
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Tom Nieves
February 25, 2019
Page 11

hour trips. If so, the Project may adversely impact regional routes including SR 330 and SR 138. The revised EIR must also evaluate cumulative impacts on regional highways.

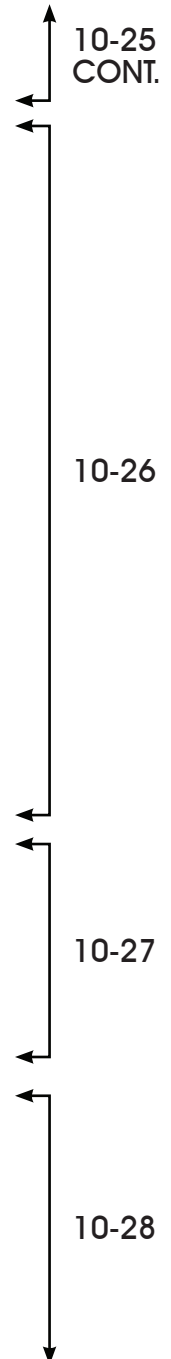
(a) The DREIR May Underestimate 2040 Traffic Conditions Due to Inadequate Growth Factors.

The DREIR identifies future background traffic by applying annual growth rates. In particular, the document applied an annual 1.2 percent growth rate per year between 2017 to 2018. However, for the next 22 years (between the years 2018 and 2040), the DREIR assumed only a 5 percent growth rate. The DREIR asserts that this 5 percent rate is “based on the observation that year 2040 turn movement volumes were less than cumulative (2018) turn movement volumes at several study intersections.” DREIR at 3.I-4. The DREIR does not explain why traffic would be expected to grow at such a nominal rate over the next twenty years. Rather, it refers the reader to the detailed development worksheets in Appendix B of the Traffic Impact Analysis (DREIR Technical Appendix H). As an initial matter, burying important information in a technical appendix is a wholly unacceptable way of presenting decisionmakers and the public with essential information, and it renders the EIR legally inadequate. Whatever is required to be in the text of the EIR must be in the EIR itself, not buried in some appendix. *See Santa Clarita Organization for Planning the Environment v. County of Los Angeles* (2003) 106 Cal.App.4th 715, 722-23; *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 727. Moreover, a review of the technical appendix does not reveal the required clarification. Instead, it simply repeats the exact text from the DEIR. *See Appendix B at 10.*

Accurately estimating future traffic is a critical component to determining the Project’s future traffic impacts. The revised EIR must provide a detailed description of how future traffic volumes were estimated. Moreover, it will be important to provide an interim forecast year, i.e., 2030. Identifying 2030 growth rates and analyzing 2030 conditions may provide important context to the abnormally low 2040 annual growth rates.

(b) The DREIR Fails to Evaluate the Project’s Operational Impacts During Snowy, Icy and Foggy Conditions.

As the attached photographs show, the San Bernardino Mountains experience foggy, icy and snowy conditions. *See Attachment D.* The DREIR fails however to take into account these weather-related phenomena into its traffic impact analyses. Clearly, the characteristics and operations of area roadways change considerably during icy, foggy and snowy conditions. When the roadway is covered in snow and/or ice, travel lanes





Tom Nieves
February 25, 2019
Page 12

become narrow and more slippery. Traveling on the roadways becomes more treacherous as visibility diminishes from falling snow and truck spray and vehicles can lose traction on slopes. Snow removal vehicles and snow storage also impact roadway conditions and traffic maneuverability. All of these factors can cause a slowing of traffic as well as a marked increase in the potential for accidents. The failure to include a traffic impact scenario in which the roadways and intersections are constrained by fog, ice and snow is a critical oversight which warrants revision and recirculation of the document.

10-28
CONT.

(c) The DREIR Fails to Identify Feasible Mitigation for the Project’s Significant Operational Traffic Impacts.

The primary goal of an EIR is to identify a project’s significant environmental impacts and find ways to avoid or minimize them through the adoption of mitigation measures or project alternatives. §§ 21002.1(a), 21061. The lead agency must adopt all feasible mitigation measures that can substantially lessen the project’s significant impacts, and it must ensure that these measures are enforceable. § 21002; Guidelines § 15002(a)(3), 15126.4(a)(2); *City of Marina v. Bd. of Trustees of the Cal. State Univ.* (2006) 39 Cal.4th 341, 359, 368-69. The requirement for enforceability ensures “that feasible mitigation measures will actually be implemented as a condition of development, and not merely adopted and then neglected or disregarded.” *Federation of Hillside and Canyon Assns. v. City of Los Angeles* (2000) 83 Cal.App.4th 1252, 1261 (italics omitted); Guidelines § 15126.4(a)(2). Here, the DREIR does not come close to meeting CEQA’s requirements.

10-29

The Project would cause or contribute to significant impacts at six of the eighteen intersections throughout the study area. DREIR at 3.I-8—3.I-21. Rather than make a concerted effort to reduce these severe impacts, the DREIR proposes a single approach to mitigation that the DREIR authors know to be infeasible. In particular, for impacts at each of the study area intersections, the DREIR calls for the applicant to make a good faith effort to “gain the approval of Caltrans” to install traffic signals. *See* DREIR at 4.I-18—3.I-21. The DREIR even goes so far as to identify the precise fair share contribution that the Project applicant would have to pay. DREIR at 3.I-19. Yet, the DREIR’s entire approach to traffic mitigation is a sham as evidenced by the following sentence: “Caltrans does not have a funding mechanism in place to allow development projects to contribute a fair-share payment to contribute to future improvements... .” DREIR at 3.I-20. Compounding matters, the DREIR explains that even if Caltrans should initiate such a program, the Project applicant would do nothing more than make a “reasonable effort to pay” its fair share to Caltrans. DREIR at 3.I-19. The end result of this lackluster approach is that the DREIR is effectively offering no mitigation at all for the Project’s severe traffic impacts – an approach that directly violates CEQA’s mandate.

10-30



Tom Nievez
February 25, 2019
Page 13

Moreover, we find it particularly perplexing that the Project itself requires Caltrans approval before it can even proceed, yet the DREIR implies that mitigating the Project’s traffic impacts is completely out of the Applicant’s control. The Project requires widening a 600-foot segment of the northern side of SR-18 (a Caltrans highway) along the Project site’s frontage by 26 feet to accommodate an eastbound left-turn lane and a westbound deceleration/acceleration lane. DREIR at 2-19. In addition, the Project would install a traffic signal at the proposed driveway and SR-18. *Id.* Clearly, the Project applicant has been coordinating with Caltrans about these SR-18 improvements otherwise the Project itself is infeasible. It is illogical that the DREIR can offer certainty about the SR-18 improvements needed to construct the Project yet imply an abject inability to coordinate with Caltrans to mitigate the Project’s impacts at other Caltrans’ intersections.

10-31

Finally, where all available and feasible mitigation measures have been identified, but are inadequate to reduce an environmental impact to a less-than-significant level, an EIR may conclude that the impact is significant and unavoidable. *See* CEQA Guidelines § 15126.2. However, the lead agency cannot simply conclude that an impact is significant and unavoidable and move on. *Berkeley Keep Jets Over the Bay Com. v. Board of Port Cmrs.*(2001) 91 Cal.App.4th 1344, 1371 (DREIR may not “travel the legally impermissible easy road to CEQA compliance . . . [by] simply labeling [an] effect ‘significant’ without accompanying analysis.”); *accord, Cleveland I*, 3 Cal.5th at 514-15. Rather, “a more detailed analysis of how adverse the impact will be is required.” *Galante Vineyards v. Monterey Peninsula Water Management Dist.* (1997) 60 Cal.App.4th 1109, 1123. Specifically, the agency must (1) perform a thorough evaluation of the impact and its severity before and after mitigation, and (2) propose *all* feasible mitigation to “substantially lessen the significant environmental effect.” CEQA Guidelines §§ 15091(a)(1), 15126.2(b) (requiring an EIR to discuss “any significant impacts, including those which can be mitigated but not reduced to a level of insignificance”).

10-32

Thus, the County is legally required to mitigate or avoid the significant impacts of the Project wherever it is feasible to do so. *See* Pub. Resources Code § 21002.1(b). In other words, it cannot approve the Project with significant environmental impacts if any feasible mitigation measure or alternative is available that will substantially lessen the severity of any impact. Pub. Resources Code § 21002; CEQA Guidelines § 15126(a).

10-33

Here, as discussed above, the DREIR’s single mitigation measure for the Project’s significant traffic impacts fails to satisfy CEQA’s standards. The revised EIR must explore other feasible mitigation measures. One obvious measure is to reduce the amount of parking on-site as limiting access to parking is the single most effective way of



Tom Nieves
February 25, 2019
Page 14

reducing car use because ample parking results in increased vehicular trips.² The DREIR acknowledges that only 200 parking stalls are required but that the Project will supply 311 parking spaces. DREIR at 2-19. The revised EIR should eliminate the excess 111 parking spaces as a mitigation measure.

10-33
CONT.

The revised EIR should also evaluate measures to increase access to the Project site via transit and bicycle. The Rim of the Mountain bus runs along SR-18 to the immediate south of the Project site.³ DREIR at 0-21. Mitigation measures to increase transit use to and from the Project site should be evaluated. These could include:

- work with the local service provider to add a bus stop at the project driveway
- pay fees to the local transit service provider
- implement a transit educational/promotional campaign
- offer shuttle and feeder bus services to the closest major transit stop
- implement a “Try it” transit pass giveaways, i.e., a raffle that could, for example, provide recipients with a dozen free transit passes.

10-34

Although the Project site does not contain sidewalks or bike lanes, Class II bike lanes are planned along Daley Canyon Road to the east of the Project site, along SR-18 to the south of the Project site, and along Bear Springs Road to the west of the Project site. DREIR at 3.I-5. Consequently, mitigation measures to increase bike travel to and from the Project site should be evaluated. These could include:

- providing bike racks and lockers
- providing incentives for bicycle use
- organizing a “bike to church day”
- providing a bicycle repair station
- providing a fleet of bicycles.

10-35

² See Parking facilities and the built environment: Impacts on travel behaviour, Science Direct, January 2017; available at: <https://www.sciencedirect.com/science/article/pii/S0965856416301525>; accessed February 11, 2019.

³ It is our understanding that there is no “Rim of the Mountain” bus service. The bus service in the Project vicinity is “Mountain Transit.”



Tom Nieves
February 25, 2019
Page 15

It is important to emphasize that the vehicular trip reductions that would result from the aforementioned mitigation measures would also reduce the Project’s impacts relating to air quality and greenhouse gas emissions.

10-36

B. The DREIR Fails to Adequately Analyze and Mitigate the Project’s Construction – related Transportation Impacts.

Construction of the Project would last a minimum of 18-months and possibly up to three years. (See DREIR at 2-24; 2-25 showing that construction could last 435 days, would occur in two phases and that Phase 1 would occur in 2018 while Phase 2 would occur in 2021; see also DREIR at 3.A-10 stating that construction activities would take approximately 18 months). Despite this protracted construction process, the DREIR includes a vague and superficial discussion of potential impacts and promptly concludes that construction-related traffic impacts would be less than significant. DREIR at 3.1-9. There are numerous flaws in the DREIR’s analysis.

First, the DREIR bifurcates its discussion of potential impacts: it identifies construction employee trips and construction materials deliveries as separate issues. But employee truck trips and construction materials deliveries have the potential to occur during the same times during the day (e.g., peak am and pm hours) and thus must be evaluated together. Moreover, since construction of Phase 2 of the Project would overlap with the Project’s operations, and because certain of the Project’s operations would cause significant impacts on area intersections (DREIR at 3.I-2), the revised EIR must also evaluate at least one scenario in which construction-related traffic is evaluated together with operational traffic.

10-37

Second, the DREIR dismisses the potential for construction-related traffic impacts claiming that “construction activities typically begin/end outside of peak hours” DREIR at 3.1-9. The DREIR provides no factual basis for this assertion. Moreover, as we explained above, the DREIR incorrectly omits an evaluation of weekday peak hours, opting instead to focus on Saturday and Sunday peak hours. Certainly, construction activities and operations at the Project site could occur during the am and pm *weekday* peak hours. The revised EIR must include the following information: (1) (ambient) weekday am and pm peak hours; (2) the total construction-related trip generation (employee trips, material delivery, and haul trucks (discussed further below); and (3) the hours that these trips would occur. The EIR must then analyze how these construction-related trips would affect local roadways and intersections.

Third, the DREIR’s construction traffic discussion focuses exclusively on construction materials deliveries and ignores entirely other truck trips. The Project would



Tom Nievez
February 25, 2019
Page 16

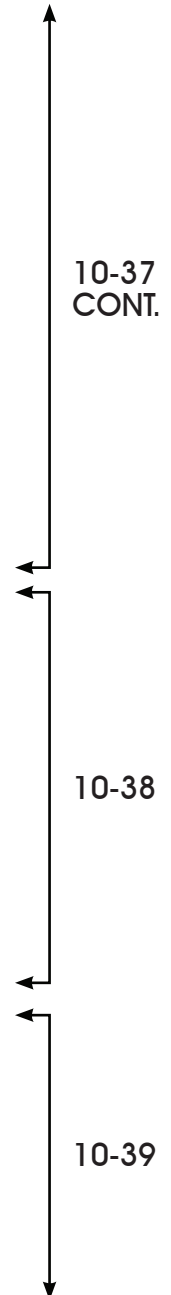
require hauling 42,368 cubic yards of material from the Project site. *See* DREIR at 2-22 stating that this material would be transported via truck to Heaps Peak Transfer Station. Depending on the size of the truck, this would result in between 2,120 trucks (assuming 20 cubic yards per truck) and 2,825 trucks (15 cubic yards per truck). Although the DREIR does not disclose this, these trucks would travel along SR-18 to access the transfer station.⁴

Nor does the construction analysis even mention that, during construction, grading activities would be required to remove approximately 50% of the existing on-site trees and vegetation (This information was obtained from reviewing the DREIR’s aesthetic impact chapter!). DREIR at 3.A-10. The DREIR’s failure to disclose that haul trucks would be utilized during the Project’s construction is a fatal flaw requiring recirculation. The revised EIR must identify the total number of truck trips that would be used to haul (a) soil, trees, and vegetation and (b) materials delivery. It must then actually analyze the effect that these haul trips, together with all other construction-related trips and operational trips, would have on area roads and intersections.

Fourth, the DREIR does not describe how the widening of SR-18 along the Project site’s frontage will be managed nor does the document evaluate how traffic will operate while this stretch of roadway is widened. Although the DREIR provides no description of the operational characteristics of SR-18, based on the aesthetics chapter, it would appear to be a narrow two-lane highway. *See* Figure 3.A-4 (page 3.A-15). Construction along the roadway will inevitably cause excessive traffic congestion. The revised EIR must describe this roadway widening project including the length of time that construction would occur and evaluate the effect that the roadway construction will have on up- and down-stream roadway and intersection conditions. If the reconstruction of SR-18 will occur concurrent with construction elsewhere on the Project site, the revised EIR must evaluate how all of these construction activities and operations would affect traffic operations.

Finally, the DREIRs construction traffic analysis does not address construction-staging at all. Other sections of the DREIR acknowledge that vehicles, equipment, and stockpiled soils would be staged during the lengthy construction process. *See* DREIR at 3.A-10. These other chapters explain that equipment staging would occur within portions of the Project site. DREIR at 0-16; 0-17. Yet, the Project site contains steeply sloped mountainous terrain. DREIR at 2-6; 3-A-2; 3.F-2. Presumably, heavy-duty construction equipment and trucks would be stored along SR-18 until such time as a level pad for

⁴ Heaps Peak Transfer Station is located at 30096-28638 Rim of the World Highway (SR-18).





Tom Nieves
 February 25, 2019
 Page 17

equipment staging is constructed within the Project site’s interior. If any portion of the Project’s construction would require staging of vehicles (including construction employees’ vehicles) on SR-18, the revised EIR must acknowledge this fact and analyze how such staging will affect roadway and intersection operations.

10-39
 CONT.

C. The DREIR Fails to Adequately Analyze and Mitigate the Project’s Impacts Relating to Increased Hazards.

The DREIR provides a cursory discussion of traffic hazards and asserts “there is no evidence that traffic hazards would increase.” DREIR at 3.I-16. Here too, the DREIR errs in its approach. In order to conclude that an impact is less than significant, the conclusion must be supported by facts and analysis, not just an agency’s bare conclusions. *Laurel Heights Improvement Ass’n v. Regents of the University of California* (1993), 6 Cal.4th 1112, 1123 (*Laurel Heights II*; *Citizens of Goleta Valley v. Board of Supervisors* (1990), 52 Cal.3d 553, 568. As documented below, the DREIR fails to identify, analyze, or support with substantial evidence its conclusions regarding the Project’s potential to increase hazards.

The DREIR’s “analysis” simply asserts that the improvements along SR-18 would be installed in conformance with Caltrans and the County’s standards and that the County reviewed the Project application and determined that the Project would not introduce a hazardous transportation design feature. DREIR at 3.I-5. These assertions do not substitute for actual analysis, i.e., the DREIR offers no facts or supporting documentation. At a minimum, the DREIR should have described the existing physical characteristics of SR-18, including its lane and shoulder widths, average daily traffic, Caltrans’ standard lane and shoulder widths for mountainous two-lane highways, speed limit(s) on SR-18 near the Project site, site distance design standards, and average accident rates for two-lane highways. It also should have identified the existing operational characteristics including average vehicular speeds near the Project site, sight distance constraints, and collision data (including vehicular, bicycle and pedestrian) for at least the last five years.⁵ This information should have been provided for blue sky days as well as during fog, snow and icy conditions. Only when this information is provided will the EIR preparers be able to evaluate the Project’s potential to increase hazards during its construction and operational phases.

10-40

⁵ Based on the DREIR’s technical appendix, sight distance appears to be constrained. *See* Traffic Impact Analysis at 42 (roundabouts were not considered as feasible mitigation due to concerns with sight distance).



Tom Nieves
February 25, 2019
Page 18

This revised analysis must necessarily evaluate the Project’s potential to increase hazards as a result of the new driveway on SR-18. In particular, the EIR must disclose whether there is adequate sight distance between the new driveway and curves in the roadway.

10-41

Finally, the addition of Project-related traffic, and particularly Saturday and Sunday traffic, has the potential to increase the safety risk to bicyclists on area roadways. The DREIR fails to provide any information about existing bicycle use on nearby roadways. Nor does it provide any analysis of how the Project’s increase in traffic would affect bicycle safety. Because bicycle traffic is all but certain to increase once the bicycle paths are constructed, the revised EIR must analyze bicycle safety impacts during the Project’s construction and operational phases and at a point when the bicycle paths are operational.

10-42

D. The DREIR Lacks Evidentiary Support For Its Conclusion that Emergency Evacuation Impacts Would Be Less Than Significant.

The Project site is located in a “Very High Fire Hazard Severity” Zone, with moderate to steep terrain, and moderate to heavy fuel loading.⁶ DREIR at 3.E-3; 3.E-7. There are only five routes in and out of the area for nearly 60,000 residences in addition to visitors. DREIR at 3.E-1. These factors combined create severe safety hazards for the area. *Id.*

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We have reviewed the DREIR’s emergency evacuation impact analysis in the DREIR’s hazards chapter: (Threshold a: Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan and threshold b: Expose people or structures to a significant risk of loss, injury, or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands. DREIR at 3.E-4. We also reviewed the discussion in the transportation chapter addressing the Project’s potential to provide inadequate emergency access during the Project’s construction and operational stage. (Threshold 2, pg. 3.1-16). Finally, we reviewed the July 16, 2017 Evacuation Plan prepared as an appendix to the DREIR. Collectively, we refer to these separate discussions as the DREIR’s “Evacuation Analysis.”

⁶ Because wildland fire hazards are particularly acute in the vicinity of the proposed Project, for purposes of commenting on the Project’s potential to interfere with emergency access, we assume that it is a wildfire, as opposed to another type of emergency event (i.e., flooding or earthquake) that would be causing the evacuation.



Tom Nieves
February 25, 2019
Page 19

The DREIR concludes that “with ongoing preplanning and coordinating efforts by local and regional fire departments and other agencies, impacts associated with emergency evacuation beyond the site are considered less-than-significant.” DREIR at 3.E-6. It further concludes that the Project would not impair the implementation of or physically interfere with emergency evacuation and that any associated impacts would be less than significant. DREIR at 3.E-9. The DREIR lacks evidentiary support for both of these conclusions.

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Perhaps the single most important flaw in the DREIR’s Evacuation Analysis is that it fails to identify the amount of time needed to implement a full evacuation of the Project site, including whether the evacuation could be accomplished within an acceptable time period. Furthermore, no determination was made regarding the adequacy of the primary evacuation route, SR-18. The specific deficiencies in the DREIR’s Evacuation Analysis are discussed below.

1. The DREIR Fails to Identify the Amount of Project-Related Traffic That Would Need to Be Evacuated.

The DREIR fails to identify how many Project-related vehicles need to be accommodated during an evacuation. The DREIR states that the Project site anticipates a maximum site occupancy of approximately 900 people and that daily trip generation could be as high as 1,340 trips on a Saturday. DREIR at 3.E-6; 3:I-4. Although it would be unlikely that 1,340 vehicles would have to exit the site during a wildfire, there could be at least 300 cars (assuming three passengers per car) trying to flee during an emergency. The DREIR never tells us how such a volume of cars would affect the capacity of nearby highways, including SR-18.

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In particular, it is imperative that the EIR disclose the approximate capacity of nearby highways, including SR-18, in the vicinity of the proposed Project. Will these highways even be able to accommodate evacuating vehicles? This is not a theoretical exercise given that the Project, together with cumulative projects are projected to cause *significant and unavoidable* traffic impacts at numerous intersections in the Project vicinity. See DREIR at 3.I-19—3.I-21.

2. The DREIR Fails to Identify the Amount of Non-Project-Related Traffic That Would Need to Be Evacuated.

The DREIR fails to identify the number of non-Project vehicles that would also be expected to be on area roadways during an emergency event such as a wildfire. It is imperative that this information be provided as non-Project traffic together with Project

10-45



Tom Nieves
February 25, 2019
Page 20

traffic will be using the same roadways to escape a wildfire. SR-18 is the primary regional and sub-regional route through the Project area and likely carries substantial traffic volumes under typical, non-evacuation circumstances.⁷ Consequently, this ambient traffic (i.e., not evacuation-related) will also be on SR-18 when an emergency is declared and evacuation commences. Consideration of the ability of SR-18 to accommodate the traffic demand associated with an emergency evacuation must fully account for the fact that non-Project traffic (both evacuation-related and ambient) will also be present on the road. Because SR-18 will operate with high levels of congestion (under Project and cumulative conditions), this will increase not only the time needed to evacuate, but also the levels of stress and anxiety for evacuees.

3. The DREIR Fails to Take Into Account Other Critical Issues Needed to Address Emergency Evacuation.

Although the DREIR includes an Evacuation Plan, it is excessively vague and does not provide the necessary information to provide the assurance that the Project site can evacuate safely and effectively in the event of a wildland fire. Information, including the following, is missing from the DREIR.

- **Mobilization Time:** Mobilization time is the pre-evacuation notification and preparation period. Mobilization time is particularly critical with respect to fires that start in close proximity to a project site. Mobilization time must realistically represent the uncertainties inherent in any emergency evacuation situation including the unique characteristics of the project site. Here, for example, DREIR’s Evacuation Analysis acknowledges that the location of the Project site can make it particularly susceptible to an instantaneous “flash” effect due to convection along the site’s drainages, wind direction, and local inversions. DREIR Evacuation Plan Appendix at 12. Modeling of the site’s conditions (meteorology, topography, brush, etc.) should be undertaken to accurately determine the necessary mobilization time.
- **Evacuation Time:** How long will the evacuation itself take, and what will be the travel time to a safe location?
- **Other Factors:** How will traffic operations on the Project’s internal roads and SR-18 be affected by the following factors, which are likely to prevail during an emergency evacuation due to a wildland fire?

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⁷ The DREIR fails to actually identify traffic volumes on SR-18 but, given the fact that intersections along the roadway are projected to operate at unacceptable service levels (see DREIR at 3.I-19—3.I-21), it likely carries substantial traffic volumes.



Tom Nieves
February 25, 2019
Page 21

- The possibility that the road will be obscured by smoke, or that other fire-related factors (such as visible flames) will exist that will have the effect of reducing roadway capacity.
- The effects of trucks or recreational vehicles in the evacuating traffic stream. Because those vehicles have lower operating characteristics (i.e., slower acceleration and longer stopping distances) than passenger cars, they reduce the effective capacity of the road.
- The emotional state of the evacuees, which could lead to irrational or unpredictable behavior by drivers.

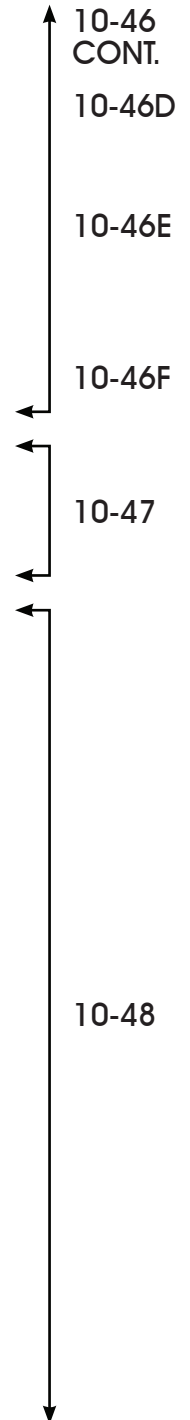
It will be important for the revised EIR to run varying evacuation scenarios depending on the location of the wildfire ignition (close to the site or miles away), wind direction, and wind speed, and assuming that various roadways are blocked entirely by fire.

E. The DREIR Fails to Adequately Analyze Wildland Fire Risks.

The mountain regions of San Bernardino County contain dense forest and have experienced drought conditions for the past fifteen years. DREIR at 3.E-1. The extended drought conditions caused the trees to become weak, which created a perfect environment for the Bark Beetles to proliferate from 2003 to 2008 and killed thousands of trees. *Id.* The combined effects of the drought, dead trees, and density of the forest created severe burning conditions for the County’s mountain areas. *Id.* The Project site is located in a “Very High Fire Hazard Severity” zone, has moderate to steep terrain, and moderate to heavy fuel loading. DREIR at 3.E-3; 3.E-7. All of these factors contribute to an extremely high fire hazard.

Against this backdrop, the DREIR devotes exactly two paragraphs to the Project’s potential to expose people or structures to a significant risk of loss, injury, or death involving wildland fire. DREIR at 3.E-7. The DREIR relies largely on regulatory compliance (e.g., installation of fire sprinklers and fire alarm systems) and the use of fuel modification areas, to conclude that impacts relating to wildland fire would be less than significant. DREIR at 3.E-7-3.E-8. The DREIR lacks *any* evidentiary support for its conclusion that the Project’s wildfire risks would be less than significant.

As the catastrophic 2017 and 2018 fires across California demonstrated, wildfires dramatically alter the state’s environment, pose a tremendous risk of injury and death, and cause billions of dollars of damage to buildings and infrastructure. Further, the threat of wildfire is increasing. In the coming decades, climate change will alter temperatures,





Tom Nievez
February 25, 2019
Page 22

winds, precipitation, and species, with potentially substantial fire hazard impacts. To make matters worse, wildfire threats are no longer seasonal. Historically, fire season in southern California occurred during the fall, when the Santa Ana winds come charging through the brush fueling wildfires. But now, the wildfire risk is year round.

Development in the wildland urban interface, as the proposed Project contemplates, significantly exacerbates the human health and environmental damage wrought by wildfires. In addition to unwisely placing people and structures directly in the line of fires, development such as the proposed Project can dramatically increase ignition risks compared to existing undeveloped conditions. Common anthropogenic causes of fire include arson/incendiary, equipment use, debris burning, smoking, vehicles, fireworks, electricity, and outdoor cooking (grilling). Additionally, structure fires sometimes spread and initiate wildland fires. The resulting human health and environmental consequences are numerous and devastating. The most obvious is the direct loss life of life and property caused by the fires themselves. The ignition of a wildfire may occur with little or no notice and certain evacuation response operations are simply not feasible.

In light of these facts, one would expect the County to have comprehensively analyzed the risk of wildfire-related impacts from the proposed Project. This analysis would evaluate the increase in the risk of wildfires due to human ignitions and the resulting harm to lives, property, and the environment from these wildfires. Yet the DREIR provides no such analysis.

It is illogical to claim, as this DREIR does, that regulatory compliance and other features such as fuel modification zones would reduce fire hazards to a less than significant impact. Such a claim—that a project developed in a location known to have the highest wildland fire risk in California would not pose a significant risk to public safety—is belied by common sense. As discussed above, new development dramatically increases the likelihood of wildfire ignition. Moreover, given the complex steep terrain and dense fuels on the Project site, a fire ignited during Santa Ana winds could easily spread at rates of several miles per hour and would be largely unimpeded by fuel modification zones. In short, a project built in a location known to have extreme wildfire risk cannot compensate for this hazard simply through a *fire-resistant* design. The only way to protect human life and structures is to not build in this location in the first place. Wildfires and the devastation they inflict will only worsen if the County continues to allow development in high fire hazard zones.

In light of the devastation that wildfires have wrought these past two years, it is imperative that this DRIER take wildfire risk seriously. To comply with CEQA, the



10-48
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Tom Nieves
February 25, 2019
Page 23

County must disclose the potential for increased wildfires due to the potential for increased ignitions from the Project and evaluate the increased risk to lives and property from these fires. Only when this analysis is undertaken will the public and decisionmakers be apprised of the real-world implications of allowing new development in the urban wildland interface.

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F. The DREIR’s Analysis of Project Impacts on Drainage and Hydrology Is Inadequate

The DREIR’s treatment of the Project’s hydrology impacts fails to provide the public and decision-makers with essential information about the Project. The DREIR fails to adequately analyze project impacts associated with hydrology and water quality because, among other reasons, key setting information is missing (e.g., description of existing water features including a perennial stream and a spring). In addition, as detailed in the attached Kamman Report, the DREIR has failed to consider two major aspects of hydrogeology that are required under CEQA:

10-49

- the first is that the increase in impervious area which leads to an increase in runoff volume and faster transmission of runoff from upstream will directly affect groundwater recharge; and
- the second is that site development will affect drainage patterns across the site and may affect flow to the spring and jurisdictional wetlands in adjacent areas.

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CEQA Guidelines, Appendix G, Section IX; Kamman Report at 2 and 4. Here, the DREIR fails to evaluate the Project’s impacts on on-site and off-site wetlands and jurisdictional waters in the event that the Rimforest Storm Drain Project, proposed on a portion of the Project site and in adjacent areas, is not implemented prior to construction of the Church of the Woods. These deficiencies are described in more detail in the Kamman Report.

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In addition, as explained in the Kamman Report, the DREIR fails to adequately analyze the impacts of stormwater runoff from the Church of the Woods Project site on the 0.5-acre area on the southeast portion of the site. Kamman Report at 4. The DREIR indicates that this flow will be redirected to the southern portion of the site under developed conditions. *Id.* at Figure 6. Should the increased flow be directed toward the active landslide area or indirectly increasing groundwater volume above the landslide would increase landslide potential. *Id.* at 4. The DREIR has not addressed or analyzed this impact.

10-52



Tom Nievez
February 25, 2019
Page 24

G. The DREIR’s Conclusion that the Project’s Biological Impacts Are Less Than Significant Is Not Supported by Substantial Evidence.

The DREIR’s treatment of biological impacts, like the DEIR before it, suffers from substantial deficiencies and fails to meet CEQA’s well established standards for impacts analysis. The document’s analysis both understates the severity of the potential harm to biological resources within and adjacent to the proposed Project site and neglects to identify sufficient mitigation to minimize these impacts. Given that analysis and mitigation of such impacts are at the heart of CEQA, the EIR will not comply with these laws until these serious deficiencies are remedied. *See Sundstrom v. County of Mendocino*, 202 Cal.App.3d 296, 311 (1988) (“CEQA places the burden of environmental investigation on government rather than the public.”).

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1. The DREIR Fails to Adequately Describe the Project’s Biological Setting.

The DREIR fails to provide a complete description of the Project’s biological setting. The DREIR fails to analyze the presence and number of special status species that it acknowledges may be present on the site and in the Project area. DREIR at 3.C-3 through 3.C-5. The Habitat Assessment determined that habitat for several special status species, including Southern rubber boa, San Bernardino flying squirrel, olive-sided flycatcher, bald eagle, purple martin, California long-eared owl and California spotted owl, exists on the Project site and noted that many of those special status species were known to exist within the region. DREIR at Appendix C, p. ES-2 and Table C-1. However, no *current* protocol level surveys were conducted for any of these species. DREIR at 3.C-1 and 2 and Habitat Assessment, Appendix D Southern Rubber Boa Habitat Suitability Assessment (Leatherman, 2018 at “Results of Literatures Search” (no page numbers provided)).

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What protocol level surveys were conducted were performed 12-16 years ago. DREIR at 3.C-1 and 2. This failure is particularly egregious given that both the Habitat Assessment and the DREIR indicate sightings of certain species in adjacent areas and the presence of suitable habitat for these vulnerable species on the Project site. DREIR Habitat Assessment, Appendix D at “Conclusion” and Habitat Assessment at 29. In the case of the Southern rubber boa, the DREIR acknowledges that even the outdated surveys are unreliable due to lack of detail regarding the methods used and the intensity of the surveys. DREIR Habitat Assessment, Appendix D at “Results of Literature Search” and “Conclusion”. The Southern rubber boa is a state-listed Threatened species, is on the U.S. Forest Service sensitive species list, and is currently being reviewed to determine if it warrants listing under the federal Endangered Species Act. Thus, it is critical that the



Tom Nievez
February 25, 2019
Page 25

DREIR determine not only whether there is suitable habitat on-site, but also where the species are found and in what concentration. Only then can the DREIR evaluate the extent and severity of the impact to individuals and identify appropriate mitigation.

The DREIR’s failure to conduct current surveys is especially surprising because the California Department of Fish and Wildlife (“CDFW”) provided detailed comments on the previous iteration of the project highlighting this omission. CDFW’s comments, specified that the EIR relies on outdated surveys and defers analysis. See, CDFW Comments on the Church of the Woods DEIR dated June 2, 2010. Rather than correcting the problem and conducting the appropriate surveys, the DREIR once again relies on outdated information and fails to conduct protocol level surveys.

In addition, the DREIR gives no sense of the Project site’s recognized high-value potential as a wildlife movement area. DREIR at Bio appendix Exhibit 7 Wildlife Corridors. Despite, the DREIR’s disclosure that “wildlife movement would be impeded by Project-related disturbance”, the document concludes that impacts would be less than significant because the northwestern portion of the site would remain undisturbed. DREIR at 3.C-23. But because the DREIR fails to adequately document the occurrence and location of sensitive species on the project site, it is not possible to know if species that are potentially in the southeast portion of the site will be impeded. Coupled with the failure to conduct protocol surveys, the DREIR’s perfunctory description of the sensitive species and their habitats present on the site results in an incomplete description of the sensitive environmental setting of this Project site. According to settled case precedent, this failure to describe the Project setting violates CEQA. See *San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus*, 27 Cal. App. 4th at 724-25 (environmental document violates CEQA where it fails to completely describe wetlands on site and nearby wildlife preserve).

Finally, as described further in the Kamman Report, the DREIR fails to disclose the existence of a spring on the project site. According to the Rimforest Storm Drain Project EIR, a spring is located south of the proposed attenuation basin. Rimforest Storm Drain Project Final EIR at 3-5. This spring is connected to the drainage on the COW site and to the wetlands to the north. Therefore, impacts to the spring will have direct impacts on the related features. The DREIR should have identified the spring as a feature that may be impacted by the COW Project and described avoidance measures, potential impacts and feasible mitigation if necessary.

Moreover, the DREIR fails to map drainage features and sensitive habitats on the project site, fails to clearly indicate what project features would impact which sensitive

10-54
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10-56

10-57



Tom Nieves
February 25, 2019
Page 26

areas, and fails to show how this project interacts with the planned Rimforest Storm Drain project. A revised analysis must correct these deficiencies.

10-57
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2. Analysis of Impacts on Biological Resources and Mitigation Is Unlawfully Deferred or Incomplete and Cursory.

In some instances, the DREIR determines that the Project may have significant impacts, but then fails to determine the extent and severity of those impacts. Merely stating that an impact will occur is insufficient; an EIR must also provide “information about how adverse the adverse impact will be.” *Santiago County Water District v. County of Orange*, 118 Cal. App. 3d 818, 831 (1981). This information, of course, must be accurate and consist of more than mere conclusions or speculation. *Id.* The DREIR’s analysis of impacts to biological resources fails to fulfill this mandate in several instances.

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For example, although the DREIR concludes that construction of the Project has the potential to adversely impact a host of sensitive animal species (i.e., Southern rubber boa, San Bernardino flying squirrel, olive-sided flycatcher, bald eagle, purple martin, California long-eared owl and California spotted owl), the document fails to explain the actual and specific consequences to these species. The DREIR provides no information regarding the number of individuals of each species that will be affected or the degree to which the populations will be impacted.

(a) The DREIR Fails to Adequately Analyze and Mitigate the Project’s Impacts Related to Edge Effects.

The Project would result in a substantial development edge contiguous with areas known to have suitable habitat for special status species, which can lead to detrimental effects related to habitat fragmentation and biodiversity. The DREIR acknowledges the Project’s potential to result in edge effects. See, *i.e.*, DREIR at 3.C-18 [acknowledgment of potential significant indirect impacts and edge effects (e.g., increased human activity, increase ambient noise, higher artificial evening light levels, and increased threats of wildlife mortality by traffic) from the development]. However, aside from brief statements noting the potential for these impacts to occur, the DREIR fails to provide any meaningful analysis. *Id.*

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A revised environmental analysis must examine the Project’s potential to result in edge-related impacts. The revised analysis must consider *all* potential related impacts including, but not limited, to the following:



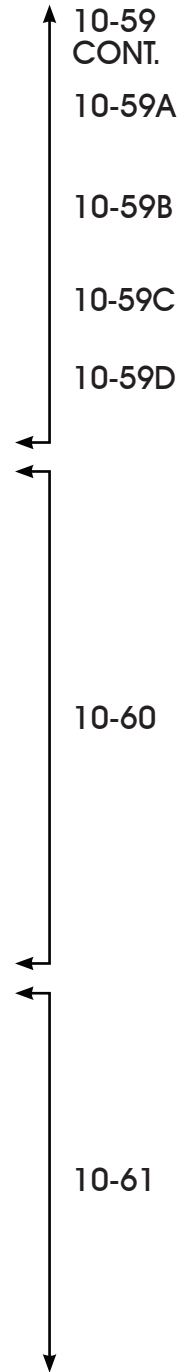
Tom Nieves
February 25, 2019
Page 27

- Introduction/expansion of invasive exotic vegetation carried in from vehicles, people, or spread from fuel modification zones adjacent to wildlands;
- Indirect impacts to vegetation from alterations of existing topography and hydrology;
- Higher frequency and/or severity of fire as compared to natural fire cycles or intensities; and
- Creation and use of undesignated trails that often significantly degrade the reserve ecosystems through such changes as increases in vegetation damage and noise.

(b) The DREIR Defers Identification of Feasible Mitigation Measures.

The DREIR’s persistent error of deferring the analysis of impacts also infects the document’s mitigation measures. The DREIR is rife with mitigation measures directed at addressing questions related to the extent of the project’s impacts until *after* the public review is completed, the EIR certified, and the project is approved. For example, despite the fact that the DREIR fails to survey for special status species, it proposes to make do with pre-construction surveys and monitoring during construction. Contrary to CEQA, the public and the decision-makers are being asked to “trust us” that questions about the projects severe impacts can and will be addressed somehow in the future. This approach contravenes CEQA’s requirement that the EIR serve as “an environmental ‘alarm bell’ whose purpose it is to alert the public and its responsible officials to environmental changes before they have reached ecological points of no return.” *County of Inyo v. Yorty* (1973) 32 Cal.App.3d 795, 810.

The DREIR proposes that it will mitigate all project-level impacts to sensitive species and habitats. DREIR at 3.C-20 through 3.C-24. However, the proposed mitigation is entirely insufficient, for several reasons. First, as discussed above, the DREIR defers to a later date the evaluations necessary to determine the extent and severity of impacts to the species that will be impacted. Mitigation measure MM-3.C1(a) prescribes pre-construction surveys and consultation with the California Department of Fish and Wildlife if animals are encountered. DREIR at 3.C-26. However, consultation with the agency should take place once protocol level surveys are completed to learn what mitigation ratios might be required. All of this should be done during the environmental review process not *after* project approval. It is our understanding that CDFW require a housing project (Blue Ridge) located in similar habitat to mitigate for lost Southern





Tom Nieves
February 25, 2019
Page 28

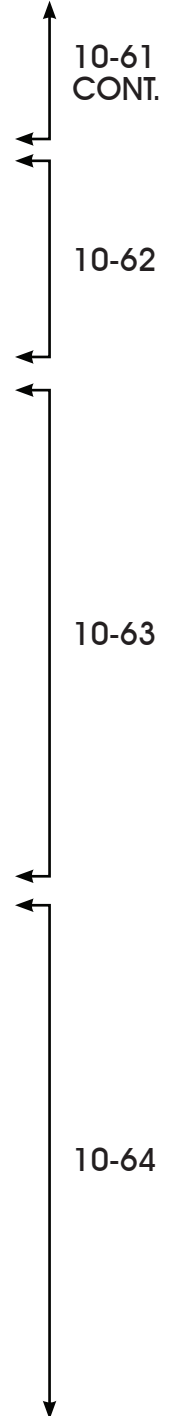
rubber boa habitat at a three to one ratio. If the same were true for this Project, the applicant may have to redesign the project to comply.

Second, the County repeatedly violates CEQA by relying on inadequate mitigation that does not reduce the projects' impacts to insignificance. For example, mitigation measure MM-3.C2(c) requires compliance with of Federal and State laws as mitigation. However, as California courts have recognized, regulatory compliance alone does not ensure that a project's impacts will be less than significant. *See Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 716.

Finally, the DREIR relies on mitigation measure MM-3.C1(b) to reduce impacts on special status species and their habitat. This measure states that prior to issuance of grading permits, the applicant will provide evidence that 13.4 acres of on-site habitat will be preserved in perpetuity. DREIR at 3.C-26. But the DREIR fails to provide any details about this easement to ensure it will be effective. For example, the DREIR fails to identify an easement holder or an entity that will be responsible for management of the preserved area. It fails to provide cost estimates for management of the proposed conservation open space area and neither specifies the level of funding that would be provided to implement the easement in perpetuity, nor provides a biological analysis of how the easement would reduce various potentially significant impacts related to fragmentation and development edge. As such, there is no way for decision makers and the public to have any idea of what, exactly, implementation of the easement can be expected to accomplish once it is prepared. For all of these reasons, MM-3.C1(b) is a classic example of deferral of mitigation, which is impermissible under CEQA.

VI. The DREIR's Cumulative Impacts Analysis is Underinclusive and Legally Flawed.

An EIR must discuss significant "cumulative impacts." CEQA Guidelines § 15130(a). "Cumulative impacts" are defined as "two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." CEQA Guidelines § 15355. "[I]ndividual effects may be changes resulting from a single project or a number of separate projects." CEQA Guidelines § 15355(a). A legally adequate "cumulative impacts analysis" views a particular project over time and in conjunction with other related past, present, and reasonably foreseeable future projects whose impacts might compound or interrelate with those of the project at hand. "Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time." CEQA Guidelines § 15355(b). Cumulative impacts analysis is necessary because "environmental damage often occurs incrementally from a variety of small sources [that] appear insignificant





Tom Nievez
February 25, 2019
Page 29

when considered individually, but assume threatening dimensions when considered collectively with other sources with which they interact.” *Communities for a Better Env’t v. Cal. Res. Agency*, 103 Cal.App.4th 98, 114 (2002).

The analysis of cumulative impacts in this DREIR is cursory and superficial. Instead of following CEQA’s mandate, the DREIR fails to actually analyze the effect of the Project together with effects of related projects on biological resources. The document merely reiterates the Project’s impacts and proposed mitigation measures and then concludes that, since the proposed Project is implementing mitigations and other cumulative projects would be required to mitigate for their impacts, cumulative impacts would be less than significant. See, *e.g.*, DREIR at 3.C-24, 3.D-17, and 3.F-29. Thus, the DREIR assumes that if an impact were less than significant, it could not be cumulatively considerable. This turns cumulative analysis on its head and is a plain violation of CEQA. An EIR may not conclude that a project will not contribute to cumulative impacts simply because it has a less than significant impact on a project level. See *Kings County Farm Bureau v. City of Hanford*, 221 Cal.App.3d 692, 720-21 (1990) (“Perhaps the best example [of a cumulative impact] is air pollution, where thousands of relatively small sources of pollution cause a serious environmental health problem.”).

The purpose of analyzing cumulative impacts is to determine whether a collection of less than significant impacts may combine to be cumulatively considerable. It is wholly inappropriate to end a cumulative analysis on account of a determination that a project’s individual contribution would be less than significant. Rather, this should constitute the beginning of the analysis.

The list of reasonably foreseeable future projects considered in the DREIR appears to be underinclusive, especially in light of the potential geographic scope of certain potentially significant impacts. For instance, the DREIR fails to consider the proposed housing complex in Blue Jay. This project has been promoted to the local community, has requested will serve letters to the Blue Jay water purveyor and has cleared several acres of trees in anticipation of the project. It will contribute to adverse impacts to traffic, air quality emissions, noise, community safety risks, hydrology and water quality and special status biological species and their habitat. These projects are already in the pipeline for review and approval by the County and should have therefore been considered in this EIR. Yet the DREIR completely ignores these projects in its cumulative analysis.

Perhaps most surprising, the DREIR fails to evaluate hydrological conditions induced by the combination of the Church of the Woods Project and the Rimforest Storm Drain Project. As discussed in detail in the Kamman Report, the DRIER fails to

10-64
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10-65

10-66



Tom Nievez
February 25, 2019
Page 30

incorporate increased stormwater flow rates from the Rimforest Storm Drain Project into the cumulative analysis of hydrological conditions. Kamman Report at 4. Unless the DREIR is revised to incorporate a more inclusive approach, its analysis of cumulative impacts will remain deficient.

10-66
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VII. The DREIR’s Analysis of Project Alternatives Remains Inadequate.

The DREIR does not comply with the requirements of CEQA because it fails to undertake a legally sufficient study of alternatives to the Project. A proper analysis of alternatives is essential to comply with CEQA’s mandate that, where feasible, significant environmental damage be avoided. Pub. Resources Code § 21002 (projects should not be approved if there are feasible alternatives that would substantially lessen environmental impacts); CEQA Guidelines §§ 15002(a)(3), 15021(a)(2), 15126(f). The primary purpose of CEQA’s alternatives requirement is to explore options that will reduce or avoid adverse impacts on the environment. *Watsonville Pilots Assn. v. City of Watsonville* (2010) 183 Cal.App.4th 1059, 1089. Therefore, the discussion of alternatives must focus on project alternatives that are capable of avoiding or substantially lessening the significant effects of the project, even if such alternatives would impede to some degree the attainment of the project objectives or would be more costly. CEQA Guidelines § 15126.6(b); *see also Watsonville Pilots*, 183 Cal.App.4th at 1089 (“[T]he key to the selection of the range of alternatives is to identify alternatives that meet most of the project’s objectives but have a reduced level of environmental impacts”).

10-67

In addition, a “lead agency may not give a project’s purpose an artificially narrow definition,” to shape this determination but rather must “structure its EIR alternative analysis around a reasonable definition of underlying purpose and need.” *In re Bay-Delta etc.*, 43 Cal.4th 1143, 1166 (2008). In particular, using overly narrow objectives to dismiss reasonable and feasible alternatives constitutes prejudicial error. *See North Coast Rivers Alliance v. Kawamura*, 243 Cal.App.4th 647, 669-70 (2015) (where the lead agency’s overly narrow project purpose caused it to “dismiss[] out of hand” a relevant alternative, this error “infected the entire EIR”). The DREIR’s discussion of alternatives in the present case fails to live up to these standards.

As discussed in our previous comments, the DREIR’s failure to disclose the severity of the Project’s wide-ranging impacts or to accurately describe the Project necessarily distorts the document’s analysis of Project alternatives. As a result, the alternatives are evaluated against an inaccurate representation of the Project’s impacts. The County may have identified additional or different alternatives if the Project impacts had been properly analyzed and if the Project had been accurately described.



Tom Nieves
February 25, 2019
Page 31

Moreover, without sufficient analysis of the underlying environmental impacts of the entire Project, the DREIR’s comparison of this Project to the identified alternatives is utterly meaningless and fails CEQA’s requirements. If, for example, the DREIR concluded that the Project would result in significant impacts to special status species and their habitats, as it should have, the DREIR would be required to evaluate additional alternatives that did not pose these risks. These additional alternatives would necessarily be off-site alternatives located away from sensitive habitat.

10-68

Similarly, if the DREIR concluded that the Project would result in significant impacts associated with wildland fire hazards and evacuation, the DREIR would be required to evaluate alternatives that minimize that risk. These alternatives would need to be off-site alternatives located away from the wildland-urban interface. Such off-site alternatives must be considered to address these impacts.

A. The DREIR Presents Project Objectives That Are Overly Narrow

The DREIR presents overly narrow and self-fulfilling project objectives. Objectives A and G effectively circumscribe and mandate selection of the Project or an alternative that is substantively similar. In particular, Objective A requires the project to provide a church campus with sports courts and a sports field. DREIR at 2-16. This objective leaves no room for consideration of anything other than development of a church with recreational sports courts and fields. Objective G calls for developing the proposed Project site in coordination with the Rimforest Storm Drain project. *Id.* Because the objectives leave no room to consider—and are used to justify dismissal without analysis of—relevant, feasible alternatives, they preclude consideration of a reasonable range or alternatives and violate CEQA. *North Coast Rivers Alliance*, 243 Cal.App.4th at 669-70.

10-69

B. The Singular Build Alternative Analyzed Does Not Constitute a Reasonable Range of Alternatives

The DREIR’s analysis of alternatives fails to remedy errors in the DEIR identified in our previous comment letters. The DREIR continues to improperly circumscribe its analysis of potential Project alternatives and makes no serious attempt to describe an alternative that avoids or substantially minimizes the impacts of the Project. Far from complying with its obligations to suggest and analyze a reasonable range of alternatives to the proposed site, the DREIR identifies only one build alternative. DREIR at 0-3 and 0-4. Analysis of one alternative does not constitute a “reasonable range.”

10-70



Tom Nieves
February 25, 2019
Page 32

While there is no “magic number” for how many alternatives an EIR should examine to present a “reasonable range,” at a minimum CEQA requires an agency to examine at least potentially feasible alternatives to try to avoid or substantially lessen significant environmental impacts that are central to a project. *See Watsonville Pilots Ass’n v. City of Watsonville* (2010) 183 Cal.App.4th 1059, 1089-90 (EIR was deficient for failing to include reduced development alternative that would avoid or substantially lessen the project’s primary growth-related significant impacts); *Habitat and Watershed Caretakers v. City of Santa Cruz* (2013) 213 Cal.App.4th 1277, 1285, 1305 (invalidating EIR that failed to discuss any feasible alternative addressing the project’s primary water supply impact). Furthermore, for a controversial development project on an ecologically, and aesthetically valuable site such as this one, the County should evaluate multiple alternatives in order to help inform the decision-makers and the public of the potential short and long-term consequences of this Project.

10-70
CONT.

As we point out in our previous comments, the EIR should have considered alternative locations, including an alternative that would site the Project’s various components (i.e., church and recreational facilities) in multiple locations. There appear to be ample other sports field facilities at other locations close by. For example, Rim High School located approximately a two minute drive from the proposed Project site, has a football field, two baseball fields, a track surrounding football field, and tennis courts. The Rim Of the World Recreation and Park District Twin Peak Sports Complex is located within a five- to ten- minute drive from proposed project and includes a baseball field with bleachers, snack bar, bathrooms, tot lot play equipment for children, multiple covered picnic kiosks, adult outdoor exercise equipment, community garden, dog park, senior/community center that holds 200 people with a full kitchen and stage, which is available for use for wedding receptions and community events. We see no reason why the DREIR could not have considered use of existing sports facilities in an alternative.

10-71

In addition, the County could have considered the Grandview Elementary School site as an alternative site. The Grandview school is currently closed due to lack of enrollment and diminishing school age population in the district. This school is located on a secondary County roadway with ball fields, playground equipment, a large assembly indoor area, multiple classrooms, and kitchen.

10-72

Finally, as SOFA and Sierra Club requested in previous comments, the EIR should have considered a ‘build’ alternative that is consistent with the General Plan and zoning for the site. Specifically, because construction of ballfields and recreation facilities are not allowable uses in the Community Industrial zone, the EIR should consider an alternative that includes the church buildings without the recreational fields. This alternative would, at a minimum, avoid the placement of structures on lands susceptible

10-73



Tom Nieves
February 25, 2019
Page 33

to landslides, avoids filling drainage channels, preserves the rural character of the area, minimizes or avoids sensitive biological resources, and provides adequate emergency access routes for protection from wildland fire hazards.

Under CEQA, an agency may not approve a proposed project if a feasible alternative exists that would meet most of the project's objectives and would diminish or avoid its significant environmental impacts. Pub. Res. Code S 21002; *Kings County Farm Bureau*, 221 Cal.App.3d at 731. Given the extensive environmental impacts this Project will have, the consideration of alternatives will not be complete until an EIR presents decision-makers and the public with a rigorous, good-faith assessment of options that reduce the environmental consequences of the Project.

In sum, the Project DREIR fails to consider a reasonable range of alternatives and in doing so, fails to provide sufficient information to facilitate review by the public and decisionmakers. To ensure that the alternatives analysis complies with CEQA and serves its informational purposes, a revised document must include an evaluation of these and other alternatives that avoid and/or minimize significant impacts to sensitive biological and hydrological resources and to nearby sensitive receptors.

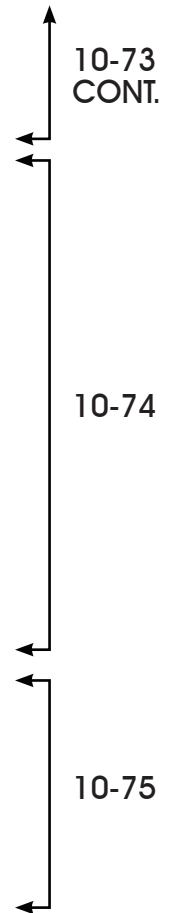
VIII. Conclusion

For all of the foregoing reasons, we respectfully submit that the County cannot lawfully approve the Church of the Woods Project. The DREIR is deeply flawed and fails to inform the public of the full impacts of the Project. It can support neither the findings required by CEQA nor a determination of General Plan consistency. In addition, the County must adopt more mitigation, and more specific mitigation, to address the Project's numerous, significant impacts.

Sincerely,
SHUTE, MIHALY & WEINBERGER LLP

Carmen J. Borg, AICP

Laurel L. Impett, AICP
Urban Planners





Tom Nieves
February 25, 2019
Page 34

cc: Hugh Bialecki, Save Our Forest Association, Inc.
Steve Farrell, Sierra Club - San Bernardino Mountains Group
Drew Feldmann, San Bernardino Valley Audubon Society
Aruna Prabhala, Center for Biological Diversity
Terri Rahhal, Director of Land Use Services, County of San Bernardino

List of Appendices:

Attachment A: Shute, Mihaly & Weinberger Comments on Church of the Woods DEIR, dated September 22, 2010.

Attachment B: Shute, Mihaly & Weinberger Comments on Church of the Woods FEIR, dated November 8, 2011.

Attachment C: Report by Kamman Hydrology & Engineering, Inc., February 21, 2019.

Attachment D: Photos of Highway 18 in winter, 2019.



ATTACHMENT C



Kamman Hydrology & Engineering, Inc.
7 Mt. Lassen Drive, Suite C122, San Rafael, CA 94903
Telephone: (415) 491-9600
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February 21, 2019

Ms. Carmen Borg
Shute, Mihaly & Weinberger LLP
396 Hayes Street
San Francisco, CA 94102-4421

Subject: Review of Draft Revised Environmental Impact Report
SCH No. 2004031114
The Church of the Woods Project, Rim Forest, California

Dear Ms. Borg:

I have been retained by Shute, Mihaly & Weinberger LLP to review and evaluate the Draft Revised Environmental Impact Report (DREIR) for the Church of the Woods (COTW) Project, Rim Forest, California. In addition, I have reviewed the Recirculated Draft and Final EIRs for the Rimforest Storm Drain Project (RSDP). A reference list of documents reviewed or cited in this letter and my resume are attached. Based on this review, it is my opinion that the incorrect and missing characterization of existing (baseline) conditions and incomplete assessment of potential project impacts renders the COTW DREIR's level of significance determinations incomplete and inaccurate. In addition, I have identified a number of project- induced potentially significant impacts to the environment that have not been addressed/analyzed or mitigated in the COTW DREIR. Many of these potentially significant impacts are to hydrology and, but also have bearing on impacts to biological resources. Therefore, it is my opinion that the COTW DREIR does not adequately address or mitigate for potential adverse impacts to the environment. My findings and rationale for these opinions are presented below.

10C-1

1. Deferred analysis and mitigation for impacts to jurisdictional waters and wetlands

The COTW DREIR assumes all impacts to jurisdictional waters and wetlands within the project development footprint will be addressed and mitigated under the County's Rimforest Storm Drain Project. However, there are two flaws with this assumption. First, the COTW DREIR states (pg. 3.C-7), "*Nonetheless, the Rimforest Storm Drain project is expected to be implemented by San Bernardino County prior to Project development, which would include a pipeline facility within the jurisdictional waters found on and off the Project site that would permanently alter and eliminate the Corps and CDFW jurisdictional waters found on the Project site under existing conditions.*" This assumes the County's project is constructed prior to COTW. However, on page 3.C-22, the DREIR indicates that the COTW project construction may precede the installation of the County's Rimforest Storm Drain Project. The DREIR states, "*In the event that development of the Church of the Woods Project precedes the installation of*

10C-2



the Rimforest Storm Drain Project, implementation of the proposed Church of the Woods Project would result in significant and direct impacts to the on-site drainage feature. The Project Applicant would be responsible for acquiring the necessary permits to impact the jurisdictional waters in the Project's development footprint and the Church of the Woods Project Applicant would be required to implement mitigation." If the COTW project is constructed prior to the RSDP, there will be a number of direct potential impacts to jurisdictional waters and wetlands imparted by the COTW project not already mitigated by the RSDP project. These potential significant impacts are not described nor are they analyzed in the COTW DREIR. Therefore, by deferring the analysis and mitigation for known potential impacts, the DREIR should be deemed incomplete.

10C-2
CONT.

Secondly, the RSDP RDEIR indicates that not all jurisdictional waters found both on and off the Project site would be permanently altered and eliminated as stated in the COTW DREIR. Figure 1 presents the delineated jurisdictional waters and wetlands at the COTW site along with the permanent impact and temporary disturbance areas within the Rimforest Storm Drain Project area. The RSDP RDEIR makes a clear distinction between how jurisdictional waters will be mitigated within these two areas. Page 3.3-40 of the RSDP RDEIR states the following.

Temporary impacts to jurisdictional waters would occur in portions of the project site that may be impacted by project activities but would be restored at the end of the project. This would include recontouring, restoring flow lines, and replanting vegetation. Permanent impact areas would be impacted during project activities and would not be restored at the end of the project. Some of these permanent impacts could lose function entirely while others may still convey water but would no longer be vegetated or provide habitat for wildlife.

Within the COTW project development footprint, between the southwest corner and proposed attenuation basins, the RSDP proposes to capture and convey flows on the COTW property to the attenuation basins via a 60-inch diameter stormdrain (see Figure 2). This construction work will undoubtedly impact the adjacent jurisdictional waters. However, the majority of these waters fall within the RSDP's Temporary Disturbance Zone (see Figure 1). Based on the statements in the RSDP DREIR, jurisdictional waters within the Temporary Disturbance Zone will be restored as part of the RSDP project. Thus, upon completion of the RSDP, the jurisdictional waters in the southwest portion of the COTW property will remain, albeit in a potentially slightly different restored condition.

10C-3

The COTW project plan (see Figure 3) proposes to convert these jurisdictional waters to roadway, ballfield and parking. Figure 4 illustrates this impact by superimposing the COTW project plan onto the RSDP's map of jurisdictional areas. Thus, regardless of which project gets constructed first, the COTW project will be filling and impacting these waters. This impact is not acknowledged, let alone addressed or mitigated in the COTW DREIR. The COTW DREIR should be considered incomplete until this potential significant impact to jurisdictional waters is analyzed and mitigated.



2. No characterization of surface water conditions

The presence of a perennial stream was noted by two local residents in at least two comment letters to the 2010 COTW FEIR (comments F87 and F95). At the time, COTW responded that the creek is mapped as intermittent based on interpretation of a USGS quadrangle map. In addition, the RSDP RDEIR indicates the presence of a spring just north of the COTW project footprint – the COTW DREIR makes no mention of this spring. The spring likely sustains the perennial flow in the creek as well as jurisdictional wetlands found along the downstream creek alignment through the project property. There is no mention of these important hydrologic features in the COTW DREIR. Not knowing or acknowledging that a spring, perennial creek and associated wetlands are present at the site calls into question the thoroughness of the site characterization and analysis.

10C-4

3. Incorrect characterization of groundwater conditions

The COTW DREIR states, “Overall, based on the data cited above, the Engineering Geology and Soils Investigation concludes that the groundwater at the site is anticipated to consist of insignificant amounts of perched water and limited amounts of water within the fractures of the bedrock.” However, the RSDP RDEIR identifies and maps a shallow alluvial aquifer beneath Little Bear Creek (see Figure 5). Hilltop (2010) reports that alluvium, in the form of active wash deposits, was encountered within the Little Bear Creek north of Highway 18. This valley appears to receive drainage from hills located to the west and east, and it receives some runoff from Highway 18. The surface water flow direction is toward the north. Wash deposits within this valley were generally composed of very young, unconsolidated, gray, coarse-grained clastic sediments. Drilling through shallow wash deposits (Boring No. B-1) revealed alluvial material that contained cobbles and boulders. Alluvium observed at the boring location was approximately 13 feet thick. Given the configuration of the shallow alluvium, surrounded by impermeable to low permeability bedrock, it is feasible groundwater in the alluvium is feeding the site spring and sustaining a shallow water table. Again, not reporting about the presence of a potential alluvial aquifer and its interaction with surface water (i.e., perennial flow) and/or the spring is an incomplete characterization of site conditions, which precludes proper analysis of site hydrologic conditions.

10C-5

4. Potential impacts on recharge, groundwater storage and spring flow

As indicated above, there is an active spring on COTW property that sustains perennial flow in Little Bear Creek and, in turn, likely sustains jurisdictional wetlands and downstream riparian corridor. Although it does not appear the COTW will cover/fill this spring, the introduction of large impervious surface areas adjacent to and upgradient of the spring may reduce recharge to bedrock and/or alluvial groundwater aquifers that sustain spring flows. The COTW DREIR does not acknowledge or analyze how the project facilities and impervious surface areas may interfere substantially with groundwater recharge and deplete groundwater recharge such that there would be a net

10C-6



deficit in aquifer volume, lowering of local groundwater table, or depletion in spring flows. Thus, the DREIR fails to adequately analyze potential impacts to hydrologic and associated biologic resources.

10C-6
CONT.

5. Potential impacts on slope stability

The COTW project proposes to redirect runoff from a 0.5-acre area in the southeast portion of the project. Under undeveloped conditions, this runoff is directed to Little Bear Creek and leaves the site to the north. Under developed conditions, runoff from this area will be redirected to the south towards HWY 18. The shaded area in the lower graphic of Figure 6 depicts this area of redirected runoff. The fate of this water is not addressed in the DREIR. What is concerning is that this water may be directed toward the active landslide that is being addressed by the RSDP project. The objective of the RSDP project is to divert surface water runoff away the landslide and reduce groundwater levels adjacent to the landslide to improve slope stability. However, redirecting COTW runoff into the landslide area or indirectly increasing groundwater volume above the landslide would increase landslide potential. Thus, the COTW project is introducing an increased potential for slope instability of the Rimforest landslide and counter-acting the objectives of the RSDP objectives. This impact has not been addressed or analyzed in the COTW DREIR.

10C-7

6. Incomplete cumulative impact assessment

The COTW Drainage Study (W.J. McKeever, Inc., 2018) completed to evaluate project-induced impacts on hydrologic conditions is incomplete as it does not incorporate the increased flow rates that would be introduced to COTW drainages by the Rimforest Storm Drain Project diversion. The COTW Drainage Study only analyzes storm flow runoff from the COTW site having a 100-year recurrence interval. The RSDP RDEIR indicates that the proposed attenuation basins are designed to pass lesser peak flows (e.g., flows having a 2-year recurrence interval) in order to avoid impacts to on- and off-site hydrology and sediment transport. The RSDP RDEIR states that in some cases, flow magnitudes for these lesser storms (e.g., two year peak flow) will be higher under developed than undeveloped conditions. The COTW DREIR does not analyze the same suite of lower peak flow rates and does not evaluate how the COTW project would contribute to or ameliorate potential hydrologic impacts during flows less than the 100-year return period. Because the COTW DREIR does not incorporate the large increase in flow that will occur from the RSDP in the hydrologic analysis, it is not adequately characterizing baseline conditions or the effects of the RSDP on site hydrology. A complete analysis of COTW potential impacts should evaluate baseline hydrologic conditions under two scenarios – one in which the RSDP gets constructed prior to COTW and the second in the case COTW gets constructed prior to the RSDP. In addition, given the findings from the RSDP RDEIR of increased flow rates to downstream receiving

10C-8



waters during lower magnitude flow events, the COTW Drainage Study should also have evaluated potential impacts from these same lesser peak flow events.

10C-8
CONT.

Please feel free to contact me with any questions regarding the material and conclusions contained in this letter.

10C-9

Sincerely,

Greg Kamman, PG, CHG
Principal Hydrologist





References Cited

Aspen Environmental Group, 2015, Preliminary jurisdictional waters/wetlands delineation report for the Rimforest Storm Drain Project. Prepared for: San Bernardino County Department of Public Works, July, 274p.

County of San Bernardino, Department of Public Works, Flood Control District, 2017, Final Environmental Impact Report for the Rimforest Storm Drain Project. Technical assistance provided by Aspen Environmental Group, March, 168p.

County of San Bernardino, Department of Public Works, Flood Control District, 2016, Recirculated Draft Environmental Impact Report for the Rimforest Storm Drain Project. Technical assistance provided by Aspen Environmental Group, September, 168p.

Hilltop Geotechnical, Inc. [Hilltop], 2010, Geological investigation and feasibility evaluation of proposed mitigation procedures to remove the potential for active landsliding immediately south of the community of Rimforest, San Bernardino County, California. Submitted to: Joseph E. Bonadiman and Associates, Inc., January 20, 100p.

Joseph E. Bonadiman & Associates, Inc., 2010, Final Drainage Feasibility Study, community of Rimforest, County of San Bernardino, CA. Prepared for: San Bernardino County Department of Public Works, Flood Control District, November 8, 205p.

PCR Services Corporation, 2011, Final Environmental Impact Report, Church of the Woods. Prepared for: County of San Bernardino Land Use Services Department, June, 526p.

T&B Planning, Inc., 2019, Draft Revised Environmental Impact Report, Church of the Woods Project, Rim Forest, California. Prepared for: County of San Bernardino, January 3, 376p.

W.J. McKeever, Inc., 2018, Preliminary drainage study to determine peak pre and post development Qs, Church of the Woods, Rim Forest, CA. April, 165p.

10C-10

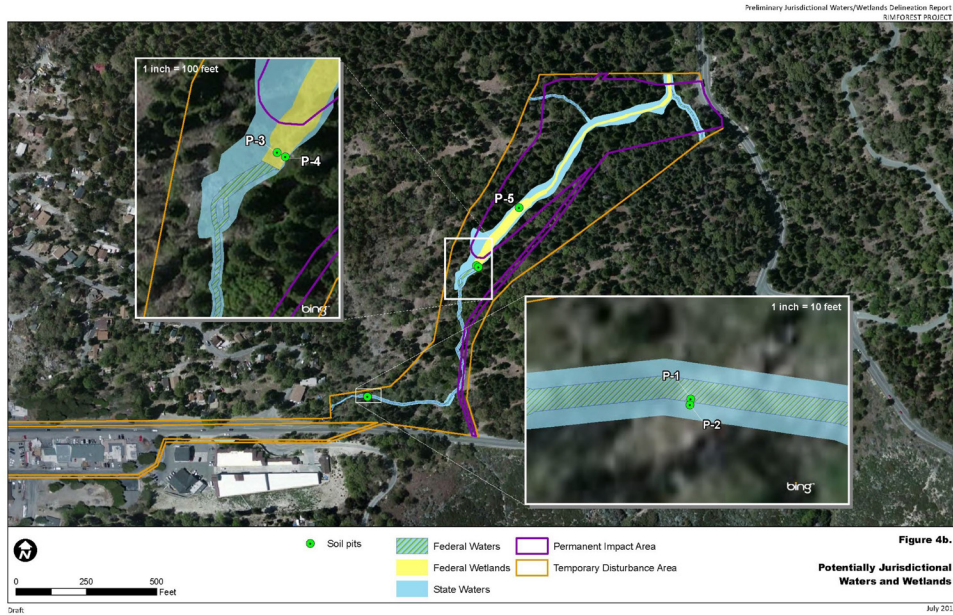


FIGURE 1: Jurisdictional waters and wetlands from Rimforest Storm Drain Project EIR (source: Aspen Environmental Group, 2015).

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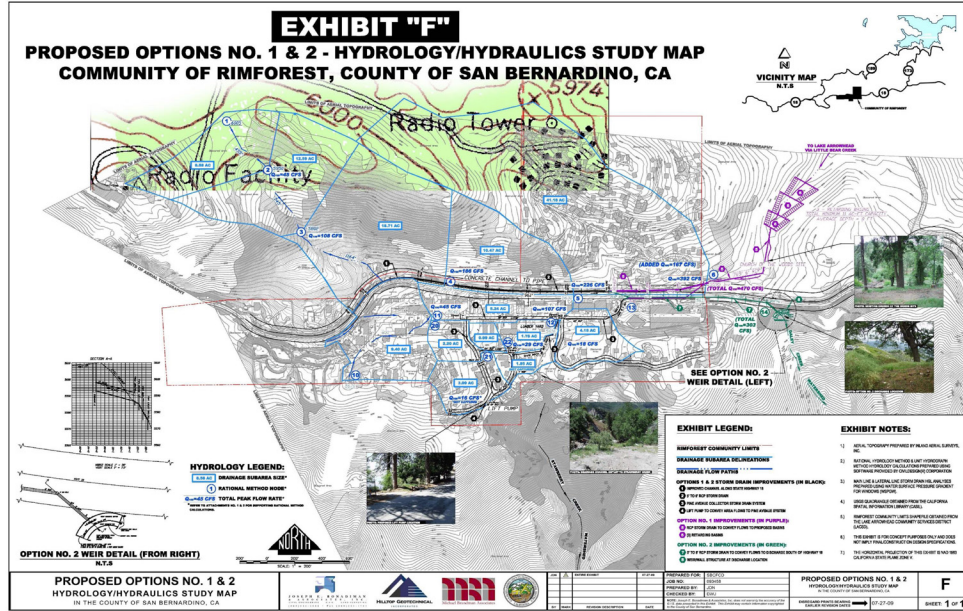
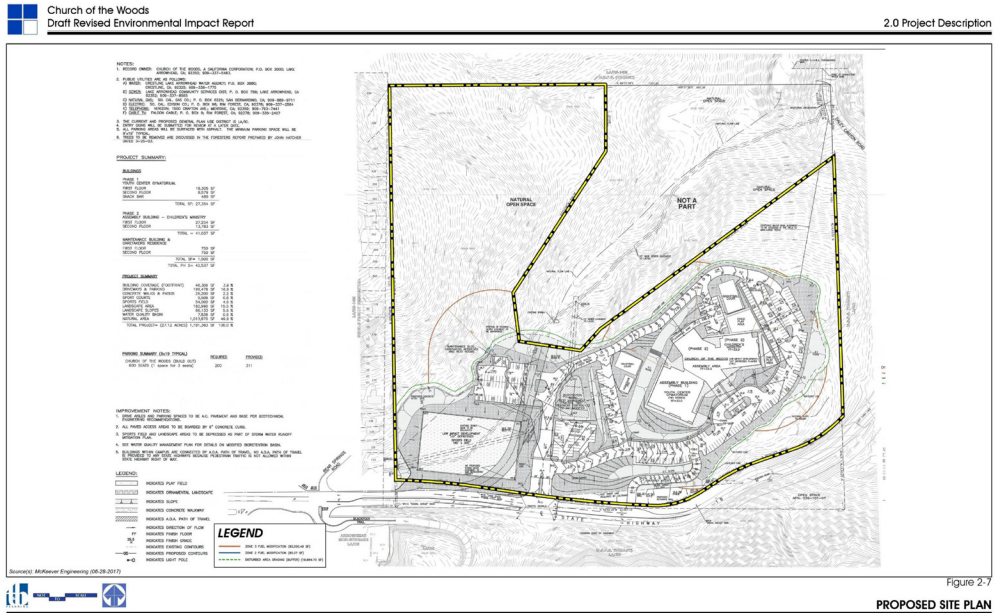


FIGURE 2: Proposed Rimforest Storm Drain Project Site Plan. [Source: Joseph E. Bonadiman & Associates, Inc., 2010].

10C-10
CONT.



10C-10
CONT.

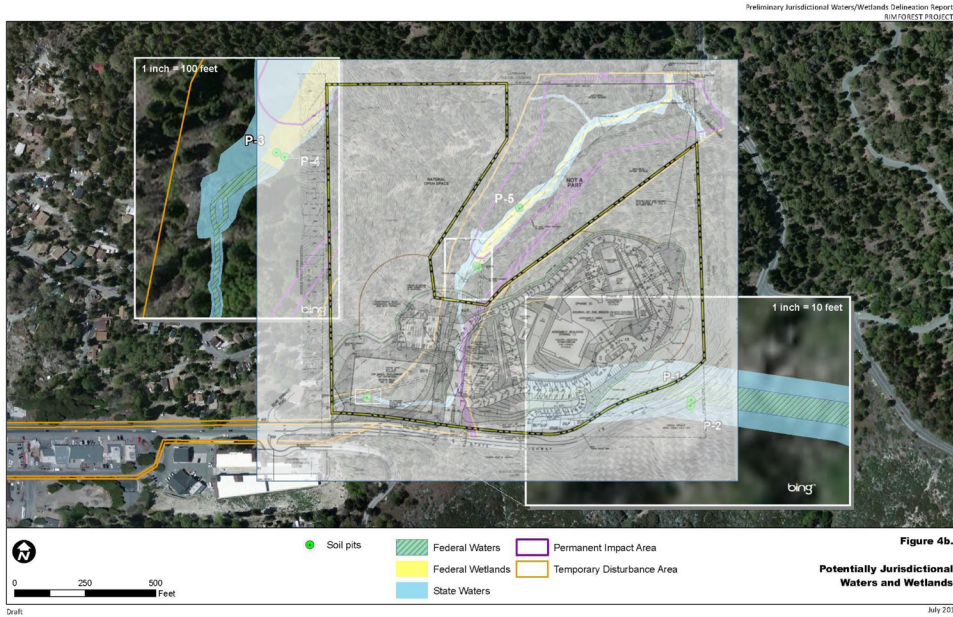


FIGURE 4: Overlay of COTW Site Plan on jurisdictional waters including temporary and permanent impact area boundaries of Rimforest Storm Drain Project.

10C-10
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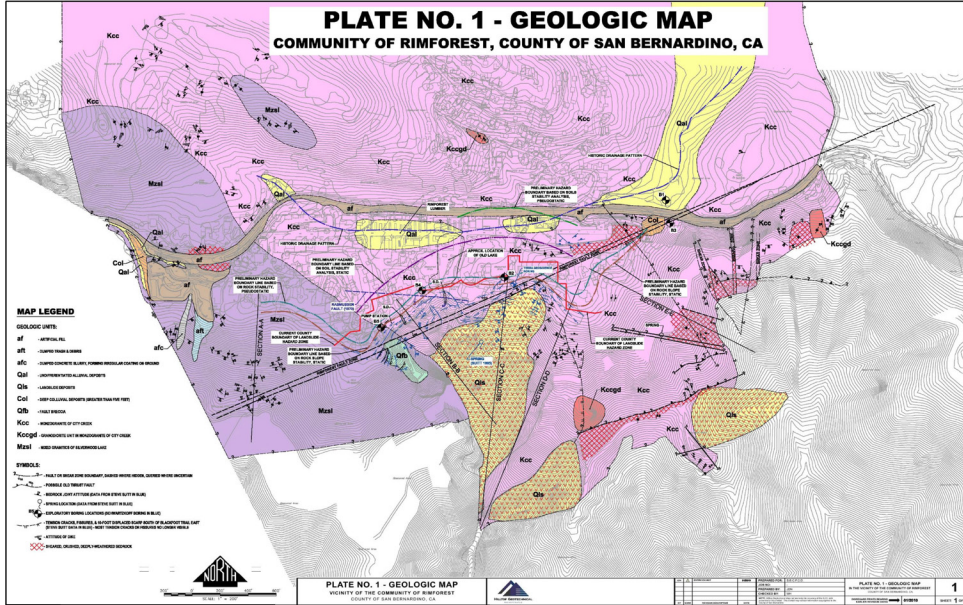
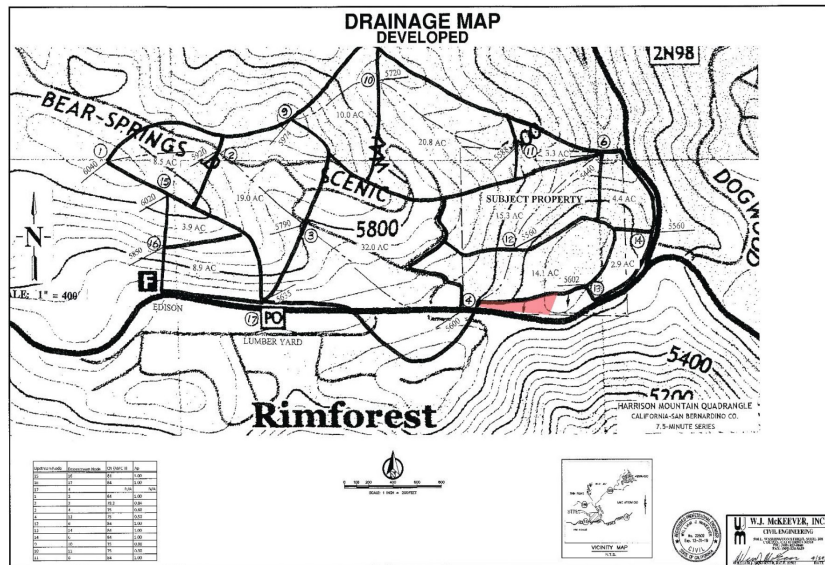
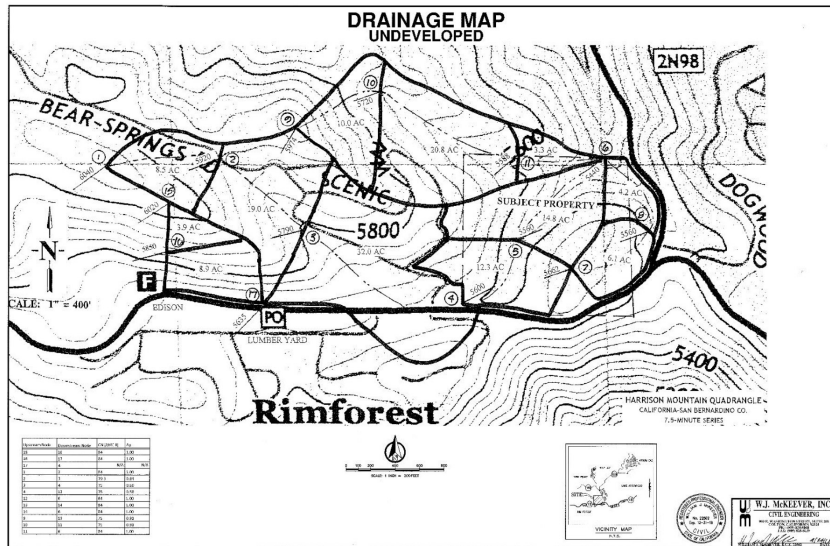


FIGURE 5: Geologic map illustrating extent of alluvial (Qal) aquifer on COTW project site (source: Hilltop, 2010).

10C-10
CONT.



10C-10
CONT.

FIGURE 6: COTW drainage maps for undeveloped (upper) and developed (lower) conditions (source: W.J. McKeever, Inc., 2018). Shaded area in lower map depicts runoff redirected to south by COTW project.



Greg Kamman, PG, CHG
 Principal Hydrologist

EDUCATION	1989	M.S. Geology - Sedimentology and Hydrogeology Miami University, Oxford, OH
	1985	A.B. Geology Miami University, Oxford, OH
REGISTRATION	No. 360 No. 5737	Certified Hydrogeologist (CHG.), CA Professional Geologist (PG), CA
PROFESSIONAL HISTORY	1997 - Present	Principal Hydrologist/Vice President Kamman Hydrology & Engineering, Inc. San Rafael, CA
	1994 - 1997	Senior Hydrologist/Vice President Balance Hydrologics, Inc., Berkeley, CA
	1991 - 1994	Project Geologist/Hydrogeologist Geomatrix Consultants, Inc., San Francisco, CA
	1989 - 1991	Senior Staff Geologist/Hydrogeologist Environ International Corporation, Princeton, NJ
	1986 - 1989	Instructor and Research/Teaching Assistant Miami University, Oxford, OH

SKILLS AND EXPERIENCE

As a Principal Hydrologist with over 25 of technical and consulting experience in the fields of geology, hydrology, and hydrogeology, Mr. Kamman routinely manages projects in the areas of surface- and ground-water hydrology, stream and wetland habitat restoration, water supply, water quality assessments, water resources management, and geomorphology. Areas of expertise include: stream and wetland habitat restoration; characterizing and modeling basin-scale hydrologic and geologic processes; assessing hydraulic and geomorphic responses to land-use changes in watersheds and causes of stream channel instability; evaluating surface- and ground-water resources and their interaction; and designing and implementing field investigations characterizing surface and subsurface conditions; and stream and wetland habitat restoration feasibility assessments and design. In addition, Mr. Kamman commonly works on projects that revolve around sensitive fishery, wetland, wildlife and/or riparian habitat enhancement. Mr. Kamman performs many of these projects in response to local, state (CEQA) and federal statutes (NEPA, ESA), and other regulatory frameworks. Thus, Mr. Kamman is accustomed to working within a multi-disciplined team and maintains close collaborative relationships with biologists, engineers, planners, architects, lawyers, and resource and regulatory agency staff. Mr. Kamman is a prime or contributing author to over 80 technical publications and reports in the discipline of hydrology – the majority pertaining to ecological restoration. Mr. Kamman routinely teaches courses on stream and wetland restoration through U.C. Berkeley Extension and San Francisco State University’s Romberg Tiburon Center.

PROFESSIONAL SOCIETIES & AFFILIATIONS	Groundwater Resources Association of California Society for Ecological Restoration International California Native Plant Society
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10C-11



RESPONSES TO COMMENT LETTER 10
Shute, Mihaly, & Weinberger, LLP

10-1:

The County acknowledges the commenter's letter from the firm Shute, Mihaly, & Weinberger, LLP representing the Save Our Forest Association and Sierra Club – San Bernardino Mountains Group. The County acknowledges the attachments referenced in this comment; however, the County is exercising the discretion authorized by CEQA Guidelines § 15088.5(f)(1), specifically stating that it will not be responding to comments made during the public review of the 2010 Draft EIR (refer to DREIR Section 1.2). The DREIR was prepared in accordance with the CEQA Guidelines §§ 15120 to 15132 and the DREIR's conclusions are based on substantial evidence in the public record. This comment does not identify any specific deficiencies in the analysis disclosed in the DREIR. No revisions to the DREIR are required in order to respond to this comment.

10-2:

The County acknowledges this comment and the attachment referenced in this comment. Responses to the comments identified in this comment letter and Attachment C to this comment letter are provided below.

10-3:

This comment summarizes the proposed Project's background information regarding the prior approval process. This comment does not raise any concerns related to the DREIR. No revisions to the DREIR are required to respond to this comment.

10-4:

DREIR Tables 3.G-1 and 3.G-2 provide an analysis of the Project's consistency with the General Plan and Lake Arrowhead Community Plan, and concludes that the Project would be fully consistent with the General Plan and Lake Arrowhead Community Plan, except for the Project's conflict with General Plan Policy M/CI 1.1 and Lake Arrowhead Community Plan Policy LA/CI 1.1 related to levels of service on Project area roadways. Specifically, the analysis in DREIR Tables 3.G-1 and 3.G-2 demonstrates that the Project would be consistent with all applicable policies related to steep slopes, open space conservation, and biological resources. This comment does not identify any specific deficiencies in the analysis disclosed in the DREIR, nor does it provide any evidence of a conflict with General Plan policies. No revisions to the DREIR are required in order to respond to this comment.

10-5:

This comment accurately summarizes the Project's proposed development. This comment does not raise any concerns related to the DREIR. No revisions to the DREIR are required in order to respond to this comment.

10-6:

The Project's impacts to multiple special status species, habitat loss, and open space are addressed in DREIR Section 3.C, *Biological Resources*; the Project's visual impacts are addressed in DREIR Section 3.A, *Aesthetics*; and the Project's traffic related impacts are addressed in DREIR Section 3.I, *Transportation and Circulation*. Additionally, DREIR Section 3.E, *Hazards*, addresses impacts related to wildfire. The DREIR



disclosed that cumulatively-considerable impacts to habitat for the Southern Rubber Boa (SRB), California spotted owl (CSO), and San Bernardino Flying Squirrel (SBFS) would be significant and unavoidable, and also discloses significant and unavoidable impacts to transportation and traffic. The DREIR concludes that impacts to visual quality would be less than significant. This comment does not identify any specific deficiencies in the DREIR's analysis of impacts. Furthermore, DREIR Tables 3.G-1 and 3.G-2 provide an analysis of the Project's consistency with the General Plan and Lake Arrowhead Community Plan, and conclude that the Project would be fully consistent with the General Plan and Lake Arrowhead Community Plan, except for the Project's conflict with General Plan Policy M/CI 1.1 and Lake Arrowhead Community Plan Policy LA/CI 1.1 related to levels of service on Project area roadways. This comment does not identify any specific deficiencies in the analysis presented in DREIR Tables 3.G-1 and 3.G-2. With respect to ordinances, the Project was reviewed by the County of San Bernardino and was found to be fully consistent with all County ordinances and requirements. No revisions to the DREIR are required in order to respond to this comment.

10-7:

The commenter correctly states that rural sports and recreation are not permitted within the Community Industrial zone as a primary use; however, the Project's proposed sports field is an accessory use, which would be permitted following the submittal and approval of a Site Plan Permit. Additionally, according to San Bernardino County Development Code § 84.01.020, whenever accessory uses are questioned, the Director shall be responsible for determining if a proposed accessory use meets the criteria within Chapter 84 of the Development Code. With respect to Attachment A to this comment letter, the County is exercising the discretion authorized by CEQA Guidelines § 15088.5(f)(1), specifically stating that it will not be responding to comments made during the public review of the 2010 Draft EIR (refer to DREIR Section 1.2).

10-8:

The DREIR Section 4.0, *Alternatives*, provides three alternatives to the proposed Project. DREIR Section 4.0 analyzes a No Project/No Development Alternative, a No Project/Feasible Development Alternative, and a Reduced Project/Alternative Site Design Alternative. DREIR Section 4.0 identifies the Reduced Project/Alternative Site Design as the environmentally superior alternative. Under the rule of reason, an EIR need discuss only those alternatives necessary to permit a reasoned choice, as provided by CEQA Guidelines § 15126.6(f). The alternatives presented in DREIR Section 4.0 provide a reasoned choice. Additionally, the commenter fails to suggest any other feasible alternatives to the Project. No revisions to the DREIR are required in order to respond to this comment.

10-9:

The DREIR was prepared in accordance with the CEQA Guidelines Sections 15120 to 15132 and the DREIR's conclusions are based on substantial evidence in the public record. This comment does not identify any specific deficiencies in the DREIR. Additionally, DREIR Tables 3.G-1 and 3.G-2 provide an analysis of the Project's consistency with the General Plan and Lake Arrowhead Community Plan, and conclude that the Project would be fully consistent with the General Plan and Lake Arrowhead Community Plan, except for the Project's conflict with General Plan Policy M/CI 1.1 and Lake Arrowhead Community Plan Policy LA/CI 1.1 related to levels of service on Project area roadways. Project impacts due to transportation and traffic are identified by the DREIR as significant and unavoidable, and this comment does not identify any alternatives to the proposed Project that would be feasible and that would avoid the Project's significant and unavoidable transportation and traffic impacts. Furthermore, and for the reasons stated in Section F.0 of this FEIR, no recirculation of the



DREIR is required pursuant to CEQA. No revisions to the DREIR are required in order to respond to this comment.

10-10:

With exception of the Project's unavoidable traffic impacts, DREIR Tables 3.G-1 and 3.G-2 provide substantial evidence that the proposed Project is consistent with the General Plan. This comment does not provide any evidence demonstrating that the Project would result in a conflict with General Plan Policy M/LU1.1. This comment letter also does not provide any evidence that the Project would conflict with any applicable development standards or the County Code.

10-11:

An analysis of the Project's consistency with General Plan Policy OS 7.5 is provided in DREIR Table 3.G-1. This comment does not identify how the analysis presented in DREIR Table 3.G-1 is deficient. As noted in the analysis presented in the DREIR, the Project would preserve approximately half of the naturally existing topography located in the northern and southeast portion of the Project site, would avoid the prominent natural slope on the southeast part of the site, and the Project would be required to comply with all applicable provisions of the County's Development Code as well as a Project specific WQMP, SWPPP, and NPDES. Under CEQA, compliance with specific laws or regulations is evidence of adequate mitigation. As such, the Project would not conflict with General Plan Policy OS 7.5, and no revisions to the DREIR are required in order to respond to this comment.

10-12:

This comment summarizes the DREIR's conclusion regarding consistency with San Bernardino General Plan Policy M/LU 1.6. The Project site is in a residential alpine area. Implementation of the proposed church campus would be a compatible with the density and character of the area. Additionally, the Project would include ornamental landscaping that would be compatible with the existing mountainous vegetation, which also would partially screen views of the proposed buildings from the residential uses and from travelers along SR-18. The comment does not identify other uses allowed in the IC District that would be more compatible with the density and character of the area. No revisions to the DREIR are required in order to respond to this comment.

10-13:

As stated on DREIR page 3.G-55, the Project would result in significant and unavoidable impacts related to land use pertaining to the Project's conflict with General Plan Policy M/CI 1.1 and Lake Arrowhead Community Plan Policy LA/CI 1.1 related to levels of service on Project area roadways. This impact is disclosed in DREIR Section 3.G as a significant and unavoidable impact of the proposed Project due to the fact that the Project's traffic mitigation falls under the jurisdictional authority of Caltrans and not the County of San Bernardino, and the timing of the improvement is outside of the control of the Project Applicant and the County of San Bernardino. As a result, the DREIR concluded that these mitigation measures would not be feasible and that the impact would be significant and unavoidable. It is acknowledged that there was a typographical error in DREIR Table 0-1, which incorrectly identified the impact as a less-than-significant impact under the environmental topic of Land Use. Notwithstanding, Table 0-1 identified this same impact as significant and unavoidable under the topic of Transportation and Circulation. DREIR Table 0-1 has been revised to reflect the correct significant and unavoidable conclusion disclosed in DREIR Section 3.G, *Land*



Use. Revisions the DREIR are identified in Section F.3, *Additions, Corrections, and Revisions*, of this FEIR. The County also finds that the analysis in DREIR Section 3.G provides substantial evidence that the Project is substantially consistent with the General Plan and Lake Arrowhead Community Plan.

10-14:

Refer to the Response to Comment 10-7.

10-15:

Future implementing permits (e.g., grading permits, building permits, etc.) would be reviewed by the County to ensure consistency with all applicable San Bernardino County ordinances, standards, and requirements. Additionally, the County finds that the description of the proposed Project, as presented in DREIR Section 2.0, provides an adequate level of detail that will enable County decisionmakers to make an informed decision regarding the Project and its potential environmental consequences. This comment does not identify any specific deficiencies in the description of the proposed Project, and fails to identify how the proposed Project is inconsistent with Code standards related to overlay areas. The proposed Project would not result in any impacts to drainage courses, as the Project would not be implemented until after completion of the Rimforest Storm Drain project. Additionally, the Project would preserve approximately 50% of the Project site as natural open space, and would therefore preserve sensitive natural terrain on site. No revisions to the DREIR are required in order to respond to this comment.

10-16:

The slope of “10% or less” noted in this comment refers to one of the criteria the County uses when deciding which properties to zone Community Industrial (IC). The Project site is zoned IC in the existing condition, indicating the County’s acceptance of this zoning classification on the Project site. Nowhere in the County’s Development Code, Chapter 82.06, “Industrial and Special Purpose Land Use Zoning Districts,” is there a development standard that applies to the IC zoning classification to limit development in areas having less than 10% slope.

10-17:

The Project’s impacts to biological resources are addressed in DREIR Section 3.C, *Biological Resources*. DREIR page 3.C-23 discloses that approximately 0.10-acre of streambed/riparian and 0.05-acre of non-wetland jurisdictional waters are located within the Project site. However, the proposed Project would not be implemented prior to completion of the County’s Rimforest Storm Drain Project, and the Project would therefore not result in any impacts to jurisdictional waters or wetlands. DREIR Section 3.0 also provides discussion regarding the special status species that have the potential to occur on the Project site, which is supported by evidence within the Project’s habitat assessment. The Project’s habitat assessment, dated July 2018, is provided as DREIR *Technical Appendix C*, and provides recent surveys of special status species that have the potential to be located on the Project site. DREIR page 3.C-23 provides a discussion regarding the Project’s impacts to wildlife corridors and concludes that the Project’s open space areas would abut the existing wildlife corridor’s eastern boundary, which would continue to provide wildlife movement opportunities. Groundwater conditions are described in DREIR Section 3.F, which notes that groundwater at the site is anticipated to consist of insignificant amounts of perched water and limited amounts of water within the fractures of the bedrock, and indicates that no groundwater extraction is proposed by the Project. This comment does not identify any specific deficiencies with the DREIR’s analysis of impacts to hydrology and



water quality, which the County finds provides an adequate description of the existing hydrologic setting of the Project site and surrounding areas. The DREIR has been revised to disclose that the Project would be developed following the completion of the County's Rimforest Storm Drain Project.

10-18:

The description of CEQA case law with respect to project descriptions is acknowledged. The Project Description contained in DREIR Section 2.0 provides a description of the proposed Project at a level of detail that is commensurate with the level of detail contained in the Project's application materials, and meets all of the requirements of CEQA Guidelines § 15124. Depictions of the Project's potential effects to visual quality from public viewing areas are presented in DREIR Figures 3.A-2 through 3.A-4. The proposed buildings would be constructed in a manner consistent with the County's Development Code requirements, including standards related to building height. The DREIR appropriately relies upon compliance with applicable standards, as future implementing permits would not be issued by the County if they were found to be in conflict with the Development Code. Any exceptions of the Development Code requirements would occur in a manner set forth by the Development Code. No revisions to the DREIR are required in order to respond to this comment.

10-19:

An updated Foresters Report has been prepared for the Project site, prepared by Timothy D. Morin, RPF #2505, and is included as Attachment A to this response. The updated report does not affect the findings or conclusions of the DREIR with respect to the removal of trees from the site. The Church of the Woods has been carefully managing the native trees on the Project site with input and oversight of both federal and State forestry agencies for the past 15 years. The DREIR acknowledges that tree removal would occur within the development footprint of the Project as an inherent part of the Project's construction, the effects of which are evaluated throughout the DREIR.

10-20:

In response to this comment, changes to the DREIR have been made to clarify that the proposed Project and Reduced Project Alternative both do not include an amphitheater or a trail. The revisions made are indicated in Section F.3, *Additions, Corrections, and Revisions*, of this Final EIR.

10-21.A:

The DREIR describes the existing condition of the Project site as containing trees and indicates that tree removals will occur in the Project's development footprint as part of Project-related construction. The removal of trees associated with the Project's construction is an inherent part of the proposed Project evaluated in the DREIR and is evaluated as such throughout the environmental analyses contained DREIR, particularly but not exclusively in DREIR Section 3.C, *Biological Resources*. Development Code § 88.01.090 is titled "Tree Protection from Insects and Disease" and addresses felled trees that are cut and left exposed on a property for more than 15 days. The Project is required by law to comply with the County's Development Code, inclusive of § 88.01.090, and the method(s) that the Project will employ to mandatorily comply with § 88.01.090 will be determined in conjunction with the issuance of grading permits.



10-21.B:

It is reasonably foreseeable that special events may include weddings, funerals, meetings, sport tournaments, and other gatherings that would be typical of a church facility that provides a recreational field. It would be speculative for the DREIR to include a listing of every special event that may ever occur at the Project site, and the DREIR, specifically Table 2-4, contains enough information about the Project's intended uses to allow a complete evaluation and review of its potential environmental impacts.

10-21.C:

The Project's conceptual landscape plan is presented on DREIR Figure 2-8, while DREIR Section 2.0 contains a description of the Project's proposed drainage plan. Measures to address erosion and storm water are governed by federal and State law, including compliance with NPDES permitting requirements, and would occur as part of the required Project-specific, design level SWPPP and WQMP. Refer to Response 10-21.A regarding tree removal.

10-21.D:

Fencing and walls as proposed by the Project would be confined to the proposed development areas in the southern portions of the site, and the on-site open space areas would not be fenced or walled off from open space areas off site.

10-22:

The DREIR includes an accurate, stable, and consistent description of the proposed Project. The Project Description contained in DREIR Section 2.0 provides a description of the proposed Project at an appropriate level of detail that is commensurate with the level of detail contained in the Project's application materials on file with the County, and contains sufficient specific information about the Project to allow a complete evaluation and review of its potential environmental impacts. The Project Description included in the DREIR also meets all of the requirements of CEQA Guidelines § 15124.

10-23:

Comments describing CEQA case law and requirements are acknowledged. However, for the reasons stated in the following responses, the County finds that the DREIR adequately evaluates and discloses the Project's impacts to transportation and circulation, public health and safety, biological resources, and hydrology, and that the DREIR includes an adequate discussion of the Project's potential cumulative effects. Refer to the individual responses to the comments raised by this letter, below.

10-24:

The Project's weekday trip generation including the 600-seat church and soccer field would generate 7 a.m. peak hour trips and 34 p.m. peak hour trips based on rates from ITE's Trip Generation (10th Edition). The trip generation is included below. Consistent with the San Bernardino County Transportation Authority's Guidelines for CMP Traffic Impact Analysis Reports in San Bernardino County, the analysis of off-site intersections at which the Project is forecast to add 50 or more peak hour trips were included in the Traffic Impact Analysis (TIA) (see DREIR *Technical Appendix H*). Since the weekday a.m. and p.m. peak hours do



not add 50 or more peak hour trips to any CMP facility or Caltrans facility, the weekday a.m. and p.m. peak hours were not included in the TIA and impacts during weekdays would be less than significant.

Table A - Project Trip Generation

Land Use	Units	AM			PM			Daily
		In	Out	Total	In	Out	Total	
Soccer Complex	1 Field ¹							
Trip Generation Rates ²		0.475	0.515	0.99	6.736	9.694	16.430	71.330
PCE Inbound/Outbound Splits		48%	52%	100%	41%	59%	100%	50%/50%
Trip Generation		0	1	1	7	10	16	71
Church	600 Seats ²							
Trip Generation Rates ²		0.005	0.005	0.010	0.015	0.015	0.030	0.440
PCE Inbound/Outbound Splits		50%	50%	100%	50%	50%	100%	50%/50%
Trip Generation		3	3	6	9	9	18	264
Total Trip Generation		3	4	7	16	19	34	335

¹ Rates based on peak hour of the generator for Land Use 488 "Soccer Complex" from Institute of Transportation Engineers (ITE) *Trip Generation*, (10th Edition).

² Rates based on peak hour of the generator for Land Use 560 "Church" from ITE *Trip Generation*, (10th Edition).

10-25:

Consistent with the San Bernardino County Transportation Authority’s Guidelines for CMP Traffic Impact Analysis Reports in San Bernardino County, the analysis of off-site intersections at which the Project is forecast to add 50 or more peak hour trips were included in the TIA. As stated earlier, the weekday activities based on a 600-seat church is likely to generate fewer than 50 peak hour trips. Since the weekday a.m. and p.m. peak hours do not add at 50 or more peak hour trips to any CMP facility or Caltrans facility, the weekday a.m. and p.m. peak hours were not included in the TIA and impacts during weekdays would be less than significant.

10-26:

As stated in Section 4.4 of the Project’s TIA (DREIR *Technical Appendix H*), Year 2040 peak hour volumes were developed by applying an annual growth rate from 2017 to 2040 to the existing volumes at each study intersection. The growth rate was applied for 23 years (2017 to 2040) not 5 years. Only at turning movements where the 2040 volumes were less than cumulative volumes was a growth factor of 5 percent applied to the higher cumulative volumes. This is due to some cumulative projects not being included in the SBTAM or modeled differently. Because growth generally occurs due to additional land development, this is an acceptable and commonly used forecasting methodology.

10-27:

As stated in Section 4.4 of the Project’s TIA (DREIR *Technical Appendix H*), Year 2040 peak hour volumes were developed by applying an annual growth rate from 2017 to 2040 to the existing volumes at each study



intersection based on the SBTAM. The growth rate was applied for 23 years (2017 to 2040) not 5 years. Only at turning movements where the 2040 volumes were less than cumulative volumes was a growth factor of 5 percent applied to the higher cumulative volumes. This is due to some cumulative projects not being included in the SBTAM or modeled differently. Since growth generally occurs due to additional land development, this is an acceptable and commonly used forecasting methodology. As such, the DREIR assumes a reasonable growth rates for forecasting the 2040 conditions. Furthermore, and consistent with the San Bernardino County Transportation Authority's Guidelines for CMP Traffic Impact Analysis Reports in San Bernardino County, the analysis of traffic operations and LOS was provided for existing, opening year, and year 2040 conditions in the Project's TIA. An analysis of interim years between a project's opening year and the horizon year is not required nor is it necessary to enable informed decision-making with respect to the Project's impacts to transportation and traffic.

10-28:

The saturation flow rates and other analysis parameters used in the Project's TIA (DREIR *Technical Appendix H*) are based on the Highway Capacity Manual, which uses survey data from the entire United States (including areas with rain, fog, snow, and sun). While it is correct that winter conditions and lower visibility result in slowing of traffic, the background (without Project) traffic is also slowed down. Therefore, on an incremental basis, the Project's impacts remain unchanged under winter and summer conditions.

10-29:

Comments describing CEQA's requirements for mitigation are acknowledged. The County finds, however, that the DREIR fully complies with CEQA and the CEQA Guidelines. Refer to the individual responses to the comments raised by this comment letter, below.

10-30:

The intersections referenced by this comment are under the jurisdiction of Caltrans, and not the County of San Bernardino. The County has no authority to compel or require other agencies to enact mitigation measures or to approve the construction of improvements. Notwithstanding, if approved by Caltrans the Project Applicant would be obligated to construct traffic signals at the intersections of Bear Springs Road at State Route 198 and Pine Avenue at SR-18 prior to the issuance of an occupancy permit for the Project. Thus, the commenter is incorrect in alleging that the Project offers no mitigation for its significant impacts to transportation and traffic. As the DREIR goes on to note, however, the timing of the improvement is outside of the control of the Project Applicant and the County of San Bernardino. As a result, and as authorized by the CEQA Guidelines, the DREIR concluded that these mitigation measures would not be feasible and that the impact would be significant and unavoidable. With respect to cumulatively-considerable impacts, CEQA requires that a project's mitigation must be roughly proportional to the project's significant environmental effects. Because the Project would contribute to but would not directly cause the projected LOS deficiencies at Intersection Nos. 8, 10, 11, 17, and 18, the Project's impacts to these intersections would be cumulatively considerable. It would not be "roughly proportional" to require the Project Applicant to implement and bear the full cost of improvements that are only warranted with traffic from cumulative development. Because there is no regional funding program for transportation improvements, and because Caltrans does not have a mitigation fee program in place, the DREIR makes a good-faith effort to impose mitigation requiring payment of the Project's fair share of fees towards the cost of required improvements, should Caltrans establish such a mitigation program prior to Project occupancy. It is acknowledged by the County that such mitigation ultimately may not occur because the County cannot compel Caltrans to adopt such a fee program. In fact, the DREIR



discloses that the Project would result in cumulatively-considerable and unavoidable impacts to transportation and traffic precisely because the County cannot compel Caltrans to establish a funding mechanism as would be necessary to reduce the Project's cumulatively-considerable impacts to transportation and traffic to below a level of significance. The DREIR also concluded that these mitigation measures would not be feasible and the impact would be significant and unavoidable. Accordingly, the County finds that the DREIR fulfills CEQA's requirements for evaluating environmental impacts and imposing appropriate and proportional mitigation measures to address such impacts. No revisions to the DREIR are required in order to respond to this comment.

10-31:

The commenter is correct that the Project would require the widening of SR-18 for approximately 600 feet along the Project's frontage and the installation of a traffic signal at the Project's access from SR-18, which would require approval from Caltrans before the Project can be implemented. If Caltrans does not approve the Project's frontage improvements, then revisions to the Project would be required that may be subject to additional CEQA review; however, at this time, the County has no reason to believe that the proposed improvements would not be approved by Caltrans. With respect to mitigation for the Project's direct and cumulatively-considerable impacts to transportation and traffic, the DREIR imposes mitigation, including requirements to install traffic signals and to pay a fair share towards the cost of improvements needed with traffic from cumulative developments. As specified in DREIR Mitigation Measures 3.I-1 and 3.I-2, the Project Applicant is required to make a good faith effort towards fulfilling the required mitigation. With respect to the installation of traffic signals at Intersection Nos. 4 and 18 pursuant to Mitigation Measure 3.I-1, the County cannot compel the Caltrans to approve the required improvements. As discussed in the DREIR, however, the timing and implementation of the improvements is outside of the control of the Project Applicant and the County of San Bernardino and the DREIR concluded that mitigation measures are infeasible and the traffic impacts are significant and unavoidable. As a result, if Caltrans disapproves of the mitigation requiring the installation of traffic signals at Intersection Nos. 4 and 18, and/or if Caltrans does not establish a fee program for the Project's cumulatively-considerable impacts, then the Project would be allowed to proceed without implementation of the required traffic signals and/or payment of fair-share fees for cumulatively-considerable impacts. For this reason, the DREIR identifies the Project's direct and cumulatively-considerable impacts to transportation and traffic as significant and unavoidable. No revisions to the DREIR are required in order to respond to this comment.

10-32:

The cited provisions of the CEQA Guidelines and CEQA case law are acknowledged; these comments do not raise any specific concerns related to the DREIR. No revisions to the DREIR are required to respond to this comment.

10-33:

The County acknowledges its role under CEQA to mitigate significant environmental effects where feasible, and all feasible mitigation measures have been applied to address the Project's significant and unavoidable environmental effects. This comment does not offer any feasible mitigation measures that would reduce the Project's direct and cumulatively-considerable traffic impacts to below a level of significance. Reducing the number of parking spaces is a potentially successful measure for reducing traffic in urban areas where alternative modes of transportation other than by personal vehicle are available and ample, such as car-sharing programs, public transit, and comprehensive pedestrian and bicycle networks; however, the Project site is not



located in an urban area and there is no evidence in this comment to demonstrate that a reduction in parking spaces in a non-urban environment would result in an actual decrease in the amount of traffic that would be generated. The number of parking spaces proposed is based on the Applicant's assessment of parking needs, which is more than the minimum required by the County Development Code requirements; the Development Code does not specify a maximum requirement. If a smaller parking lot were to be provided, it would be more likely that the same number of vehicles would be attracted to the Church of the Woods, resulting in parking congestion and potential congestion on SR-18 and at the Project's access driveway at SR-18 from vehicles queuing while waiting to enter the site to find a parking space.

10-34:

The County acknowledges that the Church of Woods could add bus stop at the interior of the Project site, however, the Mountain Transit route (RIM OTM (Off the Mountain) Route 6) does not run on Sundays, which is when the vast majority of the Project's traffic is generated. As such, this proposed mitigation measure would not be feasible. Regarding the commenter's other suggestions, the County has not imposed them as mitigation because CEQA Guidelines § 15091 provides that mitigation measures must be within the responsibility and jurisdiction of the lead agency and have a proportional nexus to the Project's impact on the environment. The County has no authority or enforcement capacity to compel the Church of the Woods to conduct raffles, offer a private shuttle service, to educate its visitors on public transit opportunities, or to fund public transit. Also, even if the Church of the Woods voluntarily undertook any of these efforts, there is no evidence to suggest that visitors to the Church of the Woods would actually use the transit system or use it in any volume that would result in a measurable reduction in vehicular traffic.

10-35:

The County acknowledges that the Church of Woods could add bicycle racks on the interior of the Project site. As such, the County will add a condition of approval to the Project's CUP to require the installation of bicycle racks at the assembly building and the recreational field. Regarding the commenter's other suggestions, the County has not imposed them as mitigation because CEQA Guidelines § 15091 provides that mitigation measures must be within the responsibility and jurisdiction of the lead agency and have a proportional nexus to the Project's impact on the environment. The County has no authority or enforcement capacity to compel the Church of the Woods to organize a bike-to-church day, provide for bicycle repair, or provide bicycles. Also, even if the Church of the Woods voluntarily undertook any of these efforts, there is no evidence to suggest that visitors to the Church of the Woods would actually bike to and from the site, or do so in any volume that would result in a measurable reduction in traffic.

10-36:

Please refer to Responses to Comments 10-34 and 35.

10-37:

To assure that construction traffic would result in a less-than-significant impact, the County has added the following mitigation measure to Subsection 3.I.8 and the addition is indicated in Section F.3, *Additions, Corrections, and Revisions*, of this Final EIR:

MM 3.I-3 During the hours of 7 a.m. to 9 a.m. and 4 p.m. to 6 p.m., construction traffic shall be minimized. No more than 50 total passenger-car-equivalent trips per hour (inbound and



outbound combined) may enter or exit the construction site during these periods. The construction contractor shall be responsible for monitoring the entries and exits during these time periods to ensure compliance and permit periodic inspection of the construction site by the County of San Bernardino or its designee to further ensure compliance. A requirement to comply with this restriction shall be noted on all construction documents and also shall be specified in bid documents issued to prospective construction contractors. Passenger-car-equivalents shall be counted as follows:

- Passenger Vehicle – 1 PCE
- 2 Axle Truck – 1.5 PCE
- 3 Axle Truck – 2 PCE
- 4+ Axle Truck – 3 PCE

10-38:

To address construction traffic, the County has added the following mitigation measure to Subsection 3.I.8 and the addition is indicated in Section F.3 of this Final EIR:

MM 3.I-4 Prior to the issuance of grading permits, building permits, or improvement plans for frontage improvements along SR-18, the Project Applicant shall prepare and the County of San Bernardino shall approve a temporary traffic control plan. The temporary traffic control plan shall comply with the applicable requirements of the California Manual on Uniform Traffic Control Devices. A requirement to comply with the temporary traffic control plan shall be noted on all construction documents and also shall be specified in bid documents issued to prospective construction contractors.

10-39:

Construction staging areas are proposed to be accommodated on the interior of the site. For assurance, the County has added the following mitigation measure to Subsection 3.I.8 and the addition is indicated in Section F.3 of this Final EIR:

MM 3.I-5 All heavy-duty construction equipment and vehicles shall be staged interior to the construction site. The parking or storage of construction equipment and vehicles on SR-18 is prohibited. The construction contractor shall be responsible for ensuring compliance and permit periodic inspection of the construction site by the County of San Bernardino or its designee to further ensure compliance. A requirement to comply with this provision shall be noted on all construction documents and also shall be specified in bid documents issued to prospective construction contractors.

10-40:

Based on the Traffic Injury Mapping System (TIMS), there were six accidents near the Project site between 2011 and 2015. The reasons varied, including unsafe speeds, DUI, right of way violations, and driving on the wrong side of the roadway. The accident data also reveals that there is no merit in the assertion that safety is compromised during winter and snow conditions as a majority of the reported accidents along the nearby segments of SR-18 were during non-snow conditions. This comment provides no substantial evidence that the



Project would compromise traffic safety. As noted in DREIR Subsection 2.4.1.A.3 (DREIR page 2-19), the Project Applicant proposes to widen the northern side of SR-18 for an approximately 600-foot segment of the roadway along the Project site's frontage adjacent to the access driveway (approximately 300 feet in each direction from the driveway) by 26 feet to accommodate an eastbound left-turn lane and a westbound deceleration/acceleration lane and install a traffic signal at the Project's driveway intersection with SR-18 as a means of safe traffic control to enter and exit the site. Please refer to Response to Comment 10-41 for additional information.

10-41:

The Project includes the proposed installation of a traffic signal at that intersection of the Project's driveway with SR-18. Based on AASHTO's *A Policy on Geometric Design of Highways and Streets*, the stopping sight distance on a roadway with a speed of 35 miles per hour is 287 feet on a 9% downgrade and 222 feet on a 9% upgrade. Based on review of the site plan (DREIR Figure 2-7 on DREIR p. 2-18), the new traffic signal on SR-18 will include 300 feet of stopping sight distance approaching from the west (downgrade) and over 300 feet of stopping sight distance from the east (upgrade). Therefore, there is adequate stopping sight distance between the Project's proposed driveway and curves on SR-18.

10-42:

Bicycle-involved collisions near the Project site were documented in the Rim of the World Active Transportation Plan (March 2018)¹ and shows that over a ten-year period from 2006 to 2016, of the 34 bicycle-involved collisions in the Rim of the World, two collisions occurred on SR-18 near the Project site. The Project does not propose any changes to the roadway network that would worsen bicycle safety or operations. Widening of SR-18 by 26 feet along the Project site's frontage to widen the northern side of SR-18 for an approximately 600-foot segment adjacent to the access driveway (approximately 300 feet in each direction from the driveway) to accommodate an eastbound left-turn lane and a westbound deceleration/acceleration lane would provide additional room for bicyclists. Refer to Response to Comment 10-41 for information regarding safety of the Project's proposed driveway intersection with SR-18. Bicyclists are required to follow the same rules of the road as vehicles, and vehicles are required by the California Vehicle Code, "Three Feet for Safety Act" (CVC 21670) to provide a three feet buffer between his/her vehicle and the bicycle when passing; and, a driver who is unable to provide the minimum three-foot passing distance due to traffic or roadway conditions is required to (1) slow to a reasonable and prudent speed when passing and (2) only pass when doing so would not endanger the safety of the bicyclist.²

10-43:

The County finds that the Project's revised Evacuation Plan, included in the FEIR as *Technical Appendix E1*, provides substantial evidence that emergency egress from the Project site and local area can be accomplished in a manner that provides for the safety of both Project occupants and the surrounding community. In the event of a wildland fire in the area, the Project site would most likely be utilized as an evacuation center, as the Project's expansive irrigated open space areas would provide opportunities for sheltering in place, similar to the high school or middle school. The proposed sports field and large open areas within the Project site could be used to stage people, cars, and fire trucks. Furthermore, the amount of traffic along SR-18 during an

¹ <http://www.rim-rec.org/files/b08889d3c/Rim-of-the-World-ATP-FINAL-DRAFT-2018-03-13.pdf>

² http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?sectionNum=21760.&lawCode=VEH



emergency would not substantially increase, if at all, as a result of the Project because worshipers and other patrons of the Project are likely to reside in the local area and would utilize the same evacuation routes with or without the proposed Project, including SR-18. No revisions to the DREIR are required in order to respond to this comment.

10-44:

Please refer to Response to Comment 10-43 regarding the Project site's likely utilization as an evacuation center as a benefit to the community in the event of a wildfire. As noted on the Project's site plan (DREIR Figure 2-7), the Project would accommodate a total of 311 parking spaces; thus, under the hypothetical scenario in which the site does not serve the community as an evacuation center, the parking lot is 100% full, and a complete evacuation is necessary, it is assumed that 311 vehicles would need to exit the site. Although hypothetical, the County acknowledges that an emergency evacuation from the site is plausible in general terms, and thus this response includes a general discussion of the environmental effects of an evacuation scenario in general terms and not include a detailed analysis for the hypothetical scenario. In an emergency evacuation of the site, both the inbound and outbound lanes of the Project's driveway would be made available for outbound traffic to expedite an evacuation, and the traffic signal at the Project's driveway at SR-18 would be overridden to set to "blink," or emergency management personnel would be positioned at the intersection to direct traffic in a safe and expeditious manner. As stated in Response to Comment 10-43, the amount of traffic using SR-18 during an emergency would not substantially increase, if at all, as a result of the Project because worshipers and other patrons of the Project are likely to reside in the local area and would utilize the same evacuation routes with or without the proposed Project, including SR-18. Thus, the need for an emergency evacuation of the site would not result in significant impacts on the environment. No revisions to the DREIR are required in order to respond to this comment.

10-45:

As stated in Response to Comment 10-43, the amount of traffic using SR-18 during an emergency would not substantially increase, if at all, as a result of the Project because worshipers and other patrons of the Project are likely to reside in the local area and would utilize the same evacuation routes with or without the proposed Project, including SR-18. The number of non-Project vehicles using SR-18 during an evacuation would be mere speculation because it would depend on the type of emergency, where it occurs, and how the evacuation is conducted. Further, during an evacuation scenario, it is likely that inbound traffic would be restricted to emergency vehicles only, with both inbound and outbound lanes of the Project's entry driveway made available for outbound traffic. There is no evidence to suggest that there would be significant impacts to the environment resulting from the Project during an evacuation.

10-46:

Please refer to Responses to Comments 10-44 and 10-55.

10-47:

Refer to the Project's revised Evacuation Plan, included in the Final EIR as *Technical Appendix E1*, which provides substantial evidence that safe emergency egress from the Project site can be accomplished. The Evacuation Plan addresses convection-driven fires (non-Santa Ana wind driven), Santa Ana wind driven fires with winds from the northwest, and with winds from the northeast, as well as fires burning from the south, southeast, or southwest.



10-48:

The County acknowledges the description of fire risks in the local area as described in this comment. DREIR Subsection 3.E.1.1, *Wildland Fire Hazard*, also includes a discussion of the wildland fire hazard risks in the Project area. As discussed in FEIR Subsection 3.E.5, *Project Features*, the Project is designed to meet the San Bernardino County Fire Department (SBCFD) standards for fire protection, and incorporates fuel modification zones (FMZs). In order to comply with San Bernardino County requirements for fire hazard control, fuel modification zones (FMZs) would be established around buildings on the developed portions of the Project site. FMZ 1 is required to extend to 10 feet from buildings and FMZ 2 is required to extend to 30 feet from buildings, and no FMZ 1 or 2 areas would occur beyond the Project's limits of grading. FMZ 3 is required to extend 200 feet from the Project's proposed on-site buildings, which would all occur within the Project's limits of grading with the exception of approximately 0.66 acres that would extend into areas of the site beyond the limits of grading. In these FMZ 3 areas, all dead logs, branches, litter, and decaying organic material (i.e., leaves, needles, and woody material) would be removed from the ground. Standing dead material, stems, vines, and non-productive trees also would be removed from FMZ 3. Thinning and pruning of trees and shrubs would also occur within FMZ 3, and ongoing periodic maintenance would be required in the FMZ 3 area to ensure that the conditions of this zone are met.

The Project also would be subject to compliance with water main, fire hydrant and fire flow standards, fire sprinklers and fire alarm system requirements, approved emergency/evacuation road access plans, an Evacuation Plan, and a host of other requirements to support compliance with the Uniform Fire Code, the Fire Safety (FS) Overlay, and all applicable statutes, codes, ordinances, and conditions of the SBCFD. Refer to DREIR *Technical Appendix E2* for a copy of the Project's conditions and requirements pertaining to wildfire protection. The County finds that compliance with these requirements, as would be enforced by the County and the SBCFD, would provide for an appropriate level of safety for future structures and occupants of the Project in the event of wildland fire hazards.

Furthermore, the Project would not result in an increase in wildfires due to "increased ignitions from the Project" as alleged by this comment. There is no evidence that the Church of the Woods campus development would result in increased risks of arson. The burning of debris is regulated by the SBCFD and is not anticipated with development of the Project as proposed. Fire risks from cigarettes and outdoor cooking would be no different from these and other human activities that occur in and around the San Bernardino National Forest and, as previously described, FMZs would be located on the property to provide appropriate fuel modification. Although not anticipated with development of the site, fireworks would not be allowed without appropriate permits, including permits from the SBCFD, which would require appropriate safety measures to preclude fire hazards. Additionally, should any structure fire occur on the site, it is unlikely to spread to off-site areas due to the incorporation of on-site fire protection measures (fire sprinklers, hydrants, etc.) and the FMZs located around the buildings as described above. No revisions to the DREIR are required in order to respond to this comment.

10-49:

The Project site's hydrologic setting is described in DREIR Subsection 3.F.1. Item C provides a discussion regarding the Project site's on-site hydrologic setting, which includes details of the on-site natural drainage course (DREIR 3.F-2). Thus, the DREIR includes the hydrologic setting requested by this comment. No revisions to the DREIR are required to respond to this comment.



10-50:

The Project's Engineering Geology and Soils Investigation (DREIR *Technical Appendix D*) concludes that the groundwater at the site is anticipated to consist of insignificant amounts of perched water and limited amounts of water within the fractures of the bedrock. Thus, the Project site does not serve as an important recharge zone for groundwater under existing conditions. Moreover, and as discussed in DREIR Section 3.F, only approximately 25% of the entire Project site would consist of impervious surfaces in the proposed condition. The developed portion of the Project site would consist of 50% permeable and 50% impervious surfaces. Initial "first flush" flows would be directed to grassy swales within the landscaped areas. The landscaped areas and athletic field would act as infiltration beds to mitigate the increased runoff due to the impervious areas. As such, no drainage outlets would be needed for these areas. These landscaped areas would facilitate the process of groundwater recharge similar to the existing conditions before the remaining flows are conveyed to the natural drainage system that occurs within the center of the Project site. Furthermore, the hard, non-porous nature of the underlying bedrock at the Project site tends to abate groundwater flows, with the exception of limited amounts of water perched over the bedrock or found within the fractures of the bedrock.

With respect to the rate of runoff, and as disclosed in DREIR Section 3.F, the total area that encompasses the off-site and on-site drainage areas would result in a slight increase in the peak rate of runoff to 551.39 cfs from 550.15 cfs as compared to the undeveloped conditions, which represents a 1.24 cfs increase within the total drainage area. This represents a nominal increase of 0.002% as compared to existing conditions and due to the small amount, would not significantly affect groundwater recharge.

The analyses of Thresholds c., d., and e. in DREIR Section 3.F also include an assessment of potential impacts associated with changed drainage patterns on site. The Project would not be implemented prior to completion of the Rimforest Storm Drain project, and the Project would have only minor changes to the site's existing drainage patterns. Impacts to the spring would occur as part of the Rimforest Storm Drain project, and would be mitigated in accordance with the Rimforest Storm Drain Project EIR that was certified by the San Bernardino County Board of Supervisors on May 23, 2017 (SCH No. 2015051070). Runoff would be conveyed to bioretention basins for water quality treatment and detention prior to being discharged into the facilities to be constructed as part of the Rimforest Storm Drain project. As documented in DREIR Section 3.C, the Project would not result in any direct or indirect impacts to gates or wetlands.

10-51:

The DREIR has been revised to indicate that the proposed Project would not be implemented prior to completion of the Rimforest Storm Drain project. As discussed in FEIR Section 3.C, the Project would not result in any impacts to jurisdictional waters or wetlands. Thus, this comment is no longer applicable to the proposed Project.

10-52:

As noted in the Response to Comment 3-11, approximately 2.97 acres of the southeastern portion of the Project site drains into the Caltrans right-of-way. With buildout of the Project, there would be 2.10 acres that would drain to the Caltrans right-of-way. Of this area, 1.58 acres would remain in its natural condition. These areas undeveloped and developed are shown in the Addendum to Drainage Study appended to this FEIR as *Technical Appendix F1*. The commenter expresses concern that stormwater runoff from the Project could increase flow to an area above a mapped landslide, thereby possibly increasing groundwater flow above the landslide and increasing the landslide potential. As proposed by the Project, all collected and diverted stormwaters would be



directed toward approved drainage devices, including the on-site bioretention basin, and would not exacerbate the landslide potential.

10-53:

DREIR Section 3.C includes a detailed analysis of the Project's potential impacts to biological resources, in conformance with the requirements of CEQA. Refer to the Responses to Comments 10-54 through 10-63.

10-54:

The DREIR does not rely on outdated protocol surveys. The Project's Habitat Assessment, dated July 2018, is provided as DREIR *Technical Appendix C*, and provides recent surveys of special status species and habitats that are or have the potential to be located on the Project site. Focused or protocol surveys for sensitive species may be used to determine the presence or absence of that species within the survey boundaries. However, there are several species where even a strict adherence to conducting protocol surveys may not provide a reasonable determination whether the species is present on a site or not. Such species as California tiger salamander and Mohave ground squirrel are seldom seen either during favorable years and USFWS and CDFW will often not accept negative surveys as sufficient evidence of absence from a site. Instead, these agencies require an assumption that the species is present and requires project applicants to work with the agencies to determine mitigation based on the potential presence and the quality of the existing habitat for that species on the project site. Such is the case with SRB, an extremely secretive species that seldom emerges into open habitat where it can be seen. Following this accepted practice of assuming presence allows mitigation to be determined based on the suitability of onsite habitat based on the results of a suitability assessment of the site by a biologist certified to conduct protocol surveys for that species.

Using this methodology, areas with moderate or higher quality will be assumed to be occupied and mitigated through the acquisition of an Incidental Take Permit (ITP) from CDFW. The approach of assuming presence is commonly-accepted methodology and has been used by the County of San Bernardino and regulatory agencies for other projects in the area, including the deamination of potential impacts to the SRB at SkyPark at Santa's Village for which the County of San Bernardino certified an EIR (SCH No. 2015091001) and determined the extent of mitigation through the CDFW's ITP process. The same practice/methodology is appropriate for the Church of the Woods site and for determining mitigation for the loss of potentially occupied SRB habitat; SkyPark is located within the same vicinity (approximately 2.7 miles east of the Project site) and contains a similar environmental setting as compared to the Project site. As stated on DREIR page 3.C-20, only low-quality SRB habitat will be removed by the Church of the Woods development. The type of disturbance activities anticipated in FMZ 3 would be limited to the removal of dead or decaying vegetation and tree thinning and pruning. These types of fuel management activities in low-quality SRB habitat would not significantly impact the quality of the SRB habitat with the careful management of fuel management disturbance activities required through the CDFW's ITP process. Additionally, the DREIR identifies Mitigation Measure MM-3.C1(b) as a requirement of the Project, discussed in further detail on DREIR page 3.C-26, which requires that all high quality and moderate quality SRB habitat be permanently preserved onsite and managed in perpetuity by a CDFW-approved land management entity using a non-wasting endowment to fund management activities as reviewed and approved by CDFW through the ITP process. All management requirements are required to be documented in a Long-term Management Plan and submitted to CDFW as part of the application process for the ITP. Using this clearly defined, effective, and approved methodology, the Project's impacts to SRB (assumed to be present) will either be avoided or minimized, and a long-term management process put in place to provide permanent protection and in perpetuity management for potentially SRB-occupied habitat. Other sensitive species may occur on-site, including California spotted owl



(CSO) and San Bernardino Flying Squirrel (SBFS), would occur within the SRB habitat and the mitigation for the SRB also would mitigate impacts to habitat for these species. No revisions to the DREIR or DREIR *Technical Appendix C* are required in order to respond to this comment.

With respect to comments related to the 2010 Draft EIR, the County is exercising the discretion authorized by CEQA Guidelines § 15088.5(f)(1), specifically stating that it will not be responding to comments made during the public review of the 2010 Draft EIR.

10-55:

The wildlife movement corridor in question provides movement opportunities for small and large mammals to traverse the San Bernardino Mountains from north to south. As described by the DREIR, this corridor, the Strawberry Creek Corridor as designated by the San Bernardino County General Plan Open Space Element, is outside of the boundaries of the Church of the Woods Project site. The eastern boundary of the Strawberry Creek Corridor abuts the western boundary of the Project site, indicating minimal overlap. Given that the Project site is surrounded by natural plant communities and forest habitat, and because the Project would preserve the northern portions of the site, including most of the western Project boundary, as open space, it would be expected for wildlife to occasionally utilize the Church of the Woods property. Furthermore, the Project's Habitat Assessment, provided as DREIR *Technical Appendix C*, includes an assessment of habitats for sensitive species, including SRB, CSO, and SBFS, and areas planned for impact by the Project generally contain low quality habitat. Please refer also to the Response to Comment 7-14. No revisions to the DREIR are required to respond to this comment.

10-56:

The proposed Project would not be implemented prior to completion of the Rimforest Storm Drain project, and revisions to the DREIR have been made accordingly to reflect this fact in Section F.3, *Additions, Corrections, and Revisions*, of this FEIR. As documented in revised DREIR Section 3.C, the Project would not result in any direct or indirect impacts to jurisdictional waters and wetlands, including the spring referenced by this comment. Impacts to the spring would occur as part of the Rimforest Storm Drain project, and would be mitigated in accordance with the Rimforest Storm Drain Project EIR certified by the San Bernardino County Board of Supervisors on May 23, 2017 (SCH No. 2015051070). No revisions to the DREIR are required to respond to this comment.

10-57:

Sensitive habitats on site were mapped as part of the Project's Habitat Assessment (DREIR *Technical Appendix C*). Exhibit 6 of the Habitat Assessment depicts existing vegetation on site. Exhibit 8 of the Habitat Assessment depicts habitat suitability for the SRB, Exhibit 9 depicts the habitat suitability for the SBFS, and Exhibit 10 shows the habitat suitability for the CSO. With respect to jurisdictional waters and wetlands, the Project would not be implemented until completion of the Rimforest Storm Drain project. As such, the Project would have no impacts to jurisdictional waters or wetlands, as none will occur within the impact footprint for the Project. The proposed Project relates to the Rimforest Storm Drain project only in the sense that runoff from the proposed bioretention basin would be conveyed into the subsurface storm drain that would be constructed as part of the Rimforest Storm Drain project. There would be no impacts to jurisdictional waters or wetlands as a result of this subsurface connection, which would occur within areas planned for impact by the Project. No revisions to the DREIR are required to respond to this comment.



10-58:

Project impacts to biological resources are evaluated in DREIR Section 3.C. As discussed in Section 3.C, the Project's proposed development would occur within the southern and central portion of the Project site, which would result in the direct removal of common plant communities and common plant species from these portions of the Project site. Moreover, the DREIR discloses that the common plant community and species present on the Project site occur in large numbers throughout the region, and impacts would be less than significant as a result. With respect to sensitive habitats on site, Exhibit 8 of the Habitat Assessment (DREIR *Technical Appendix C*) depicts habitat suitability for the SRB, Exhibit 9 depicts the habitat suitability for the SBFS, and Exhibit 10 shows the habitat suitability for the CSO. As disclosed by the DREIR, development of the Project would result in the loss of approximately 8.64 acres of low-quality SRB habitat; approximately 2.56 acres of low-quality habitat and approximately 4.61 acres of moderate quality SBFS habitat; and approximately 2.56 acres of low-quality habitat and approximately 4.61 acres of moderate habitat for the CSO. DREIR Section 3.C also discloses that the Project site has a low potential to support the olive-sided flycatcher, purple martin, long-eared owl, bald eagle, California mountain kingsnake, and white-eared pocket mouse. Due to the low potential for these species to occur on site, impacts were determined to be less than significant. Furthermore, an estimation of the number of SRB, SBFS, or CSO individuals that would be impacted by the Project would be speculative given that the Project's impacts are identified in the DREIR based on suitable habitat for these species, and not based on the number of individuals occurring on site (see CEQA Guidelines § 15145). Refer also to the Response to Comment 10-54 for an explanation of why focused protocol surveys were not required for the Project. As such, the County finds that the DREIR properly identifies and discloses impacts to biological resources, including sensitive habitats and sensitive animal species, and no revisions to the DREIR are required to respond to this comment.

10-59:

Development as proposed by the Project would be concentrated in the southern portions of the Project site. The portions of the Project site that abut the off-site Strawberry Wildlife Corridor are proposed to be preserved as open space by the Project. Additionally, there would be large setbacks between buildings and natural open space areas due to internal circulation and fuel management areas. As described in the Noise Impact Assessment (DREIR *Technical Appendix G*), the noise levels generated from Project-related outdoor activities would be approximately 50 dBA L_{eq} (one hour) at 240 feet; therefore, long-term stationary noise from the sports field would not impact sensitive habitats on or adjacent to the Project site. The Project Applicant would be required to prepare and implement a SWPPP and WQMP as required by the County's NPDES permit, which would preclude indirect impacts due to drainage or water quality. All outdoor lighting would be shielded and directed on site in compliance with County Development Code § 83.07.040 (Glare and Outdoor Lighting – Mountain and Desert Regions). Furthermore, San Bernardino County Code § 83.10.070(b)(8) requires the avoidance of planting invasive species near conservation areas/reserves, and other open space areas because of the potential to cause harm to environmentally sensitive areas. As such, indirect impacts to biological resources would be less than significant. Refer also to Responses to Comments 10-59.A through 10-59.D.

10-59.A:

In response to this comment, San Bernardino County Code § 83.10.070(b)(8) requires avoiding the planting of invasive species near conservation areas/reserves, and other open space areas because of the potential to cause harm to environmentally sensitive areas. In regards to seed carry, the potential for invasive vegetation to be carried on to the Project site by vehicles and people would be no different from this same potential on all other properties used by human activities in and around the San Bernardino National Forest. As a large



majority of the patrons using the Project site are expected to come from the local area, there is no evidence to suggest that development of the Project site as proposed would introduce exotic vegetation into the area from people and vehicles carrying seed.

10-59.B:

The proposed Project would not be implemented prior to completion of the Rimforest Storm Drain project. All runoff from developed portions of the site would be conveyed to the proposed bioretention basin for detention and water quality treatment, and would then be discharged into the subsurface storm drain line to be constructed as part of the Rimforest Storm Drain project. Except for areas proposed for development by the Project, there would be no changes to topography or hydrology. As previously noted and as disclosed in DREIR Section 3.F, the total area that encompasses the off-site and on-site drainage areas would result in a slight increase in the peak rate of runoff to 551.39 cfs from 550.15 cfs as compared to the undeveloped conditions, which represents a 1.24 cfs increase. This represents a nominal increase of 0.002% as compared to existing conditions, which is not a large enough increase to cause significant environmental effects. As such, the Project would result in less-than-significant impacts to vegetation due to alterations of existing topography and hydrology. No revisions to the DREIR are required to respond to this comment.

10-59.C:

As noted in the Response to Comment 10-48, the Project is designed to meet the San Bernardino County Fire Department (SBCFD) standards for fire protection, and incorporates fuel modification zones (FMZs) that would extend for a distance of up to 200 feet from proposed structures. The Project also would be subject to compliance with water main, fire hydrant and fire flow standards, fire sprinklers and fire alarm system requirements, approved emergency/evacuation road access plans, an Evacuation Plan, and a host of other requirements to support compliance with the Uniform Fire Code, the Fire Safety (FS) Overlay, and all applicable statutes, codes, ordinances, and conditions of the SBCFD. As such, the Project would have a less-than-significant wildfire impact, resulting in a less-than-significant impact to wildlife caused by wildfire.

10-59.D:

No trails are proposed as part of the Project. Much of the Project site's open space area will be protected by a Conservation Easement (CE), established by several steps—selecting and quantifying the proposed conservation area, placing a Conservation Easement (CE) over the area that will provide for its permanent preservation, preparing a Long-term Management Plan that will be used by a CDFW approved land management entity, and setting up a non-wasting endowment based on the required funding needed for in perpetuity management as documented in a Property Action Report (PAR). All of these steps will be under the direct oversight and approval of CDFW as defined by § 2081 of the California Endangered Species Act. No significant indirect impacts associated with unauthorized trail use are expected due to the requirement for and implementation of a Long-term Management Plan managed by a CDFW-approved management entity.

10-60:

The requirement for pre-construction surveys is standard protocol for development on sites that have the potential to contain sensitive species, such as the Project site. Mitigation Measure MM-3.C1(a) includes enforceable measures that would be undertaken to avoid direct impacts to sensitive species that may be present on the site. Additionally, and as noted in the Response to Comment 10-54, the DREIR relies upon a habitat suitability assessment for determining impacts to sensitive species on the site because the species with potential



to occur on site, including the SRB, are not always detectable during focused protocol surveys. Thus, the DREIR conservatively assumes all moderate and high-quality habitat for SRB, SBFS, and CSO on the site is occupied. As disclosed by the DREIR, development of the Project would result in the removal of approximately 8.64 acres of low-quality SRB habitat; approximately 2.56 acres of low-quality habitat and approximately 4.61 acres of moderate quality SBFS habitat; and approximately 2.56 acres of low-quality habitat and approximately 4.61 acres of moderate habitat for the CSO. DREIR Mitigation Measure MM 3.C1(b) requires the Project Applicant to provide for the permanent preservation and management in perpetuity of 13.40 acres of onsite habitat that supports a total of 1.65 available onsite acres of high-quality SRB habitat, 2.18 acres of moderate quality SRB habitat, and 9.57 acres of low quality SRB habitat; 5.45 acres of moderate quality SBFS habitat and 7.95 acres of low-quality SBFS habitat; and 5.85 acres of moderate-quality CSO habitat and 7.55 acres of low-quality CSO habitat. Areas proposed for mitigation generally contain higher-quality habitat for the sensitive species with a potential to occur on site as compared to the lower-quality habitat that would be impacted by the Project. Furthermore, before any ground-disturbing activities can occur as part of the Project, the Project Applicant would be required to obtain an Incidental Take Permit (ITP) from CDFW. As part of the ITP process, CDFW will evaluate the adequacy of the Project's mitigation measures. The CDFW may or may not require additional mitigation as part of the ITP process. However, because the ITP process cannot be completed with the CDFW until after certification of the Project's EIR, it is not possible at this time to determine what, if any, additional mitigation may result from the ITP process. Furthermore, the ITP process is a regulatory requirement, and the commenter's statement that this process is deferred mitigation is specious and without merit. Courts have consistently held that it is sufficient to articulate specific performance criteria and make further approvals contingent of finding a way to meet them. (*Rialto Citizens for Responsible Growth v. City of Rialto* (2012) 208 Cal.App.4th 899, 944-945) Mitigation Measure MM-3.C1(b), however, goes above and beyond even this standard, with thorough performance criteria with regard to high, moderate and low quality habitat, the requirement for conservation easements and the consultation, coordination and approval of CDFW.. Accordingly, the County finds that the DREIR does not defer identification of feasible mitigation measures, but rather includes reasonable and enforceable mitigation requirements that address the Project's potentially significant impacts. No revisions to the DREIR are required to respond to this comment.

10-61:

As noted in the Response to Comment 10-54, the DREIR relies upon a habitat suitability assessment for determining impacts to sensitive species on the site because the species with potential to occur on site, including the SRB, are not always detectable during focused protocol surveys. Thus, and in accordance with CDFW requirements, the DREIR conservatively assumes all moderate and high-quality habitat for SRB, SBFS, and CSO on site is occupied, and the DREIR discloses the Project's impacts as including impacts to approximately 8.64 acres of low-quality SRB habitat; approximately 2.56 acres of low-quality habitat and approximately 4.61 acres of moderate quality SBFS habitat; and approximately 2.56 acres of low-quality habitat and approximately 4.61 acres of moderate habitat for the CSO. Thus, the analysis of the Project's potential impacts is not deferred. Furthermore, the requirement for pre-construction surveys is standard protocol for development on sites that have the potential to contain sensitive species, such as the Project site, and is a separate requirement from the Project's required ITP process with the CDFW. As noted in the Response to Comment 10-60, as part of the ITP process CDFW will evaluate the adequacy of the Project's mitigation measures. The CDFW may or may not require additional mitigation as part of the ITP process. However, because the ITP process cannot be completed with the CDFW until after certification of the Project's EIR, it is not possible at this time to determine what, if any, additional mitigation may result from the ITP process. It should be noted that any such additional mitigation would not need to occur on site, but rather could occur at an appropriate off-site location as may be required by the CDFW. Thus, no redesign of the Project would be needed as part of the ITP process.



10-62:

The DREIR has been revised to indicate that the proposed Project would not be implemented until the Rimforest Storm Drain project is complete. As such, Mitigation Measure MM-3.C2(c) has been removed from the DREIR as it is no longer applicable to the proposed Project. CEQA requires the Lead Agency to impose feasible mitigation even when the mitigation would not reduce a project's impacts to less-than-significant levels. The DREIR relies on mitigation measures that reduce the Project's impacts either to less-than-significant levels or to the maximum feasible extent, as required by CEQA. Furthermore, the DREIR does not solely rely on regulatory requirements except where those regulatory requirements have been demonstrated by the DREIR to reduce Project impacts to less-than-significant levels. No revisions to the DREIR are required to respond to this comment.

10-63:

DREIR Mitigation Measure MM-3.C1(b) requires that the 13.40 acres of onsite habitat to be preserved shall be maintained through the recordation of a CDFW-approved conservation easement, requires the selection of a CDFW-approved conservation management entity, and requires the funding of a "non-wasting" endowment that provides for the costs associated with any initial improvements and management actions as defined in the Long-Term Management Plan. Mitigation Measure MM-3.C1(b) provides specific performance-based criteria that will ensure the long-term conservation of the 13.40 acres of the site. It is not necessary to identify the specific entity that would be responsible for maintenance, as any such entities would require approval from CDFW. It is also not necessary to identify the costs of establishing or maintaining the endowment that would be required, as Mitigation Measure MM-3.C1(b) is clear in requiring that the endowment must be "non-wasting," meaning that available funds for maintenance shall not be depleted over time. The conservation of the northern portions of the Project site, including areas that abut the Strawberry Creek Corridor, would not result in impacts related to fragmentation and development edge, as these areas would abut natural open space areas to the north and west. The purpose of the conservation easement is to preserve the northern portions of the site as open space in perpetuity in order to provide habitat for sensitive species with a potential to occur on site. For these reasons, Mitigation Measure MM-3.C1(b) is not deferred mitigation as alleged by this comment.

10-64:

The DREIR's significance determinations regarding cumulative impacts were not based on whether the Project's impacts would be less than significant on a project-level basis. On the contrary, while DREIR Section 3.C concludes that the Project would result in less-than-significant direct impacts to SRB, SBFS, and CSO habitat following the incorporation of mitigation measures, DREIR Section 3.C concludes that the Project's impacts to SRB, SBFS, and CSO habitat would be cumulatively considerable and unavoidable even with incorporation of the required mitigation. Thus, the allegation that the DREIR based its cumulative impact conclusions on whether the Project would result in significant environmental effects is incorrect. With respect to DREIR Section 3.D, *Geology and Soils*, the cumulative impact analysis demonstrates that the only potential cumulatively-considerable impact is associated with erosion, as all other thresholds under this topic relate to site-specific conditions. The analysis in DREIR Section 3.D properly relies upon mandatory regulatory compliance with the County's NPDES permit in concluding that impacts due to erosion would be less than significant, as the NPDES program was specifically established to reduce water quality impacts, including sedimentation, associated with new and on-going developments. Similar considerations apply to the issue of water quality in DREIR Section 3.F, because all cumulative developments within the Project's watershed would be required to prepare and implement a WQMP and SWPPP in order to comply with the County's NPDES permit. Under CEQA, compliance with applicable regulatory standards can provide a basis for



determining that the project will not have a significant environmental impact. (*Tracy First v City of Tracy* (2009) 177 Cal.App.4th 912.) Additionally, the cumulative impact analysis in DREIR subsection 3.F.7 with respect to water supply is not based on regulatory compliance, but is instead based on the CLAWA UWMP, and demonstrates that the water demand created by the identified cumulative projects in addition to the proposed Project would be within the anticipated supply to be provided by CLAWA. As such, the County finds that the DREIR's analysis of cumulatively-considerable impacts fully complies with the requirements of CEQA.

10-65:

Refer to Response to Comment 10-64. The cumulative projects that were known to the County at the time that environmental analysis commenced for the proposed Project are listed in Table 3.0-1 of the DREIR. The County is not aware of a discretionary application for development that has been filed with the County for a project in Blue Jay.

10-66:

The DREIR has been revised to indicate that the Project would not be implemented prior to completion of the Rimforest Storm Drain project. Impacts associated with the Rimforest Storm Drain project were evaluated in the Rimforest Storm Drain Project EIR (SCH No. 2015051070), and the Rimforest Storm Drain project would be required to implement all mitigation measures identified in the EIR for that project, certified by the San Bernardino County Board of Supervisors on May 23, 2017. It is unclear from this comment how the Rimforest Storm Drain project and the proposed Project could result in cumulatively-considerable impacts to hydrology or water quality. The Rimforest Storm Drain project is intended to accommodate drainage flows from the surrounding area, inclusive of the Project site. The Project would convey drainage to a proposed on-site bioretention basin, which would then discharge into a storm drain to be constructed as part of the Rimforest Storm Drain project. As documented in DREIR Section 3.F, with implementation of the Project the total area that encompasses the off-site and on-site drainage areas would result in a slight increase in the peak rate of runoff to 551.39 cfs from 550.15 cfs as compared to the undeveloped conditions, which represents a 1.24 cfs increase within the total drainage area. This represents a nominal increase of 0.002% as compared to existing conditions. Thus, any cumulatively-considerable impacts associated with hydrology or drainage would be less than significant.

10-67:

Commenter is referred to the previous Responses to Comments regarding the adequacy of the DREIR's analysis and description of the proposed Project. As noted, the County finds that the DREIR's description of the Project and its attendant impacts fully comply with the requirements of CEQA. This comment does not identify any way in which the alternatives analysis presented in the DREIR is inadequate. As such, no revisions to the DREIR are required to respond to this comment.

10-68:

Commenter is referred to the analysis presented in DREIR Section 3.C, which concludes that the Project's impacts to southern rubber boa, San Bernardino flying squirrel, and California spotted owl habitat would be significant and unavoidable on a cumulative basis. The Project's unavoidable cumulatively-considerable impacts are in fact discussed in the analysis presented in DREIR Section 4.0. The DREIR presents two alternatives that would reduce these potential impacts as compared to the proposed Project, which are identified



as Alternative 1: No Project/No Build Alternative and Alternative 3: Reduced Project/Alternative Site Design Alternative. Additionally, DREIR Section 4.0 includes a discussion of alternative sites that were considered in the analysis, and were rejected for the reasons cited in the DREIR. Additionally, DREIR Section 3.E, *Hazards*, appropriately concludes that the Project's impacts due to wildland fire hazards and evacuation routes would be less than significant; thus, an analysis of an alternative that reduces such impacts is not required under CEQA. Regardless, both the No Project/No Build Alternative and Alternative Reduced Project/Alternative Site Design Alternative would serve to reduce or avoid the Project's less-than-significant impacts due to wildland fire hazards and emergency evacuations.

10-69:

The underlying purpose of the Project Applicant is to develop the property with church and recreational uses. As such, it is appropriate to identify the Applicant's fundamental goal as an alternative to the proposed Project, as is the case with Objective A. Objective A does not preclude the evaluation of alternatives; rather, it limits the range of alternatives that can be considered to those that would achieve the Applicant's underlying purpose to develop the property with church and recreational uses. In particular, the Reduced Project/Alternative Site Design Alternative (Alternative 3) considers development of the site in an alternative configuration while still providing for church and recreational uses. Additionally, Objective G was identified merely to ensure that the Project does not result in conflicts with the Rimforest Storm Drain project, and there are any number of alternatives that could be considered that are consistent with the Rimforest Storm Drain project. Accordingly, the County finds that the DREIR's list of objectives were not narrowly construed and allowed for consideration of a reasonable range of alternatives that would achieve the Applicant's underlying purpose. Furthermore, this comment does not identify any alternatives to the proposed Project that were not considered based on the Project's statement of objectives. As such, no revisions to the DREIR are required to respond to this comment.

10-70:

DREIR Section 4.0, *Alternatives*, provides analysis of three Project alternatives, which include the following: No Project/No Build Alternative, No Project/Feasible Development Alternative, and Reduced Project/Alternative Site Design Alternative. Both the No Project/Feasible Development Alternative and Reduce Project/Alternative Site Design Alternative would involve development of the Project site. The commenter fails to provide any feasible alternatives that would reduce the Project's impacts. The DREIR includes a reasonable range of alternatives that would reduce or avoid the Project's significant and unavoidable impacts to biological resources, land use, noise, and transportation/circulation, and the range of alternatives presented would foster informed decision making in full compliance with CEQA. No revisions to the DREIR are required in order to respond to this comment.

10-71:

DREIR Section 4.0 includes a discussion of alternative sites that were considered for analysis but were rejected from consideration for the reasons stated therein. Additionally, the use of existing sports facilities would not meet the Project's underlying purpose to develop the site with both church and recreational uses. No revisions to the DREIR are required in order to respond to this comment.

10-72:

The Grandview facility is not owned or controlled by the Project Applicant, nor does the Project Applicant have the reasonable ability to acquire the Grandview facility because it is not for sale.



10-73:

The DREIR contains a reasonable range of alternatives, including the following: No Project/No Build Alternative, No Project/Feasible Development Alternative, and Reduced Project/Alternative Site Design Alternative. CEQA does not require an analysis of every conceivable alternative, but rather requires the consideration of a reasonable range of alternatives. The DREIR does include two “build” alternatives, the No Project/Feasible Development Alternative, and the Reduced Project/Alternative Site Design Alternative. The commenter correctly states that rural sports and recreation are not permitted within the Community Industrial zone as a primary use; however, the Project’s proposed sports field is an accessory use, which would be permitted following the submittal and approval of a Site Plan Permit. Additionally, according to San Bernardino County Development Code § 84.01.020, whenever accessory uses are questioned, the Director shall be responsible for determining if a proposed accessory use meets the criteria within Chapter 84 of the Development Code. Furthermore, the DREIR has been revised to indicate that the proposed Project would not be implemented prior to completion of the Rimforest Storm Drain project. As such, the Project would have no impacts due to “filling drainage channels.” The alternatives considered in the DREIR provide a sufficient range of alternatives to allow County decisionmakers to evaluate the merits of the proposed Project given constraints such as biological resources and emergency access routes.

10-74:

Refer to the Responses to Comments 10-70 through 10-73. This comment letter does not identify any alternatives that would serve to reduce or substantially avoid the Project’s significant impacts to the environment or that are substantially different from the alternatives studied in the DREIR. The County finds that the DREIR contains a reasonable range of alternatives that will foster informed decision making regarding the Project’s potential impacts and alternatives that may reduce or avoid such impacts. No revisions to the DREIR are required in order to respond to this comment.

10-75:

The County appreciates this comment letter, but finds that the DREIR is fundamentally and basically adequate and that the DREIR’s findings with respect to the Project’s potential to result in significant environmental effects are supported by substantial evidence. Refer also to the individual responses to the comments included in this letter.

ATTACHMENTS A AND B

The County provided notice that it was exercising the discretion authorized by CEQA Guidelines § 15088.5(f)(1), specifically stating that it will not be responding to comments made during the public review of the 2010 Draft EIR. Accordingly, the County need not respond to any comments made in these attachments.

ATTACHMENT C

10C-1:

Comment acknowledged. For the reasons stated in the responses to the individual comments raised by this comment letter, the County finds that the DREIR adequately addresses and mitigates impacts to the environment that would result from implementation of the proposed Project, and further finds that the DREIR’s discussion of the environmental baseline sufficiently complies with CEQA.



10C-2:

The DREIR has been revised to indicate that the proposed Project would not be implemented until after completion of the Rimforest Storm Drain project. As a result, and as documented in the revised DREIR, the proposed Project would not result in any impacts to jurisdictional waters and wetlands. Any impacts to jurisdictional waters and wetlands resulting from the Rimforest Storm Drain project would be mitigated in accordance with the EIR prepared for that project certified by the San Bernardino County Board of Supervisors on May 23, 2017 (SCH No. 2015051070). No revisions to the DREIR are required in order to respond to this comment.

10C-3:

The Rimforest Storm Drain project, which encompasses physical disturbance areas both within and outside of the Project site, will permanently impact all jurisdictional areas within the Project site that would have been impacted by the Church of the Woods Project had the Church of the Woods Project been undertaken in advance of the Storm Drain project. This would include 0.05-acre of Corps/ RWQCB jurisdiction waters and approximately 0.10-acre of CDFW jurisdiction waters. Following completion of the Rimforest Storm Drain project, there will no longer be any jurisdictional waters on the Project site that could be impacted by the Church of the Woods project, because the drainage will be redirected into an underground 72-inch storm drain by the Rimforest Storm Drain project. Any riparian habitats associated with this drainage that could have been impacted by Church of the Woods will have already been permanently impacted and mitigated for by the Rimforest Storm Drain project. Because the Project would not be implemented prior to completion of the Rimforest Storm Drain project, and because all jurisdictional waters that could be impacted would be eliminated from the site by the Rimforest Storm Drain project, the Project would not have any impacts on jurisdictional waters or wetlands.

10C-4:

The DREIR appropriately discloses the Project's potential impacts to biological resources, including jurisdictional drainages. As noted previously, the Rimforest Storm Drain project will permanently impact all jurisdictional areas within the Project's development footprint, which include 0.05-acre of Corps/RWQCB jurisdiction waters and approximately 0.10-acre of CDFW jurisdiction waters. The Project proposes to concentrate development in the southern portions of the property, leaving the northern portions of the site as natural preserved open space. Because of this open space buffer, and because all of the Project's runoff would be conveyed towards the south and away from the open space areas to the north, the Project would have no potential to impact any off-site drainages or springs that may be located to the north.

10C-5:

The DREIR describes groundwater conditions at the site based on a site-specific study prepared by LOR Geotechnical Group, Inc., which is included as *Technical Appendix D1* to the DREIR. Furthermore, this comment does not identify any deficiencies in the DREIR's analysis of potential impacts to groundwater supply or quality, as disclosed in DREIR Section 3.F under the analysis of Threshold b. Refer also to the Response to Comment 10-50. No revisions to the DREIR are required in order to respond to this comment.



10C-6:

The commenter incorrectly characterizes the groundwater conditions. According to the Project's civil engineer (LOR) and based on the geotechnical investigation (DREIR *Technical Appendix D*) prepared for the Project in 2001 by LOR, groundwater is rarely present within the onsite alluvium mentioned. LOR's site excavations and those conducted by Hilltop Geotechnical (personal communication between LOR and Hilltop) did not encounter groundwater within any of the site materials and evidence indicative of past shallow groundwater conditions was not observed. Groundwater is anticipated to be fairly deep at the site and generally within the bedrock. Typically, springs in this area emanate from the bedrock along fractures where they intersect with the surface. The County is not of the opinion that not reporting about the presence of a potential alluvial aquifer and its interaction with surface water (i.e., perennial flow) and/or the spring is an incomplete characterization of site conditions because it does not appear that there is an alluvial aquifer within the site. Additionally, the proposed Project would not be implemented until after the completion of the County's Rimforest Storm Drain project and, as such, there would be no natural drainages in the Project's development footprint or the Project to impact. Refer to Response to Comment 10-50 for information regarding the Project's impacts to groundwater and groundwater recharge. No revisions to the DREIR are required in order to respond to this comment.

10C-7:

Please refer to Response to Comment 3-11.

10C-8:

The Purchase Agreement between Church of the Woods and the County related to the land that Church of the Woods conveyed to the County for the Rimforest Storm Drain Project documents that the Rimforest Storm Drain project will accept runoff from the proposed Project without further mitigation (§ 11, Paragraph 1). This issue also is addressed in the Rimforest Storm Drain EIR (SCH No. 2015051070).

10C-9:

Comment acknowledged; no response necessary.

10C-10:

References and figures included in this letter are acknowledged. Refer to the individual responses to the comments included in this letter, above.

10C-11:

Commenter's resume is acknowledged. No response is necessary.



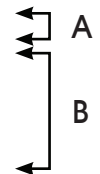
Comment Letter #11

Nieves, Tom

From: Carola Caldwell <CECALDWELL2004@msn.com>
Sent: Monday, January 21, 2019 3:29 PM
To: Nieves, Tom
Subject: Mountain Region

Hello Tom Nieves,

I wanted to lend my voice of support to the Mountain region Church of the Woods Project (Rim Forest). This facility will be a boost to our mountain community with its focus of being a place of gathering for spiritual needs as well as needs of the community including sports fields, community meeting rooms, nature trails, wildlife sanctuary, and picnic areas. As a long time resident of the Lake Arrowhead community, I heartily endorse this project.



Thank you for your time and consideration,
Carola Caldwell
1538 Krause Lane
Lake Arrowhead, CA 92352



January 22, 2019

TO: Tom Nieves, County Planner

Sir:

I saw the notice regarding the Church of the Woods Draft Revised Environmental Impact Report (SCH No. 2004031114) and I am sending this letter in support of the project for the following reasons:

The Church is currently located in a neighborhood setting which poses traffic problems for neighbors and people going to and coming from the church due to narrow streets. There is also limited parking which force church members to park on the street further congesting the roads and increasing the danger of an accident.

The Church's proposal includes multiple areas that will be available to the community. These areas include multi-used fields, picnic areas, an amphitheater, meeting rooms, and a coffee shop. It will provide the youth of the mountains with safe areas for relaxation, pick-up games, and organized sports. It will also provide families with gathering areas.

The new Church facilities would also provide individuals and families with a facility large enough to meet the needs of all who would attend. The children would have enough room for classes and a place to play. The youth would have a place to worship and learn Biblical truths, as well as the ability to engage in safe, supervised activities. Families could plan activities there, such as anniversary parties, and be united in a place to develop spiritual values.

The Church is committed to being a good neighbor and is dedicated to the preservation of the natural environment entrusted to it. The grounds will be thoughtfully maintained and the beauty of God's creation honored through the design and use of the land.

It is my belief that the Church development would benefit the mountain community area, as well as the church. Your thoughtful consideration will be appreciated.

Sincerely;

Debra I. Craig, RN, DNSc

4955 Vandever Ave
San Diego, CA 92120





Nieves, Tom

From: Carol McAllister <cmcallisterhb@gmail.com>
Sent: Wednesday, January 23, 2019 2:37 PM
To: Nieves, Tom
Subject: Fwd: Church of the Woods Draft Revised Environmental Impact Report (SCH No. 2004031114)

January 22, 2019

This letter is sent to comment on the Church of the Woods Draft Revised Environmental Impact Report (SCH No. 2004031114).

I would like this letter to voice my support of the proposed development of this campus. The benefits it will provide to the community are something that are desperately needed.

The local communities here in the mountains do not have nearly enough accessible places for our youth to be involved with healthy recreation. They greatly need facilities for activities that are suggested in this plan. The location for this proposal is in a location that would be easily accessible for all who live in the communities of Crestline, Lake Gregory, Rim Forest, Cedar Plnes Park, Twin Peaks, Blue Jay, Lake Arrowhead, Sky Forest, and Running Springs. These proposed facilities would also benefit all ages of our community with the development of meeting rooms, an amphitheater and staging area. Community organizations are always searching for areas to hold events and activities that benefit the community and this addition would create a positive impact for all our communities.

While sensitivity to our mountains and the environment is essential, with the revised plan now being proposed, I feel comfortable that the beauty our mountain environment brings has been taken into consideration and not be compromised.

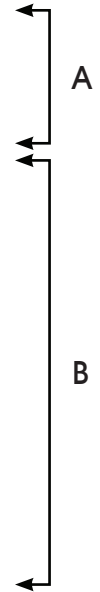
Having a church that is easier to access will also be positive as it will relieve traffic in the current neighborhood.

The benefits of this project tremendously outweigh any negatives, not only for the Church but for the community at large throughout the entire local mountain area.

Sincerely yours,

Carol McAllister

Resident in Lake Arrowhead, California





Nieves, Tom

From: Steven Oebermann <sOebermann@unicalmro.com>
Sent: Wednesday, January 23, 2019 1:27 PM
To: Nieves, Tom
Subject: Church Of The Woods

Dear Mr. Nieves,

Please except this comment letter on the Church Of The Woods Draft Revised Environmental Impact Report (SCH No. 2004031114). I am excited to see this campus developed and enthusiastically support it because of its multiple social benefits, which include, but are not limited to:

- It provides much needed resources for our whole mountain community with ball fields, a place for the youth to hang out and find healthy recreation, family friendly playgrounds for kids, meeting rooms for people to use, coffee shop to relax and fellowship, an Amphitheatre for events and an accessible staging area for emergency needs of firefighters and first responders (if necessary).
- It brings a new church campus that includes worship facilities for spiritual impact of biblical truths, a youth center with a multiple use gymnasium, children’s ministry rooms with age appropriate playground, outdoor courts for fun activities and a sports field to play soccer or baseball.
- It will give relief of the space constraints in the current residential area of the existing Church Of The Woods facility.
- This project will capitalize on the beauty of our mountain and honor the environmental ambiance of the forest area.
- It offers various public groups a place together, practice, use and enjoy.

Overall, this project would greatly benefit not only the Church, but also the entire San Bernardino mountain area. Thank you for your time and consideration.



Best regards,
Steven Oebermann
Aviation Training Manager
sOebermann@unicalmro.com
Office:
Cell: +1.626.465.8383



FAA Cert: 1YZR790C
255 South Leland Norton Way
Bay 1 & Bay 2
San Bernardino, CA 92408 USA

Office Hours 7:00AM-4:00PM (M-F)
Front Desk: +1.909.601.3020
AOG/After-Hours: +1.626.260.7002
Email: cocom@unicalmro.com
Website: www.unicalmro.com



Dear Mr. Nieves,

Please accept this comment letter on the Church of the Woods Draft Revised Environmental Impact Report (SCH No. 2004031114). We are excited to see this campus developed and enthusiastically support it because of its multiple social benefits, which include, but are not limited to:

- It provides much needed resources for our whole mountain community with ball fields, a place for youth to hang out and find healthy recreation, family-friendly playgrounds for kids, meeting rooms for people to use, coffee shop to relax and fellowship, an amphitheater for events and an accessible staging area for emergency needs of firefighters and first responders (if necessary).
- It brings a new church campus that includes worship facilities for spiritual impact of biblical truths, a youth center with a multi-use gymnasium, children's ministry rooms with age appropriate playgrounds, outdoor courts for fun activities and a sports field to play soccer or baseball.
- It will give relief of the space constraints in the current residential area of the existing Church of the Woods facility.
- This project will capitalize on the beauty of our mountain and honor the environmental ambiance of our forest area.
- It offers various public groups a place to gather, practice, use and enjoy.

Overall, this project would greatly benefit not only the Church, but also the entire San Bernardino mountain area. Thank you for your time and consideration.

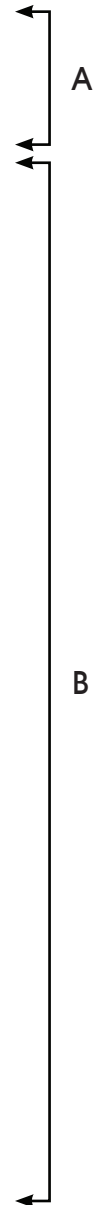
OVERBY TRUST 1/18/10

Name, as it appears on tax roll: Mr. WAYMON E. & CYNTHIA A. OVERBY

Address in Mountain community: 1041 Burnt M. 11 Rd Lk Arrowhead

Signature: Waymon E. Overby Date: Jan 24, 2019

We have lived here 10 years now and plan on never leaving this mountain community that we so dearly love. Please consider our church project with favor. Thank you for your time.





Comment Letter #16

Nieves, Tom

From: Ashley Miller <mjmacct7@gmail.com>
Sent: Friday, January 25, 2019 11:58 AM
To: Nieves, Tom
Subject: Regarding the Church of the Woods project...

Dear Mr. Nieves,

I just wanted to write my comments regarding the Church of the Woods new campus project in Rimforest, CA (SCH No. 2004031114). First of all, I am in full support of this great project! As a Mom of two young children and a full-time resident in Lake Arrowhead CA, I am thrilled about the resources this will provide for our community! We need more safe play spaces up here in our mountains, and having sports fields and more playgrounds and a youth center with a gym, as well as more places to play and meet-up with others is something that will bless so many families. So many times it is hard to find things for our youth to do on the mountain, and knowing they will have a safe place to be and more safe activities to engage in will be so helpful to so many families and parents. Plus having facilities that are geared towards giving families great resources to spend quality time together is very needed up here on our mountain. I know so many other parents and families who have been so excited to hear about the new facilities that could be offered by the new Church of the Woods campus. Thus, it is with great excitement and anticipation that I wholeheartedly support their project and I am excited to see it help so many families in the San Bernardino Mountain area.



Thank you for your time and consideration.

Kindly,

Ashley Miller



Comment Letter #17

Nieves, Tom

From: Brad Wahl <zrd0000@gmail.com>
Sent: Sunday, January 27, 2019 11:21 AM
To: Nieves, Tom
Subject: Sonrise church

What a perfect location for this church!!! Thousands of American taxpayers will be worshipping here. May it be built quickly!

←
→ A



Comment Letter #18

Nieves, Tom

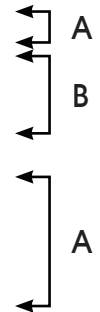
From: Katherine Richardson <roadrunnerkn@yahoo.com>
Sent: Monday, January 28, 2019 1:28 PM
To: Nieves, Tom
Subject: SCH No 2004031114

Dear Mr. Nieves,

Please accept this letter on the Church of the Woods Draft Revised Environmental Impact Report (SCH No 2004031114). I am eager to see this campus developed and support it because of its multiple social benefits. These benefits include many sports resources, several public meeting rooms, an outdoor event center, enhancement of the moral and ethical support for our community, relief of space constraints in their current location, potential emergency services staging, and beautification of the existing space.

In addition to supporting the overwhelming social benefits, I find it appallingly suspicious that the church has been delayed so long by the county in the process to allow them to build on a property that they have owned for over a decade. This seems, to me, to align very closely to the definition of religious persecution. They have been overtly accommodating in an effort to protect and enhance the space to the best of their ability. PLEASE supply your every energy and endorsement in facilitating this very needed project for our community.

Sincerely,
Katherine Richardson





Comment Letter #19

Nieves, Tom

From: Dons Auto Supply <dons2auto@aol.com>
Sent: Tuesday, January 29, 2019 12:23 PM
To: Nieves, Tom
Subject: EIR #2004031114
Attachments: EIR Letter for Sonrise in the Woods.pdf

Good morning Tom,
Please review attached letter concerning the Sonrise in the Woods project in Rimforest.
We are 100 percent in favor of the proposed plan!

Sincerely,
Daniel S. Jahelka





Don's Auto Supply 2 Inc.
26561 Hwy 18 Rimforest CA 92378
P.O. Box 600
909-336-2025 dons2auto@aol.com



1/28/2019

Mr. Neivez
County of San Bernardino
Land Use Services Dept.
385 North Arrowhead Ave., 1st Floor
San Bernardino, CA 92415

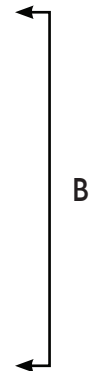
Re: Revised EIR #2004031114 (Church of the Woods)

Dear Mr. Neivez,

I am writing this view point as a longtime resident of more than 40 years, and also as a local business owner for more than 36 years. My business happens to be within two blocks of the proposed church site. I can't imagine anyone with more of a vested interest in the wellbeing of our mountain and this area specifically. I see this plan as a plus for our community. It provides places for the young, and old for that matter to gather. Both outdoors with its soccer/recreational fields, picnic areas, basketball and volleyball courts etc. and indoors as well with its library, and gymnasium. Safe recreation and gathering places for our young people should be first, and foremost on our minds moving forward as a community.

As well as the positive impact the facility will provide in and of itself. It has a twofold benefit of also moving the existing outgrown church from its residential address to more suitable location.

Sincerely,
Daniel Jahelka
Don's Auto Supply 2 Inc.





Comment Letter #20

Nieves, Tom

From: John Mark <skid60mark@gmail.com>
Sent: Wednesday, January 30, 2019 2:55 PM
To: Nieves, Tom
Subject: Sonrise in the woods project

Dear Mr Nieves I am writing to you to express my support and ask you for your support for the Church of the Woods "sonrise in the woods " project. The campus that is the main focus of the project would be extremely beneficial for the many Christians that reside in the mountain community as a place for study and worship. It would be an asset for people working on their relationship with god, provide a place for young people to find the benefits of becoming a Christian, and even possibly a place for meetings such as AA and other beneficiary help meetings. Thank you in advance for your support and hope maybe sometime you could come up for a visit and will be able to see God's work being done in the crown jewel of San Bernardino county our local mountain community. John Mark

← A
← B
← A

Sent from my iPad



Comment Letter #21

Nieves, Tom

From: gaylynn brown <glbrown20@msn.com>
Sent: Friday, February 01, 2019 10:31 AM
To: Nieves, Tom
Subject: Project

I say a big no. This is forest. It's becoming like down the hill up here. No No No!!!!

 C, L

Gaylynn
A Blue Jay Resident



Nieves, Tom

From: Bill Herrmann <billherrmann@earthlink.net>
Sent: Saturday, February 02, 2019 9:44 AM
To: Nieves, Tom
Cc: Bill Herrmann
Subject: Church of the Woods Lake Arrowhead Project

Tom,

Thank you for reading my email. I believe that this project deserves hearing all sides. I realize that many may oppose it. Not sure why but there will be some. Probably will center around the "I got mine" attitude where they seek little or no growth.

While one can say this is a growth project, I do not see it as such. We live in a community like any other community in the United States. The world today is far different from when I was a child. Homes are broken with divorces, both parents are working to make ends meet, the term latchkey children was developed etc. The children of our world are not receiving the care and love that they deserve. I always hear "well, I give my children quality time". Quality time means what? Between 4-5 today you will get me? What if the child has made other plans for that time? Makes no sense. Children need quantity of time.

This project is not a growth project that will create more people living on the mountain. This project will be a total loving and caring way to support the families that live here. The children will have a place to go after school and on weekends that is safe. Elderly people will have a facility that will provide a place to meet and socialize with others. I can go on but you get the idea.

I can say first hand that the mountain has many issues. I have volunteered the last two years with Operation Provider serving Christmas dinner. They provide food weekly for those in need. They put together a program for anyone who wants to come for a Christmas dinner at the Elks Lodge. Families have a place to go, children receive gifts and Santa Claus greets everyone. One of the best things is that the mountain has a lot of lonely single people that can come to the dinner to be with others. Holidays for many is a very lonely time. The elderly ladies will receive a small stuffed animal after they taper seated at a table. You watch them cry, hug the animal and then put a beautiful smile on their face. There is nothing better to be a part of.

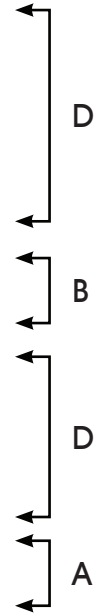
Church of the Woods dream is to provide a smile to everyone everyday. What a gift to all of us on this beautiful mountain.

Thank you for listening. If you want to reach me please use:

Bill Herrmann
PO Box 1439
Blue Jay 92317

27502 Meadow Bay Dr.
Lake Arrowhead, 92352

951-719-7780





Comment Letter #23

From: [Teresa Alexander](#)
To: [Nieves, Tom](#)
Subject: Sonrise on the Mountain
Date: Sunday, February 03, 2019 8:44:00 PM

Hi Tom,

I wanted to share how excited I am about the new church facility Church of the Woods is wanting to build. It will be such a wonderful resource for our community. I've lived on our mountain for 27 years and absolutely love it. However, raising children here I have discovered we have a shortage of fields and facilities for our youth. Practices were always a challenge due to limited fields. In addition serving on PTA for 8 years and being a Youth Leader for 9 years I know our youth are in need of more facilities. The gymnasium will be a huge asset to the youth on our mountain. And the Nature Trails will be wonderful for everyone!!



Thank you so much for making this project happen!

Teresa Alexander
Loan Officer
Viewpoint Financial
Cell 909-553-2934
Teresaphil413@gmail.com



Comment Letter #25

From: [Daniel Meers](#)
To: [Nieves, Tom](#)
Subject: Church of the woods project
Date: Sunday, February 03, 2019 4:56:08 PM

Please do not allow the church of the woods project. I live in Rimforest and fear for the negative impact this project will have on my living situation. The noise and traffic will be overwhelming and should not be allowed. Church of the woods already has a suitable facility. Why would this protect be allowed that's is negatively going to affect the residents?

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Please stop this project.

Daniel Meers
909.754.8731



Comment Letter #26

From: [G Meshorer](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods campus development
Date: Sunday, February 03, 2019 4:32:03 PM

I am opposed to the expansion of the Church of the Woods Campus.



Gwen Meshorer
PO box 642
Crestline, CA 92325
310-926-1030



Virus-free. www.avast.com

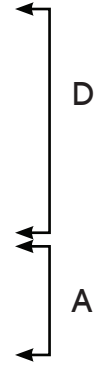


Comment Letter #27

From: [Teresa Alexander](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods project on Hwy 18
Date: Monday, February 04, 2019 3:51:09 PM

I grew up on this mountain and I would have loved all this stuff when I was a kid. I had all these same questions and actually had them answered cause the church has been answering them. Nothing sneaky as Rhea suggested. Also I was under the impression that having access to playgrounds in your neighborhood actually improved property value. And it's not a camp ground or resort. I'm not sure how that story is getting around.

When a dentist office gets built people freak out but there's a value to having that local service available. I just don't get the hostility. Positive places for kids to play just seems good. Church of the Woods has a really great reputation. They're already here on the mountain and they're still not going to ruin it here. I'm all for this project. I want my kids to be able to enjoy something like this.
Joshua Mansinon





Comment Letter #28

From: [Tessa Dick](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods
Date: Monday, February 04, 2019 6:39:59 PM

Please do not allow Church of the Woods to destroy the natural habitat of the San Bernardino mountains to construct a huge building. Do not allow them to divert the creek and flatten the slopes for a ball field. We are NOT the big city. Our economy, as well as our way of life, depends upon the forest, the wildlife, the scenic views and the NATURAL environment. Tourists visit to see the forest, not the ball field, and residents enjoy the forest, not another huge building.

←
D, L
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Thank you.

Tessa Dick, Crestline resident

--
Alive, Free, Happy!



Comment Letter #29

From: [Billy Jean](#)
To: [Nieves, Tom](#)
Subject: CHURCH PROJECT-CHURCH OF THE WOODS
Date: Monday, February 04, 2019 9:19:39 AM

Good Morning,

I wanted to express my input on the potential Church of the Woods project.

I believe it is a waste of time and money. We have a church on almost every corner of the mountain. Its almost too much. I think we have more churches than fire stations. I believe this new project would take away from our natural wild life habitats and I don't think an expansion of a church is a sufficient excuse to bulldoze through wildlife for a new 'juice bar' 'coffee shop' and yet another 'worship center'.

I hope that you and county can consider my input. I have been a resident here in Lake Arrowhead for quite some time. I hear the drums from that church already every evening. I think that's enough.

Thank You.

--
Monica Pelaez
Office Administrator



1-800-220-0209
monica@paylessforplumbing.com
monica.pelaez7@gmail.com

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G
D, F, L



Comment Letter #30

From: [Tamara Gayle](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods - Rimforest
Date: Monday, February 04, 2019 12:17:25 PM

Dear Mr. Nieves,

I wrote to you yesterday but felt compelled to write you again today. I am part of a Facebook group called "RimEverything". It's a way for mountain residents to keep abreast of local news, events, etc. One of our participants posted a link to the Mountain-News article regarding the Church of the Woods project and I started an attached discussion string. All were dissenters with the exception of one and then a congregant of Church of the Woods posted what they envision for this project. I am sharing it with you because it is more descriptive than just what is contained in the environmental impact statement.

Here is what Teresa Baca Alexander wrote:

"Hi friends, I'm a member of this church. Just wanted to share our plan: Over the course of the next year and a half, Church of the Woods will transform 15 acres of land in Rimforest into the kind of resource residents of the region have needed for decades.

THE DEVELOPMENT WILL INCLUDE:

Worship Center | Community Meeting Rooms | Library | Soccer and Recreational Fields | Basketball and Volleyball Courts | Playgrounds | Picnic Areas | Youth Center with Gymnasium | Nature Trails | Wildlife Sanctuaries | Coffee Shop | Juice Bar

"Let the fields be jubilant, and everything in them; let all the trees of the forest sing for joy'
Psalms 96:12

It will simply be a church with many amenities everyone can enjoy. ☐"

To which I replied:

"It's too large for this community and is not needed. It is a way for Church of the Woods to increase its tax exempt revenue while destroying the forest, mountain terrain and peacefulness that we here in Rimforest desire.

The huge amount of money required to build this development could be used in much more charitable ways - provide food for the hungry, shelter for the homeless and clothing for the needy. If you truly feel the need to develop the land, then why not create low-income housing?

No, I do not want my home's value to plummet because it would be adjacent to a noisy football field and I know I am not the only Rimforest resident who feels this way.



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I live full time here and knew nothing of your church's plans before I bought my house. Your proposed 'resource' is not wanted.

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← L

And how can 'the "trees of the forest sing for joy' if you cut them all down?!?"

←
← C

I am not anti-church nor anti-religion. What they are proposing is so much more than "simply a church" with amenities. It is a resort like campus that is not wanted nor needed here. They simply want to increase their coffers while detracting from our community and not sharing their monies to benefit us in any fashion.

←
← D, I

Sincerely,
Tamara L Gayle
1177 Scenic Way
PO Box 157
Rimforest, CA 92378
585-281-7543



Comment Letter #31

LAND USE SERVICES DEPARTMENT
FEB 05 2019
COUNTY OF SAN BERNARDINO

2/4/19

Dear Tom,

My church on Avenue in the Woods is going to open because our LORD JESUS is going to open it.

Enough time has passed and enough money has been wasted, why because of ignorance and wasted time,

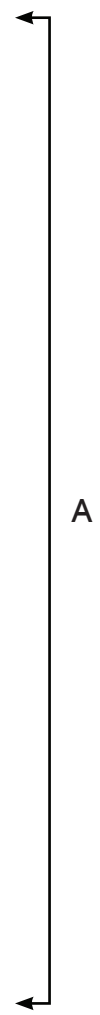
I truly believe my church is going to help our community, and my LORD is going to bless us in many ways.

Please allow us to open our doors and help our mountain people. In addition this will help our new people moving up that we need,

may GOD continue to bless you


Robert Avila

P.O. BOX 92
COVINA, CA
91723





Comment Letter #32

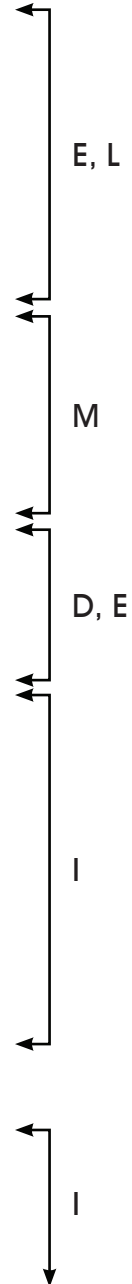
From: [Angela Holtzen](#)
To: [Nieves, Tom](#)
Subject: Church of the woods project (oppose)
Date: Tuesday, February 05, 2019 11:07:38 AM
Attachments: [Screen Shot 2019-02-05 at 10.55.11 AM.png](#)
[Screen Shot 2019-02-05 at 11.05.15 AM.png](#)

Hi,
I live in the community of Crestline, below where the "Church destroying the woods" project will reside. I strongly oppose this project. The reason my family, and most families reside in the mountains is to seek privacy, rural living, surrounded by nature. We already have enough traffic coming through littering, causing car accidents due to no chains, parking in tenant spaces, blocking roads, to come up and enjoy the snow. We do not want our mountains to turn into Orange county. We want it to remain secluded and reserved for nature loving, kind, respectable folks. They claim this won't destroy nature. Based on what they are building I disagree. They claim a church will improve the community. Why don't they use the existing Christian camp already off of thousand pines? Or utilize the 13 other churches that already reside in Crestline alone? Another church isnt going to do anything for our existing community. Why must we destroy what "god" or whatever you believe created in order to learn about it. Pick a tree. Learn under that. Respect the nature and what exists. The way it seems to me the community will gain nothing from it but noise, trash, and traffic. It does not provide anything we dont already have. It actually takes away what we want as a community. Nature, animals, breathtaking views, seclusion, clean surroundings and simplicity. I am a spiritual person myself. I have nothing against religions/beliefs. I do believe in the fact that most churches are corrupt and that is why we have 3 christian churches. Its about money and profit. How different can 3 churches of the same denomination be? Only conclusion I have is money is involved for the people or pastors running the church. The huge church in riverside, have you ever noticed the pastor drives a Mercedes? What is the need for a man of the church to drive a Mercedes. I know this might seem rantish, and I apologize for that. I just love our mountains and our community and I really feel this project will destroy what we love about where we all live. Thank you for your time and if you made it this far I greatly appreciate it.

Angela Holtzen

Attached are how many churches, based on google, reside in just Crestline.

--





Angela Holtzen

Retouching samples here

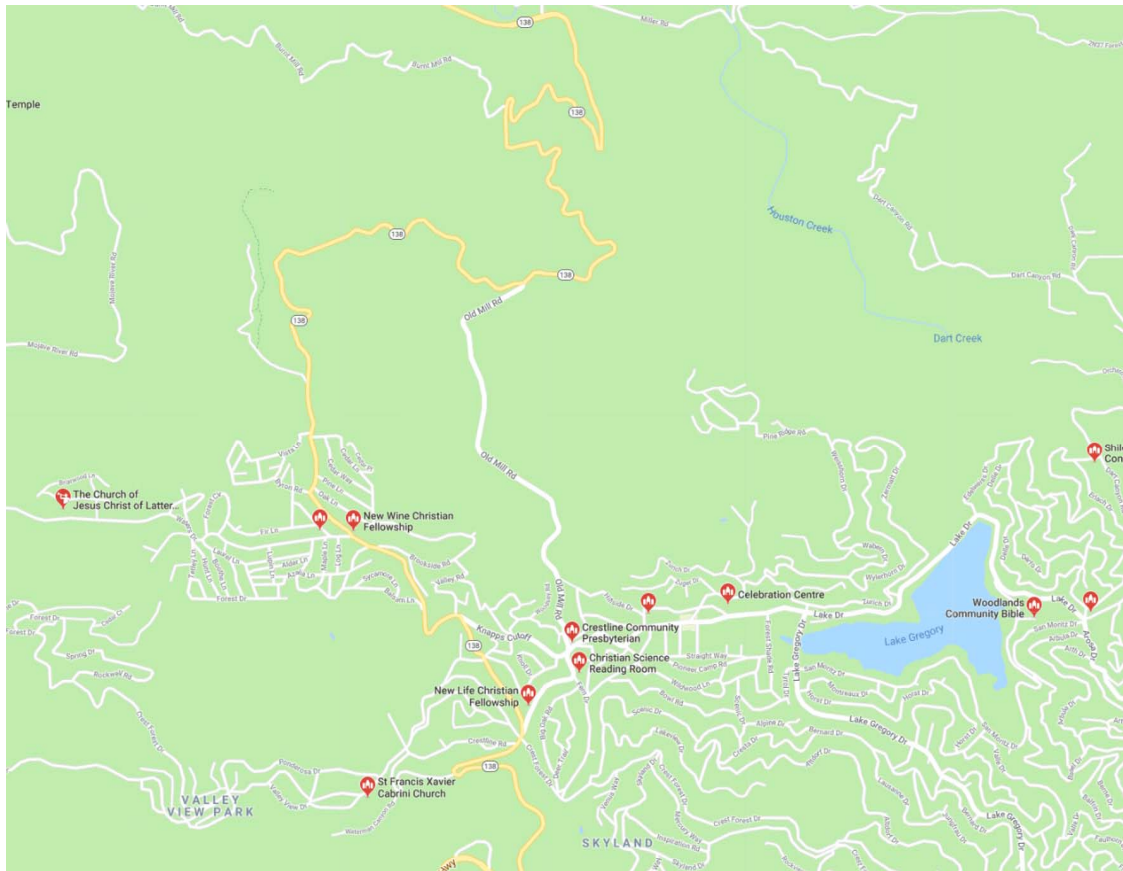
<http://angelaistenzn.tumblr.com/>

Rock Photography samples here

<https://www.facebook.com/AngelaHoltzenPhotography>












Angelaholtzen@gmail.com

I CONT.



I CONT.



<p>New Life Christian Fellowship 5.0 ★★★★★ (7) · Church 23484 Lake Dr</p>	
<p>Crestline Community Presbyterian 4.8 ★★★★★ (4) · Presbyterian Church 23594 Lake Dr</p>	
<p>St Francis Xavier Cabrini Church 4.8 ★★★★★ (8) · Church 23079 Crest Forest Dr</p>	
<p>Crestline First Baptist Church 4.9 ★★★★★ (12) · Baptist Church 533 Springy Path</p>	
<p>New Wine Christian Fellowship 5.0 ★★★★★ (1) · Church 340 Hwy 138 Upstairs</p>	
<p>Woodlands Community Bible 4.9 ★★★★★ (7) · Church 24740 San Moritz Way</p>	
<p>Mountain Hope Center 5.0 ★★★★★ (1) · Church 555 S Dart Canyon Rd</p>	
<p>Lake Gregory Community Church 4.6 ★★★★★ (11) · Church 460 Pine Dr</p>	
<p>Seventh-Day Adventist Church 4.0 ★★★★★ (4) · Seventh-day Adventist C... 22972 Waters Dr</p>	
<p>Shiloh Messianic Congregation 5.0 ★★★★★ (2) · Church 170 Dart Canyon Rd</p>	
<p>Celebration Centre 4.5 ★★★★★ (2) · Church 23978 Lake Dr</p>	

I CONT.

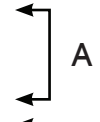


Comment Letter #33

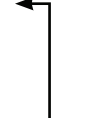
From: [John Wurm](#)
To: [Nieves, Tom](#)
Subject: Sonrise in the Woods
Date: Tuesday, February 05, 2019 12:57:43 PM

Dear Mr. Nieves,

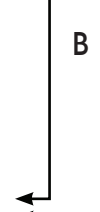
I am a regular attender of Church of the Woods. I support my church's project. I would like to add some observations why the project would be good for the community.



The church has out grown its current location. There are not enough parking spaces and the street parking is not conducive to the neighborhood. I try to leave spaces for nearby residents when I go, but I could understand if neighbors were annoyed.



The mountains are losing population and we need to attract families with opportunities for activities. The Sonrise project will offer the area an opportunity for recreation for all residents. The schools have restricted access to sports fields with fencing for safety purposes. Our youth needs recreational opportunities and Sonrise can offer those opportunities. Our park district is underfunded.



Opponents will argue that trees will be cut. We lost millions of trees to fire and the bark beetle and have survived. There are many thousands of forest land with millions of trees that are open to the public. In my over 30 years on the mountain, I've driven by the site thousands of times and never seen a single person walking in the area.



Thank you.

John Wurm

The Law Offices of John G. Wurm
[27321 North Bay Road](#)
P.O. Box 1875
Lake Arrowhead, CA 92352
P:(909) 337.2557
F:(909) 336.3697
[lakearrowheadlawyer.com](#)

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Comment Letter #34

From: [Tamara Gayle](#)
To: [Nieves, Tom](#)
Subject: Sonrise in the Woods - Rimforest
Date: Wednesday, February 06, 2019 11:10:46 AM

Dear Mr. Nieves,

I didn't think I would be writing to you again but here I am. COTW gave these weblinks in response to our community discussion on Facebook: Website – <https://www.sonriseinthewoods.org/>

Blog – <https://www.sonriseinthewoods.org/category/blog/>

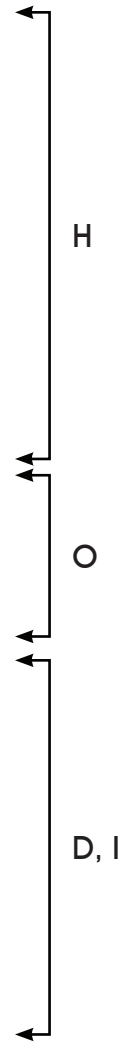
Facebook – <https://www.facebook.com/SonriseInTheWoods/>

I encourage you to take a look at them. They write in terms of this being a done deal to be completed by Easter 2020. They mention things like "there will be no increased traffic in Lake Arrowhead" but do not mention the impact on Highway 18, especially Rimforest. They mention that SB County is already planning on adding 30 traffic lights on the mountain and that their project will require "only 1" but they do not say that they will be paying for that. They then go on to quote the environmental impact report by saying, " All significant environmental impact would be mitigated" but fail to list the rest of the report that says "....except for UNAVOIDABLE impacts regarding noise and transportation and circulation and CUMULATIVE impacts regarding biological resources and transportation and circulation which would remain SIGNIFICANT".

I firmly believe that their focus remains entirely on themselves - what they want, what they hope to gain, increased status on the mountain, etc. I highly doubt that any of their congregants actually live in Rimforest and that is why they purchased this land in the first place. We are one of the smallest communities on this mountain (approx. 500 people) with out the extravagant amount of money that they obviously have to complete this unnecessary resort campus. It really feels like they are money focused as opposed to Christ focused.

If you have not been to Rimforest, I encourage you to visit (when the snow has dissipated) so you may see for yourself the land that they want to tragically alter.

Sincerely,
Tamara L Gayle
1177 Scenic Way
PO Box 157
Rimforest, CA 92378
585-281-7543





Comment Letter #35

Nieves, Tom

From: Verizon <gary.stricker@verizon.net>
Sent: Wednesday, February 06, 2019 2:48 PM
To: Nieves, Tom
Subject: Lake Arrowhead Church of the woods

Dear Mr. Nieves,

I wish to express my opposition to the Church of the Woods project in Lake Arrowhead.

We don't want or need an Orange County style mega church in our small community. The extra traffic, traffic signal will be the burden of the entire community while the Church will only serve a small percentage of the local population.

We have many Churches on the mountain to include two different Catholic facilities.

We have several abandoned schools in our Mountain community that are already built with complete athletic fields and facilities. Modifying one of these existing facilities would be less of an impact on our community.

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Thank you,
Gary Stricker



Comment Letter #36

From: [Terrence Tinucci](#)
To: [Nieves, Tom](#)
Subject: Sonrise in the Woods
Date: Wednesday, February 06, 2019 7:32:34 AM

I am writing this email to voice my opinion regarding this new church being built on our mountain. DO NOT
ALLOE THIS TO BE BUILT.

We have abandoned Christian camps, 10 churches already. There is no need for more places to worship.
Save the forest and nature.

Terrence Tinucci
909 361-1847
29383 Zurich drive
CRESTLINE CA 92325

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Comment Letter #37

From: [David M.](#)
To: [Nieves, Tom](#)
Subject: New church
Date: Saturday, February 09, 2019 7:25:56 AM

Good morning Tom,

My message is short and simple. I purchased my residence in Lake Arrowhead in March 2016. Not knowing the area, my wife and I went exploring. We were surprised about the amount of camps and churches. It's almost like the Bible Belt where a church can be seen every mile to mile and a half going down any main drag, which brings me to my simple message. There are too many churches in the mountains. Leave the plot of land untouched and go to one of the many beautiful churches in the mountain for your religious reasons (Lutheran, Christian, Episcopalian, Catholic, etc). The development will cause for many trees to be cut in our already fragile forest. I for one am against yet another church being built.

Best regards



Comment Letter #38

From: [Andrew McCreary](#)
To: [Nieves, Tom](#)
Subject: RE: Sonrise of the woods; vote/voice against approval of the project.
Date: Saturday, February 09, 2019 8:10:56 PM

Name: Andrew McCreary
Phone: (909)-744-4878
Address: PO BOX 566 Rimforest CA 92378 (mailing)
575 E Victoria CT Lake Arrowhead CA 92352 (physical)

Hello,

To begin I must say I do NOT approve of this project and want to voice my vote/opinion as DO NOT APPROVE this project for church/sonrise of the woods.

Although it may seem as just a church on the outside, it seems as if they are planning to build a "mega-church" and/or high school in a heavily wooded part of the scenic mountainside that would turn a lovely forested area into an eyesore for the community to look at.

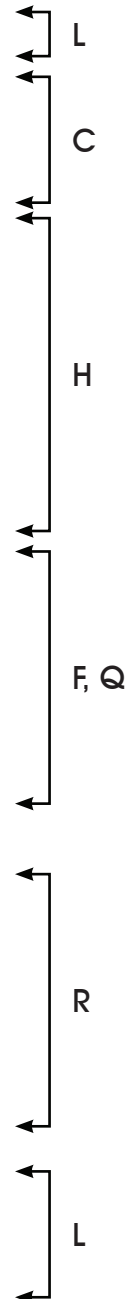
Along with the issues of tree removal and environmental concerns, this church will HEAVILY impact traffic on a mountain that is already dealing with 3+ hours long delays on what used to be 35 minute drives or less, the population is increasing with little to nothing being done about upgrading the roads to accommodate more traffic. The addition of another tourist attraction wont help this problem. There is also the issue of stoplight placement that they will need; due to their location the stoplight placement is less than a quarter mile from a blind curve which tends to become very icy during winter conditions. Not only will this curve pose a danger to motorists coming around the curve to a sudden redlight/stopped traffic, but the placement of the stoplight will potentially cause many more traffic collisions during winter months.

On top of the traffic and environmental issues, this project will cause MASSIVE construction delays whilst under the construction process, on a major highway (HWY 18) which serves as a major route for mountain residents to get gas at the valero station and get on and off the mountain, but is also the main road many delivery trucks use as well.

Construction noises will also be a nuisance during both daytime and nighttime hours for such a massive project that will affect residences that live right next to the proposed building area.

Another final note to take into consideration is with the addition of a new tourist attraction/church there will be an increase in local law violations and petty crimes that are already an annoyance of many residents over the winter months and summer weekends. Tourists break into cars, vandalize property and public spaces, leave trash everywhere, and violate many driving laws all of which isnt being enforced due to lack of law enforcement personnel. this is a small town community with small town local law enforcement that simply isnt equipped for the population surges similar to that of cities.

This project will do NOTHING in my opinion to help the community and will only serve as a nuisance and eyesore that the rest of the community on this mountain does not want (save for the few church members)





Comment Letter #39

From: [greg](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods EIR (SCH 2004031114)
Date: Saturday, February 09, 2019 9:13:41 PM

Tom Nieves
County Planner
County of San Bernardino

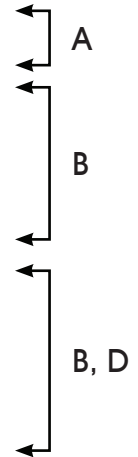
Dear Mr. Nieves,

I am writing to register my support for timely approval of the Church of the Woods Sonrise in the Woods development and the Draft EIR (SCH 2004031114). As a 20 year resident of Lake Arrowhead, a retiree from public safety and active in various organizations within the Mountain area, I am keenly aware of the value of community resources that encourage safe and healthy recreational opportunities for our Mountain youth and families. Presently, the Mountain community has a dire lack of facilities that this project will help to remedy and benefit the entire Mountain population. The new Church of the Woods campus will provide a safe environment for families, youth athletic activities, community events and a staging area for emergency services, in addition to providing the critically needed, long awaited worship center for the Church congregation.

Too often I have witnessed the well orchestrated campaigns of local and nationally funded no growth groups block desirable improvements, both private and public, within our community. The project management for this development has consistently, honestly, and responsibly responded to the coordinated efforts of these well funded, elitist groups that seek to stop any development, regardless of the merits. I ask and pray that the County consider the beneficial merits of this local, community project which will bless the community and provide responsible stewardship to our Mountain resources.

Thank you for your consideration,

Greg Morgon
1080 Voltaire Drive
Blue Jay, CA 92317-1707
gmorgon@aol.com





Comment Letter #40

From: [Margery Shelton](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods Project
Date: Sunday, February 10, 2019 10:27:37 AM

Mr. Nieves,

The information I have on this project suggests that it would be environmentally dangerous and a significant burden on the community Rimforest. The project appears to be so large that it would place traffic burdens and be highly disruptive of its neighbors.

This raises several questions:

1. Why do they need such a large facility?
2. Why don't they use existing community resources for some of their activities?
3. What does the environmental impact study say?
4. To whom do they appeal? Are they aiming at local residents or people from down the hill? This looks more like a tourist destination.
5. What are the factors the county is considering in this evaluation?
6. Is it true they plan to flatten the hillside?
7. Is it true they are planning a church that will seat 1600 people when they have only 300 parishioners?
8. If that is true, then back to question 4.
9. This appears to be plans for a megachurch. Does the county want to support such a project? The morality of this seems highly questionable.

This is not I project I can support unless your answers to the above questions persuade me otherwise.

Margery Shelton
24747 San Moritz Drive
Crestline, CA 92325
323-243-6178

Maggie Shelton, L.C.S.W.
Consulting, Coaching, Public Dialogue
maggie@maggiesheltonlcsww.com
maggiesheltonlcsww.com
Skype: maggieshel

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Comment Letter #41

From: [Kim Edwards](#)
To: [Nieves, Tom](#)
Subject: Church of the woods project
Date: Monday, February 11, 2019 10:25:47 AM

I do not support this project



Respectfully,
Kim Edwards

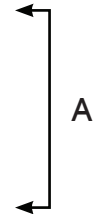


Comment Letter #42

From: [Jessica Alexander](#)
To: [Nieves, Tom](#)
Subject: Sonrise in the Woods
Date: Monday, February 11, 2019 12:11:11 PM

Hi,

My name is Jessica Alexander and I am emailing you today to give my whole hearted support for Sonrise in the Woods. I was born and raised in Lake Arrowhead, California. I've spent my life here and love our community and the forest we are fortunate enough to live in. Church of the Wood's mission is to create a place of community for the residents of our mountain. Being someone who grew up here, I know how important it is for our youth to have a safe and constructive place to gather. Church of the Woods doesn't discriminate and wants this to be a place for everyone, regardless of religious beliefs or affiliation. I am sure you are already aware of all the wonderful amenities they plan to offer the community. I believe this is should be a welcomed addition to our mountain.



Thank you for your time,
Jessica Alexander



Comment Letter #43

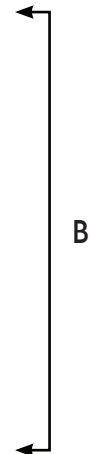
From: [Dean Stufkosky](#)
To: [Nieves, Tom](#)
Subject: Churh of the woods Draft Revised Environmentak Impact Report 9SCH No. 2004031114)
Date: Monday, February 11, 2019 9:44:20 PM

Dean A Stufkosky
PO Box 5327
Blue Jay, Ca 92317

Feb 12, 2019

Dear Mr. Nieves,

This comment letter is for Church of the Woods Draft revised Environmental Impact Report (SCH No. 20040311140. This project will befit the whole community, especially the youth. This center will bring unity to the community, a place to communicate with each other. A place for kids to play sports as well as a place to worship. It will be used by all organization on our mountain. No one likes change but this is adding a whole new look to our mountain. Positive fellowship, a place to worship for all. This is a perfect location without impacting the environment. I've lived up here for almost 50 years and this is very important project that will impact many people for many years in a very positive way. Thank you for your time and consideration.



Respectfully,
Dean A Stufkosky



Comment Letter #44

From: [Steve Andrews](#)
To: [Nieves, Tom](#)
Subject: RE: Oppistion,, to the Sonrise in the Woods, Proposed Consturctiuon Project
Date: Tuesday, February 12, 2019 2:17:26 PM

I am writing this letter in Opposition, to the Proposed, Sonrise in the Woods, adjacent to Hwy.18, in Rim Forest.

As a Former, 25 year resident of Lake Arrowhead, and one who still LOVES, to come HOME, there is NO Net benefit, for the Community, if this Project is allowed to take place.

That Piece of pristine property, just outside of Rim Forest, is 1 of the things I notice when I'm driving into town, that reminds that I'm Home.

Clearly the Installation of a Traffic Light on HWY 18, could do nothing more than disrupt Traffic Flow.

As proposed, there are only 300 Parking Places, for a 1600 Seat Auditorium. That's OVER 5 People , PER CAR. Guaranteed,That type of Carpooling will NEVER happen.

So Mr. Nieves, that MEANS, that all of the ADDITIONAL CARS WILL HAVE TO PARK ON EITHER HWY 18, OR Pretty Much anywhere they want to.

That MEANS In front of Rim Forest Business', Where the vast majority will never spend a Dime. Instead,, blocking Paying Customer Access. Or in front of Residences.

Also, ONLY 1 Entrance and Exit to the Property.. Onto Hwy 18...?? is that The BEST Idea the Developer and County came Up with..

IF THERE were to be a FIRE, During the time the Building / Property, is in use, The Traffic Light would either STOP the Flow Traffic on Hwy 18, ,and/or Delay the People on the Property from escaping.

Since this CHURCH is Probably TAX Exempt, There is No Net Financial benefit to Rim Forest, as a Community, or even the County.

This Might be a good project somewhere else... NOT, Rim Forest..

Sincerely
Stephen Andrews
2496 Ellington Ct.
Simi Valley, Ca.
93063
805-404-4760





Comment Letter #45

From: [Matthew Clevenger](#)
To: [Nieves, Tom](#)
Cc: [Wesley Laverne Lynn](#)
Subject: Re: proposed Church of the Woods development
Date: Tuesday, February 12, 2019 4:27:39 PM

Mr. Nieves,

I am writing in behalf of my partner, Wesley Lynn, and myself expressing our opposition to the proposed Church of the Woods development. The proposed area is north of Hwy 18 and west of Daley Canyon. We believe it will create a negative impact on the surrounding wilderness including the existing creek.

← L
← G, W
← L

Thank you for considering denying the approval of this proposed development.

Matt Clevenger
619.708.4420
Matt.clevenger@ymail.com

Wesley Lynn
619.708.6859
weslynn@me.com

767 Grass Valley Rd.
Lake Arrowhead, Ca
92352



Comment Letter #46

From: [Roberta Dacks](#)
To: [Nieves, Tom](#)
Subject: NO MEGA CHURCH IN RIMFOREST -No to Sunrise
Date: Tuesday, February 12, 2019 12:22:25 PM

Dear Mr. Nieves,

I've been a tax paying resident of Lake Arrowhead SBC for over 20 years. The San Bernardino Mountains community doesn't need this over blown development on Highway 18 in Rimforest known as Sunrise Development.

← L

The traffic, noise and other items which cannot be mitigated are worrisome in this mountain alpine setting. This problematic development will have numerous devastating effects on our way of life.

← E, F, H

A 1600 seat church building is totally ridiculous and there is no public demand for such a mega church. Ruining the topography including trees and rolling hills to flatten and asphalt for parking lots and other non essential development is not worth all the damage to our mountains.

← C, I

Please accept my email as an opposition statement to this Sunrise development by Church of the Woods. Thank you.

← L

Best,
Roberta Dacks-Rindenow
P.OBox 1313/ 27849 North Bay Road
Lake Arrowhead,CA 92352
310 925-0069



Comment Letter #47

From: [nina_kate](#)
To: [Nieves, Tom](#)
Subject: Church project in San Bernardino mountains
Date: Tuesday, February 12, 2019 10:53:25 AM

Dear sir

I am writing to you to voice my opposition to the proposed church of the woods project here.
My name is Nina Downer and my address is P.O. Box 2423, crestline, CA 92325
Phone: 8188047392



Regards,
Nina Downer



Comment Letter #48

From: [Mary Dydo](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods Project
Date: Tuesday, February 12, 2019 12:53:46 PM

Dear Mr. Nieves:

Having been a homeowner up in the San Bernardino Mountains for over a decade, I appreciate the nature and solitude it brings to the residents.

←
← D

I feel The Church of the Woods Project is not feasible in our local mountains. We have unlevel land, streams, wildlife and nature that needs to be left in its natural state. This project is way too large for the amount of roads we have available for the number of residents and tourists the San Bernardino Mountain attracts. We do not want to drive by a mega-church and have multiple traffic signals. In adverse conditions, such as snow or fire, emergency exits from the mountain do not seem able to accommodate such a project and maintain emergency vehicles to protect the mountain.

←
← C, T, V

As a tax payer, I strongly oppose this project. As a resident that lives only four miles from this proposed project, I feel very uncomfortable with the size of this project and how it will affect the safety and beauty of the mountain. This project is close to the business district in Rimforest and roads are very narrow and steep in this area.

←
← L

As a resident and tax payor, I would like to formally register my opposition to this project.

←
← L

Sincerely,

Mary Dydo
24183 Cresta Dr.
P.O. Box 706
Crestline, CA 92325
714-554-3768



Virus-free. www.avast.com

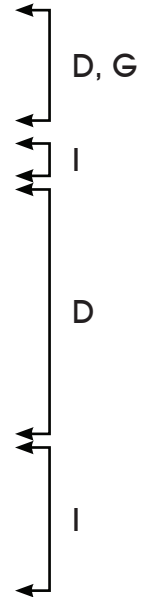


Comment Letter #49

From: [Colleen Correnti Gaw RN](#)
To: [Nieves, Tom](#)
Subject: Sonrise development, Rim Forest
Date: Tuesday, February 12, 2019 9:00:22 PM

To whom it may concern:

Please consider all your past reasons for not approving this development. There will be such a huge impact on the wild life in the area, not to mention the human population. The destruction of the natural landscape and indigent population is not worthy of the monetary gain of a local church. This organization already has a beautiful location for their 300 member (?) organization. They tout the benefits to the community, but this is not the case, and at what cost?. This past weekend, with the major snow storm and lack of skilled professional busses as well as personal drivers, was a disaster waiting to happen, and close to happening. This is not the city. This is an entirely different demographic and mindset. This is why we moved here. Please don't allow our small town vibe to be destroyed. This is why the majority of us live here. The peace, the gift of nature and a sense of community protection are what hold us together. Please don't allow one entity, that does not have our community in it's best interest, ruin our lives and the lives of the natural species, for their personal gain. And as a side note, there are a plethora of wonderful churches on the mountain. There is room for everyone, however, in all honesty, not enough people at any one church or school, to outgrow their present campus. Thank you for your consideration.



Colleen C. Gaw
P.O. Box 143
Cedar Glen, Ca. 92321

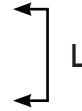
344 Maple Drive
Lake Arrowhead, Ca.92352
(951)809-1353



Comment Letter #50

From: [Donna](#)
To: [Nieves, Tom](#)
Subject: Proposed Church of the Woods Project
Date: Tuesday, February 12, 2019 6:06:43 PM

I am strongly opposed to the subject project. In my opinion, it will disrupt the environment and cause extra congestion and traffic. I also believe it will negatively impact the mountain landscape and the animals and residents who live on the mountain.



Donna Lain, Cedarpines Park resident for over 37 years
P.O. Box 9368
Cedarpines Park, CA 92322
909-633-9673
Lainxxdm@yahoo.com



Comment Letter #51

From: [William Marin](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods Project in Rimforest
Date: Tuesday, February 12, 2019 3:17:55 PM

Tom Nieves,

This email is to state my strong opposition to the Church of the Woods project at Assessor's Parcel Number 336-101-15 in Rimforest.



William Marin
729 Woodland Road
PO Box 3070
Crestline, CA 92325
951-288-0802



Comment Letter #52

From: [Daniel Meers](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods Project in Rimforest, CA
Date: Tuesday, February 12, 2019 10:34:11 AM

To Whom It May Concern,

I am a 12-year resident of Rimforest, CA. Though some have lived in this area longer than I...I have lived in Rimforest longer than most current residents. I am deeply opposed to this project for numerous reasons. First and foremost, Rimforest is well known to mountain residents as one of the most dangerous areas of the mountain when it comes to poor weather. It gets more snow than other communities because of its location right on the rim. Also, the roads throughout the community of Rimforest, including highway 18, are shaded by large trees and thus the roads can be icy for weeks at a time during the winter. There is already significant congestion, accidents, and disabled vehicles without the addition of hundreds of cars traveling to this proposed church campus—I cannot imagine the difficulty of travel and increase of accidents and injuries when hundreds of vehicles will now flow into our community. Furthermore, the addition of a traffic signal will actually worsen the problem during bad weather. Having to come to a full stop and then attempting to get your vehicle moving forward again in ice and snow is very difficult. I can only fearfully imagine the traffic nightmare that will be created on days with bad weather. One stuck vehicle coming out of the church’s parking lot will create a hazardous situation for thousands of people trying to travel on highway 18.

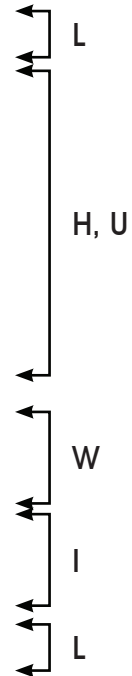
Secondly, the drainage of Rimforest during rain and snow-melt is a real and sensitive issue. Many of our homes have issues with drainage and flooding. Most of the snow melt and rain drains to what I believe is called Bear Creek. It's hard for me to imagine the impact that these changes in the terrain will have in the flora and fauna.

Finally, I would like to remind those involved that this church ALREADY has a huge campus and building. They already have leveled and built a huge campus on another part of the mountain. Their current campus is adequate for the size of their congregation and the programs they run.

I STRONGLY ask that San Bernardino County disallow this project to protect our community.

Sincerely,

Daniel Meers
1140 Scenic Way/ PO Box 432
Rimforest, CA 92378
909-754-8731





Comment Letter #53

From: [David F. Miller](#)
To: [Nieves, Tom](#)
Subject: Proposed Church of the Woods Project in Rimforest, CA
Date: Tuesday, February 12, 2019 12:49:45 PM

To:

County of San Bernardino
Land Use Services Department
Tom Nieves, Planner
385 North Arrowhead Avenue, First Floor
San Bernardino, CA 92415
Phone: (909) 387-5036 | Fax: (909) 387-3223
Email: Tom.Nieves@lus.sbcounty.gov

From:

David F. Miller
284 Delle Drive
Crestline CA 92325

Re: Proposed Church of the Woods Project in Rimforest, CA

Tom Nieves, I would like to register my strong opposition to the proposed Church of the Woods project in Rimforest.

I believe that this project as outlined would be a definite overall negative for residents of the San Bernardino mountains, as well as for tourists to the area. Simply put, the project as proposed is too large and destructive for the area and for the current infrastructure as well as the proposed infrastructure.

This project takes the communal resource of open forest space on the mountain and turns it into a mega-project for a very small segment of the population, namely the members of the church. It would not be a community resource and in fact would be a drain on community resources by requiring significant changes to the infrastructure at taxpayer expense. So the project turns over a communal resource and communal taxes to benefit a very small slice of the resident and tourist population in the San Bernardino Mountains. In addition, because churches don't pay taxes, the proposed project would never add tax revenue to the area.

I urge you to oppose this project on my behalf, and on behalf of the other residents and tourists in the area, not to mention on the behalf of the natural flora and fauna of the area which would be sacrificed to build this urban blight in an otherwise pristine area.

Thank you for your attention.





Comment Letter #54

From: [Amanda Myers](#)
To: [Nieves, Tom](#)
Subject: Sunrise in the woods church
Date: Tuesday, February 12, 2019 9:08:01 PM

Dear Mr. Nieves,

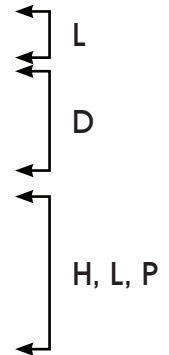
I'm writing in regards to the proposal for the Sunrise in the woods church. I'd like to say that this idea is NOT a good choice. We have only lived in the mountains for a year, and before that we lived in Huntington Beach. My husband was a worship leader for a MEGA church. People get lost in a MEGA church. They aren't seen. My husband took a job out this way and we moved to the mountains. We love it here! People know each other. (At the grocery store, the restaurants, etc), they are willing to help one another. We never found that in Orange County. I love that about the mountains.

The downside of living here, on the weekends we can't go anywhere without sitting in traffic for 3-4 hours to get back to our house. To drive 13 miles from the bottom of the 330 to our house in running springs, it's terrible! Having more traffic is not a good idea. Cutting down the trees and taking the beauty away from Gods creation up here is kind of hypocritical. The animals that will be left without a home isn't good either.

I'm asking you to consider this new church and say no to letting them build it.

Thank you for your time,
Amanda Myers
949-887-0718
31135 outer highway 18 S
Running springs, Ca 92382

Sent from my iPhone





Comment Letter #55

From: [Dawn Selleck](#)
To: [Nieves, Tom](#)
Subject: So rise in the woods proposed development in Rim Forest
Date: Tuesday, February 12, 2019 6:09:03 PM

Sir,

I would like my objection to this project to be noted. The mountain communities do not need such a large development in our locale.

← I, L

There is no need for removal of the trees, diversion of a natural stream and added traffic lights.

← L

This development is too large for a stated congregation of 400, this smells of a mega church, our communities can't support this kind of development. And our natural surroundings shouldn't suffer, we already have some sports facilities at the crestline former adult education center, why doesn't this church use those? Instead of building their own.

← I, M

Sincerely,

Dawn Selleck
1005 Mercury way
Po Box 2880
Crestline, Ca 92325
909/589-2324

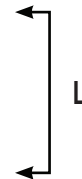


Comment Letter #56

From: [Tamara St. John](#)
To: [Nieves, Tom](#)
Subject: sunrise of the woods project
Date: Tuesday, February 12, 2019 7:21:33 PM

Dear Mr. Nieves,

I am writing to oppose the building of the Sunrise of the Woods project proposal in Rimforest, CA. I am a resident of Rimforest, CA and did not move up to the mountains for noise and suburban living. This project would decimate a beautiful patch of forested land and create a traffic nightmare and additional noise for the residents of this community. Currently this is a quiet community and I am hoping it stays that way.



Feel free to contact me if you have further questions.

Sincerely,

Tamara St. John
P.O. Box 205
Rimforest, CA. 92378
909-485-1344



Comment Letter #57

From: [Joann Arriola](#)
To: [Nieves, Tom](#)
Subject: Sunrise of woods project
Date: Wednesday, February 13, 2019 1:39:38 PM

Please please please do not let this happen. I moved up here for the amazing beauty and peaceful existence. I thought we all respected wildlife and nature but this project does not. We do not need a gym - Rim high, a coffee shop- Starbucks and hotshots. Everything they offer we have or don't need. The environmental impact is so sad along with a traffic light. It is so beautiful now why change it to something we do not need.
please do not allow the raping of our mountain!!



Thank you
Joann

“Every day may not be good, but there’s something good in every day.” ~Unknown
☺



Comment Letter #58

From: [Cathleen Coombs](#)
To: [Nieves, Tom](#)
Subject: Sunrise/Church of the Woods proposal
Date: Wednesday, February 13, 2019 12:55:06 PM

Attn: Tom Nieves, Planner
County of San Bernardino, Land Use Services Dept.
385 N Arrowhead Ave, First Floor
San Bernardino, CA 92415
909-387-5036
tom.nieves@lus.sbcounty.gov

Dear Mr. Mr. Neivez:

My name is Cathleen Coombs. I am a resident of Crestline. PO Box 1271, 23688 Scenic Drive, Crestline, 92325
909-499-4226

I am writing to register my opposition to the proposed Sunrise/Church of the Woods project for several reasons:

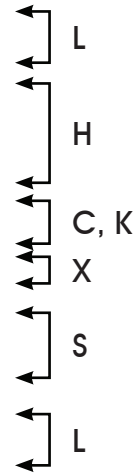
- 1) this project is proposed in the small community of Rim Forest that is located on the single highway artery that connects all Rim of the World communities. This is a two lane highway. This project is expected to bring a significant amount of traffic. From my experience, highly increased traffic makes traveling along the highway cumbersome, doubling or tripling travel time. Increased traffic also increases the risk of accidents
- 2) this project proposed clearing many acres of forest land, leveling and terracing it. This raises significant concern regarding the stability of the mountainside and soil erosion issues.
- 3) this project raises concerns for fire management. It will take away a necessary buffer zone in the event of a wildfire.
- 4) economic and tax burden on the community. Members of the community have raised concern that the tax burden to upgrade the highway with an additional traffic light (or 2), along with increased highway patrolling, will be a cost born by the tax payers, not the church.

For these specific reasons and many others I am not in favor of this project.

Thank you.

Cathleen Coombs

Sent from my iPhone





Comment Letter #59

From: [Nori.](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods project in Lake Arrowhead
Date: Wednesday, February 13, 2019 9:03:16 AM

Dear Sir;
We DO NOT want this atrocity the Church of the Woods is proposing on our mountain!! This would be an egregious use of our beautiful, natural land. No,no, no!!
Thank you,
Noreen Day (Crestline resident of 30 years)

 D, L

Sent from my iPhone



Comment Letter #60

From: [Joanna Hamilton](#)
To: [Nieves, Tom](#)
Cc: [Jeanne Kincheloe](#)
Subject: Proposed church build in Rimforest
Date: Wednesday, February 13, 2019 12:37:31 PM

Please do not allow a mega church to be built on the proposed site as we have enough traffic, accidents, and definitely do not want more traffic lights. It is a totally unnecessary and selfish project. These churches do fail at times. I do not think it is an appropriate fit for our forest or highway. In fact, it's a horrendous idea. Please deny them. Yuck!!!



Sent from my iPhone



Comment Letter #61

From: [Jennifer Hunter](#)
To: [Nieves, Tom](#)
Subject: Proposed Church of the Woods
Date: Wednesday, February 13, 2019 11:58:48 AM

Good Day Mr. Nieves,

As a resident of Crestline, I am opposed to the proposed project Church of the Woods. My family and I moved to Crestline to get away from the crowds and traffic found "Down the Hill". We also came here to be closer to nature. There are already churches and community programs here, and for our small mountain community they offer plenty of opportunities. If the intention is to provide church and community services for people from Down the Hill, maybe those services should be offered within their own communities' footprints. If they want to visit the mountains, they might take advantage of the accommodations already available to them.

Please don't destroy what so many of us love about our home.

Thank you.

Jenny Hunter
General Manager



office: 909-401-2010 **cell:** 623-229-9627
2298 Stonehurst Dr Rialto CA 92377

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←
D, I, L
←



Comment Letter #62

From: [Nancy Lemler](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods opposition
Date: Wednesday, February 13, 2019 9:44:54 AM

Dear Sir,

I am writing in opposition to the proposed Church of the Woods project in Rimforest. This plan will destroy the local environment with the loss of an important stream and the increased traffic going through the already crowded 18 corridor.



Thank you for your consideration,
Sincerely,

Nancy Lemler
22947 Cedar Way
Crestline, Ca.
92325
909 798 7884

Sent from my iPhone



Comment Letter #63

From: [Sarah Lemler](#)
To: [Nieves, Tom](#)
Subject: Regarding the Church of the Woods Proposition in Rimforest
Date: Wednesday, February 13, 2019 8:07:49 AM

To Whom It May Concern:

I am writing this e-mail in regards to the proposed building of the Church of the Woods Project in Rimforest, CA. As a local resident I am very concerned about the likelihood of this project getting county approval. I believe that our community is unable to support a facility of this size and feel that it would negatively impact our local community and environment. The impact to traffic alone could potentially cripple our community, as traffic is already a huge issue that we have yet to find a solution to. The displacement of local wildlife in excavating a piece of land that large would also be huge, as well as the need to properly re-route the seasonal creek on the property. Please do not approve this project.

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C, H, L,
W
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Thank You For Your Consideration,

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



Comment Letter #64

From: [Robert Lopez](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods New Campus, Rim Forest, San Bernardino Mountain Community,
Date: Wednesday, February 13, 2019 11:44:00 AM

Dear Mr. Nieves,

Please accept this comment letter on the Church of the Woods Draft Revised Environmental Impact Report (SCH No. 2004031114).

I understand this project has been an ongoing effort by our church for more than 10 years. I believe the mountain community has waited long enough for this project to commence. This project offers many benefits, especially for our youth of our community that will enhance their growth and development into productive members of our society. I and my wife have 5 grandchildren that will, as they mature, take advantage of the many programs that our church will provide, and does provide at our present location.

The ball fields, and age appropriate playgrounds as well as gathering facilities, a multi-use gymnasium youth a place to spend time in a positive way. Not to mention the accessible staging area for emergency needs of firefighters and first responders.

This project will capitalize on the beauty of our mountain and honor the environmental ambiance of our forest.

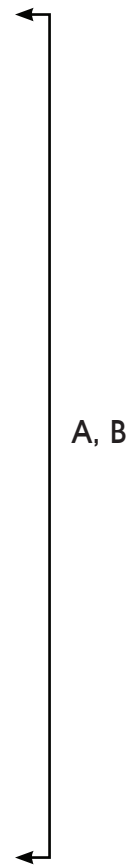
It also offers various public groups a place to gather, practice, use and enjoy.

Overall, this project would greatly benefit not only the church, but also the entire San Bernardino mountain area.

Thank you for your time and consideration.

Sincerely

Robert & Linda Lopez
Mountain residence members,,





Comment Letter #65

From: [Judie Macinka](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods building proposal
Date: Wednesday, February 13, 2019 3:43:22 PM

I am expressing my grave concern, regarding the requested center being built by the Church of the Woods, in Rimforest.

I have a real concern, as to the wildlife that will be destroyed, the food source gone. No relocation aspects.

I vote to NOT build the recommended Worship Center by Church of the Woods.

Cordially yours

Judie C Macinka
909 260 1821

←
←
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←
G
L



Comment Letter #66

Pam Nichols
P.O. Box 1288, 981 Chateau Drive
Crestline, CA 92325
909-338-3269

LAND USE SERVICES DEPARTMENT

FEB 19 2019

COUNTY OF SAN BERNARDINO

2-13-2019

County of San Bernardino, Land Use Services Department
Tom Nieves, Planner
385 North Arrowhead Avenue, First Floor
San Bernardino, CA 92415

Regarding: Church of the Woods Draft Revised Environmental Impact Report

Dear Mr. Nieves,

Please accept this comment letter on the Church of the Woods Draft Revised Environmental Impact Report (SCH No. 2004031114. I am excited to see this campus developed and support it because of its multiple social benefits, which include, but are not limited to:

← A
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1. It provides much needed resources for our whole mountain community with ball fields, a place for youth to meet and find healthy recreation, hiking trails, family-friendly playgrounds for children, meeting room for people to use, a coffee shop to relax and fellowship, an amphitheater for events and an accessible staging area for emergency needs of firefighters and first responders, if necessary.
2. It brings a new church campus that includes worship facilities for spiritual impact of biblical truths, a youth center with a multi-use gymnasium, children's ministry rooms with age appropriate playgrounds, outdoor courts for fun activities and a sports field to play soccer or baseball.
3. It will give relief of the space constraints in the current residential area of the existing Church of the Woods facility.
4. This project will visually capitalize on the beauty of our mountain and the building design will honor the environmental ambiance of our forest area.
5. It offers various public groups a place to gather, practice, use and enjoy.

← B
←

Overall, this project would greatly benefit not only the Church, but also the entire San Bernardino mountain area. Thank you for your time and consideration.

Sincerely,

Pam Nichols



Comment Letter #67

From: [Jeri Simpson](#)
To: [Nieves, Tom](#)
Subject: Opposition to Church of the Woods Project
Date: Wednesday, February 13, 2019 7:06:37 AM

I am writing you to oppose the development of the Church of the Woods Project. There is a large site called Grandview Elementary that sits vacant up here in the mountains. Why not use that already flattened, deforested site for this development?

←
← I, L, M

I am opposed to anymore deforestation on this mountain, anymore traffic congestion, or any traffic lights. Please do not allow this project to continue.

←
← L

Jeri Simpson
27799 Alpen Dr
PO Box 3701
Lake Arrowhead CA 92352
310-498-6076

Sent from my iPhone



Comment Letter #68

From: [Gloriann, Smiley](#)
To: [Nieves, Tom](#)
Subject: Proposed church of the woods project
Date: Wednesday, February 13, 2019 5:39:30 AM

Hello,

I am a mountain resident, registered voter, a tax payer and a member of this community.

I oppose the destruction of nature to build another church when there is no population to fill it and no need other than greed. This and the traffic it would bring is not good for the mountain, its people and its towns.



Thank you.

Glori Smiley
P.o. box 1578
Running Springs, CA

9096599267



Comment Letter #69

From: [Brian Wahl](#)
To: [Nieves, Tom](#)
Subject: Church of the woods project
Date: Wednesday, February 13, 2019 8:16:31 AM

Good Morning Tom,

I recently read a proposed church of the woods project for up in the mountains, and as a mountain resident I am strongly opposed. I moved up here to get away from the crazy city life. Bringing in such a big church would bring huge crowds up here, destroy forest land, and add unnecessary construction. The mountains are a quiet get away. Let's keep it that way!

←
D, L
←

Brian Wahl
Running Springs



Comment Letter #70

From: [Monica Wehrle](#)
To: [Nieves, Tom](#)
Subject: Sonrise In The Woods
Date: Wednesday, February 13, 2019 11:21:54 AM

Dear Mr. Nieves,

This is in regards to the Sonrise In The Woods project. I would like to inform you that as part of the mountain community I do not agree with this project. Sonrise In The Woods website states that this project is a "resource residents of the region have needed for decades". We do NOT need this facility. In fact, most of the mountain residents are apposing this project because we beleive this would have a very negative impact on our wild life and higher traffic would wear down our roads even faster. Also, when we have rain and/or snow and non-residents come up the mountain it makes for a very dangerous situation as most people do not know how to safely navigate a mountain during such weather conditions. We urge you to please, DO NOT approve this project.

I may be reached at 909-262-5248 my mailing address is: P.O. Box 2634 Crestline, CA 92325

Best regards,

Monica Wehrle

←
L, U
←



Comment Letter #71

From: staciefamilytree@aol.com
To: [Nieves, Tom](#)
Subject: Project Opposed Sunrise Church of the Woods
Date: Wednesday, February 13, 2019 5:26:29 PM

Dear Tom,
We in the mountain community as asking you to please do not let this development project go thru. These mountains are the home to several animals. We are told they have filled in a creek and that this project was stopped 10 years ago because of endangered species what happened to them they have since then filled in the creek. They want to level the mountain side and make a church 1600 people and parking this is not the city this is a project not for the pristine mountains that belong to the animals and the people here. Please we are all asking kindly to end this project for the sake of the wildlife up here and the mountain side. Tell them they can build this somewhere where there is not nature to be destroyed for their project.
Stacie Welcome
Crestline Resident.

←
D, E, I, L
←



Comment Letter #72

From: [Jane Horsfield](#)
To: [Nieves, Tom](#)
Subject: Oppose Church of the Woods proposal
Date: Thursday, February 14, 2019 3:20:39 PM

--
I oppose this proposal

Jane Horsfield
23679 Shady Lane
Crestline
949-689-9403





Comment Letter #73

From: [Nancy Lewis](#)
To: [Nieves, Tom](#)
Subject: Support for Church of the Woods Project in Rimforest, CA
Date: Thursday, February 14, 2019 10:20:03 AM

Dear Mr Nieves,

I am writing in support of the above named project. I have been a fulltime resident of the Lake Arrowhead area for 44+ years. I arrived as a teenager and attended the MPH middle school and graduated from Rim of the World High School in 1979. I raised my children on the mountain as well.

For 5 years I was the President of the Mile High Volleyball Club, a traveling team that competes throughout southern California. This club feeds directly into our high school volleyball team. A team that has won many state championships dating back to the time that I played for the team in the late 70's and even earlier I'm sure.

As President I was fully aware of the lack of practice facilities available on the mountain. So many times we were forced to carpool the players down to the Drayson Center in Loma Linda just to be able to practice before an important competition. Many times this was due to school closure caused by weather and traveling down the mountain was necessary, but unsafe. I completely welcome this new Church of the Woods facility as a local asset that will perpetuate a winning high school team, introduce our community's children to sports beginning at the elementary school level, provide a safe location for our youth to gather and our adult residents as well.

This proposed project will be a huge asset to our mountain community! It excites me to watch it progress into a location for residents to gather, recreate, play sports, wander on trails and worship. All good!!

I currently live in Twin Peaks at 167 Grandview Road right next to the Calvary Church and Christian school. Living next to this facility causes no impact to me or my family whatsoever. In fact I love being outside gardening and listening to the music and singing coming from the church services.

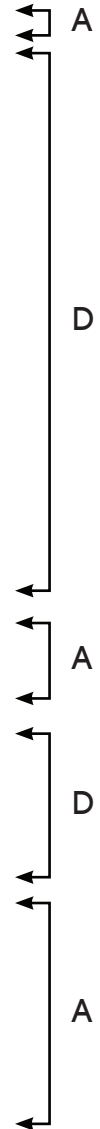
I really do not see a downside to this new development project. I know there are a lot of people opposed to the lands' development and so I wanted to let you know that there are also a huge number of supporters that share the vision of Church of the Woods. This is so needed on the mountain!!

Thank you for hearing me out. I believe I have represented the supporters fairly and honestly.

Sincerely,

Nancy Lewis
(909) 436-8118

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Comment Letter #74

From: [Christine Smiley](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods mega church
Date: Thursday, February 14, 2019 9:21:40 AM

Dear Mr Nieves

I write with deep concern about the proposed mega church in the small town of Rim Forest in San Bernardino Mountains Forest. These are my reasons I am against the proposed development:

Church of the Woods already has a church in Lake Arrowhead.

Rim Forest is a very small town.

The area around Rim Forest is pristine forest and meadow.

The huge development would be an eye sore in our mountain environment and in our community.

We need to preserve our open spaces, not destroy them.

Thousands of people would be drawn up to the church and its facilities, making both Highway 18 and the town of Rim Forest, as well as the other Rim communities, flooded with cars, buses and people.

There are many church camps in the mountains already, which cater to hundreds of religious children and adults.

Please, reject this proposal from Church of the Woods.

Yours sincerely

Christine Smiley

L
I
D
P
C
H
I
L



Comment Letter #75

From: [Teri](#)
To: [Nieves, Tom](#)
Subject: Proposed COTW megachurch complex in Rimforest
Date: Friday, February 15, 2019 4:17:53 PM

Hello Tom,

I vehemently oppose the construction of this megachurch. I don't see how the majority of the residents of the mountains will benefit from this - I only see traffic, people, congestion and basically bringing city life to the mountains.

I respectfully say no.

Thank you,
Teri DeBatte
909 677 8070





Comment Letter #76

From: [Tracy](#)
To: [Nieves, Tom](#)
Subject: Stop Sonrise in Rim Forest
Date: Friday, February 15, 2019 6:48:34 PM

Hello,

I am a property owner in Crestline and a 35 year plus resident and I totally oppose the Sonrise Church in Rim Forest. Please stop this terrible project from ruining our community.



Thank you,
Tracy Marinaro
909-245-1404



Comment Letter #77

From: [leanne.martinez](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods
Date: Friday, February 15, 2019 7:13:40 AM

My name is Leanne Martinez. My address is 1237 Bear Springs Rd, Rimforest, Ca. My phone # is 909-224-5549.

I'm strongly against to the purpose project of Church of the Wood, now called Sunrise of the Woods. I've have been a resident of Rimforest for 36 years now. I have watched my once peaceful, quiet little town be destroyed over the years and turned into a circus. First starting with Valero, which is open 24/7. Then next to that came the storage facility both taking up a beautiful hillside, and more businesses to follow in the coming years. Streets having to make be wider with turn lanes to accommodate the extra flow of traffic coming in and out. Not to mention the tourists on the weekends lining up and down highway 18. Now add a Church? They would literally be in my back yard, with massive noise, bright lights lighting up mine and my neighbor's backyard with their sporting event and parking area. In addition having to put in a street light to accommodate yet more traffic on Highway 18. Please, I'm urging you to deny this proposal. Rimforest residents have endure enough of massive noise and traffic in the recent years. Don't let the only piece of natural forest left in Rimforest be destroyed. I think the resident in Rimforest has had enough growth in our area to last us a life time.

←
D, L
←

Thank you, Leanne



Comment Letter #78

From: [T.N.](#)
To: [Nieves, Tom](#)
Subject: No Church of the Woods
Date: Friday, February 15, 2019 7:25:29 PM

Hi Tom,

I'm writing to express my opposition to the Church of the Woods project. The environment impact is the biggest reason, and a potential increase in traffic congestion is a close second.

The mountain communities could certainly benefit from new ball fields and I hope the county can help facilitate that effort in the future.

Best Regards,
Tommy Noble

B, L



Comment Letter #79

From: benpanganjr@yahoo.com
To: [Nieves, Tom](#)
Subject: Rimforest Church of the Woods
Date: Friday, February 15, 2019 4:20:38 PM

NO NO ONE THOUSAND TIMES NO.
Please don't make this mountain a city with the street lights and the people.

←
← D, L

Benjamin Pangan Jr
909-553-3555

[Sent from Yahoo Mail on Android](#)



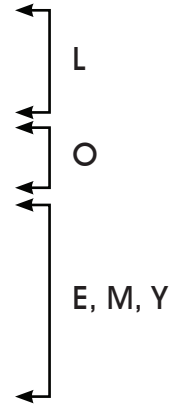
Comment Letter #80

From: [Judy Weber](#)
To: [Nieves, Tom](#)
Subject: Proposed Church of the Woods project
Date: Friday, February 15, 2019 10:37:12 AM

Good morning Tom,

My name is Judy Weber and in September of 2016 I purchased a home at 1178 Scenic Way in Rimforest. I am a senior citizen, I live alone and I live here full-time. This is the second time I have responded to the county's request for comments. I am opposed to this project for a variety of reasons. If you have ever taken a drive up Scenic Way off of Bear Spring Rd., up the loop and then back down to Bear Spring Rd., you know this project is literally in our back yard. The county has also recognized there will be significant and inevitable impacts on our community in terms of noise and traffic congestion.

I am not entirely opposed to this project, but I am opposed to their choice of location. Clearly this project would generate revenue for the church, but I believe it would lower property values for the home owners of Rimforest. But more importantly, I see this project as a potential assault on the peace and tranquility I currently enjoy. I have submitted a letter to the editor of the Mountain News encouraging all of my neighbors in Rimforest to make their voices heard. I would also like to see the county schedule a public forum where we could present our concerns in person. I hope you will give this option consideration.
Sincerely, Judy Weber





Comment Letter #81

To: County of San Bernardino
Land Use Services Department
Tom Nieves, Planner
385 N. Arrowhead Avenue, First Floor
San Bernardino, CA 92415

Date: February 16, 2019

From: Travis Alexander
26560 Amador Lane / P.O. Box 2039
Lake Arrowhead, CA 92352

LAND USE SERVICES DEPARTMENT

FEB 20 2019

COUNTY OF SAN BERNARDINO

RE: Draft Revised Environmental Impact Report
SCH No. 2004031114
Church of the Woods Project

Mr. Nieves,

Thank you for your part in coordinating a comprehensive Environmental Impact Report in which our community may make informed decisions.

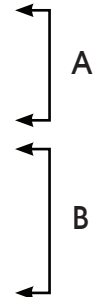
Although I am a member of the Church of the Woods, I am a resident and I can objectively consider the impacts. I find no conflict with the Draft Revised EIR; implementation of the proposed mitigation measures would not result in any significant secondary environmental effects.

Additionally, I hold the opinion that this project will enhance the quality of life to our residents and visitors as it will provide a Fire Safe and CALGreen infrastructure in support of both indoor and outdoor healthy social activities. Furthermore, the location and accessibility of property may also serve well as an Initial Attack Incident Command Post or Extended Attack Staging Area to our first responders.

Thank you for your time and consideration in this matter.

Respectfully,


Travis Alexander
(951) 575-5513





Comment Letter #82

From: [Julie Louise](#)
To: [Nieves, Tom](#)
Subject: Proposed Church of the Woods Project
Date: Saturday, February 16, 2019 12:21:29 PM

I absolutely do NOT support this project. There's plenty of churches up here and we do NOT need traffic. No, no, and no.

← I, L
←

Julie Campbell
450 S Dart Canyon Rd, Crestline, CA 92325
3237027277



Comment Letter #83

From: [Michael DiGiovanni](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods project comment
Date: Saturday, February 16, 2019 7:07:43 AM

Tom Nieves,

I am a Lake Arrowhead resident. I oppose the proposed Church of the Woods project. Which is to be located near Hwy 18 and Daley Canyon, due to the negative impact on the environment, traffic, and noise.



My vote is NO

Michael DiGiovanni
1063 Carousel Rd/P.O. Box 3527
Lake Arrowhead, CA 92352
(301)675-5800



Comment Letter #84

From: [iris.walters](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods
Date: Saturday, February 16, 2019 10:11:52 PM

The proposed 15 acre church will add nothing to the community....except traffic and congestion. There is no tax paid by churches and therefore this mega-development will only bring more congestion and people who care for their church which is fine...but have nothing to benefit the mountain as a whole.

←
←
L, S

The suggestion that this will benefit the children, the youth and adults is based upon fitting in to the churches policies and agendas. As within the last go round of this development, much is said about how beneficial this will be. I don't see that at all.

←
←
L

Our small and quaint communities already have several churches; we are not church poor.

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←
D, I

Would prefer to see our beautiful mountain left as it is, however, to truly benefit the mountain and it's communities this would need to be a source of income.....stores, ice rink, restaurants...not a church which will in no way contribute any value not already present.

←
←
L, S

Am very much against building an eye sore which benefits no one except this particular church.

←
←
L

Thank you for the opportunity to present my concerns and outlook

Iris Walters.



Comment Letter #85

From: [Christie Gabriel-Millette](#)
To: [Nieves, Tom](#)
Subject: Objection to Church of the Woods Project
Date: Saturday, February 16, 2019 3:35:01 PM

Mr. Nieves,

As a mountain homeowner and institutional effectiveness & planning researcher, I object to this development for many reasons:

← L
←

There are species in the report, such as the long-eared owl, that will not fare well with this development. Why has this been ignored?:

<http://www.sbcounty.gov/uploads/lus/environmental/Church%20of%20the%20Woods%20Update/Appendix%20C%20-%20Habitat%20Assessment.pdf>

← G
←

The mountain does not welcome any more development! Notice, we are not building new homes nor businesses up here because they are not what the residents want. We move to the mountains to escape land development. The water usage has not been properly evaluated either, especially considering that Nestle has been and continues to drain the mountain of essential water, already killing off species and contributing to a Bark Beetle situation.

← G, AA
←

I find it slightly comical that a consulting group out of Irvine (massive industry-based, congested city) found that the noise levels for construction were acceptable for the mountains. In the report, there was also no mention of the ongoing noise level that will result from the traffic to/from the facility and from the facility itself. Despite what the report says, the canyons do create an echo, a huge echo, so I can guarantee that it will be loud for local residents. We can hear concerts from Glen Helen, Devore in Crestline, so I know first-hand that their analysis on the trees buffering this noise is untrue.

← F
←

There are over 30 churches already between just Crestline and Rim Forest, a population of less than 13,000. We do NOT need another church, let alone an environmentally and mountain lifestyle-damaging facility.

← I
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As a former Rancho Cucamonga resident (I moved because of the increased development/congestion), and now a 13 year mountain resident, I am adamantly opposed to this development!

← L
←

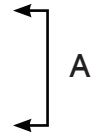
Thank you for your time,
Mrs. Christie Millette



Comment Letter #86

From: [Mary Ann](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods project Lake Arrowhead
Date: Saturday, February 16, 2019 2:34:04 PM

Mr. Nieves,
Our family has lived up here in the San Bernardino Mountains for over 20 years. I am in FAVOR of the proposed campus that Church of the Woods would like to build. I think it would be a great addition to our mountains!
Mary Ann Whitesell
590 Cottage Grove Rd, Lake Arrowhead, CA 92352
951-961-2660

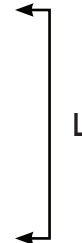




Comment Letter #87

From: [Joann Arriola](#)
To: [Nieves, Tom](#)
Subject: Church of the woods project
Date: Sunday, February 17, 2019 10:51:47 AM

I am so against this project. We don't need another mammoth church project over the environmental impact. The traffic alone would be horrendous. This project would cheapen and degrade our mountain as it is. The animals would be largely impacted as would the mountain itself. A gym - we have at RHS, we do t anymore coffee shops etc. how is their wants more important then our mountain and animals



Please please please do not allow this

Joann Arriola
312 Birchwood Drive
Lake Arrowhead, CA
714-356-2952

“Every day may not be good, but there’s something good in every day.” ~Unknown





Comment Letter #88

From: [Jen Aubrey Smith](#)
To: [Nieves, Tom](#)
Subject: Sonrise of the Woods
Date: Sunday, February 17, 2019 7:54:08 PM

Good evening,

I wanted to email and show my support for the project in Lake Arrowhead. I am no expert in the environment or even a huge nature person to argue about the streams or wildlife.

I am a mother of 3 who moved on the mtn 6 years ago. Church of the Woods has consistently been a support to my family and my children.

We have so many youth in the mountain who have parents who either both work or for whatever reason are unavailable in their lives. I am fortunate enough to have dinner each night as a family's round the table and talk about our day. This is not common on the mountain. My son comes home and tells me about all the drugs that are prevalent in the high school, was bullied in both middle and high school and yet still tries to be a leader of positivity and support for his friends.

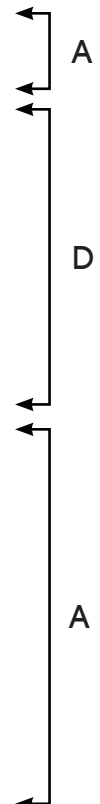
If for nothing but for the church to be able to be more centrally located for commuting and the outreach to our young people - I support this. I want my son to have more community, I want my elementary age daughter to have community from the church's outreach projects from the new location and I want to be able to reach the mountain community with the programs and activities that are planned throughout the year for everyone to participate in - including free Wednesday night dinners.

I am reading a lot of misinformation about the church and this project online and hope you are able to be knowledgeable of what is truth to make a decision (hopefully in support!).

Thank you for taking the time to read this and hearing our community.

Respectfully,

Jen Smith





Comment Letter #89

February 18, 2019

County of San Bernardino
Land Use Services Dept.

LAND USE SERVICES DEPARTMENT

FEB 20 2019

COUNTY OF SAN BERNARDINO

Dear Sirs,

Please add our names to those who are protesting the proposed Church of the Woods project at Highway 173 and Daley Canyon Road in the San Bernardino mountains.

L

This huge project ruins the quality of life which we, and thousands of others, have moved to the mountains to enjoy. It destroys the peace and quiet we now have. It threatens our wild life; destroys hundreds of shade trees, flattens many hillsides, and will add noise, chaos, traffic congestion and many crowds of people.

E, L, O

As you know, on winter weekends our mountain highways are already busy with snowboarders and skiers. This additional traffic congestion, traffic signals on Hwy. 18 and additional vehicles and people will be a nightmare. Please do not allow this desecration of our mountain life.

Thank you,

Patrick Bennett
Marge Bennett

Patrick + Marge Bennett
355 Annandale Drive
Lake Arrowhead, CA 92352

J

Mailing Address:
P.O. Box 1117
Twin Peaks, CA 92391



Comment Letter #90

From: [elizabeth.thompson](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods
Date: Tuesday, February 19, 2019 7:35:31 AM

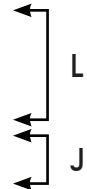
Good morning Tom,

I am writing to express my concern with the Church of the Woods project. This is not an appropriate project for our mountain community. Just the size of the buildings are enough to get a no vote from me. traffic? Density? Mega-church in the mountains? NO!

My address: 492 Delle Drive Crestline, CA

Regards,

Elizabeth Thompson & Frank Carpenter





Comment Letter #91

LAND USE SERVICES DEPARTMENT

FEB 21 2019

COUNTY OF SAN BERNARDINO

February 19, 2019

Dear Mr. Tom Nievez,

My name is Yolanda Trujillo Lyons, and I live in Rimforest. I am against having a mega-church in Rimforest. I believe the existing Church (C) is of a sufficient size for those that live here. We don't need a mega-church!

I, L

Once again, I am, and vote NO!

Sincerely,
YOLANDA TRUJILLO-LYONS
PO BOX 104, BLUE JAY, CA 92317
classyyola@yahoo.com

J



Comment Letter #92

LAND USE SERVICES DEPARTMENT

FEB 22 2019

COUNTY OF SAN BERNARDINO

Michele Laws
P O Box 3239
Lake Arrowhead, CA 92352

County of San Bernardino
Land Use Services Dept.
Tom Nieves, Planner
385 No. Arrowhead Ave. (1st Floor)
San Bernardino, Ca.

Dear Sir,

Feb. 20, 2019

I am opposed to the revised Church of the Woods EIR on several grounds, not the least of which is the proposed installation of 5 signals on and around the area of Daly Canyon, Hwy 18 in Rim Forest, and all the way to where Hwy 173 meets Hwy 18.

That will impede the flow of traffic and cause frustrating wait times during the peak tourist seasons, summer & winter, when the mountain roads are already choked with cars spewing pollutants from exhaust emissions. Nor do we need more people coming up here to attend church services, or attending sporting events in large venues during the rest of the year. The damage to the environment caused by the construction of those buildings is not acceptable. The costs to the interruption of the wildlife corridor, removal of old-growth trees, and diversion of a stream cannot be compensated by visitor patronage to this church facility.

Please do not allow this project to go forward.


Michele Laws, full-time resident
Lake Arrowhead

H, L, O,
U, DD
L



Comment Letter #93

From: [David G. McAfee](#)
To: [Nieves, Tom](#)
Subject: Opposition to Sonrise in the Woods project in Rimforest
Date: Wednesday, February 20, 2019 11:40:46 PM
Importance: High

Hello, sir, I hope you're well. My name is David G. McAfee, and I'm an author and journalist who lives in Lake Arrowhead, California. I'm writing about the Sonrise in the Woods church project, where faith leaders plan to build a massive, 15-acre facility that will destroy the natural beauty of the area.

The church claims that this project will benefit the local area, but there is absolutely no evidence that it will positively affect anyone other than the megachurch and its members. Considering it's a private organization, there's no guarantee that others will even have access. That's not to mention the fact that Rimforest has a total population of 400 people, which means they have absolutely *no need* for a sprawling megachurch that will congest traffic and endanger the local wildlife.

I oppose this plan as a local resident, as an environmental activist, and as a reasonable person who doesn't want to see my mountain destroyed. Thank you so much for your consideration.

Best,
David
(805) 455-9767

I, O, DD
L



Comment Letter #94

LAND USE SERVICES DEPARTMENT

FEB 20 2019

COUNTY OF SAN BERNARDINO

February 20, 2019

Re: the Church of the Woods project

As one of the thousands who visited and then moved to the Lake Arrowhead area permanently for the life sustaining natural beauty and peace of these mountains, I urge you to permanently prohibit the Church of the Woods development of the property in Sky Forest.

D, L

The multiple stoplights that will be required (remember how we petitioned to remove the ill advised and costly stoplight at the junction of SH 173 and SH 189), the removal of hundreds, thousands? of trees which are needed for their clearing of the air we breath, and homes for our birds and animals and the natural beauty for all the people who drive by that area each day, the various endangered species that count on undeveloped areas like this for life, the paving over of so much land and the removal of so much natural topography and so many more reasons which you all are aware of is why I urge you to vote against this development that will change our mountain area forever, profoundly, irreversibly.

C, H, L

This is an inappropriate development for our mountains. If the Church of the Woods believes that this development is necessary for them and will possibly be needed for them, they then should find a site that will not throw it in our faces where there is no way for any of us to avoid the ugliness of this total destruction which has already been reported by the County as having significant impact on Aesthetics, Air Quality, Land Use, Noise, and "cumulative significant impacts" on Noise and Biology.

D, M, O, DD

Very sincerely,

Helen Richardson
Permanent resident for 56 years
PO Box 938
Lake Arrowhead CA 92352

J

cc Mountain News
cc:Alpine Mountaineer



Comment Letter #95

From: [stella braund](#)
To: [Nieves, Tom](#)
Subject: RE : SCH No. 2004031114
Date: Thursday, February 21, 2019 3:25:42 PM

Dear Mr. Nieves,

Further to the Church of Woods Draft Environmental Impact Report, the proposal is unacceptable as it would create unavoidable significant environmental impact to the area and destroy the nature of the town and it's natural attraction.
The revised proposal should be rejected in it's entirety.

←
L, O, DD
←

Yours sincerely Stella Braund

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Comment Letter #96

From: [Marcy](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods
Date: Thursday, February 21, 2019 12:17:10 PM

Dear Mr. Nieves,

Please accept this comment letter on the Church of the Woods Draft Revised Environmental Impact Report (SCH No. 2004031114).

Please, please do not destroy our lovely community with your unnecessary church and complex.

We do not want or need your business here.

Please do not destroy our lovely outdoor areas.

Please do not bring your mega-church and it's tax-evasion scams to our wholesome city.

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D, L
I, S

You know in your mind and heart that what you are doing is not in the name of faith or a higher power.

Please do not bring your negative influence to this area to corrupt and defraud the good people here.

←
←
L

Kind Regards,

Marcy & family



Comment Letter #97

From: [Michael Ferges](#)
To: [Nieves, Tom](#)
Subject: Sonrise in the Woods Impact
Date: Thursday, February 21, 2019 5:28:01 PM

Hello,

I am a sometimes visitor to your area, and I wish to express my concern for the Sonrise in the Woods project. In my experience such a huge project in a rural area inevitably affects the surrounding area. I have lived near similar projects in Oklahoma, and the regions around them have never been the same. In addition, they always seem to grow larger than the sponsors initially claimed, making the impact even worse.

The people I know in the area are opposed to this project, realizing that it will end up using more resources than the area can easily support, requiring even more construction and destroying the beautiful rural area.

I would hope that full consideration of the irrevocable damage to the area will be taken into account, and that this project will not be approved.

Yours,
Michael Ferges





Comment Letter #98

From: [Jenn Lyons](#)
To: [Nieves, Tom](#)
Subject: NO to the mega church project.
Date: Thursday, February 21, 2019 9:27:10 PM

Dear Mr. Nieves

I'm specifically writing to oppose the building of the "Sonrise in the Woods" project. It is my understanding, the environmental report, as posted in its entirety online, may not have been fully disclosed, with pertinent information either by error or deed, not included. I'm appealing to the better nature of both you and your community, to look past the immediate gain and look more to the future and the environmental cost this project is bound to incur. Are you willing to put the future of your children and grandchildren on what may very well be a environmental disaster?
I appreciate your consideration.

← CC
← O, DD
←

Jennifer Gauthier



Comment Letter #99

From: [Trevor Harrison](#)
To: [Nieves, Tom](#)
Subject: The Church.
Date: Thursday, February 21, 2019 6:26:31 PM

Hello,

I am writing you to ask you to not build this massive church. The town is far too small to have a need for such a church. I hope you choose a better location for this as I feel it would be a burden on the locals. Please consider what the townspeople want and do not build it.

I, L, M

Thank you. Trevor Harrison.



Comment Letter #100

From: [Jen Horton](#)
To: [Nieves, Tom](#)
Subject: Deadline 2/25 - Sonrise proposed development
Date: Thursday, February 21, 2019 2:30:32 PM
Attachments: [image003.png](#)
[2019-Ltr-Against-Sonrise.pdf](#)

Dear Mr. Nieves
Attached is my letter against the proposed development in Rimforest for a new church campus by Church of the Woods, Sonrise.
Thank you for taking time to read and listen to my concerns.



Jen Horton
POB 4639, Blue Jay CA 92317
310.415.1685 cel & text





My family has owned property in Lake Arrowhead since 1978, and I'm adamantly opposed to the development of Sonrise by Church of the Woods, an already established church in Lake Arrowhead. I'll keep this message as straight-forward as I can.

According to the most recent U.S. Census Bureau statistic, there are 12,424 people living in "Lake Arrowhead CDP, California." Lake Arrowhead as listed with the Census Bureau is 17.7 square miles. I do not consider Lake Arrowhead a large community – in fact, many if not most the homes here are second-homes owned by part-timers AND in my area of Lake Arrowhead many of those part-timers visit once or twice a year.

With over a dozen churches/conference centers located within the Lake Arrowhead Metropolitan Area (LAMA), I do not feel that the proposed Sonrise location is as necessary as Church of the Woods would have you believe. The following is a list of churches and religious based conference centers within/and/serving the LAMA – for purposes of this letter I include Rimforest, Twin Peaks, Agua Fria, Blue Jay, Cedar Glen, Sky Forest in the LAMA. Pali Retreat is 2.7 miles outside the LAMA and included because of its popularity and close proximity. Chart #1

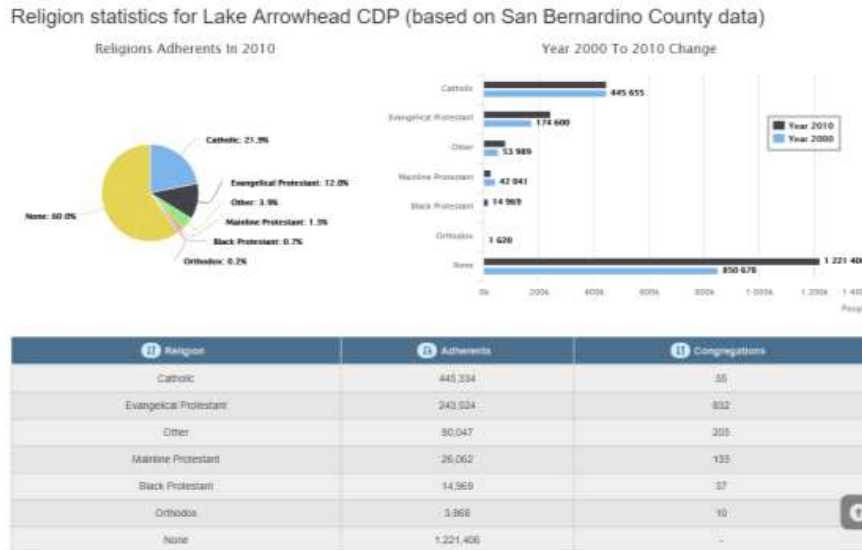
	Name	Street Address	City	Church (Y/N)	Conf Ctr (Y/N)
1	<u>Church of the Woods – THIS IS SONRISE</u>	1410 Calgary Dr	Lake Arrowhead	Y	N
2	Church of Jesus Christ LDS	1160 CA-173	Lake Arrowhead	Y	N
3	Sandals Church Lake Arrowhead	1103 CA-173	Cedar Glen	Y	N
4	Lake Arrowhead Community Church	351 CA-173	Lake Arrowhead	Y	N
5	St. Richard's Episcopal Church	28708 CA-1-8	Skyforest	Y	N
6	Our Lady of the Lake Parish	27627 Rim of the World Drive	Lake Arrowhead	Y	N
7	Mt Calvary Lutheran Church	27415 School Rd	Lake Arrowhead	Y	N
8	Alpine Camp & Conference Ctr	415 Clubhouse Dr	Lake Arrowhead		Y
9	Calvary Chapel Lake Arrowhead	101 Grandview Rd	Twin Peaks	Y	N
10	Twin Peaks Community Church	26032 CA-189	Twin Peaks	Y	N
11	Twin Peaks Christian Conf Ctr	26409 CA-189	Twin Peaks	N	Y
12	Pinecrest Christian Conference Ctr	1140 Pinecrest Rd	Twin Peaks	N	Y
13	Pali Retreat	30778 CA-18	Running Springs	N	Y

Based upon information from San Bernardino County data, 60% of the population of the LAMA do not adhere to any religion (*Chart #2 below from www.city-data.com/city/Lake-Arrowhead-California.html*) This chart suggests that of the 12,424 residents of the LAMA, approximately 7,450 will not be interested in the proposed "new church campus that includes worship facilities for spiritual impact of biblical truths, ... with ... children's ministry rooms ..."

L
CONT.

D

I



I found this statement on the Sonrise website - <https://www.sonriseinthewoods.org/>

THE DEVELOPMENT WILL INCLUDE:

- Worship Center | Community Meeting Rooms | Library
- Soccer and Recreational Fields | Basketball and Volleyball Courts
- Playgrounds | Picnic Areas | Youth Center with Gymnasium
- Nature Trails | Wildlife Sanctuaries | Coffee Shop | Juice Bar

Let me go one by one why I feel we don't "NEED" this development – understand, these are my opinions:

1. Worship Center – Chart 1 addresses this – with a dozen other worship centers in the LAMA, I don't feel this is a community "NEED" AND this church is already established in Lake Arrowhead.
2. Community Meeting Rooms – currently established churches, the senior center, firehouses, our library – all provide community meeting rooms. While this *would be a nice feature...* I don't feel it is a "NEED" that warrants this massive development
3. Library – San Bernardino County Library - Lake Arrowhead Branch, 27235 CA-189, Blue Jay – less than 2 miles from the proposed development – definitely not a "NEED"
4. Soccer and Recreational Fields – We have three schools here in the LAMA, all with soccer and recreational fields. We have a fourth school – currently unoccupied – with a huge field area. We have Harich Field (baseball) at Rotary Centennial Park in Twin Peaks. Fields may sound attractive but I don't believe more fields are a "NEED"
5. Basketball and Volleyball Courts – Again, we have four schools with these style courts; and Lake Arrowhead has plans for these types of courts at the already established McKay Park over in the North Shore district of Lake Arrowhead – I don't feel we "NEED" more
6. Playgrounds – the LAMA has McKay Park, complete with playgrounds, Lake Arrowhead Village with not only a playground but with a carnival style area next to it. The Senior Center in Twin Peaks has a playground. While a playground is always welcome in a community I can't consider a playground a "NEED" when we already have many and rarely see any children using them
7. Picnic Areas – we have several parks within the LAMA: USFS Baylis, USFS Crest Forest, Heaps Peak Arboreteum, Rotary Centennial, Grass Valley and McKay parks – all located around Lake

I
CONT.



Arrowhead. In addition we have USFS Dogwood Campground, USFS Lake Arrowhead Green Valley Campground, and Pine Mountain Camp a 40acre forest retreat with hiking trails all within the LAMA. While an additional community picnic area would be nice, I rather suppose the proposed Sonrise picnic area would be used by the guests of the "new church campus" rather than by the "community" – and so we don't "NEED" it

8. Youth Center with Gymnasium – this is truly the only item proposed in this development which we don't have in this small community that would be a nice addition for all – IF it were made available to "ALL" of the community and not just the church congregation
9. Nature Trails – well... we live abreast the National forest; we have trails EVERYWHERE – Baylis Park, Crest Forest Park, Dogwood Campground, Heaps Peak Arboreteum, The Nature Conservancy; even Strawberry Peak Fire Lookout facility also has many hiking trails along its road. This definitely is not a "NEED"
10. Wildlife Sanctuaries – 29453 Pineridge, Cedar Glen... Wildhaven Wildlife Sanctuary. How many wildlife sanctuaries does any one community really "NEED"
11. Coffee Shop – This area is riddled with restaurants – from coffee shops like Bills Villager in Blue Jay to the rustic Tudor House in Lake Arrowhead, Hortencia's at the Cliff Hanger or one of the newest Puglias in Agua Fria. We have plenty of places to eat, and rarely need to wait for a table as the locale is saturated with eateries. We don't "NEED" another eatery.
12. Juice Bar – Well we don't have one of these; this is a rather small market for a "juice bar" but no, we don't have one

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CONT.

Let me address #4 above – Soccer and Recreational Fields. First to be done – remove all the natural landscaping in a very large area; Second – level the area, flat; Third – fill the area with grass, a non-native species to the mountains; Fourth – water the grass to keep it alive. EVERY YEAR we struggle with water conservation in order to prevent our main tourist attraction – the lake – from becoming too low. EVERY YEAR we hope the drought will be less; in 2019 we're getting snow and rain, thankfully. As a resident of Lake Arrowhead I'm forbidden to put in a lawn of grass and now Sonrise intends to put in a massive field area with grass??? As a homeowner I'm asked to sparingly use water 24/7/365 and now Sonrise wants carte blanche to put in a water-drinking-hog field of grass??? Does anyone see how inherently wrong that is??? AND... we don't "NEED" a field as we already have several.

AA

The entrance to Sonrise would be from CA-18 – a two-lane highway which is the main connector of all metropolitan areas on the mountain. The location on CA-18 which appears to be earmarked as the entrance is very close to a blind curve; during periods of poor visibility – common on CA-18 – an entrance here would establish a location where accidents could/and/likely/would become prevalent. I wish people drove better but the fact is they don't. Common sense tells us this should not be approved.

H

There's been talk of a traffic signal OR TWO! I feel confident in saying none of the mountain residents want a traffic signal along CA-18. The dynamics of the road are NOT conducive to traffic signals – and signals could become more of a detriment than a help. How can there be time to stop at a red light when you cannot see the light until you round the blind curve – then it might be too late. Again, I wish people drove better but the fact is they don't. In my opinion, signals would also be a blight on the beauty of our natural landscape. Common sense tells us this should not be approved.

There's been talk of widening the road; the road at the proposed entrance site cannot be widened to accommodate any substantial traffic into the proposed development without changing the landscape dramatically – literally taking out the mountainside, trees, earth and all. I'm absolutely opposed to changing the landscape in this manner. Residents of the area moved here for the natural landscape beauty. I don't want large developments to take over our small town atmosphere; I don't want our landscape to look like I'm back in the city; I moved out of the city to get away from traffic, propaganda, and frankly to get away from cement covering every square inch of earth.

C, D, P



There's been talk of changing the flow of natural streams in the area, leveling various areas over the 15 acres of development, and obviously a huge number of trees would need to be cut down in order to build this new church campus. I'm opposed to changing our natural environment in this way. We "NEED" to live with nature, not destroy local habitats and ecosystems for an oversized church campus, and especially not to destroy them for a church campus we don't "NEED."

C

Sonrise is the child of Church of the Woods in Lake Arrowhead. This church has an established location here in Lake Arrowhead, and I'm against this expansion/move into/and/destruction/of our wooded area in Rimforest. They've possibly outgrown their current site, but that's not reason enough to approve this project. This development may seem wonderful and exciting to the congregation of Church of the Woods - but the 15 acres earmarked for development in Rimforest is a living ecosystem whose animal kingdom residents would be displaced by their new church campus and facilities. As you can see from this photo, the area proposed is densely wooded - and 15 acres of that densely wooded ecosystem would be lost.



C

In its "sample letter" to the County Planner, the last sentence suggested by Church of the Woods reads, "Overall, this project would greatly benefit not only the Church, but also the entire San Bernardino mountain area." I believe there's very little proposed by this development that this community doesn't already have. I believe the new church campus benefits mostly the Church, and not the LAMA nor the San Bernardino mountain area. I believe this project should be halted; and I believe the loss of habitat proposed by this development is not justified by the benefits the LAMA would actually realize.

L

Thank you for taking the time to carefully consider this matter and listen to the residents - listen to me - asking that you halt this development and preserve the natural beauty of our mountains.



*Jen Horton
POB 4639, Blue Jay CA 92317
310.415.1685 cel & text
Lake Arrowhead property owner since 1978*

J



Comment Letter #101

From: [John Houll](#)
To: [Nieves, Tom](#)
Subject: Christian Megachurch
Date: Thursday, February 21, 2019 12:32:31 PM

Mr Nieves,

These 400 people *do not need* a massive Christian megachurch. I *don't* think this would benefit anyone else other than church members and leaders. The feedback from locals has been decidedly negative, including from Christians who think a megachurch goes against their Holy Book, so this is clearly not something that the people want. *Sonrise in the Woods*, a massive church-owned "recreational resource" planned for Easter 2020, would be devastating for the mountain environment and the local residents alike.

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D, L
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Thanks,

John T Houll



Comment Letter #102

From: [kirsten Livingston](#)
To: [Nieves, Tom](#)
Subject: Just say No!
Date: Thursday, February 21, 2019 5:56:45 PM

Hi Tom,

Please say No to the megachurch and the plan to build in your community. There is no need for it as there are already more than enough churches and mega churches on the continent.

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I, L
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Thank you for your time.
Kirsten



Comment Letter #103

From: [Tricia Martineau](#)
To: [Nieves, Tom](#)
Date: Thursday, February 21, 2019 6:18:27 PM

Dear Tom

Please don't let this megachurch to destroy the beauty of the mountain. No one needs that much property for a church.

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← I, L

Sincerely
Tricia Martineau.
Sent from my iPad



Comment Letter #104

From: [Sarah Kate](#)
To: [Nieves, Tom](#)
Subject: Please do not allow the Church of the Woods to build in Rimforest
Date: Thursday, February 21, 2019 11:51:13 AM

Hello Mr. Nieves,

I am writing to ask you to consider that the 400 residents of Rimforest do not need a megachurch, which will dramatically change the quiet mountain town they know and love, and not in ways that benefit them. Most local Christians feel that megachurches contradict the holy book and do not support this in their community. Regardless of religious affiliation, this is a community that has no use for a megachurch and would be forever altered for the worse if it is allowed to overwhelm them. Please do not allow that to happen.

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Thank you for your consideration,

Sarah Moore



Comment Letter #105

From: [Michelle Tanner](#)
To: [Nieves, Tom](#)
Subject: PLEASE STOP ROD ATKINS!
Date: Thursday, February 21, 2019 8:43:36 PM

This project will WILL BE A DETRIMENT TO the beauty of our mountain and A DISASTER the environmental ambiance of our forest area.

"Significant" impact on our town per the Notice. We don't want him and his huge church. It goes against everything I believe.

The bigger they are, the more money he needs. This takes away a ton of money that could be going to our community, instead of his tax-free pockets.

Please, say no to *Sonrise in the Woods*

Respectfully,

Mish

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Comment Letter #106

From: [Rick and Mini](#)
To: [Nieves, Tom](#)
Subject: Don't Approve Church of the Woods Project.
Date: Thursday, February 21, 2019 12:20:57 PM

Dear Mr. Nieves

As someone who has been to this area many times I have always enjoyed the peace and the quiet and the beauty of the area.

Letting a Mega Church destroy it is not the way to go. With Evangelical Christianity and religion in general on the decline (<https://bigthink.com/stephen-johnson/the-us-is-losing-its-religion-and-faster-than-you-may-think>) there is a SIGNIFICANT possibility that the church would not be able to maintain the huge facilities they are building.

Not to mention that your OWN impact report says that they can only reduce the impact to just "less than significant" that comment alone does not leave me with any confidence they will care for the environment.

Rick and Mini
714-381-4333
www.rickandmini.com

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Comment Letter #107

From: [Robin](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods Project
Date: Friday, February 22, 2019 4:58:11 PM

The thing I have always loved about visiting your little town is the peace and quiet. A small town like yours cannot absorb that many people and cars without a huge impact on the ambience. Not to mention increased fire danger from more people descending on Rimforest weekly. Thought I'd put in my two cents. If you must let them in, please consider limiting their membership to no more than the population of your town. You don't want them taking over. When I lived in OR a swami and his followers took over a little town (Antelope) near us by sheer numbers.

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E, X
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Sincerely,
Robin Bendler



Comment Letter #108

From: [Don Bloomer](#)
To: [Nieves, Tom](#)
Subject: STOP Church of the Woods !
Date: Friday, February 22, 2019 4:15:13 PM

Dear Mr. Nieves,

Please do not let the Church of the Woods build “Sonrise in the Woods”, a so-called “recreational resource”. It would be devastating for the mountain environment and our local residents alike. The draft Revised Environmental Impact Report (SCH No. [2004031114](#)) shows that it will overwhelm the local resources. Please help protect this mountain community.





Comment Letter #109

From: [Sharon Rice](#)
To: [Nieves, Tom](#)
Cc: [Jeremy and Lindsay Rice](#)
Subject: I support Sonrise of the Woods
Date: Friday, February 22, 2019 11:59:11 AM

To:
Tom Nieves, Planner
County of San Bernardino, Land Use Services Department

From:
Sharon Rice Butler
885 Fern Dr.
PO Box 574
Crestline, CA 92325
951-522-9631

Dear Mr. Nieves,

I support the SONRISE OF THE WOODS project in the mountains of San Bernardino County.

I have attended this church with my son’s family on numerous occasions and think it’s a wonderful, compassionate group of people. My grandson attended preschool there.

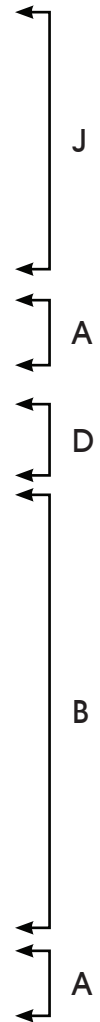
I bought my home in Crestline in October 2018 and now would like to attend this church regularly; however, getting there on Sundays and other days when the weather is stormy or snowy has proved difficult. It would be wonderful to see this church moved to a more central location for all the Rim communities, on a major highway that is easier to travel and more likely to be plowed.

I believe this church – the structure, grounds and especially the people – will do so much to enhance the entire mountain community with sports fields, playgrounds, walking trails and programs that are open to the public.

I have heard a few voices in opposition to this project and I respect their concerns. However, I KNOW that once this church finally reaches full buildout and program operations, most people who now oppose it will see that it truly offers great benefits for all ages: children, teens, singles, families and seniors.

I respectfully request that you give approval to this project!

Sincerely, Sharon Rice Butler





Comment Letter #110

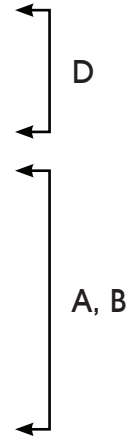
From: [Alise Davis](#)
To: [Nieves, Tom](#)
Subject: Environmental Impact Report (SCH No. 2004031114)
Date: Friday, February 22, 2019 3:42:38 PM

Dear Mr. Nieves,

Please accept this comment letter on the Church of the Woods Draft Revised Environmental Impact Report (SCH No. 2004031114). I have lived in the mountains since 1978 and am a retired school teacher of The Rim of the World School District. My two children were born and raised in our mountain community.

I very much want the Church of the Woods new campus developed, because it will provide benefits to people of all ages. The plan includes the much needed facilities of a youth center, a multi-use gymnasium, playgrounds, outdoor courts for sports activities, ball fields, meeting rooms, a worship center, an amphitheater for events, as well as an accessible staging area for emergency needs of firefighters and first responders (if needed). Many of these features are scarce and much needed in the mountain community. This development will be an asset not only for the church, but also for all the people who live and work in the San Bernardino mountain area.

Thank you for your consideration,
Alise Horak Davis





Comment Letter #111

From: davisena@charter.net
To: [Nieves, Tom](#)
Subject: Church of the Woods Draft Revised Environmental Impact Report (SCH No. 2004031114)
Date: Friday, February 22, 2019 4:11:50 PM

Dear Mr. Nieves,
Please accept this comment letter on the Church of the Woods Draft Revised Environmental Impact Report (SCH No. 2004031114).

I am writing to endorse the development of the Church of the Woods campus as it would be a wonderful place for children, youth and adults to have a greatly needed recreational facilities in our mountain area. Also, a new church facility would be welcome in our community as their present facilities have been outgrown. I know my family and I would enjoy the use of the recreational facilities, as well as it's spitual contribution to our mountain residents.

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Thank you so much for your work and consideration,

Gratefully yours,

Marion Everett Davis and family



Comment Letter #112

From: [Love One Another Photography](#)
To: [Nieves, Tom](#)
Subject: Church of the woods project RIM FOREST
Date: Friday, February 22, 2019 12:22:22 PM

Hello!

I'm a business owner on this mountain and have been a resident up here for 35 years. I am for this approval as it will help our community, give kids a place to go and hang out instead of finding places to go. It will provide jobs along with an area for people to meet. I believe this mountain would benefit from this approval, there is nothing like this on the mountain as it stands. The area for the project, no one is currently enjoying, it's along the hwy and no access.

Again, I'm ALL for this project.

Nichol Davis

1834 Nob Hill Dr Box 1902

Running Springs, Ca 92382

909.867.9812

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Wishing you a blessed day!

Nichol Davis

Love One Another Photography

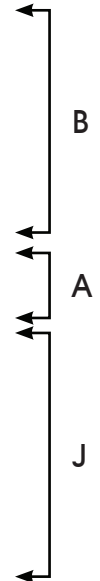
<http://www.LoveOneAnotherPhotography.com>

Facebook @Love One Another Photography :: Instagram @LOAStudios

Recommendations and reviews: Check out our 5 star reviews on facebook or at

<http://www.stik.com/nicodnico>

wife...artist...mommy...photographer...friend





Comment Letter #113

From: [Teri Davis](#)
To: [Nieves, Tom](#)
Cc: tdavisrealestate@hotmail.com
Subject: Formal Opposition to Church of The Woods Rim Forest Proposal
Date: Friday, February 22, 2019 5:10:34 PM

County of SB Land USD
Attn: Tom Nieves, Planner
385 N Arrowhead, First Floor
San Bdn, CA 92415
909-387-5036

Dear Tom:

I am writing to voice my opposition to the project proposed by Church of the Woods. My letter isn't going to quote the number of cubic feet of earth that will be moved if the Church of the Woods Project goes through as planned. Nor is it going to list the number of lights, buildings, traffic signals, traffic lanes, or site the predicted increase in traffic flow. Rather it is going to address the heart of the matter. There is a reason that each of us have chosen to live "up here" on the mountain, it is our environment and that is the heart of the matter!

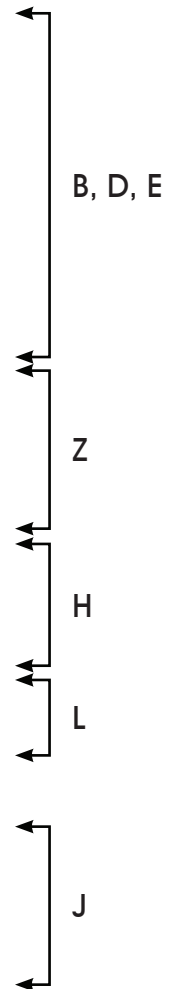
Does the Church of the Woods have a right to build a new facility? Of course they do. Could our community use the economic gains that this new facility would generate? Of course we could. Wouldn't it be great to have new ball fields? Of course it would. However, that is not the heart of the matter. Our mountain is rich, rich in pines and oaks, rich in raccoons and bobcats, rich in native wildflowers, and we are enriched by living in this environment. This environment, on the fragile edge of a mountain, is the heart of the matter! The heart of the matter is that we have chosen to live here because of what "here" represents. Does Church of the Woods have a "right" to build a new facility? Yes, they do. Does Church of the Woods have a "right" to build a facility that is much more suited to an urban environment, a facility that will drastically change the environment that we have chosen to live in? No, they should not have that "right"! A glaring concern is the riparian area of Little Bear Creek. Church of the Woods plans to significantly alter the natural drainage and runoff of Little Bear Creek which, according to Ralph Wager, significantly contributes to the level and health of Lake Arrowhead. We have all experienced the worry, concern and loss of property and dock values when the water level runs low. We are fortunate to have recent back to back snow and rainstorms that have filled our lake but history has proven how quickly that can change.

An additional valid concern is the substantial traffic delays caused by this mega church being located on a main highway that is our only means of traveling east and west across the mountain. I'm sure you are aware of the substantial traffic accidents and delays from our most recent snow storms. Imagine adding to that mess the additional pressure of traffic in and out of the proposed Rim Forest location.

Thank you for taking the time to read my letter. My hope is that you will consider the negative impacts this project will cause to our residents and the environment.

Sincerely,

Teresa L Davis, Trustee
Davis Family Trust
PO Box 1091
Highland CA 92346
909-709-8348

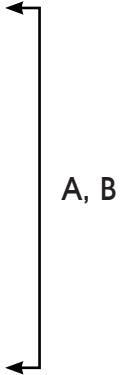




Comment Letter #114

From: [Glenn Goodwin](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods Project
Date: Friday, February 22, 2019 10:32:33 AM

We have been part of the Lake Arrowhead community for 30 years and are in full support of the Church of the Woods project.
Sonrise in the Woods is a wonderful expression of love towards the entire mountain offering spiritual support and community involvement.
This project started in 2002 with the purchase of the land zoned for commercial development and has been before the County planning department for over 15 years.
Now, it will supply much needed support for family activities on our mountain. The youth of the mountain will have a place to grow in a safe environment.
The project will allow our families to grow spiritually strong in an ever increasing dangerous world.
We encourage the support the project as we proceed to the completion of an excellent project for all.



Glenn & Tilda Goodwin



Comment Letter #115

From: [Bruckhart, Jessie](#) on behalf of [LUS - Duty Planner](#)
To: griffhsgriff@gmail.com
Cc: [Nieves, Tom](#)
Subject: FW: Church of The Woods Project
Date: Friday, February 22, 2019 2:44:35 PM
Attachments: [image001.png](#)

Hello Holly,

Thank you for contacting Land Use Services and providing your input about the Church of the Woods project. I have forwarded your comments on to the project planner so that he can reach out and address your concerns.

Thank you,
Jess Bruckhart

Duty Planner
Planning Division
Land Use Services Department
Phone: [909-387-8311](tel:909-387-8311)
Fax: [909-387-3223](tel:909-387-3223)
385 N. Arrowhead Ave
San Bernardino, CA, 92415-0187



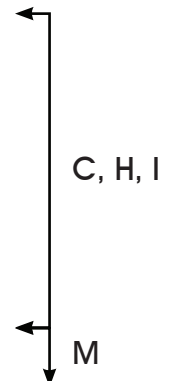
Our job is to create a county in which those who reside and invest can prosper and achieve well-being.

www.SBCounty.gov

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From: Holly Griffiths [<mailto:griffhsgriff@gmail.com>]
Sent: Friday, February 22, 2019 2:31 PM
To: LUS - Customer Service <luscustomerservice@lus.sbcounty.gov>
Subject: Church of The Woods Project

This project would destroy my back yard and property value. My name is Holly Griffiths, I live at 1195 Scenic way, Rimforest, CA. The plans go right up to my back yard. It's going to make this peaceful quiet neighborhood loud and ugly. Most of the people that live here, bought because of how beautiful these woods are, and love living next to them. We don't want the traffic either. I don't know if you yourself have ever had to drive on Highway 18 on a Saturday in July, but if you have, I don't have to tell you how busy this road already is. Rimforest has a population of 500 people. Why on Earth in this small town do we need a giant sports complex and ANOTHER place of worship. We have enough church's, they plan to cut down untouched forest to build our 13th church. If it's one thing the Lake Arrowhead area is lacking, it isn't a church. Not only will this ruin our neighborhood, but we won't even be able to use it. Only members of the church will be able to use this massive complex. That means they're going to build a 54,000 foot spots field in my yard and tell the neighborhood they can't use it. This really isn't benefiting anyone but the small number of people that attend that church. If they wanted to use this project to revitalize a different part of town it would be met with much less animosity. There are many places on this mountain





that are not in use. Why develop this land when there is perfectly good land that has already been deforested. Please give it some thought, these woods really mean a lot to me and my family. Please feel free to contact me at any time, text or call, (909)-714-1443 or Email, Griffhsgriff@gmail.com. Thank you for your consideration.

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Comment Letter #116

From: [DH](#)
To: [Nieves, Tom](#)
Subject: Sonrise in the Woods
Date: Friday, February 22, 2019 8:35:31 AM

Dear Mr. Nieves

I'm just letting you know that this project will devastate the local flora and fauna. It has absolutely no benefit to the local 400 or so population, and will only serve to enrich Rid Akins' own pockets. As I understand it, local residents have begun speaking out as they are also experiencing undue hardships because of it.

Please consider rejecting this plan.

Sincerely,
Debby Holeman





Comment Letter #117

From: [LA Jones](#)
To: [Nieves, Tom](#)
Subject: Sonrise in the woods proposed project
Date: Friday, February 22, 2019 10:48:04 AM

Sir,

Today's date is February 22, 2019. I am writing you in regards to the proposed environmental disaster "sonrise in the woods" is attempting to push through.

I am COMPLETELY OPPOSED to this project on environmental grounds, the inability to handle the increased traffic, and the potential for the rise in crime associated with projects such as this. I am a full-time resident Lake Arrowhead and believe this will impact me negatively. My name is LA Jones PO Box 2292 Lake Arrowhead, CA 92352. If there is anything else you need regarding my opposition please feel free to contact me at 714-679-4036. Thank you for your consideration in this matter

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J, L
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Sent from my iPhone



Comment Letter #118

From: [Aarin Kenaga](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods Sunrise project
Date: Friday, February 22, 2019 10:55:46 AM

Mr Nieves:

I am against this project and what it will do to the community. We do not need a huge mega church and its many buildings. It will destroy the environment and adding signals will only congest the area even more.

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With regard to the signals being considered for the top of Daley Canyon during the winter that road is always icy and lots of cars have trouble making it up having a signal at the top would only exacerbate the problem. During the school year when the high school lets out the traffic already backs up I can only imagine what it would look like once there are signals.

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I implore you to vote no on this project.

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Aarin Kenaga
48 year resident of this community



Comment Letter #119

From: [Linda Lopez](#)
To: [Nieves, Tom](#)
Subject: Sonrise in the Woods/Church of the Woods
Date: Friday, February 22, 2019 7:47:51 AM

Dear Mr. Nieves,

Please accept this comment letter on the Church of the Woods Draft Revised Environmental Impact Report (SCH No. 2004031114). We are excited to see this campus developed and enthusiastically support it because of its multiple social benefits, which include, but are not limited to:

It provides much needed resources for our whole mountain community with ball fields, a place for youth to hang out and find healthy recreation, family-friendly playgrounds for kids, meeting rooms for people to use, coffee shop to relax and fellowship, an amphitheater for events and an accessible staging area for emergency needs of firefighters and first responders (if necessary).

It brings a new church campus that includes worship facilities for spiritual impact of biblical truths, a youth center with a multi-use gymnasium, children’s ministry rooms with age appropriate playgrounds, outdoor courts for fun activities and a sports field to play soccer or baseball.

It will give relief of the space constraints in the current residential area of the existing Church of the Woods Facility.

This project will capitalize on the beauty of our mountain and honor the environmental ambiance of our forest area.

It offers various public groups a place to gather, practice, use and enjoy.

Overall, this project would greatly benefit not only the Church, but also the entire San Bernardino mountain area.

Thank you for your time and consideration.

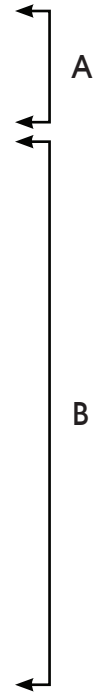
Linda Lopez

Bentson, Vuona & Westersten, LLP

Certified Public Accountants

949-789-1050

909-744-8097





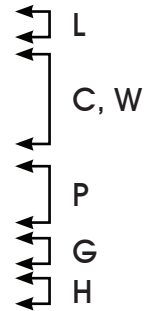
Comment Letter #120

From: [klaus meister](#)
To: [Nieves, Tom](#)
Cc: [klaus meister](#)
Subject: church of rhe woods project at lake arrowhead
Date: Friday, February 22, 2019 4:33:35 PM

Sent from [Mail](#) for Windows 10

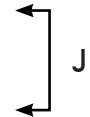
I would not like to see this project to proceed for the following reasons:

- 1-they will shave off the top of the mountain and replace with considerable amount of black top ruining the current water shed. This can cause flooding in the Blue Jay business district during heavy rains. Who will pay for lost property-lives?
- 2-Our scenic mountain entrance will be ruined, replaced by urban looking structures. It will be totally out of character with our mountain community at a focal point of the community.
- 3-Tje project will be detrimental to animal life
- 4-This is the busiest stretch of road on the mountain and the project would be detrimental to traffic flow



Respectfully,

Klaus Meister
PO Box 1528, Blue Jay, CA 92317
909-289-7046





Comment Letter #121

From: [G Meshorer](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods
Date: Friday, February 22, 2019 10:31:27 AM

I am against the Church of the Woods project. It is too big and too intrusive.



Gwen Meshorer
PO Box 642
Crestline, CA 92325
310-926-1030



Comment Letter #122

From: [L Myers](#)
To: [Nieves, Tom](#); Tom.Nieves@lusbccounty.gov
Subject: Opposition Letter for Church of the Woods Project
Date: Friday, February 22, 2019 2:51:47 PM
Attachments: [EIR Church of the Woods 2019.docx](#)

Dear Mr. Nieves:

Attached is my letter of opposition to the Church of the Woods Project. A hard copy was mailed to your attention on Tuesday, February 19, 2019.

The two different email addresses were each printed separately in the Alpine Mountaineer and in the Mountain News on February 21, 2019.

Regards,
Lynn Myers
Lake Arrowhead resident





February 17, 2019

County of San Bernardino
Land Use Services Department
Tom Nieves, Planner
385 North Arrowhead Avenue, 1st Floor
San Bernardino CA 92415

SUBJECT: Opposition to proposed Church of the Woods Development Project at Highway 18 and Bear Springs Road, Rimforest; 11697CF1/M265-11/2004/CUP & TPM 16155 APN: 0336-101-06

Dear Mr. Nieves:

Review of the Draft Revised Environmental Impact Report (DREIR) for this project raises concerns about future use of the multiple large structures in the proposed plans. Clarification of structure use and the long term business plan will help further define the severity of negative impacts on the environment and geology of the area, as well as safety evacuation routes of the area.

I, O

The plan proposes to develop 38 acres on forested land north of Highway 18 and west of Bear Springs Road in Rimforest, CA. The project’s proposed structures would establish a 27,364 sf assembly building, a skate park/ recreation facility / play fields, a 41,037 sf children’s ministry building, a 2,500 sf maintenance and caretaker residence; establish a 3,073 sf chapel, a 23,510 sf worship center, a baseball field, two amphitheatres (one temporary and one permanent) , and parking for 300 cars.

B

This plan appears to describe a rental conference center similar to Alpine Conference Center.

The proposed Church of the Woods development would be located approximately two miles from the Alpine Conference Center in Blue Jay, CA. This development density may create additional negative environmental and geological impacts.

I, O

Although the project plans to roll out development in phases, review and clarification of the proposed building uses and detailed plans, and the long term business plan, would aid in the determination of future additional negative impacts of this project if fully implemented and rented out 52 weeks a year.

If these structure use and business plans are accessible to the public, I was not able to locate the documents on the Land Use Services Department website.

I, O

I appreciate the opportunity to comment on the DREIR for the Church of the Woods development project. Please include me on future public communications regarding this project. Thank you.

J

Sincerely,

Lynn Myers

Lmyers809@gmail.com



Comment Letter #123

From: [Brenda Pope](#)
To: [Nieves, Tom](#)
Subject: Say NO to Church of the Woods
Date: Friday, February 22, 2019 2:29:56 PM

Development of type is not needed or wanted in the area.





Comment Letter #124

From: [Paul Salverda](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods Project -- please decline this project.
Date: Friday, February 22, 2019 3:43:59 PM

Contact: Tom Nieves, Planner
County of San Bernardino, Land Use Services Dept.
385 N Arrowhead Ave, First Floor
San Bernardino, CA 92415
909-387-5036

Sir,

In my opinion, this project should be declined.

A 68,401 sq foot 2-story building - 1,600 person capacity building -- with 300 parking spaces is planned.

The San Bernardino County code specifies: f 1 for each 3 fixed seats; and f 1 for every 25 s.f. of seating area where there are no fixed seats; and f 1 for each 400 s.f. of floor area outside the main assembly area

If there are 1,600 seats, there should be 533 spaces. If there are no fixed seats, there should be dramatically more that are not in the plan.

The water runoff from the parking lots would be a huge problem to the nearby areas.

Most of the time there would be **large, empty, unused parking lots** instead of the beautiful trees and scenery that is there currently.

All of the time there would be a **large, highly visible building** standing instead of the beautiful trees and scenery that is there currently.

A 54,000 sq foot sports field is planned.

Who would be able to use it? It can't be public unless the church is willing to pay for liability insurance for everyone.

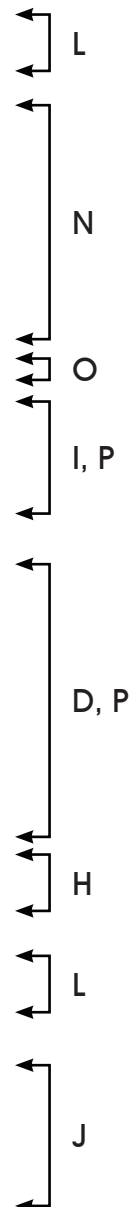
Most of the time, there would be a **large, empty, hopefully maintained, sports field** instead of the beautiful trees and scenery that is there currently.

The amount of forest that would be removed and the leveling required would be a blight, an eyesore.

The traffic it would generate would require numerous changes to the roadways and traffic patterns. Who would pay for those upgrades?

The mountain community does not need this expansion of church space, especially at this location, the beginning of the forest for most.

Paul Salverda
714-267-5219
210 Brentwood Dr.
Lake Arrowhead, CA 92352



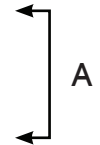


Comment Letter #125

From: [Jayne Schuljak](#)
To: [Nieves, Tom](#)
Subject: Sonrise: Church of the Woods Service Project YES!
Date: Friday, February 22, 2019 12:56:17 PM

Hello Mr. Nieves,

Very excited to have this development take place on the mountain. These resources are much needed by local residents. We are continuing to hope that the project will take place quickly. Thank you for working to benefit our community.



Sincerely,
The Schuljaks
p.o. box 4216
Crestline Ca, 92325
909-222-2900



Comment Letter #126

From: [Mary Smith](#)
To: [Nieves, Tom](#)
Subject: No to Megachurch
Date: Friday, February 22, 2019 12:34:25 PM

Sir,

It is ethically wrong in the eyes of God to destroy nature.

It is morally wrong to sneakily attempt conversion by location and shoving this down people's throats.

Go away. This is extremist and is real estate ploy as well as political ploy. IT is so wrong on such a massive scale.

Mary Smith





Comment Letter #127

From: [Valencia Spaccia](#)
To: [Nieves, Tom](#)
Subject: NO to Church of the Woods project/ Sonrise in the Woods.
Date: Friday, February 22, 2019 1:07:26 PM

Dear Mr. Niece,

I am writing in regards to the Church of the Woods project/ Sonrise in the Woods project being proposed for Rimforest.

I realize you are probably being inundated with emails, phone calls, etc regarding this project as it is a VERY HEATED subject in our mountain communities. I rarely feel compelled to add my 2 cents, but this is HUGE, literally. These mountain communities already have a church on every corner, which are almost never at capacity, so it seems unnecessarily destructive to the integrity and natural flow of the forest itself, let alone the impact it's size and capacity would have on traffic. I'm not adverse to progress, when, where, and why it is needed, but THIS proposed project does little to lend itself to necessity and constructive, supportive (ie; revenue generating) purposes. These are not affluent communities up here, and a mega church would do little, to nothing to improve on that as they would not be paying taxes, nor would they be patronizing local businesses anymore than they currently are.

So to be clear...I am NOT IN FAVOR OF THIS PROJECT, as it will only negatively impact our mountain communities.

Thank you for your time and consideration.

Very Sincerely,

Valencia Spaccia

P.O. Box 4698
24271 San Moritz Dr.
Crestline, CA 92325

(909)338-4005

vaspaccia@gmail.com

I, S
L

J



Comment Letter #128

From: ourthinman@aol.com
To: [Nieves, Tom](#)
Cc: ourthinman@aol.com
Subject: Fwd: Church of the Woods
Date: Friday, February 22, 2019 3:49:33 PM

February 22, 2019

Re: Church of the Woods (SCH No. 2004031114)

We have been members of Church of the Woods over 29 years and I have been their treasurer over 25 years.

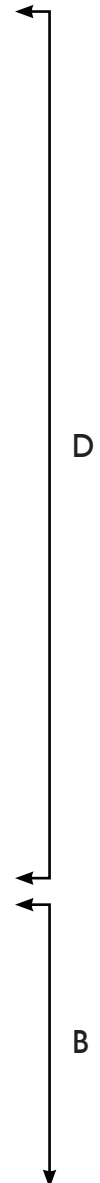
There have been a number of negative letters written about Church of the Woods building a new facility on Hwy 18 ever since the land was purchased in 2002. However, I would like to remind everyone about one of the things this church does very well.

There are many people here on the mountain that are in financial difficulty due to loss of work, injury or sickness. They have helped pay for their rent, utilities, hospital bills, medicine, car repairs, etc. averaging over \$55,000 each year covering an average of 165 families.

In addition to supporting approximately 30 missionaries, they have sent many thousands of dollars in the prior years to assist in the earthquake needs in Haiti, the flooding in New Orleans, the fires on our own mountain, the tsunami in Japan and many other disasters.

The point I wish to make is that we value people very highly and want to make their lives better as much as possible.

This church can even reach and improve the lives of our mountain friends with this new facility where they can provide an indoor basketball court and gym year around and a baseball field for the summer months plus meeting rooms for people to use, a coffee shop for our youth and much more.





Thank you for your concern in this matter.

Ken and Rosemary Thiele

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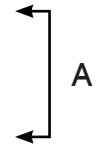


Comment Letter #129

From: [Nichelle Trulove](#)
To: [Nieves, Tom](#)
Subject: SCH No. 2004031114 project support
Date: Friday, February 22, 2019 11:39:24 AM

Dear Mr. Nieves,

Please accept this comment letter on the Church of the Woods Draft Revised Environmental Impact Report (SCH No. 2004031114). I am excited to see this campus developed and I am an eager supporter because of its multiple social benefits, which include, but are not limited to:



- It provides much needed resources for our whole mountain community with ball fields, a place for youth to hang out and find healthy recreation, family-friendly playgrounds for kids, meeting rooms for people to use, coffee shop to relax and fellowship, an amphitheater for events and an accessible staging area for emergency needs of firefighters and first responders (*if necessary*).
- It brings a new church campus that includes worship facilities for spiritual impact of biblical truths, a youth center with a multi-use gymnasium, children’s ministry rooms with age appropriate playgrounds, outdoor courts for fun activities and a sports field to play soccer or baseball. It will offer all the youth of this mountain another outlet to enjoy safe social interaction.
- It will give relief of the space constraints in the current residential area of the existing Church of the Woods facility.
- This project will capitalize on the beauty of our mountain and honor the environmental ambiance of our forest area. The new facility will leave as much of the natural beauty of the mountain as possible as it is valued considerably.
- It offers various public groups a place to gather, practice, use and enjoy.



Overall, this project would greatly benefit not only the Church, but also the entire San Bernardino mountain area. Thank you for your time and consideration.

Sincerely,

Nichelle Trulove



Comment Letter #130

From: [Erin Willcutt](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods project: Sonrise in the Woods
Date: Friday, February 22, 2019 12:58:31 PM

Tom Nieves,

Regarding Church of the Woods project: Sonrise in the Woods

Hello, I would like to introduce myself. My name is Erin Willcutt, I have been a mountain resident off and on my entire life. Full time since 2012. When I moved to Lake Arrowhead in 2012, I had no friends. I was a stay at home mom of a one year old. And miserably alone. I became a member of Church of the Woods, and they introduced me to amazing friends and support groups.

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I fully support Church of the Woods. And think their project, Sonrise in the Woods, will be an amazing addition to our mountain.

←
A
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If you have any questions, please feel free to contact me,

Erin Willcutt
PO Box 1562
1189 Golden Rule Lane
Lake Arrowhead, Ca 92352

←
J
←

Cell 626-221-4542
Email erinwillcutt@gmail.com



Comment Letter #131

From: [Cynthia Willman](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods Project
Date: Friday, February 22, 2019 11:15:12 AM

Mr. Nieves:

I'm writing as a full-time Lake Arrowhead resident to register my disapproval of the Church of the Woods project. This project is too massive for an area with only one two-lane highway servicing it. In the winter, especially, this road is dangerous and overused, and to put hundreds of additional vehicles on it would overtax the resources of the area.

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← L, U
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There are many churches on the mountain that have facilities to serve large congregations that are nearly empty every Sunday. I know because I toured all of them after moving here last year looking for a new home church.

←
← I
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Please don't approve of this project. The environmental and social and transportation impact will be large and destructive.

←
← L
←

Thank you,
--Cynthia Willman 323-509-7361
P.O. Box 5722
Blue Jay, CA 92317

←
← J
←



Comment Letter #132

From: [Ryan Wolverton](#)
To: [Nieves, Tom](#)
Subject: Church of the woods project
Date: Friday, February 22, 2019 12:07:49 PM

Hello my name is Ryan Wolverton, my address is 1195 Scenic Way, Rimforest CA and I am strongly against this project. It will bring years of unwanted noise and traffic to what is a peaceful environment. Why not finish McKay park? Why not the development across from the golf course? There are multiple locations that would be much better and wouldn't destroy the forest. Maybe I would be for this project if it weren't so pointless. We simply don't need another church up here. It won't, in any way, benefit this community but instead cause noise pollution, traffic and destruction of what is a widely loved area. Please do not approve this project. My cell is (909) 744-4649

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J, L
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Comment Letter #133

From: [carole.anderson](#)
To: [Nieves, Tom](#)
Subject: The new church plans
Date: Saturday, February 23, 2019 12:51:58 PM

The locals don't want it. Please abandon this project.

[Sent from Yahoo Mail on Android](#)





Comment Letter #134

From: [Patricia Arack](#)
To: [Nieves, Tom](#)
Subject: Megachurch project
Date: Saturday, February 23, 2019 12:48:36 PM

This megachurch is detrimental to the environment and the community. Please do not approve this project.



Patricia Arack, Retired
CCSF ESL Dept. Faculty
415 216 9221



Comment Letter #135

From: [Bob & Shari Jochums](#)
To: [Nieves, Tom](#)
Subject: EIR: Sonrise in the Woods
Date: Saturday, February 23, 2019 12:43:52 PM

Dear Mr. Nieves,

I urge you to carefully consider the negative impact that Sonrise in the Woods would have on not only the environment of the surrounding forest, but also on the environment of the 400 or so folks who reside in that area. It is unlikely that this “campus” will provide much benefit for the community in which it is to be built. It is more likely that it will encourage people from far-reaching towns to visit Rimforest and create tremendous and undesirable transportation, circulation, and environmental impacts that will not be mitigated by church funds.

I know you will look closely at the impact that this project would have and see through the shallow and self-serving form letters that Church of the Woods has encouraged their membership (and others desiring a megachurch in the mountains) to write.

Thank you.

Bob & Shari Jochums

I, L, O



Comment Letter #136

From: [Dan Lewis](#)
To: [Nieves, Tom](#)
Subject: Wrong sort of business for such a small town
Date: Saturday, February 23, 2019 1:57:02 AM

Mr. Nieves,

Please accept this comment letter on the Church of the Woods Draft Revised Environmental Impact Report (SCH No. 2004031114).

We are strongly convinced that this is the wrong place for such a thing.

Thank you for your time and consideration.





Comment Letter #137

From: [Steve Lowen](#)
To: [Nieves, Tom](#)
Subject: Megachurch
Date: Saturday, February 23, 2019 1:46:43 PM

Mr. Nieves:

Good afternoon.

I just became aware of the potential building that is proposed by 'Sunrise.' This project will certainly have a multiple of negative effects, as we have seen in my venue of North Scottsdale. In the short time this church has been part of our landscape we have experienced a tremendous increase in traffic with the problems associated with that. Further, as soon as the church was built expansion plans were formulated. This means that projections were 'false.'

Be good to your community and deny this protocol.

Steve Lowen





Comment Letter #138

From: [Sandy McReynolds](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods
Date: Saturday, February 23, 2019 6:56:32 PM

I regularly drive through this area, and I think that a megachurch is problematic at best, impacting traffic, and sucking up valuable county resources, and an eyesore as well.

John McReynolds





Comment Letter #139

From: [don_merhar](#)
To: [Nieves, Tom](#)
Subject: Mega Church
Date: Saturday, February 23, 2019 6:59:15 PM

Please don't let a megachurch destroy your little community. If they are allowed to go forward the quality of life now enjoyed is forever gone.

←
E, L
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Comment Letter #140

From: meyer@zoominternet.net
To: [Nieves, Tom](#)
Subject: The Church in the Woods request.
Date: Saturday, February 23, 2019 12:40:18 PM

This request to build a mega-church in a small community is downright shocking, considering the fall out of having such a monstrosity using roads, taking up land and what with all the traffic and noise such an organization will inevitably develop. The request of this mega-church and its pastor should definitely NOT be accepted, but denied. If they want to build such a traffic and noise making building, they should have to build it somewhere out in the country where there are no people around and no small community to be so harmfully impacted by such an organization's activities that benefit only its members and definitely nobody else. The requests from members of this organization's congregation should clearly be treated as tainted, and NOT in the best interests of anyone but themselves.



Thank you for your consideration.,

Ralph

Make America Decent, Moral, and Humane Again: Rip out foul racist criminal Trump and his vile republican fellow travelers!



Comment Letter #141

From: [Patty Pagel](#)
To: [Nieves, Tom](#)
Subject: Thank You for your time in this matter
Date: Saturday, February 23, 2019 10:10:39 AM
Attachments: [Church of the Woods letter to Environmental Group.docx](#)

Letter is attached
Patty Pagel



February 23,2019

Dear Mr. Nieves,

Please accept this comment letter on the Church of the Woods Draft Revised Environmental Impact Report (SCH No, 20040311114). We are excited to see this campus developed and enthusiastically support it because of it multiple social benefits, which include, but are not limited to:

It provides much needed resources for our whole mountain community with ball fields, a place for youth to hang out and find healthy recreation, family-friendly playgrounds for kids, meeting rooms for people to use, coffee shop to relax and fellowship, an amphitheater for events and an accessible staging area for emergency needs of firefighters and first responders (if necessary).

It brings a new church campus that includes worship facilities for spiritual impact of biblical truths, a youth center with a multi-use gymnasium, children’s ministry rooms with age appropriate playgrounds, outdoor courts for fun activities and a sports field to play soccer or baseball.

It will give relief of the space constraints in the current residential area of the existing Church of the Woods facility.

This project will capitalize on the beauty of our mountain and honor the environmental ambiance of our forest area.

It offers various public group a place to gather, practice, use and enjoy.

Overall, this project would greatly benefit not only the Church, but also the entire San Bernardino mountain area, like the Republican Women’s Group that needs a place for monthly meetings.

Thank You for your time and consideration of this matter.

God Bless and may your days be warm and delightful. And we hope you come and join us whenever your heart desires.

Brad Pagel

Patricia Pagel





Comment Letter #142

From: [Steven Pazzitzky](#)
To: [Nieves, Tom](#)
Subject: Church Of The Woods request
Date: Saturday, February 23, 2019 4:05:01 PM

Dear Mr. Nieves,
Please consider the wishes of the residents of Rimforest and deny the request of the Church Of The Woods. Thank you.
Steven Pazzitzky
Riverside, CA 92506

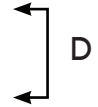




Comment Letter #143

From: [cyd_peace](#)
To: [Nieves, Tom](#)
Date: Saturday, February 23, 2019 1:56:01 PM

You need to consult with your residents, and they ALONE as to whether or not they wish this "sonrise" development to occur. Why on earth would you take into consideration anyone else? These are your people; your family, your friends, your community.





Comment Letter #144

From: [Lynne Portnoy](#)
To: [Nieves, Tom](#)
Subject: Stop the Megachirch
Date: Saturday, February 23, 2019 2:41:18 PM

Please don't allow an outsized presence to move in and destroy the balance of the town.



Sent from my iPhone



Comment Letter #145

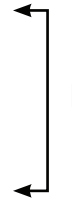
From: nervousp@aol.com
To: [Nieves, Tom](#)
Subject: Sunrise in the Woods project
Date: Saturday, February 23, 2019 3:21:15 PM

Dear Mr. Nieves

Here are your actual benefits of this proposed project:

- Not paying taxes
- Using limited county resources
- Fleeing the local populace

Richard Pratt
Prescott, Arizona





Comment Letter #146

From: [CHRIS SAUNDERS](#)
To: [Nieves, Tom](#)
Subject: Proposed Construction Project.
Date: Saturday, February 23, 2019 1:55:02 PM

Dear Mr Nieves,

I have studied the environmental report as regards to the possibility of constructing “Sonrise In The Woods” Christian Church in your district, and the disadvantages would seem to considerably outweigh any redeeming features that are being claimed for this project. The environmental report specifically cites ...

“..... unavoidable impacts regarding noise and transportation and circulation and CUMULATIVE IMPACTS regarding biological resources and transportation and circulation which would REMAIN SIGNIFICANT.”

This would seem a heavy burden to place on a small community of 400 residents, who seem to be unanimously against this proposed Christian retreat, as there would seem to be absolutely no advantages to the resident community, of having a continuous stream of urban visitors commuting to “Sonrise”.

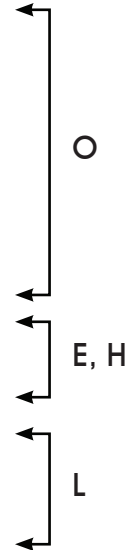
The proposed traffic from the city to your community, being of a transient nature, would not be committed to maintaining the integrity of their surrounding as are the permanent residents, who feel that this project would negatively impact and disrupt their lives, and those of their families.

Therefore, I reiterate, that this large noisy disruptive project, being against the express wishes of the majority of your community, would not be a wise action to approve, as the full extent of the negative physical effects, although noted in the impact report, cannot be fully estimated, and the negative emotional effects are already being experienced and expressed.

Sincerely,

Chris Saunders.

Sent from my iPad





Comment Letter #147

From: [Steven Schafersman](#)
To: [Nieves, Tom](#)
Subject: Negative impact of Church of the Woods' recreational facility in Rimforest, CA
Date: Saturday, February 23, 2019 4:05:36 PM

Dear Mr. Nieves,

Please investigate thoroughly before granting Church of the Woods a permit to build a recreational facility in an isolated, wooded area with a small population in San Bernardino County. The current residents' quality of life will surely be harmed by such a giant facility. Its own preliminary EIS states that the facility will have significant unavoidable impacts on the area by increasing noise, transportation, traffic circulation, and harming biological resources. The church's recreational facility should be build in or near a larger population area whose infrastructure can handle the increased human-use demands necessary. The facility will also unavoidably decrease property values by its presence and the church will no doubt claim that its recreational facility is tax exempt.

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Thank you for your attention to this matter.

Best regards,

Steven Schafersman



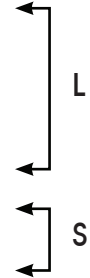
Comment Letter #148

From: pasapdub@aol.com
To: [Nieves, Tom](#)
Subject: Please consider the environment...
Date: Saturday, February 23, 2019 1:30:55 PM

...and do NOT approve a "megachurch" in this small community.

I thought churches were concerned with giving to the community--not destroying FIFTEEN ACRES of forested land!

Tax-free money has no business in the massive church business.



Thank you,
P.T. Wright



Comment Letter #149

From: [Rhetta Alexander](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods DREIR Public Comment
Date: Sunday, February 24, 2019 8:40:09 PM
Attachments: [Church of Woods DREIR Public Comment.pdf](#)

Dear Mr. Nieves,
Please accept my attached comment concerning the Church of the Woods DREIR.

Thank you,

Rhetta Alexander
818-430-6749



February 24, 2019

Tom Nieves, Planner
County of San Bernardino
Land Use Services Department
385 North Arrowhead Avenue, First Floor,
San Bernardino, CA 92415

Dear Mr. Nieves,

I am writing in opposition to the proposed Church of the Woods Project as described in the Draft Revised Environmental Impact Report (DREIR).

The project site is located immediately north of State Highway 18, west of Daley Canyon Road and east of Scenic Way, in Rimforest and encompasses approximately 27.12 acres. The Church of the Woods proposes to develop the southern portion of the site with a church campus to include (as reported in the Mountain News):

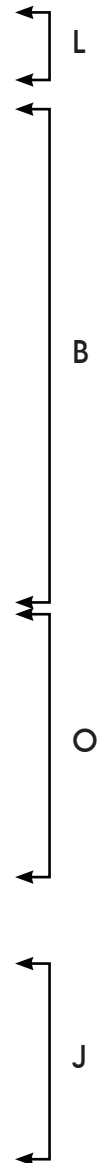
- A two-story building consisting of a 27,364-square-foot gymnasium and a 41,037-square-foot assembly building/children’s ministry, located on the southeast portion of the site;
- One 1,500-square-foot maintenance building, caretaker residence and lavatory facilities, located on the southwest portion of the site;
- One 54,000-square-foot sports field, located in the southwest corner of the site;
- Sports courts located in the south central portion of the site; and
- One 7,838-square-foot water quality retention basin, on the south central portion of the site.
- Associated on-site drainage facilities, utility connections, landscaped areas, pedestrian pathways, internal circulation roadways, driveways and parking areas would be constructed.
- Approximately 13.5 acres of the site would remain as natural open space.

While the analysis within the DREIR, stated that ‘all significant environmental impacts would be mitigated to less than significant levels, ... **unavoidable impacts regarding noise, transportation and circulation, and cumulative impacts regarding biological resources and transportation and circulation, would remain significant.**’

My family has enjoyed the beauty, peace and quiet of our mountain home located in the community of Twin Peaks since 1966. I believe that the unavoidable impacts described above, are indeed, far too significant and render this development clearly unsuitable.

Respectfully submitted,

Rhetta Alexander
6903 Burnet Avenue
Van Nuys, CA 91405
818-430-6749





Comment Letter #150

From: [Doug Allen](#)
To: [Nieves, Tom](#)
Subject: Sonrise in the Woods
Date: Sunday, February 24, 2019 3:22:00 PM
Attachments: [Sonrise letter doug..docx](#)

Attached is my letter regarding the development of Sonrise in the woods,

Regards,

Russell (Doug) Allen



February 24, 2019

Dear Mr. Nieves,

I am writing you regarding the Sonrise in the Woods project and the Church of the Woods Draft Revised Environmental Impact Report (SCH No. 2004031114). I have been anticipating the development of this project since it was first presented. I have been living in Running Springs since 1996 and I am excited to see the development of this campus because it would provide so many benefits to the entire community.

- This campus would offer various public groups to gather, use and enjoy the beauty of this mountain.
- It would provide much needed resources for our youth and community such as, ball fields, a safe place for our youth to gather, play grounds for children and families, coffee shop to fellowship and visit, an amphitheater for events, an accessible staging area for emergency needs of firefighters and first responders if needed.
- It brings a new church campus that includes worship facilities for teaching biblical truths, youth center with a multi-use gymnasium.
- Church of the Woods is currently located within a residential area and this new location will give relief to the residents of this neighborhood.
- This project would capitalize on, honor and preserve the beauty of this mountain.

A, B

Regards,

Russell Allen

PO Box 2065

Running Springs, CA 92382

J



Comment Letter #151

From: [Sandra Allen](#)
To: [Nieves, Tom](#)
Subject: Sonrise in the wood.
Date: Sunday, February 24, 2019 3:28:48 PM
Attachments: [Sonrise letter sandy.docx](#)

Attaching letter regarding the project for Sonrise in the Woods.

Sandy Allen
PO Box 2065
Running Springs, CA 92382



February 24, 2019

Dear Mr. Nieves,

I am writing you regarding the Sonrise in the Woods project and the Church of the Woods Draft Revised Environmental Impact Report (SCH No. 2004031114). I have been anticipating the development of this project since it was first presented. I have been living in Running Springs since 1996 and I am excited to see the development of this campus because it would provide so many benefits to the entire community.

- This campus would offer various public groups to gather, use and enjoy the beauty of this mountain.
- It would provide much needed resources for our youth and community such as, ball fields, a safe place for our youth to gather, play grounds for children and families, coffee shop to fellowship and visit, an amphitheater for events, an accessible staging area for emergency needs of firefighters and first responders if needed.
- It brings a new church campus that includes worship facilities for teaching biblical truths, youth center with a multi-use gymnasium.
- Church of the Woods is currently located within a residential area and this new location will give relief to the residents of this neighborhood.
- This project would capitalize on, honor and preserve the beauty of this mountain.

A, B

Regards,

Sandra Allen

PO Box 2065

Running Springs, CA 92382

J



Chaplain Ray Bates
49 Park Avenue, Middleville, New York
Mail To: P.O. Box 391, Herkimer NY 13350
315-891-3890
humanistchaplain@hotmail.com



24. February 2019

LAND USE SERVICES DEPARTMENT



Mr Tom Nievez, Contract Planner
Land Use Services Department
County of San Bernadino
385 North Arrowhead Avenue (First Floor)
San Bernadino, California

MAR 04 2019

COUNTY OF SAN BERNARDINO



SUBJ: Rimforest, California



REF: *Sonrise in the Woods* (construction proposal)

Greetings, Planner Nievez:

A colleague has requested comments on a megachurch construction proposal to erect large buildings and major parking facilities in the tiny village of Rimforest as a religious retreat. I live in a village of 500-600, (812 in 2010), and thought of the dreadful impact such a complex would have on our village, the township, and the nearby agricultural and forested areas.



The trend toward megachurch installations is pervasive, nationwide. Most USA religious centers are losing membership, especially among younger people. I've attached a graph published by Pew Research Center that clearly shows trends.



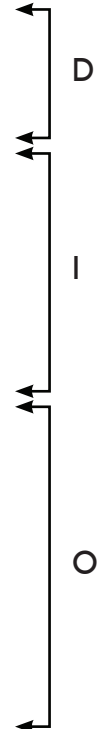
In this village, the Roman Catholic church and its rectory are now residences. A former Baptist Church is now a residence. The beautiful stone church and its attached rectory are now abandoned. I had plans for restoring the complex as a community center and museum, with consecrated spaces for various religions, but now I'm too old and disabled to make that happen.



The impact on Rimforest and environs will be substantial, and the downstream communities, forests, and agricultural land will also suffer. Every roof and paved parking area will contribute to an already statewide problem of increased floods and pollution.



West Canada Creek (likely a "river" in California) is a good trout stream and tributary to Mohawk River as well as New York's Erie Canal System. Runoff from additional water-impervious structures would be negative here, in the extreme. The *Sonrise in the Woods* proposal would very likely be the same for Rimforest and downstream communities and many other contributors to the economies of San Bernadino County and State of California.





As I mentioned earlier, the nationwide trend is for more of these megachurch complexes to be constructed. They are intended to concentrate remaining populations to maximize income and ensure a wealth of income resources, usually to clergy who are vociferous in their advocacy of "The Prosperity Gospel". Purchases of fleets of large passenger aircraft, palatial residences in various parts of the USA (and foreign luxury resorts) are typical of far too many of these sorts of institutions. A corresponding lack of charitable donations would be far more apparent if they were required to disclose their income and revenue streams, as are other nonprofit companies.

O, S

When I studied for my Certificate as Humanist Chaplain, I was surprised to learn that about 1/3 of my colleagues in those Webinar sessions were actually religious, and many were ordained. I think that is explained by the graph I've enclosed from the Pew Research Center. The soaring change in numbers of "unaffiliated" believers underscores what's happening. Churches are on track to lose more and more enrolled members, and they are concentrating what remains of their resources to bring as many paying customers together as they can.

Other than a few food-service or maintenance services for buildings and grounds, I can't see a major contribution of *Sonrise in the Woods* to the Rimforest economy, and none to County, State, or Federal revenues. For the County and the Rimforest community, this is a lose-lose proposal.

S

With serious negative impact on local government resources, intermittent surges in traffic, very large potential for runoff from heavy rains (apparently increasing in likelihood for California); I strongly suggest that *Sonrise in the Woods* would be a bad choice for approval.

I've held positions in municipal government here in New York and in Maryland, including some Zoning & Planning, Zoning Appeals, Emergency Preparedness and City Council. I'm obviously not one of the constituents for your County Legislature; I couldn't be much farther away. But, I'm very sincerely concerned for as much control as possible to be exercised over the shrinking pool of natural and community resources we face, nationwide. I hope that you don't consider this to be offensively interfering in an issue that's none of my business. I wish you well in your analysis of the *Sonrise in the Woods* proposal and strongly recommend its disapproval.

L, O

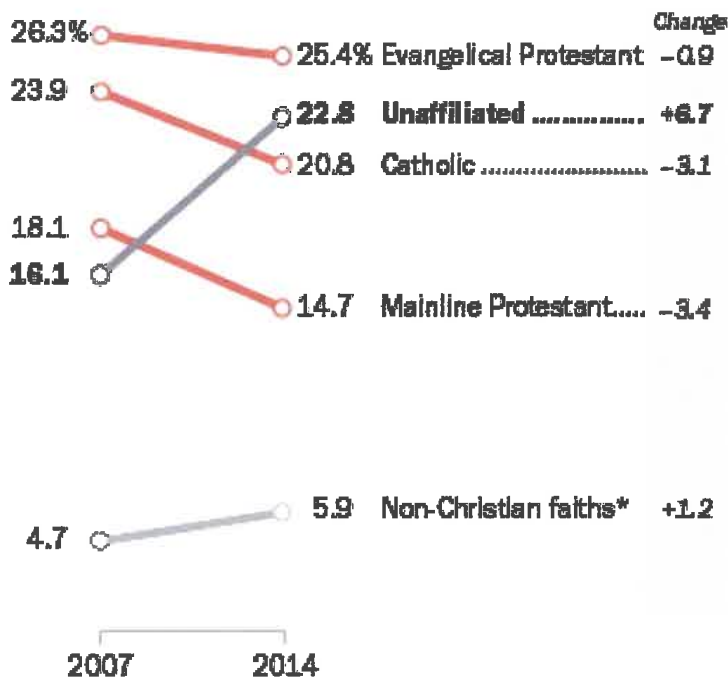
Very Respectfully,

Roy
BATES
LT, USNR, Retired
and
Humanist Chaplain



Changing U.S. Religious Landscape

Between 2007 and 2014, the Christian share of the population fell from 78.4% to 70.6%, driven mainly by declines among mainline Protestants and Catholics. The unaffiliated experienced the most growth, and the share of Americans who belong to non-Christian faiths also increased.



* Includes Jews, Muslims, Buddhists, Hindus, other world religions and other faiths. Those who did not answer the religious identity question, as well as groups whose share of the population did not change significantly, including the historically black Protestant tradition, Mormons and others, are not shown.

Source: 2014 Religious Landscape Study, conducted June 4-Sept. 30, 2014

PEW RESEARCH CENTER



Comment Letter #153

From: [George Bereschik](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods project -- environment impact
Date: Sunday, February 24, 2019 12:51:42 PM

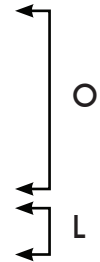
Mr. Nieves,

As I'm sure you know, the environmental impact report on the Church of the Woods project states,
"...environmental impacts would be mitigated to less than significant levels EXCEPT for ... noise and transportation and circulation and cumulative impacts regarding biological resources transportation and circulation which would REMAIN SIGNIFICANT." (emphasis mine)

Clearly, this is not a good fit for such a small community as Rimforest.

Thank you for your consideration.

George Bereschik



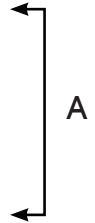


Comment Letter #154

From: [Lisa Bolanos](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods Project
Date: Sunday, February 24, 2019 3:07:30 PM

I live within two minutes of the church. I also attend the church. I fully support the project. I am not sure why a small group from Crestline...on Facebook are against it. I don't see how this would impact them in any way.

The issue that I see that they have is that they are atheists, which is fine but they appear to have issues with religion in general. That shouldn't be a factor at all.



Lisa Bolanos, JD
Broker, Lisa Bolanos and Associates

Image 909-380-9955
Image LisaBolanosandAssociates@outlook.com

Image 28677 Brigadoon Ct. Lake Arrowhead, CA 92352, PO Box 808
Dre#: 01846120

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Begin forwarded message:

From: Lisa Sells Homes
Date: January 23, 2019 at 10:34:57 PM PST
To: Lisa Bolanos JD
Subject: Hi

photo Image
Lisa Bolanos, JD
Broker, Lisa Bolanos and Associates
Image 909-337-9999
Image 909-380-9955
Image LisaBolanosandAssociates@outlook.com



Image LisaandMarysellHomes.com

Image 28200 Hwy 189, C205, Lake Arrowhead, CA 92352, PO Box 808

Dre#: 01846120



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Comment Letter #155

From: [Lisa Bolanos](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods Project
Date: Sunday, February 24, 2019 3:15:21 PM

Dear Mr. Nieves,

Please accept this comment letter on the Church of the Woods Draft Revised Environmental Impact Report (SCH No. 2004031114). We are excited to see this campus developed and enthusiastically support it because of its multiple social benefits, which include, but are not limited to:

It provides much needed resources for our whole mountain community with ball fields, a place for youth to hang out and find healthy recreation, family-friendly playgrounds for kids, meeting rooms for people to use, coffee shop to relax and fellowship, an amphitheater for events and an accessible staging area for emergency needs of firefighters and first responders (if necessary).

It brings a new church campus that includes worship facilities for spiritual impact of biblical truths, a youth center with a multi-use gymnasium, children’s ministry rooms with age appropriate playgrounds, outdoor courts for fun activities and a sports field to play soccer or baseball.

It will give relief of the space constraints in the current residential area of the existing Church of the Woods facility.

This project will capitalize on the beauty of our mountain and honor the environmental ambiance of our forest area.

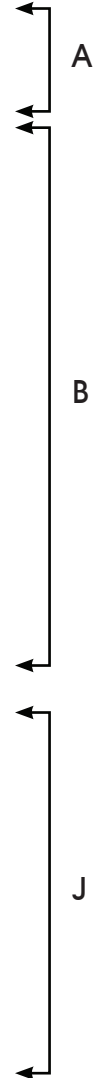
It offers various public groups a place to gather, practice, use and enjoy. Overall, this project would greatly benefit not only the Church, but also the entire San Bernardino mountain area. Thank you for your time and consideration.

Finally got your email address correct.

photo

Lisa Bolanos, JD
 Broker, Lisa Bolanos and Associates

[909-380-9955](tel:909-380-9955)
LisaBolanosandAssociates@outlook.com
LisaBolanosandAssociates.com
 PO Box 808, Lake Arrowhead, CA 92352
 Dre#: 01846120



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Please consider the environment before printing this e-mail!



Comment Letter #156

From: shellie.lakearrowhead@charter.net
To: [Nieves, Tom](#)
Subject: Church of the Woods project
Date: Sunday, February 24, 2019 6:55:10 PM

Mr. Tom Nieves,

This email is in regards to the huge project that Church of the Woods want to build on the property off State Highway 18 and Daley Canyon.

We have been residents here for well over 25 years and have raised our 4 children here as well.

We want to make it very clear that we ABSOLUTELY DO NOT want this project done, decimating one of the nicest forested areas on our mountain.

The population of full-time residents here continues to go down with the current full-time residents from Crestline to Green Valley Lake at about 30-32% (see water-district statistics/data). This enormous project is not needed whatsoever here on Mountain. There are numerous, large camps already that if COW needs a larger facility for an event, they have more than enough options to hold such events.

We DO NOT NEED more congestion and traffic especially in the Hwy 18/Daley Canyon area and we DO NOT NEED MORE OF OUR FOREST CUT AND DECIMATED. We are not 'tree-huggers" but place a high value on not only the forest but also the many animals that live in this particular area.

COW has LOTS of MONEY and think that they can use that to always get what they want. We ask that you DO NOT APPROVE THIS UNNEEDED PROJECT in our Mountains.

Thank you for your time,
Steve and Shellie Boydston
PO Box 2924
Lake Arrowhead, Ca. 92352
909-337-9578

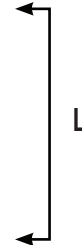




Comment Letter #157

From: [toni_carroll](#)
To: [Nieves, Tom](#)
Subject: Mega church on the rim
Date: Sunday, February 24, 2019 8:52:33 PM

I am vehemently voicing my objection to the proposed installment of a mega church along the rim highway in RimForesr. Are you people stupi, stupid, or just stupid? You are ruining the small town atmpshere provided by the mountains community. ONE OF THE FEW PLACES LEFT THE IS NOT OVERGROWM, OVERPOPUPATED, OVER USED, AND JUST PLAIN UNWANTED. GO SOMEWHERE ELSE THAT HAS PLENTY OF ROOM FOR YOU MEGA CONGRAGATION, LIKE THE DESERT. WE WILL FIT YOU TOOTH AND NAIL TO KEEP YOU OF OUR MOINTAIN, OUR HOme. Tonicarroll@yahoo.com



[Sent from Yahoo Mail for iPad](#)



Comment Letter #158

From: [Dorian Dane](#)
To: [Nieves, Tom](#)
Subject: NO NO NO to Sonrise in the Woods San Bernardino Mountains
Date: Sunday, February 24, 2019 5:41:39 PM

Please do not allow Sonrise in the woods to come to fruition.

The idea that children and families need “safe spaces” that they can go to in retreat is a distraction that ignores the already established presence of multiple other Christian centers on the mountain. (IE. Pinecrest, Calvary Chapel, and Thousand Pines - among OTHERS). All of these large church retreats are within a ten mile radius of one another and offer many of the same things that Church of the Woods is proposing for their new build. Church of the woods presents themselves as a new idea or service coming to the mountain, and that is simply not true, these types of retreats already exist here. Church of the woods seeks to build a new structure for self serving reasons and masks it behind the appeal of being beneficial to the community. They act to benefit themselves, no matter the cost to the community.

I

Additional reasons against:

1.

Traffic

Highway 18 through Rimforest is a single lane road each way that this winter alone has had to be shut down multiple times due to traffic accidents, bad weather, and more often than not a combination of the two. Highway 18 is also one of the only main roads to navigate around up here, and bringing a new surplus of cars and traffic to this area will not benefit anyone. In the winter months it will actually be additionally dangerous. Romforest can not handle this sort of traffic!

H, U

2.) Nature

The destruction of many acres of forest will not only displace wildlife causing a domino effect of other problems for the actual residents of this area but it’s construction and presence will also be an eye sore to the many residents who moved here to escape these exact types of large developments. They seek to level the mountain side and to fill a creek bed - neither can be done without consequence!

C, O, Z

3.) Misrepresentation

Sonrise in the woods continues to claim that it is NOT a megachurch - but with a capacity for over 1500+ in a village of only 500 residents that claim is ridiculous. I live in the immediate neighboring village of ‘Twin Peaks’ and every resident of my town would be able to fit inside of this massive “not megachurch”. It is unnecessary!

I

These are just a few of the bare minimal reasons to reconsider allowing this megachurch to build on top of our beautiful mountain. Please do not pass Sonrise in the Woods.

L

-Taylor Chenoweth
Resident and home owner of 916 Willow Springs, Twin Peaks ,CA, 92391
972-523-8767

J



Comment Letter #159

From: [Ron Coates](#)
To: [Nieves, Tom](#)
Subject: Please Stop the Church
Date: Sunday, February 24, 2019 8:32:12 AM

A city as small as Rimforest does not need a huge church like the one proposed by Sonrise. Please help stop them from taking over Rimforest.



Sincerely,
Ron Coates



Comment Letter #160

Bruce C. Daniels

P.O. BOX 3137, RUNNING SPRINGS, CALIFORNIA 92382

February 24, 2019

PHONE (909) 867-5879
EMAIL brujos42@gmail.com

Mr. Tom Neivez, Planner
San Bernardino County
385 North Arrowhead Ave.
(First Floor)
San Bernardino

SUBJECT: Church of the Woods EIR

Dear Mr. Neivez:

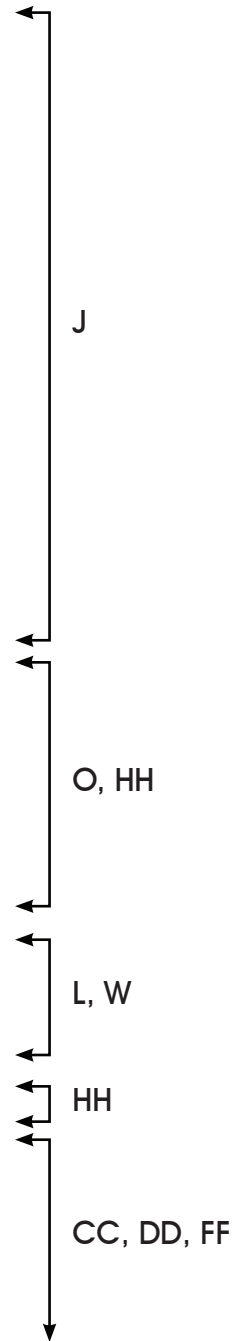
I write you in my capacity as a 36-year resident of the San Bernardino Mountains, County redevelopment consultant and community planning committee member, former city manager, County department head, charter member and first chairman of the Rim of the World Recreation and Park District, former supervisory appointee to County Service Area 70-P3 and local AYSO board member.

I currently serve as interim manager for the Rim of the World Trails Alliance, which identifies the Blue Jay/Rim Forest Little Bear Creek sub-region as one of its five priorities for an intermountain trail, related village revitalization and safe routes to schools. This concept was endorsed by the Lake Arrowhead Chamber of Commerce.

I respectfully request that the County grant a time extension of at least 60 days to thoroughly review this proposal. This sub-region is the location of the administrative headquarters of the Rim of the World Recreation and Park District, ROW Unified School District, County library, ROW High School and the U.S. Forest Service Dogwood Campground. Most importantly, the site is the source for a very rare Southern California year-round stream, Little Bear Creek, which water quality and stream flow flows through Agua Fria and Blue Jay into Arrowhead Lake affecting the entire area. The proposed development is anything but a "Church of the Woods", threatening to clear the land of forest only to pave over, dig into and build on invaluable natural wetlands habitat. Affected authorities, organizations and the general public should be provided ample opportunity to review what amounts to a major impact on the quality of life of our community and our eco-economy.

I am strongly opposed to this development and its accompanying Rim Forest Storm Drain Project permit from an ecological, economic and quality of life standpoint: The environmental and economic impacts are very substantial, especially when combined with County Flood Control District plans to construct a lined channel, duplicating the error now being corrected by the City of Los Angeles naturalizing the Los Angeles River:

- County notification provides inadequate time for either a public or professional comprehensive review and comment
- The study is woefully incomplete and inadequate. The entire sub-region should conform to habitat conservation as part of a specific plan similar to that of the City of Big Bear Lake Village Specific Plan before any significant development, plan or permit approval takes place. Rim Forest is a blighted area deserving of a comprehensive physical, economic and social impact analysis affecting the entire Rim of the World, especially residents and tourists utilizing State Route 18, "The Rim of the World Scenic Byway" in that area.
- The proposed project site incorporates highly significant natural features such as a rare riparian wetlands habitat and wildlife corridors





- Any major disturbance of the project site such as grading and movement of equipment creates serious permanent ecological damage; yet F-1 Construction activities and ground disturbance associated with project development may impact surface water flow. This is considered a less-than-significant impact with conformance to State and local regulatory requirements requiring no mitigation measures.
- F-4 Project operations could increase pollutant concentrations in surface water, yet this is considered a less-than-significant impact with conformance to State and local regulatory requirements. No mitigation measures required.
- F-5 Construction and operation of the project could be inconsistent with applicable regulations and goals and policies of the General Plan and Lake Arrowhead Community Plan; yet this is considered a less-than-significant impact with conformance to State and local regulatory requirements. No mitigation measures required.
- The EIR contributes to further desecration of a rare and already abused year-round creek as evidenced down slope in Blue Jay Village, most notably next to the Rite-Aid parking lot and the illegal Rock Ridge former mobile home park cutting of older growth trees, further adversely affecting the natural character so appealing to residents, visitors and wildlife alike. The site and surrounding area deserve much better unselfish and sensitive care.
- The plan and environmental review appear to transfer Valley land-use values to an alpine community surrounded by national forest dependent on water and shade in a natural environment and habitat for residents, visitors, flora and fauna alike.
- The development is planned to accommodate future use, which may never occur, thereby creating greater damage to our environment either way.
- I've not found any comprehensive or intensive socio-economic analysis in the community plan or anywhere else regarding a highly sensitive site that is the source of Little Bear Creek, a vitally important year-round waterway connecting a blighted unplanned Rim Forest, Blue Jay and Arrowhead Lake.
- This privately-owned property is supported by public improvements such as water, sewer, roads, police and fire protection, yet serves no public purpose. In fact it adversely affects traffic with proposed signalization and added traffic congestion in an already congested commercial strip along the only cross-mountain highway, exacerbating obstruction along a major evacuation route. Paradise should have taught us a lesson, a problem that first needs to be addressed.
- Developing this critical parcel would be a lost opportunity and a humongous waste of money for an area in desperate need of sound planning and environmental enhancement, not destruction.
- This is a vital village revitalization project weaving our environment and economy together via Little Bear Creek tourism and recreation; highly deserving of a specific plan similar to that of Big Bear Village.

CC, DD, FF
CONT.

Sincerely,

 Bruce Cort Daniels

cc.
 Karen Watkins
 Lake Arrowhead Chamber
 Lewis Murray
 Supervisor Janice Rutherford
 Josh Lee, SBCTA
 Caltrans

J



Bruce C. Daniels

P.O. BOX 3137, RUNNING SPRINGS, CALIFORNIA 92382

PHONE (909) 867-5879
EMAIL brujos42@gmail.com



Bruce Cort Daniels

CONSULTANT

29 Palms Band, Torres Martinez Band: Hotel/Casino feasibility Study; Salton Sea/Casino Federal funding negotiations

Mariposa County: State Mining Museum Study, Bower Cave Study, Yosemite Area regional economic development, transportation & housing marketing studies

San Bernardino National Forest Association

Cities of Coachella, Indio, El Centro: Brandenburg Industries, The Dimare Company, entertainment district plan and development; inter-modal transportation, planning, funding, implementation and management

City of San Bernardino/Coast Soccer League - Soccer Complex General Manager

Cochrane Associates: Feasibility study to establish a Miami soccer academy

County of San Bernardino: CDBG and redevelopment eligibility study

Dong Koo Kim Industries, Inc.: Foreign Trade (Korea, U.S. & Mexico)

Sam Digati For Supervisor: Riverside County political campaign

Professional Soccer Referee: N.C.A.A., C.I.F., C.Y.S.A.

GOVERNMENT

City of Coachella, CA – City Manager

County of Riverside – Director of Housing & Community Development

City of Lancaster – General Manager, Lancaster National Soccer Center

City of Big Bear Lake –Economic Development Specialist

U.S. Department of Housing and Urban Development (HUD): Program Manager Indian housing, Deputy

Director: Disaster housing; Community Planning & Development Representative: San Bernardino, Riverside, Inyo and Mono Counties; Urban Renewal Representative: Baltimore & Annapolis, MD; International Training

Officer (Office of the Secretary): Asia, Latin America

PRIVATE NON-PROFIT CORPORATION

General Manager: Shasta Economic Development Corp., Superior California Economic Development Council; Manufacturers Association, Counties & cities of Shasta, Trinity, Siskiyou, Modoc and Lassen

AWARDS: Greater Riverside Hispanic Chamber of Commerce; United Nations Soccer League; U. S. Housing and Urban Development. California Association of Recreation and Park Districts; County of Los Angeles; Inland Empire Soccer Referees Association

EDUCATION: Syracuse University, AB; Tulane University, M.A. Latin American Studies (economics, political science, history, Spanish)



Comment Letter #161

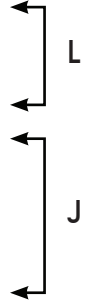
From: [Michael Farrell](#)
To: [Nieves, Tom](#)
Subject: Church of The Woods Project
Date: Sunday, February 24, 2019 3:29:55 PM

Sirs...

I am a home owner in the Crestline, Lake Arrowhead area... I am against this project. It is too large and it is environmentally destructive... I can see no way it would benefit the community, or the necessity for it...

Sincerely,
Mike Farrell
5818 East Fairbrook St.
Long Beach, Ca. 90815

Property owner,
23806 & 23846 Crest Forest Dr.,
Crestline, Ca. 92325





Comment Letter #162

From: [Harley Freeman](#)
To: [Nieves, Tom](#)
Subject: NO to Church of the Woods Sunrise project.
Date: Sunday, February 24, 2019 6:19:22 PM

Hello,

My name is Harley Freeman. My home is on Willow Springs Drive, just up the road from Daley Canyon Dr and Highway 18 near the proposed site of Church of the Woods' new Sunrise in the Woods development in Rimforest. This new project is almost literally in my backyard. As a commuter for work I drive through Daley Canyon to take the 18 down the mountain every day. The increased traffic brought first by construction vehicles, then visitors to this new center, will only serve to make an already struggling route of transit more burdened. Anyone who drives this stretch of the 18 knows how plagued it is by backups, especially in the winter months. Just this last Thursday the 21st, both Daley Canyon and 189 were shut down due to car accidents in the snow.

J
H, Q, U

From Strawberry Peak where we go hiking, we overlook the forest that will be cleared for this new development. As one of my favorite places to go on the mountain, it breaks my heart to think that so much of this land would be cleared for parking lots, tennis courts and other buildings. The increased light and noise pollution, displaced animals and cut down trees is not the vision that any of us local people have for our community.

C, D

Many other neighbors have spoken up against the proposed plans, just like in 2010 when development was halted due to opposition. Community members who live in Twin Peaks, Agua Fria and Bluejay share our concern that we do not want a large church complex tearing down our forest, displacing wildlife, and bringing more traffic and strangers. No one minds if this church wants to build a new chapel for worship on a few acres of land. What we don't want is 15 acres bulldozed so they can have a huge complex with a gym, lodging, recreational facilities, parking and much more. There are already many places within just a few miles radius which offer that, such as Pinecrest, Twin Peaks Christian Conference Center, Alpine Camp and Conference Center and others.

I, L

Please reconsider approving this project that members of the community feel will negatively impact our small area. This project is nearly bigger than the actual town of Rimforest and would bring many more people than even the small town of 500 people currently holds. We do not want another large church complex invading our neighborhood.

J

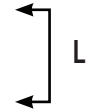
Thank you,
Harley Freeman
916 Willow Springs Dr. #1450
Twin Peaks California, 92391



Comment Letter #163

From: [Ken Gray](#)
To: [Nieves, Tom](#)
Subject: "Sonrise . . . ?"
Date: Sunday, February 24, 2019 12:16:54 PM

I just perused the Environmental Impact Report for what is truly a "megachurch" planned for your community. Oh, what a waste. Oh, what devastation to your community. You must stop this!



--K
[Kenneth Gray](#)
Playwright/Director

Darwin.

They say he read novels to relax,
But only certain kinds:
nothing that ended unhappily.
If he happened on something like that,
enraged, he flung the book into the fire.

True or not,
I'm ready to believe it. [Wisława Szymborska](#)



Comment Letter #164

From: [PATRICIA GUTTA](#)
To: [Nieves, Tom](#)
Subject: Megachurch"
Date: Sunday, February 24, 2019 2:32:08 PM

Dewar Mr Nieves:

A megachurch is all about money. Money for land, money for buildings, money to collect and influence, You have a beautiful little town, in Gods Cathedral. He threw out the money changers, so should you. If People want to visit your town for it's spiritual beauty, advertize and share the beauty... please don't sell it. Call yourself the town that aid no to the Golden Bull. Build a trail to a lovely lake, offer canoe rides, or Nature Hikes...Share a season of Mushroom hunting. Use something besides selling the soul of your community. No MegaChurch... Sincerely



Ms Patricia Gutta



Comment Letter #165

From: crazycatdumbdog@aol.com
To: [Nieves, Tom](#)
Subject: Church of the Woods project
Date: Sunday, February 24, 2019 6:51:36 PM

Tom Nieves:

I am strongly opposed to the Church of the Woods project, proposed for Blue Jay. It is too large and it is environmentally destructive. This mountain is too small for such a huge and non community "project".

←
←
D, L

Sincerely,

Debbie Lamont
PO Box 6161
Crestline, CA 92325

←
←
J

crazycatdumbdog@aol.com
(909)714-0644



Comment Letter #166

From: [Steve Loe](#)
To: [Nieves, Tom](#)
Cc: [Bob Sherman](#); [Chris Risher](#); [DaveG](#); [Hugh Bialecki](#); [Jeff Brandt](#); [Jeff Villepique](#); [Steven Farrell](#); mstamer@fs.fed.us
Subject: Church of the Woods Project, Draft Revised Environmental Impact Report Comments
Date: Sunday, February 24, 2019 11:19:05 AM

Thank you for the opportunity to comment on this proposed project. I am a retired Forest Service biologist that worked over 30 years in the San Bernardino Mountains, including the National Forest lands around and adjacent to the project. I was a founding member of the Southern Rubber Boa Advisory Committee with local mountain experts, CA Fish and Game, and SB County. I have worked as a consultant for the County specifically related to rubber boa habitat and protection during flood control and facility maintenance activities.

J

The draft EIR seriously underestimates and plays down the biological importance of the site and the impacts of the development in regards to wildlife movement, CA spotted owl, southern rubber boa and San Bernardino Flying squirrel and the National Forest. Basing the impacts strictly on a habitat assessment which assumes only impacts to a very small acreage directly impacted by the footprint is very misleading. None of the three threatened and sensitive species would spend their life only on those small areas mapped as high and moderate quality. The species of concern would use adjacent areas of lower quality to meet their daily or seasonal needs. Without detailed current surveys, it must be assumed that the species are present on or use the site periodically. Habitat mapping helps identify if there is suitable habitat, but not as an opportunity to say the less quality habitat is not occupied or not important. Stressing the fact in the EIR that none of the species have been detected since 2007 is misleading. There have not been good surveys during that time. The habitat needs to be looked at on a longer term than just current conditions. Forests mature, die and regrow. Acreage that is not suitable can change over time for these species.

G

The analysis also downplays and does not fully address impacts from artificial lighting human disturbance, and fuel modification associated with the church and its activities. The final fuel treatments required to protect the development will significantly affect the “protected” areas for biological resources. Additional analysis needs to be conducted to accurately predict total impacts and not just the footprint.

G

The following need to be re-evaluated, described and mitigated for:

Southern Rubber Boa

The entire project site is habitat for southern rubber boa. They are not restricted to those areas mapped as high or moderate habitat. San Bernardino Valley Audubon (Dave Goodward) comments made in 2010 are still appropriate and are included as input.

“The assumption that SRB are found only under logs, stumps and rocks is false and unsupported. We presume that their definition of suitable SRB habitat comes from the literature that states (correctly) that SRB use outcrops, stumps and logs as winter hibernacula, and that SRB are often found under these objects at other times of the year as well. 1, 2 While SRB are often found under these objects, they are also found on trails and crossing roads, particularly during summer rainfall that stimulates their movement. 4 They are nocturnal, meaning they will not often be seen when they are out and about. During the day they will almost invariably be underground. It is also documented in the literature that they sometimes move to moist canyon bottoms and streambeds in the summer when the surrounding soil dries

G



out. 3 In one report, SRB were reported to exhibit strong site fidelity. 5 However, a high percentage of the marked SRB in this study were not recaptured, suggesting at least some of the missing SRB dispersed away from where they were captured. In this study, the only two individuals found far from their hibernacula were males. This is consistent with the widespread pattern among many species of male dispersal for mating purposes, resulting in the important biological function of out-breeding, which maintains a diverse and healthy genome.

One estimate of dispersal comes from an Oregon study of Rubber Boas. This study documented dispersal up to 500 yards within one season. This figure has been used to estimate the dispersal needs of the Southern Rubber Boa. 6 A local account of SRB dispersal ability comes from an individual seen to disperse 300 yards in one season. 1 This documented dispersal range would fully encompass the 37 acres of the project site.

All these studies point to the obvious fact that SRB do not simply hide under the same rocks, stumps or logs their entire life. Rather, they move about their habitat to find food, shelter and mates like any other animal species. Given that the rocks logs and stumps are scattered throughout the project site, and that a moist streambed runs through the center of the project site, it is safe to assume that any SRB on site could be found virtually anywhere on TPM 16155, and that the entire site is suitable for SRB. The entire project site contains prime habitat components for the SRB as described in the CDFW protocol.

Research shows that the main food of SRB is mice and other rodents, often nestlings, as well as snake and lizard eggs. 8 These mice and other prey function under the same long-term biological rules of breeding and dispersal and occupying optimal habitat when it becomes available. Nobody knows how far away the boas food comes from, even in the short term, let alone in a biologically valid time scale. Nor do we know which plants those mice depend on, and the population dynamics of those plants. SRB habitat must include foraging and breeding areas for their prey, without which the snakes could not survive. This highlights how unreasonable and illogical the assumption is that the project site contains only 0.54 acre of suitable SRB habitat. We need to keep the entire food web intact if we are to ensure the long-term survival of SRB.

To conclude, the project site is within the range of SRB, is within the 10 mile swath of land between Twin Peaks and Green Valley that has produced the majority of SRB records, lies within the preferred plant community and elevation range, and has the essential features needed by SRB. All these factors reinforce the conclusion that the project site is suitable SRB habitat. Under such conditions, CDFW assumes presence, and it is up to the project proponents to prove otherwise with the required three consecutive years of protocol surveys.7 Given that only one year of protocol surveys was conducted rather than the required three years, the conclusion that SRB is absent from the project site is baseless. In addition, the assumption that only 0.54 acre is suitable habitat is unsupported by substantiating evidence, neither observational or from the scientific literature. The entire 37-acre should be considered suitable habitat.

1. Keasler, Gary . 1981. Rubber Boa Survey for the San Bernardino National Forest. USDA.
2. Stewart, Glenn. 1988. The Rubber Boa (*Charina bottae*) in California, with Particular Reference to the southern subspecies, *C.b. umbratica*. Proc. Conf. Calif. Herpetology. Eds: H.F. De Lisle, P.R. Brown, B. Kaufman, and B. M. McGurty. Southwestern Herpetologists Society.



G
CONT.



3. Loe, Steve. 1985. Habitat Management Guide for Southern Rubber Boa (*Charina bottae umbratica*) on the San Bernardino National Forest. San Bernardino National Forest publication.

4. California Dept. of Fish and Game. 2001. Survey Guidelines.”

The entire project area must be assumed to be occupied and important for the rubber boa. Impacts outside the developed footprint from lighting, fuel treatments, and human disturbance have been underestimated. Destruction of habitat on half of the area is significant and needs to be mitigated. Real mitigation for that loss should include off-site protection of potentially developable lands capable of being protected in the long-term for southern rubber boa.

California Spotted Owl

The importance of the area for spotted owls and the impacts of the project have been seriously underestimated. This area is connected to a larger block of National Forest suitable/occupied habitat that is not densely developed in the area bounded by the mountain communities. This area also connects the forested areas on the north side with those forested islands in upper City Creek and Strawberry Creek. All of the project is suitable for spotted owl nesting or foraging. They are not restricted to dense nesting habitat. Open areas are important for foraging and adjacent shrub habitats are important for production of preferred prey species. The lighting and human disturbance impacts on the proposed “protected” area has not been assessed. Much of the area will be impacted and these significant impacts should be mitigated with off-site habitat protection.

San Bernardino Flying Squirrel.

As discussed above for the southern rubber boa and CA spotted owl, limiting impacts to high and moderate quality habitats fails to recognize the importance and use of adjacent areas that they will use to meet their daily and seasonal needs. Permanent destruction of habitat (including effects of human disturbance, lighting, and fuel modification must be mitigated with off site habitat protection.

Wildlife Movement

The EIR underestimates the regional importance of the project area for wildlife movement. Because it is immediately outside of the decades old mapping of important Corridors, it is assumed to be of little importance. These County Corridors were developed to identify broad areas and protection concepts that would need to be evaluated and refined through project planning and design.

If one looks at the habitat in and around the project from the air or aerial photos, it is clear that this project is in the most viable landscape linkage remaining that connects the north-side habitats from the Mojave River Watersheds of Grass Valley Creek, and Deep Creek to the south side watersheds of City Creek and Strawberry Creek. The proposed development and recreation fields planned for the southern boundary have potential to completely cut off movement across the highway to City Creek and Strawberry Creek.

This location is the best landscape linkage opportunity between Rimforest and the high school. Much of the rest of the rim is developed which reduces the effectiveness for animal movement. The headwaters of City Creek directly across Highway 18 have forested areas that are used by owls and many species that also use the north side of the mountain.



G
CONT.



Protection measures need to be built into the project to avoid creating barriers to north-south movement across the highway. Lighting and fencing need to be modified to the extent possible to provide for large mammal and other species movement. Failure to maintain this linkage will have regional implications to wildlife and would be significant. Adversely affecting wildlife movement through the project area will have impacts to the Grass Valley, Deep Creek, Strawberry, and City Creek Corridors as well as to Arrowhead Ridge Preserve.

Cumulative Impacts

These lightly developed areas on the mountaintop are very important to wildlife. The species of concern are being adversely affected by climate change, habitat destruction from wildfire, and development. This development will result in the permanent loss and degradation of good habitat for these species and should be fully mitigated. I suggest that in addition to site specific mitigation measures, off-site habitat protection be required to mitigate for the permanent loss of this extremely valuable habitat.

Effect on National Forest Habitat

The adjacent National Forest makes this private land habitat all the more important for wildlife and plant habitat on the mountain. The EIR needs to address this and provide mitigation measures to protect our public land. Maintaining the habitat for the imperiled species and the landscape linkages, corridors and crossings are critical and must be mitigated for.

Thank you considering these comments in the finalization of the EIR and final project design. If I can be of any help, please contact me. I would be happy to meet on the ground to work with you and the proponent on protection and mitigation measures.

Steve Loe, Certified Wildlife Biologist, TWS
33832 Nebraska St.
Yucaipa, CA 92399
909-809-9980

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CONT.

J

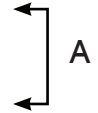


Comment Letter #167

From: [Bleu Luna](#)
To: [Nieves, Tom](#)
Subject: Sunrise in the Woods
Date: Sunday, February 24, 2019 10:05:56 PM

Mr. Nieves,

I'm writing in support of the proposed project of Sunrise in the Woods, Rim Forest, CA. The project, once completed will serve our mountain communities well. I strongly urge the Land Use Service department to approve the project and prevent further delays.



Sincerely,

Bleu Luna
17 year Mountain resident

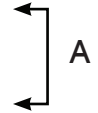


Comment Letter #168

From: [Jaida Luna](#)
To: [Nieves, Tom](#)
Subject: Sonrise in the Woods
Date: Sunday, February 24, 2019 11:31:09 PM

Mr. Nieves,

I am writing in support of the proposed project of Sonrise in the Woods, Rim Forest, CA. The project, once completed will serve our mountain communities very well. I strongly urge the Land Use Service department to approve the project and prevent further delays.



Sincerely,

Jaida Luna
17 year Mountain resident

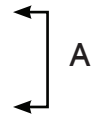


Comment Letter #169

From: [Mario L](#)
To: [Nieves, Tom](#)
Subject: Support Sonrise in the woods
Date: Sunday, February 24, 2019 10:04:12 PM
Attachments: [icon.png](#)

Mr.Nieves,


I am a seventeen year mountain resident. I support the proposed project of Sonrise in the Woods to be located in Rimforest, CA. This has been a long awaited need for our community. I strongly urge the Land Use Services Dept to approve the project so it can move forward.



Sincerely,

Mario Luna
Twin Peaks, CA

Error Icon



Address not found

Your message wasn't delivered to **tom.nieves@lus.sbcounty.giv** because the domain **lus.sbcounty.giv** couldn't be found. Check for typos or unnecessary spaces and try again.

The response was:

DNS Error: 11249973 DNS type 'mx' lookup of lus.sbcounty.giv responded with code NXDOMAIN Domain name not found: lus.sbcounty.giv



Comment Letter #170

From: [Rachel Luna](#)
To: [Nieves, Tom](#)
Subject: Sonrise in the Woods Project
Date: Sunday, February 24, 2019 10:18:16 PM

Mr. Nieves,

I'm writing in support of the Sonrise in the Woods, Rim Forest, CA proposed project. This project will have a significant positive impact in serving our mountain communities and families. I strongly urge the Land Use Service department to prevent further delays and move forward with approving the Sonrise in the Woods project.



Regards,

Rachel Luna



Comment Letter #171

From: [Ruby Luna](#)
To: [Nieves, Tom](#)
Subject: Sonrise in The Woods
Date: Sunday, February 24, 2019 9:53:12 PM

Mr. Nieves,

I'm writing in support of the proposed project of Sonrise in the Woods, Rim Forest, CA. The project, once completed will serve our mountain communities well. I strongly urge the Land Use Service department to approve the project and prevent further delays.



Sincerely,

Ruby Luna
17 year Mountain resident

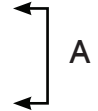


Comment Letter #172

From: [Yvonne Luna](#)
To: [Nieves, Tom](#)
Subject: Sonrise in the Woods
Date: Sunday, February 24, 2019 9:46:29 PM

Mr. Nieves,

I'm writing in support of the proposed project of Sonrise in the Woods, Rim Forest, CA. The project, once completed will serve our mountain communities well. I strongly urge the Land Use Service department to approve the project and prevent further delays.



Sincerely,

Yvonne Luna
17 year Mountain resident



Comment Letter #173

From: [Janice Markovich](#)
To: [Nieves, Tom](#); [Akins Rod & Sandy](#)
Subject: Sunrise on the Woods
Date: Sunday, February 24, 2019 5:25:24 PM

Mr. Nieves,

I am writing to you to express my absolute support for the new project in RimForest, Sonrise in the Woods. I have lived in Lake Arrowhead for over 45 years and have been a member of Church of the Woods since 1990. My late husband, Peter J. Markovich's family has lived in Lake Arrowhead since 1947. Three generations of Markovichs have attended our local schools. During all this time we have noticed a need for more wholesome youth oriented activities in our mountain community. All of our children have played sports on a limited amount of playing fields.

← A
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← D
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We have outgrown our current church location and have been trying to build a bigger church, more centrally located for over 14 years. The need for a larger facility with more amenities for the public is already here. The different phases of our proposed church project include a sports field and a youth center that would benefit the entire mountain community. As you can see by the proposed site plan and the results of all of the environmental studies, this project would not have a negative impact on the building site or surrounding areas.

← A
←

We are not proposing a strip mall, giant box store, etc. but a worthwhile venue that not only can impact people's lives spiritually for eternity, but physically and socially as well. Please consider the positive impact Sonrise in the Woods would have on our mountain community.

Thank you in advance for your time and consideration.

Sincerely,
Janice Markovich

951 312-3020 cell
PO Box 144
Lake Arrowhead, CA 92352

←



Comment Letter #174

From: daniel.mcallister
To: Nievesz.Tom
Subject: Sonrise in the Woods SCH No. 2004031114
Date: Sunday, February 24, 2019 5:38:14 PM
Attachments: [Sonrise in the Woods Letter.pdf](#)

Attached is a letter of support for Church of the Woods.



--

Dan McAllister
dmcallisterhb@gmail.com



Daniel McAllister

27355 Alpen Dr. PO Box 1706, Blue Jay, CA 92317 (714) 904-2512

dmcallisterhb@gmail.com

February 24, 2019

Mr Tom Nieves
Planning Associate
Land Use Services, San Bernardino County
Tom.Nieves@lus.sbcounty.gov

Dear Mr. Nieves,

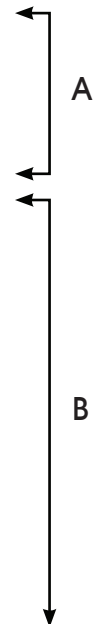
Please accept this letter of comment and support regarding the Church of the Woods Draft Revised EIR (SCH No. 2004031114).

I am enthusiastically supporting this development for a number of reasons.

It provides critically needed resources for the mountain communities in Recreation, Youth facilities, meeting space, playground space, accessible staging areas for emergency services and equipment at a junction of the most accessible location in the area.

It provides various public groups a place to meet and gather and enjoy.

It will take pressure off the residential areas near the current location of the Church and eliminate traffic through those neighborhoods.





The project has been designed to not have adverse impacts to watershed quality or quantities for the drainage areas and lake use below it. Ralph Wagner has studied the design and concurs with the engineering analysis, thus finds no reason to suggest any changes.

The amount of grading is minimal on a per acre basis thus creating more useable flat area for the many uses as planned for it.

Traffic impacts are generally small with peak times naturally occurring on Sunday mornings. In and out traffic will be regulated by a traffic signal, although annoying to some, it is a minimal intrusion on the Hwy 18 traffic for the majority of time.

The social and Spiritual benefits of a facility of this nature has been voiced by many members of Church of the Woods and I agree with them as well.

Sincerely,

Daniel McAllister, Architect (C-9118)



B
CONT.





Comment Letter #175

February 24, 2019

Dear sirs:

I am opposed to the Church of the Woods project due to both quality-of-life and environmental concerns, including potential harm to endangered wildlife species such as the California spotted owl, southern rubber boa and San Bernardino flying squirrel, as well as the diversion of a riparian stream, interruption of an established wildlife corridor, flattening of the hilly, forested terrain and removal of hundreds of old-growth trees.

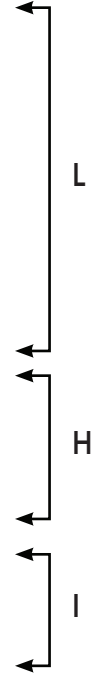
I am also opposed to increased noise levels from an outdoor amphitheater and sports fields near a residential area, increased highway traffic from some 600 parishioners attending worship services on Sundays and Wednesdays, as well as additional traffic from weekly Bible studies, social gatherings and recreational activities, including sports practices and sporting events.

In addition, according to the Draft Revised Environmental Impact Report, installation of as many as five traffic signals would be required at the intersections of Highway 18 and Pine Avenue, Church of the Woods Entrance driveway, Daley Canyon Road, Daley Canyon Access Road and Highway 173. This is simply too much automobile traffic for a quiet, rural community of some 400 residents.

Church of the Woods would do well to follow the lead of many other church camps in the mountain area, which are located in remote areas, where they are not disrupting the quality of life of nearby mountain residents.

Yours truly,

Douglas W. Motley
Crestline, California





Comment Letter #176

From: [Laure Ochart](#)
To: [Nieves, Tom](#)
Subject: Church Woods project
Date: Sunday, February 24, 2019 9:40:53 AM

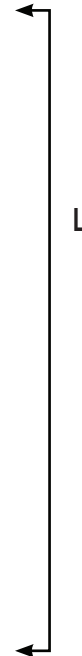
I wish to voice my opinion on the proposed Church of the Woods development in Rimforest. I vehemently oppose this project.

I don't have a problem with Church of the Woods itself, or any house of worship. However, this project will have long-lasting and detrimental effects to our Mountain community...if it even gets finished.

There are currently a number of un-finished "projects" which were begun with good intentions, I suppose. However, as is often the case, a project like this is started, land cleared of massive old growth trees, hillsides bulldozed, and then the project is abandoned and the land is never the same. To name just a few, see the lower portion of Dogwood Canyon in Blue Jay; the fiasco that was started in Grass Valley, "Arrowhead Ridge", now run by the Land Trust which is attempting to rehabilitate the forest there.

If the project is actually completed as planned, the beauty of that particular hill, the forest around it, the watershed, wildlife corridors, and our mountain community will be affected forever. We really no longer need such a huge facility, due to population decreases in the last decade since the original planning on this was done. Additionally, this area of the Rim needs to remain pristine to preserve our Mountain heritage, crucial wildlife habitats, and our quiet way of life.

Thank you for your time.
Laure Ochart





Comment Letter #177

From: [Jeremy Schnieder](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods Comments
Date: Sunday, February 24, 2019 12:42:37 PM

Thank you for accepting our thoughts and comments. I am concerned about the environmental impacts of this project. I truly want to ensure the wildlife can still live and move while also keeping our mountains beautiful and less obstructed.

I, L

I am also concerned about the nature of the project. While religious groups need spaces to congregate, this congregation is rather small and this building far exceeds their current needs. There is no real guarantee that what they want to happen will actually happen making this project a gamble to begin with.

Best,
Jeremy Schnieder

J

Physical address:
296 Donner Drive

Postal Address:
PO Box 3161

Crestline, CA 92325
Cell: 419-575-9481



Comment Letter #178

From: [Duron, Heidi - LUS](#)
To: [Janice Smith](#)
Cc: [Nieves, Tom](#)
Subject: Re: Church of the Woods project
Date: Sunday, February 24, 2019 9:54:21 AM

Ms. Smith,

Thank you for input. Your comments will be included in the Project record and addressed in the Final EIR. We appreciate your participation in this process.

Sincerely,

Heidi Duron, MPA
Planning Director
Land Use Services Department
Phone: 909-387-4110
Fax: 909-387-3223
385 N. Arrowhead Ave.
San Bernardino, CA 92415-0187



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From: Janice Smith <sunshineray@verizon.net>
Sent: Sunday, February 24, 2019 8:12 AM
To: Duron, Heidi - LUS
Subject: Fwd: Church of the Woods project

Dear Ms Duron, please read this letter & hear us.

-----Original Message-----
From: Janice Smith <sunshineray@verizon.net>
Sent: Wed, Feb 20, 2019 10:55 am
Subject: Church of the Woods project



County of San Bernardino Land Use Services Department
Tom Nieves, Planner
385 North Arrowhead Avenue (1st floor) San Bernardino

I am writing regarding the proposed Church of The Woods Mega Project in the quiet peaceful neighborhood of Rimforest

.We who live in Rimforest here moved here to enjoy a peaceful lifestyle surrounded by the beauty of the forest away from the hectic city life It may be difficult to understand tranquility if you have never experienced it.

SCENIC WAY on the West side of the project is a narrow 1 lane winding passage with many blind turns - and 2 way traffic - serving 53 homes . Not paved by the county .

BEAR SPRINGS Road (15 mph) is also 1 lane (no painted line) it is the route to strawberry Peak Very Steep winding and extremely icy with blind dangerous curves. accidents are common as road is slick. .the road goes between RimForest & Twin Peaks - often used by the sheriff.

Highway 18 is 2 lanes where the project is proposed it is narrow with no room for a turnout Often covered with heavy fog. the tow truck drivers call this area Fog Forest. approaching the proposed project going west from the High School are more blind corners .

During Winter we have more snow on the Rim than most other areas of Lake Arrowhead - we have the added problem of tourist traffic -inexperienced drivers in snow and icy conditions blocking the road and causing accidents..

Recent years have seen more development on Scenic Byway Hwy 18 in this area including a gas station, restaurants and businesses. the speed limit is 45 mph.

My father built our home in 1964 we have enjoyed the spectacular forest views all the way to Big Bear. clean air and quiet respectful neighbors.with many species of birds & wildlife in the area including visits from Bears.

I personally own 4 1/2 lots.

I can clearly see Rim High School including the parking lots , class rooms and especially the football field . . We hear and see all field activities , band practice, assemblies and especially the FOOTBALL Games. The field lights shine all night. every night.

also in the last years we are subject to the noise from the newly created flight plan corridor into Ontario Airport.

Flights from 4 30 Am to 11 p m the jets fly lower when the weather is foggy.

Please consider the Residents and the Animals of RimForest Do Not Destroy this wonderful wildlife corridor and valuable watershed area. do not issue a permit for this MEGA Church. THIS IS NOT THE proper PLACE for this project

Sincerely, Janice Smith 1152 Scenic Way , Rimforest ca 92378
909 337 5759

D, E

H, U

D, L



Comment Letter #179

2/24/19

* This massive urges
"NO" to approval of the
Church of the Woods
Project. *

Dear Mr. Nieves,

I wish to state my complete opposition to the proposed Church of the Woods Project. I feel the scope and size of the project will permanently change the culture of the mountain community (ies) in a multitude of negative ways.

The environmental impacts are well documented and all are unacceptable to me and my family of four.

The stoplights and commercialism of the project are incompatible with the mountain experience. For those visiting, they will be subjected to an eyesore. For residents, the cultural changes associated with the project are life-altering.

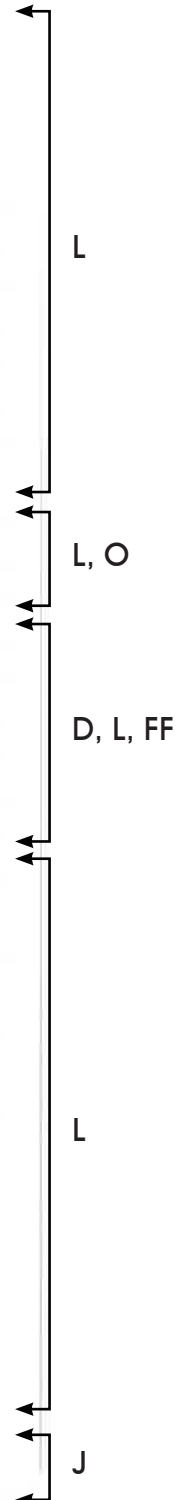
The project was a terrible idea from inception. It was bad then and it is bad now. The impacts from this project are huge. I do not feel the usage impacts will only be felt 2-3 days per week. Even at that, 60% of every week disrupted is too much. Unpredicted "events" will arise and ideas for usage will expand.

These mountains have had two traffic signals. One was hated so much, it was removed at the entrance of Lake Arrowhead Village. The other on Lake Drive is tolerable, barely.

Please share my opposition to this project!

Respectfully,
Jim West

909 553-6388 P.O. BOX 3 Blue Jay, CA

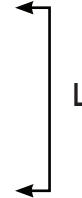




Comment Letter #180

From: [Axel Scraxel](#)
To: [Nieves, Tom](#)
Subject: Proposed church expansion in Rimforest
Date: Sunday, February 24, 2019 4:27:55 PM

Please no. The church camps up here are poor neighbors with activity noise, extra traffic, including 12 stuck tour buses this last snow storm that shut down two highways, and permanent changes to infrastructure just to name a few concerns. The artists rendering of the proposed facility looks like an eyesore not compatible with mountain living. Thank you for your consideration from an 18 year resident.



Barry Williams



Comment Letter #181

From: [C.J. Williams](#)
To: [Nieves, Tom](#)
Subject: Church of the woods
Date: Sunday, February 24, 2019 11:26:48 AM

Dear Mr. Nieves,

I happened to read about the planned mega church in your area on the internet. Although I live nowhere near your area, I do live in a similar setting minus the mountains. I live in northern Wisconsin where there are thousands of lakes and forests. Up here we don't fit the traditional view of Wisconsin with cows and farmland.

Because we have beautiful forests, lakes and streams we are a top vacation spot for the Midwest. Churches want to build camps and resorts by the hundreds. Lately, we've been in a fight with a church that wants to build a bible camp on one of our larger lakes. They claim that having hundreds of kids and adults visiting every summer won't affect the peace and serenity of other property owners on the lake.

Let me tell you what happens every summer when the people from the large cities visit our area. They do spend millions of dollars but they also bring their bad manners. They think because they're spending money here they have the right to treat our area like their garbage dump. Every fall we all adopt a highway and clean up all the refuse these people have thrown from their cars. They use our small animals for target practice killing squirrels, chipmunks, raccoon and even deer to name a few.

In short, they're not good neighbors. Before you hand over land to these people remember that many believe the Bible tells them they must have dominion over the land and animals and that god thinks it's proper that they ruin animals' habitat for the purpose of worshipping.

You may want to think long and hard before you turn your peaceful community over to these people. I don't think you really know what you're in for.

C.J. Williams
Rhineland, WI





Comment Letter #182

From: [Amanda Aberg](#)
To: [Nieves, Tom](#)
Subject: Sonrise in the woods
Date: Monday, February 25, 2019 11:03:52 AM

Hello,

Please consider doing everything possible to support Sonrise in the Woods. Our community would benefit greatly from the many types of facilities this would offer. We are especially short on fields for recreational use and safe places for teens to hang out. This project is also centrally located to accommodate all mountain residents. Our communities needs are so unique, it is important to consider them when ruling on projects.

Thank you so much for your time and consideration.

Amanda Aberg
Running Springs Resident

Sent from my iPhone

A, B



Comment Letter #183

From: [Ben Adrian](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods Project
Date: Monday, February 25, 2019 1:36:42 PM

Greetings Mr. Nieves,

I am against the Church of the Woods project. It seems much too large and beyond the scope and ability of a small town that is only accessible by small to medium mountain roads.



Sincerely,

Ben Adrian
772 Bergschrund Dr.
Crestline, CA 92325
510-543-6407



Comment Letter #184

From: [Orchid Black](#)
To: [Nieves, Tom](#)
Cc: AskRegion6@wildlife.ca.gov; santaana@waterboards.ca.gov
Subject: Church of the Woods Comment on DREIR
Date: Monday, February 25, 2019 4:04:19 PM
Attachments: [Church of the Woods DREIR Comment Orchid Black CNPS.pdf](#)

Dear Mr. Nieves,

Please see attached comment on the Church of the Woods DREIR which notes defects in wetlands delineation and wetland plant identification.

Regards,

Orchid Black
Member, CNPS

--

coyotemint@gmail.com
626-354-2240



2/25/19
Orchid Black
Member, CNPS
coyotemint@gmail.com
Box 3466
Blue Jay, CA 92317

County of San Bernardino
Land Use Services Department
Tom Nieves, Planner

cc: Santa Ana Regional Water Quality Control Board
CDFW

Re: Comment on Draft Revised Environmental Impact Report
SCH No. 2004031114
The Church of the Woods Project, Rim Forest, California

Dear Mr. Nieves,

I am writing as a member of the California Native Plant Society to comment on the DREIR for the Church of the Woods Project.

The DREIR is inadequate. A proper wetlands delineation was not done.

On page 0-9, the DREIR states,

“Threshold b and c: A single drainage feature containing riparian habitat is located within the southwest portion of the Project site. This drainage feature does not contain any wetland or wetland vegetation.”

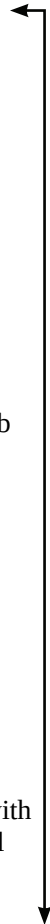
Attached please find photos (see p. 2) of *Cornus sericea*, taken at the site on January 30, 2019 by Bob Sherman and Gina Richmond (former USFS Botanist). *Cornus sericea* is a Facultative wetland plant.

This photo contradicts the findings that there is no wetland or wetland vegetation.

Given that this Facultative wetland plant is obviously present on the site, what is the rationale for concluding that there are no wetlands plants present on the site?

What is the rationale for assuming that the project is not governed by the Regional Water Quality Control Board and CDFW, given the presence of wetland plants and the uncertainty of the timing of any County hydrological project being completed before construction?

The biological surveys for this DREIR are clearly inadequate. The project area must be resurveyed with a proper wetlands delineation done. The new site plans must be of sufficient scale to show the natural areas, which is not currently the case.



G, EE



Regards,

Orchid Black



G, EE
CONT.



Comment Letter #185

From: [Hugh Bialecki](#)
To: [Steven Farrell](#)
Cc: [Nieves, Tom](#); [Sara L. Breckenridge](#); [Rahhal, Terri](#); aprabhala@biologicaldiversity.org; drewf3@verizon.net; [Carmen J. Borg](#); [Laurel L. Impett](#)
Subject: Re: Church of the Woods Project Draft Revised Environmental Impact Report – State Clearinghouse No. 2004031114
Date: Monday, February 25, 2019 9:14:14 PM

Nicely done Steve ! Glad we are covering a wide range of key issues not adequately discussed in the DREIR.

Sent from my iPad

> On Feb 25, 2019, at 4:26 PM, Steven Farrell <stevencfarrell@gmail.com> wrote:

>

> Mr. Nieves,

>

> On behalf of the Sierra Club San Bernardino Mountains Group, please accept the attached comment letter regarding the Revised EIR for the Church of the Woods project. I am also sending separately our comments from the previous cycle as they remain for the most part, germane.



>

> Thank you,

>

> Steven Farrell

> San Bernardino Mtns Group

>

>

> <Mtns Group comments to COW RDEIR final.doc>



Comment Letter #186

From: [cher birge](#)
To: [Nieves, Tom](#)
Subject: SONRISE IN THE WOODS
Date: Monday, February 25, 2019 4:42:12 PM

Mr Nieves,

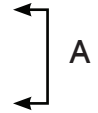
We look forward to full approval for son rise in the woods.

Rimforest residents and our fellowship will mutually benedit from this.

Godspeed,

Fletcher Birge

Lake arrowhead





LAND USE SERVICES DEPARTMENT

FEB 26 2019

COUNTY OF SAN BERNARDINO

County of San Bernardino
Land Use Services Dept.
385 North Arrowhead Ave., 1st Floor
San Bernardino, CA 92415

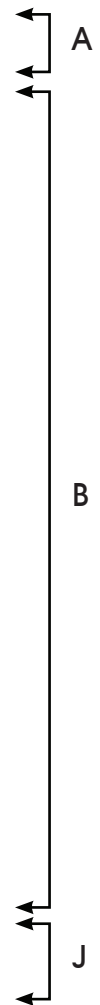
To Whom It May Concern,

I have lived in the mountain community for almost 25 years, have participated in both SOFA and The Church of the Woods, and I am strongly in FAVOR of the Sonrise in the Woods project. Let me tell you why.

1. Provides much needed fields for our mountain youth. My grandchildren are active in sports. Imagine 5 different sport teams practicing in the field at Grandview, a closed school with a neglected field. The 5 teams included T-ball, softball, baseball and soccer with ages ranging from preschool to high school all trying to practice on a field full of gopher holes, uneven ground, clumps of grass and competing for space on a field designed for 2 teams.
2. Provides a much needed fire break. We were here during 2 fires that sent us fleeing off the mountain. I am a tree hugger but I've seen firsthand the fury of a fire that goes unchecked through wild lands. The location of Sonrise in the Woods will provide a needed fire break not only to the community of Rim Forest, with its dangerous tiny winding roads, but to the communities of Blue Jay and Lake Arrowhead which lie just to the north with nothing to slow down a fire's progress in between.
3. A no growth community is a dead community. Like I stated before, I have participated in SOFA and do not approve of a lot of growth in our mountain community. But having traveled a lot, especially in small communities I have noticed that a community with no growth is a community that is dying or that is dead. One can see that in the dilapidating buildings that line Highway 18 in Rim Forest. The citizens of Rim Forest, which is composed of a lot of minorities, deserve better than that.
4. The benefit to children living on the mountain. There is a lot of drug use on the mountain. We have a lot of children up here that are at risk. The Church of the Woods welcomes children, they have an excellent youth program and it costs nothing. The handful of programs that are offered to children up here are costly and more for the elite or the talented. The county should never discourage an organization that benefits children.

I have heard some of the concerns from opposing viewpoints. One of them is increased traffic. Sonrise of the Woods moves the church off of a small residential street and places it on the major highway that runs through our mountains. This only helps with traffic in the mountains. Another arguments is that it will lower property values. One has only to compare the property values of Rim Forest to Lake Arrowhead (where the church is located now) to see that this argument fails. Noise is another concern but does not take into account the green space that surrounds the project. And like I said, no growth sounds good, we all love the forest, but no growth has dire consequences. Please ponder my arguments. Please let this project go forward, not only for my family but for the good of our mountain community. Thank you.

Ken & Darlene Brage
PO Box 5623
Blue Jay, CA 92317
909 485-1003





Comment Letter #188

From: [Jonathan Burnette](#)
To: [Nieves, Tom](#)
Subject: Sonrise in the Woods Community Comment
Date: Monday, February 25, 2019 11:24:36 AM

Dear Sir,

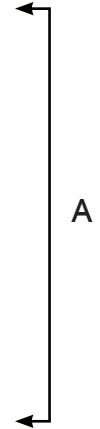
Please allow our church project Sonrise in the Woods to go through. Our church has followed all rules and obligations asked of it and we have been very patient all these years. My family has been a member of Church of the Woods for over 10 years. My kids have grown up this church. Our church teaches us to be kind, patient, and to have a gentle heart. We have outgrown our current church and many times we have to park on the street which may be a nuisance to other houses in the area. Sonrise in the Woods will provide much needed activities for youth on our mountain and allow us to grow as a church. I am the first one to oppose anything harming the environment and believe in good stewardship of our natural resources. This is a very responsible project that will have little harm to our Forest.

Please allow the Sonrise in the Woods project to continue on and be a blessing on our mountain.

Sincerely,

Jonathan and Julie Burnette

Twin Peaks
909-890-6273

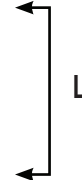




Comment Letter #189

From: [G-L Chaparro](#)
To: [Nieves, Tom](#)
Subject: Church in the Woods project
Date: Monday, February 25, 2019 3:06:43 PM

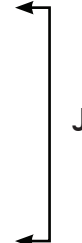
I am against this project totally and completely. My husband and I retired to Lake Arrowhead for the quiet, quaint atmosphere of the mountains. The proposed plan is way too large, too destructive to the mountain and to the native population of wildlife. We lived in a very large metropolitan/suburbia/urban area for 25 yrs plus and DO NOT want to see this kind of super/mega complex here!



Thank you for your time and consideration of my comments & opinions.

Lani Chaparro

Name: Gilbert & Lani Chaparro
Mailing Address: P.O. Box 845
Cedar Glen, CA 92321
Physical address: 28471 Warner Court
Lake Arrowhead, CA 92352
Email: chapfour@yahoo.com
Phone: 972-679-0819



Lani
[Sent from Yahoo Mail for iPhone](#)



Comment Letter #190

From: [Claudia Choi](#)
To: [Nieves, Tom](#)
Subject: Church of the woods project
Date: Monday, February 25, 2019 11:02:55 AM

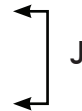
Hi Tom

I have just bought a house in crestline and recently moved up. I want to voice my opposition to the church of the woods project. This plan is harmful to the natural beauty of area, the environment and is totally out of scale for this small community. As a politically active new member of this district, I felt compelled to write to you to let my strong opposition be known. Please do not allow this plan to move forward



Thank you

Claudia Choi
772 Bergschrund Dr
310-463-0651





Comment Letter #191

From: [Gary M Clay](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods
Date: Monday, February 25, 2019 2:57:56 PM

Dear Mr. Nieves, I would like to recommend approval of environmental impact report for Church of the Woods (SCH 200-4031114). I believe this project to be a great asset to the mountain communities. It will enhance the limited parks and recreation available now for our youth. The ball field and outdoor recreation facilities will be available for all to enjoy. It is not an additional church in the area as many have stated, but an opportunity for the church to move out of it's existing location in a residential area to an area better zoned for the amount of people, traffic and noise. The new facility will offer a more convenient area for public groups to gather and meet with minimal impact on residential communities.

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Thank you, Gary Clay

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Comment Letter #192

From: [slctstore](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods / Sonrise project
Date: Monday, February 25, 2019 10:21:34 AM

February 25, 2019

Please approve this project. It will bring much needed community services to the mountains. The church has complied with all requests over 10+ years and will continue to be a good neighbor to everyone in the mountians.

←
←
A, B

Thank you,

Lee Cuthbertson
26844 Hwy 189
Agua Fria, Ca. 92317
909-337-9384

←
←
J

Sent from [Mail](#) for Windows 10



Comment Letter #193

From: [Chris Del Ross-Risher](#)
To: [Nieves, Tom](#)
Subject: Church of the Wood Draft Revised EIR comments
Date: Monday, February 25, 2019 3:07:28 PM
Attachments: [COW DREIR comments 2.25.2019.doc](#)

Hello Mr. Nieves,
Attached please find my comment letter regarding the DREIR for the Church of the Woods project.
Chris Del Ross-Risher, AICP



February 25, 2019

County of San Bernardino, Land Use Services
Att: Tom Nieves
385 North Arrowhead Avenue
San Bernardino, CA 92415
email: Tom.Nieves@lus.sbcounty.gov

Re: Church of the Woods Draft Revised Environmental Impact Report (DREIR)
SCH No. 2004031114 CUP No.#P201700270

Dear Mr. Nieves,

I am writing to comment on the latest iteration of the proposed Church of the Woods (COW) mega-church campus. I have previously commented on a previous version of the COW Project in May of 2017.

I live on Rim of the World Dr. in Lake Arrowhead, east of the high school and just northwest of the intersection of State Hwy. 18 and State Hwy. 173. I have lived here for over 28 years. This huge Project will negatively impact my neighborhood. I am a professional land use and environmental planner.

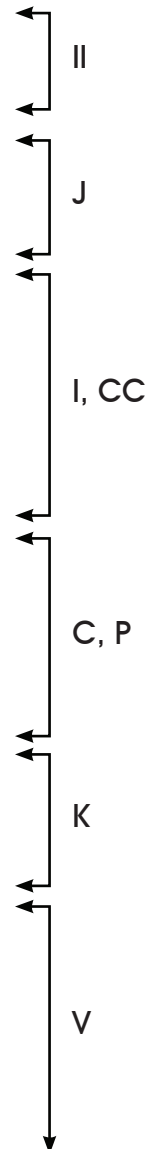
This revised Project is still huge and out of scale for the communities it will impact. The above referenced DREIR analysis, mitigation, and conclusions have failed to address many of the proposed Project's environmental impacts. The proposed revised Project still conflicts with the current San Bernardino County General Plan and Development Code and the Lake Arrowhead Community Plan.

There are several Project environmental impacts which had been inadequately analyzed in the DREIR and dismissed erroneously as having a Less-Than-Significant impact. As described in the Executive Summary of the DREIR these include:

Aesthetics, Threshold C. During Project construction and during operation, there would be both a TEMPORARY and a PERMANENT change in the Project area's visual character. The Project would change the area's visual character by clear-cutting 50 % of the site's trees and vegetation and the proposed massive grading cut and fill during Project construction. The operational Project proposes large buildings, non-native landscaping, huge fences, and monument signage along State Highway 18, a designated Scenic Highway. These are Significant Impacts.

Geology and Soils, Threshold A. The Project is within an area of landslide susceptibility. Merely requiring a project to prepare a geotechnical investigation, and using minor remedial measures during grading does not eliminate subsidence, liquefaction and erosion impacts to the area and is not adequate mitigation for environmental impacts. This is a Significant Impact.

Hazards, Threshold A. The planned Project's church complex includes a two-story building consisting of 27,364 sq. foot gymnasium and a 41,037 sq. foot assembly building that will accommodate a much larger number of people than the existing COW congregation. The Hazards analysis states that emergency access and evacuation routes for this anticipate that the Project would not meaningfully change the number of people needing emergency reaction and/or evacuation. This seems to be a deliberate misstatement of the number of people that will actually be on the site, downplaying the





requirement of improvement to emergency routes and/or response during a hazardous event such as a wildfire. This is a Significant Impact.

Hydrology, Threshold C. D. and E. The planned Project would significantly alter the site's hydrology by grading and covering much of the site with impermeable surfacing such as structures, paving and hardscape. These proposed actions will concentrate onsite water flow and increase the drainage area's Q value. As already mentioned, the Project site has been identified by San Bernardino County as an area of "high to moderate" landslide susceptibility and there is a possibility of the exposure of people and structures to landslide or mudslide events. This is a Significant Impact.

Transportation and Circulation A. B. D. E. This huge Project impacts 18 intersections in our communities, 3 of these are under San Bernardino County jurisdiction. The remaining 15 intersections are under the jurisdiction of Caltrans, many of the proposed improvements for this Project are on State Highways, under the jurisdiction of Caltrans. This Project and the County cannot direct construction of traffic signals, traffic lane widening, left turn pockets, acceleration/deceleration lanes or emergency access on State Highways.

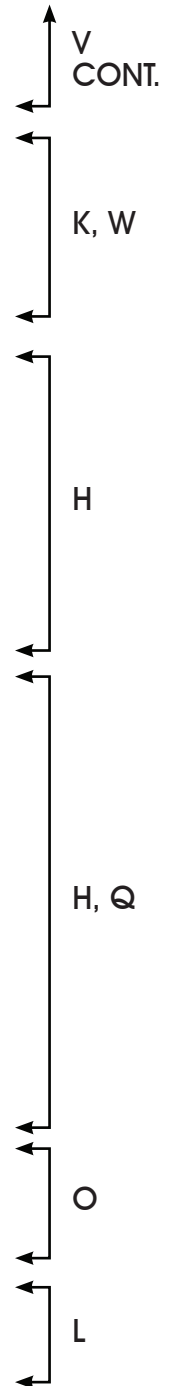
The DREIR fails to identify any of the Project's traffic trip generation during weekdays. As this church campus may provide additional activities such as bible studies, congregational meetings and celebratory events such as weddings and memorials, all these activities generate traffic.

Construction of the Project may last for as long as three years and is proposed to proceed in two phases. Also, construction of Phase 2 of the Project will take place concurrently with the Project's operations. This combination of traffic generators will significantly impact the intersections in the Project area, and as construction related traffic may impact a larger area, this may require trips further on State highways 18 and 330. The DREIR does not adequately analyze the construction-related traffic impacts which would occur generally on weekdays. The DREIR only states that construction activities will begin/end outside of peak hours. (DREIR 3.1-9). There is no substantiation for this conclusion.

The Project traffic migration proposes complete installation of two traffic signals, partial payment for the installation of five more signals, a signalized Project driveway at State Hwy. 18 and further improvements. These installations are outside the jurisdiction authority of the County. Caltrans may not assure traffic improvement installations prior to the Project's approval, or operation nor even allow any traffic signals or improvements. CEQA requires that an agency may not defer assessment nor mitigation of environmental impacts to a future unknown, nebulous date. These are SIGNIFICANT, UNAVOIDABLE and CUMULATIVE Impacts.

Besides the above identified environmental impacts, I believe there are Significant Impacts to Biological Resources, Land Use, and Noise which have been glossed over as temporary impacts, rather than permanent Significant Impacts.

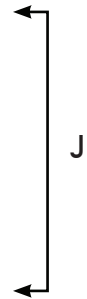
For the reasons set forth above, I respectfully urge the County to reevaluate the feasibility of the Project at this location. This Project is still huge and will negatively impact the unique mountain communities for the benefit of a small congregation.





Please keep me informed of future project progress,
Thank you,
Christine A. Del Ross-Risher, AICP

P.O. Box 3302
Lake Arrowhead, CA 92352
[delrossrisher.chris@gmail](mailto:delrossrisher.chris@gmail.com)





Comment Letter #194

From: [Theresa Grant](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods project - Hwy 18 - Rimforest, CA
Date: Monday, February 25, 2019 11:44:23 AM

I have lived in the Lake Arrowhead area full-time since 1993. I am born and raised in Redlands. I have been a Realtor for over 20 years, and I have a background in land use planning as well as hazard mitigation.

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I am opposed to the overly-large Church of the Woods building project in Rimforest. The idea has come and gone for over a decade and each time it comes up, the local residents bring up the same reasons in opposition. They are as valid now as they have been in the past.

The elimination of the school project proposed is a great start, but it still does not address the over-improvement of the property which will result in leveling a hillside and using fill for a canyon to make a sports field, amphitheater, and more. These items are unnecessary, as there are plenty of publicly accessible similar improvements already in place in the mountain. The disruption and destruction to the habitat is not feasibly sound. The overall project is too large for the community, and its construction will not only overtake the neighborhood but also the community at large.

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The community of Rimforest has less than 500 residents. It is primarily commercial and industrial. It has been built on the natural terrain of the land and this large facility, which will seat 600 at a time, will absolutely not fit in visually with the environment or socially with the community. This will overwhelm and destroy the nature of the town.

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This massive development will require the removal of 13 acres of forested land and displace many animals, some of whom has been identified as endangered in previous Environmental Impact Reports (EIR), and they admit there will be significant impacts of noise as well as traffic that cannot be mitigated. This large facility will forever change the character of the small community of Rimforest by removing the forest are, where many hike daily. It will permanently ruin the tranquility of the community at large, which the residents sought when purchasing their homes over the past decades.

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The project predicts thousands of people will attend the services on Wednesdays and Sundays, (two services of up to 600 each) and they have other activities every day of the week at their present location, which when transferred to this location will bring additional traffic, requiring the need for at least one traffic signal right now due to the increased traffic. (and in the DREIR mentions up to five signals when fully built out). The current neighbors of the church in Lake Arrowhead are anxious for the church to leave, so their neighborhood can have less traffic and noise. It is not right to transfer this to a new community.

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Further, as we have seen recently as a result of the snowstorms that have blanketed the mountain, our roads and public services (including police and fire infrastructure) are wholly inadequate to add this type of regular traffic.

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When entire neighborhoods in Rimforest slipped entirely down the front side of the mountain I represented several homeowners who lost their property, as well as the banks who took back what was left of them when owners walked away. This kind of project concerns me due to potential slippage and further damage and destruction. To achieve their project completion the

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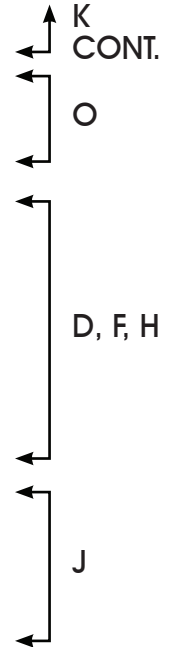


call for level and fill may work in the valley but it will not work here.

The environmental impact is not just for the animals and trees but also for the people who already live here. The increase in traffic translates to more cars, pollution, water use, sewer use, trash, an increase in noise, and more.

The current neighbors for Church of the Woods - of which I am arguably one, as my home is within half a mile of its current location - are fairly exasperated with the traffic and noise that the existing location brings to our neighborhoods. This proposed project not only moves the nuisance but also compounds it. This project does not benefit the community in the long term - it benefits Church of the Woods while forever changing existing landscape and community composition to bring a mega-church to the area. The reach is over ambitious, it does not reflect highest and best use of the land, fails to meet EIR standards, and is not appropriate to the existing communities surrounding it.

Theresa Grant
27910 St Bernard Ln / PO Box 2137
Lake Arrowhead, CA 92352
(909) 336-7933



Director, Rim o' the World Association of Realtors
Certified CAR Ethics Advocate



Be aware! Online banking fraud is on the rise. If you receive an email containing WIRE TRANSFER INSTRUCTIONS call your escrow officer immediately to verify the information prior to sending funds.



Comment Letter #195

From: [Larry Lanzrath](#)
To: [Nieves, Tom](#)
Subject: re: Full Support for Sonrise in the Woods Project...
Date: Monday, February 25, 2019 2:38:52 PM
Attachments: [Full Support Sonrise in The Woods Project 02242019.pdf](#)

Hi Tom,

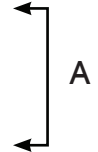
I have attached a letter in Support for Church of the Woods Sonrise in the Woods project.

I hope you can find time to read my letter and should you have any questions please feel free to give me a call.

Thanks.

Sincerely,

Larry





Date: February 24, 2019
To: County of San Bernardino, Land Use Services Department
Attention: Tom Nieves
Re: FULL SUPPORT for Sonrise in the Woods Project

To the County,

As a 12 plus year resident of Lake Arrowhead who has seen the needs of our youth, young families and seniors continue to be ignored I wish to give my **FULL SUPPORT** to Church of the Woods and their project **Sonrise in the Woods**.

As a parent and neighbor to the interconnected communities from Crestline to Little Bear, Sonrise in Woods amenities and location is a perfect fit to fill some of these many community needs.

What is lacking in opportunity for many full time families, youth and seniors is a "safe" place where children, parents seniors or anyone can come together and not have to worry about drugs, homelessness, harassment, gangs and just being feeling of being safe together in a safe environment.

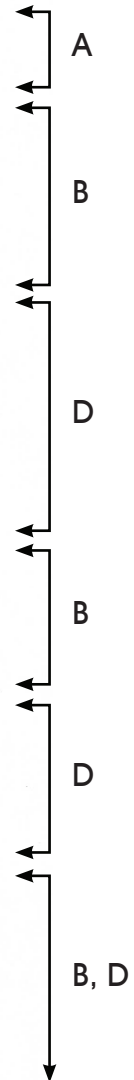
There are some individuals on the mountain that will likely oppose the project but that is more for "self-serving and self-centered interests. This is an attitude that permeates among the few and powerful on the mountain. Some of the naysayers put on the face of a concerned citizen but once you really listen to their dissent it is obvious as to their mission.

The children on this mountain are largely unrepresented because the "upper echelon" economically squeezes them out of the picture. For most children Lake Arrowhead is not an option and no longer is Lake Gregory if you can't afford the price. Which, by the way, many families or their children cannot.

The children of this mountain need a **SAFE PLACE** to be able to turn to relax, socialize and have fun together without the external influences that consume them and in many cases remind them of the harsh realities that beset them. Sonrise in the Woods will provide just that place. A place where children and young adults can in part build their self-confidence knowing they are in a caring environment that doesn't come with a price tag for admittance.

Right now many full time families and seniors on the mountain communities live paycheck-to-paycheck. They do not have the means to go to Skypark, Snowvalley, Bigbear or even the ability to enjoy Lake Arrowhead or Lake Gregory. All cost money and even when the economy is on the upswing money is still tight for many of these residents as they find themselves climbing out of the debt accumulated when times weren't so good.

Sonrise in the Woods will provide that place where no matter the income you are welcome. Welcome because it doesn't come with a price tag. To note, childcare is a "big issue" up here in the mountains and Sonrise in the Woods being centrally located for most all commuters is the ideal location. Presently, we have some costly private care and care that is offered by the park district. I'm surprised the park district is allowed to offer childcare as I find it hard to believe it is up to health code. The park district's childcare is in the "attack" of an "old" retail building with no yard to play. In fact, the facility abuts a lumber yard and is located on busy Highway 18. Commuting parents have little choice because





economically they are "squeezed" out of any other type of care. Care that Sonrise in the Woods can provide.

So what are some of the current choices afforded in the mountain communities? To name a few:

- 1) Most if not all park district facilities are not open including fields to general public without a prohibitive fee or as during the peak use times of the year leagues monopolize any general use of its facilities.
- 2) Machay Park in Lake Arrowhead has no running water and one outdoor portable restroom. The parks focus is as a revenue generator for the park district so at peak times is unavailable to the general public.
- 3) Lake Gregory has been monopolized by private enterprise and no longer is a place where residents can feel comfortable in visiting without saving up for its price tag
- 4) The public schools have often been an opportunity for children and their parents to frequent for the want of open space. Open space for sports, recreation or quality family time. Again, these facilities are not intended for that purpose but the overflow to these facilities is representative of the need for quality well maintained facilities.
- 5) I know this is winter but I'm surprised to see the 35-45 regularly cars parked along "The Ridge" any time after a snow. Again the quest for recreation. Not only is this dangerous area for sledding I don't know how liability wise ownership of "The Ridge" can afford insurance with children and their parents sledding down asphalt driveways that were once markers for a housing development.
- 6) Crestline skatepark as most locals know is a bastion for loitering and drugs.
- 7) Any nature trails for walking in the mountains are not suited for the casual adventurer.

The point being Sonrise in the Woods will provide to the mountain communities an outreach to serve the community in way that will provide a healthy environment for those of all ages. An environment where one can thrive without regard as to their financial situation.

Should you have any questions for me please call 310.897.3490.

Sincerely,

Larry Lanzrath

B, D
CONT.



Comment Letter #196

From: [Robert Brian Lopez](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods Project in RimForest
Date: Monday, February 25, 2019 8:52:37 AM

Dear Mr. Nieves,

Please accept this comment letter on the Church of the Woods Draft Revised Environmental Impact Report (SCH No. 2004031114). I'm very excited to see this campus develop and enthusiastically support it because of its multiple social benefits, which include, but are not limited to:

A

1. One of things that is really lacking in our mountain community are fields and places for children to go and hang out. There are hardly any fields up here to run around on and play on for our children. And this project will provide that to our community. The children in our community really don't have a lot to do up here but get in trouble and many are doing drugs. It's really sad to see that happen up here. And I believe that this facility will help to mitigate a lot of that. Please take that into consideration when discussing this project.

B

2. It provides much needed resources for our whole mountain community with ball fields, a place for youth to hang out and find healthy recreation, family friendly playgrounds for kids, meeting room for people to use, coffee to relax and fellowship, an amphitheater for events and an accessible staging area for emergency needs of firefighters and first responders (if necessary).

3. It offers various public groups a place to gather, practice, use and enjoy.

J

--
R. Brian Lopez
Skyforest Family Chiropractic
28715 Sycamore Dr.
Skyforest, CA 92385
<https://www.facebook.com/skyforestfamilychiropractic>



Comment Letter #197

From: educwriter@aol.com
To: [Nieves, Tom](#)
Subject: Sonrise
Date: Monday, February 25, 2019 7:45:50 AM

I am wholeheartedly in favor of Sonrise In The Woods. It is going to be such a blessing to our mountain community.

Kathleen Luster
909-556-7810
P.O. Box 1132
Crestline, CA 92325

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A
J



Comment Letter #198

From: [Maureen Mann](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods Sunrise Project - Comments re DREIR
Date: Monday, February 25, 2019 9:44:28 PM

February 25, 2019

Tom Nieves, County Planner
County of San Bernardino
Land Use Services
385 N. Arrowhead Avenue
San Bernardino, CA 92415

Dear Mr. Nieves,

Thank you for the opportunity to comment on the Draft Revised Environmental Impact Report for the Church of the Woods Project, SCH No. 2004031114.

Concerned residents and organizations of our mountain communities who appreciate our unique quality of life have tracked this proposal since its inception. I've lived in the San Bernardino Mountains for more than 30 years and am one of those concerned residents.

Let me be clear. I am not opposed to and I understand Church of the Woods (COTW) wanting/needing to offer its parishioners suitable facilities for its anticipated growing congregation.

However, I am opposed to the development of such facilities at the proposed location adjacent to Highway 18 in Rim Forest. It may be financially beneficial to COTW because the Church already owns this land but that does not mean this is the appropriate location for this Project.

A number of major concerns immediately arise upon a review of the DREIR:

1) The natural terrain is proposed to be reconfigured by 295,000 cubic yards of grading, digging down into the natural unsuitable materials from 3' - 16', removal/cleaning & compacting of materials to create suitable foundation for the proposed buildings & parking areas. A good portion of that material will be unsuitable for use on the site necessitating truck transport off-site, apparently to Heap's Peak Transfer Station.

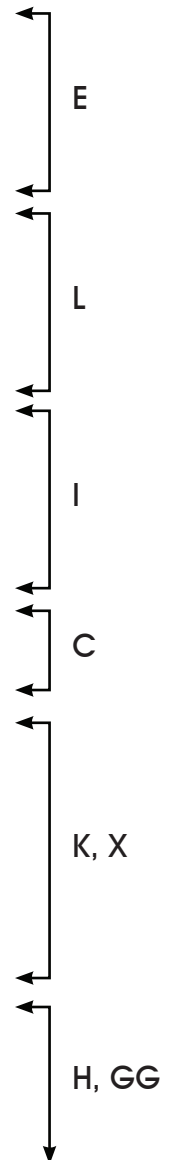
Before grading there will be the removal of trees, shrubbery, plant materials to allow for the structures and parking areas. How many trees will be removed, destroying the natural beauty and natural resources that currently exist on the site?

How much vegetation will be removed in the areas described in the Fuel Modification Plan that describes the Fuel Modification Requirements for the three Defensible Space Zones, the 3rd Zone setting forth requirements out to 200' from developed areas?

The Fuel Modification Plan states that 2/3 of the site will remain open space and 1/3 disturbed (contrary to the statement elsewhere that the lesser amount of 50% will remain natural).

This proposed project is in a Very High Fire Hazard area. Also noted for this parcel is potential for erosion, landslides and liquefaction in some areas — threats not only to those on site but also to neighboring residents.

2) The potential for cumulative, significant and unavoidable traffic impacts requiring installation of 6 traffic signals between Pine Road/Highway 18 and Highway 173/Highway 18, plus an ingress/egress traffic signal at the Project entrance should be enough for the County to deny approval for this proposed Project at this site. Traffic delays because of traffic signals would disrupt businesses, residents and tourists, having economic impacts. Also, stopped vehicles with idling engines because of traffic delays at signals would increase vehicle emissions affecting air





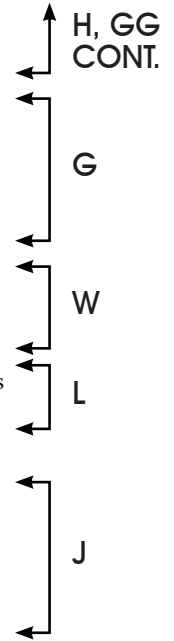
quality.

3) The impacts to the natural resources of the area, the biological impacts to flora and fauna, loss of habitat, and interruption of the wildlife corridor would be permanent. Many specific comments on these issues have been set forth in the comments of Hugh A. Bialecki, DMD, President of the Save Our Forest Association. I agree with Dr. Bialecki's comments and concerns. Rather than reiterate what has already been presented, I incorporate those comments herein, including all attachments, as if set forth in full.

It is unclear in the DREIR how the Dam Commission's already approved project will impact the proposed COTW Project. Is there a schedule set for construction of the Dam Commission's project?

I support the 'no project' alternative for this site. I urge the County planning Commission and the County Board is Supervisors to deny approval of the Church of the Woods Project at the Rim Forest site.

Sincerely,
 Maureen E. Mann
 PO Box 9260
 Cedarpines Park, CA 92322
 909-553-8200
 marley-mann@msn.com



Sent from my iPhone



Comment Letter #199

From: jmullendor@aol.com
To: [Nieves, Tom](#)
Subject: Ltr. of Opposition to Church of the Woods Project
Date: Monday, February 25, 2019 8:59:51 PM

Greetings!!

have been a resident of the San Bernardino County mountains for over 40 years. During this time I have personally witnessed the reduction of forest resources and habitat due to wildfires, bark beetle infestation, and development. As wildlife habitat and forest resources have diminished, traffic and congestion has increased. As noted in the latest Draft Revised Environmental Impact Report, the proposed Church of the Woods project would result in significant, unavoidable, and cumulatively considerable impacts on traffic, noise and biological resources. The biological resources of this area and the absence of the kind of traffic and noise that can be found in more urban areas are the very characteristics that make the San Bernardino County mountains unique and an important asset to the Inland Empire. The preservation of these qualities should be a top priority in any decisions affecting this area. Thank you.

Jennifer Mullendore
(909) 844-4352

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D, O
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Comment Letter #200

From: [Desiree Muller](#)
To: [Nieves, Tom](#)
Subject: CHURCH OF THE WOODS OPPOSITION LETTER
Date: Monday, February 25, 2019 3:03:04 PM

Desiree Muller
1176 Scenic Way
Rimforest, Ca 92378

Dear Mr. Nieves,

My name is Desiree Muller, I am one of the many residents/homeowners that will be negatively affected by the Church of the Woods, mega church construction project. I purchased my home on Scenic Way in Rimforest, in December of 2016. At the time of my purchase, the huge construction project for Church of the Woods was not disclosed to me. The reason I chose to move to the small, quiet community of Rimforest was the same for myself as it is for all of my 53 neighbors; to be away from the stress, noise and traffic of living down the mountain.

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Currently, I and my family enjoy the peaceful tranquility of living 50 feet from the amazing landscape of a heavily wooded area where many species of wildlife call home. Much of the wildlife includes raccoons, squirrel, skunk, deer, large families of bear and coyote; as well as an enormous community of birds. We get to enjoy the experience of often watching these beautiful animals in their natural habitat. To think that the sprawling woods literally outside my front door could soon be senselessly destroyed is an appalling notion.

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The project will severely, in the most negative way impact homeowner property value, bring an enormous amount of unwanted traffic congestion and church congregation noise; not to mention all the construction pollution and racket. Additionally, the project will be a total intrusion of mine (and all other residents privacy) since the project is planned to come within yards of my home.

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In summation, I am pleading with you to help our peaceful and quiet community of Rimforest have a voice in this decision of a horrible plan by Church of the Woods to destroy our beautiful forest and wildlife habitat that myself and so many others call home.

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L

Respectfully submitted

Desiree Muller
951-591-9351
desireemuller@yahoo.com



Comment Letter #201

From: [Rhea Tetley](#)
To: [Nieves, Tom](#)
Subject: Comment on CHurch of the Woods project in Rimforest
Date: Monday, February 25, 2019 9:25:36 AM

February 25, 2019 - 9 a.m.
 Comment on Church of the Woods project in Rim Forest

I am a long time San Bernardino Mountains resident with deep roots in the mountain communities. I was OPPOSED to this massive Church of the Woods building project in Rimforest when it was first presented over a decade ago. With the elimination of the school part of the project at this time, it has made me wonder why they still need to level the hillside and fill-in the canyon to make such a large sports field, amphitheater and more. The buildings are too large for the community and this construction will overwhelm the neighborhood and the small mountain community in which it is intended to be built. I am still opposed.

The community of Rimforest has less than 500 residents. It has been built on the natural terrain of the land and I Do NOT think this large facility, which will seat 600 at a time, will fit-in both visually with the environment and the community, at all. This will overwhelm and destroy the nature of the town.

To me the diagrams of the development looks like SUBURBIA, which is NOT the look the mountain communities have strived over the last 100 years to achieve. Those who move to the remoteness of the mountains, who are willing to separate themselves from the city are not seeking convenience and large buildings and the look of cityhood, they are seeking nature, forest and trees.

Plus, this massive development will require the removal of 13 acres of forested land and displace many animals, some of whom has been identified as endangered in previous Environmental Impact Reports (EIR), and they admit there will be SIGNIFICANT IMPACTS of noise, traffic that cannot be mitigated. This large facility will forever change the character of the small community of Rimforest, by removing the forest area, where many hike daily and the homes of local animals, and permanently ruin the tranquility of the community, which the residents sought when purchasing there over the past decades.

They predict 1000s of people will attend the services on Wednesdays and Sundays, (two services of up to 600 each) and they have other activities every day of the week at their present location, which when transferred to this location will bring additional traffic, requiring the need for at least one traffic signal right now, due to the increased traffic. (and in the DREIR mentions up to five signal when fully built out). The current neighbors of the church in Lake Arrowhead are anxious for the church to leave, so their neighborhood can have less traffic and noise. It is not right to transfer this to a new community.

I also have concerns over the movement of so much land as the nearby Rimforest mountain frontage has had slippage in the past (sending several homes down into the valley below) so I worry so much construction may cause future landslides as well, since the road is right along the front of the mountain.

I also don't like so many trees being cut, as I feel it will contribute to the loss of our forest... without trees the forest feels quite bare. Tree create oxygen and cutting the trees, is not healthy for the environment.

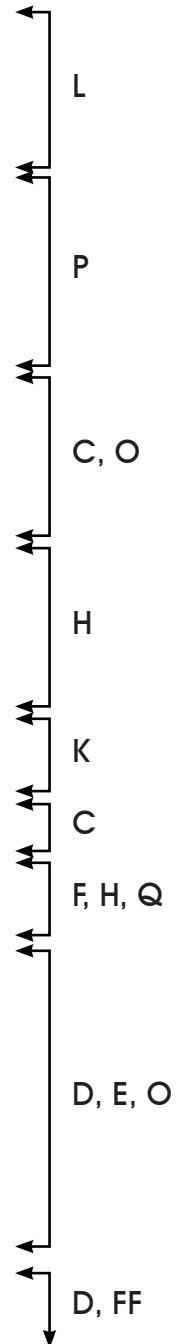
It also will affect the neighbors of the area, with the noise from children playing on the fields, and car noise, people talking, the noise from the amphitheater the Church says they plan to build (on their website), and traffic both during construction and forever afterwards. Now residents have the silence of the forest from that site.

Even though I do not live in Rimforest, I feel there they are not enough Rimforest residents to complain for you, the county, to take enough notice, so since I have been encouraged by many local residents to support them, I am.

Since the Church obviously intends to begin construction immediately because they intend to be completed by April of 2020, I have worries that it is a "done deal"... which doesn't seem to bode well for a church group coming into a small community. Their current neighbors, with whom I have spoken are excited the Church will be moving out of their neighborhood soon, as they are tired of the traffic and noise. I don't think ANOTHER neighborhood should not only be destroyed on this mountain, and imposed upon by this massive project. It may not be big, by city standards but by bringing in a project that will daily serve more people than live in the current town, it does impact them completely and will destroy their current lifestyle.

This is not the look of a church in a mountain community. It looks just like any suburban community down the hill. That is Not what is desired by most mountain residents.

Please DO NOT approve this massive destruction of the forest for a development which will destroy the look of a





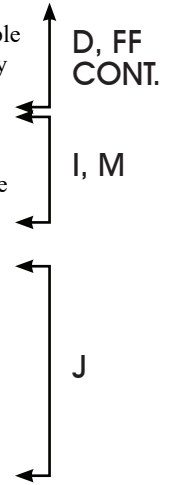
mountain community and overwhelm the community by building one building that can house inside it, more people than currently live in the town. This leads to the destruction of the current community, and is not good community planning.

The church admits they are serving their community now with many services, and Just because they want to grow, does not give them the right to destroy another community for their desires.

I imagine the San Bernardino Mountain Land Trust would purchase the land if approached, so this land could be preserved as natural forest land.

Rhea-Frances Tetley
 PO Box 6032
 23947 Skyland Drive, Crestline, 92325
 (909) 338-3557

42-year mountain resident
 with family roots/property ownership stretching back to 1923 in the Valley of Enchantment in Crestline





Comment Letter #202

From: [Sue Walker](#)
To: [Nieves, Tom](#)
Cc: [Barrie, Dave & Mary](#); [Bob Sherman](#); [Farrell, Steve](#); [Loe, Steve](#); [Hugh Bialecki](#); [Smith, Jan](#); [Risher, Chris](#)
Subject: Comments on Church of the Woods by Sue Walker
Date: Monday, February 25, 2019 2:39:41 PM
Attachments: [SVW Let. CA.doc](#)

Hi Tom,
Attached are my comments.
Sue



Susan V. Walker

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

(909) 337-1279
svwalker@gmail.com

February 25, 2019

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
Italicized type = comments

Dear Tom Nieves:

“0.2 PROJECT SUMMARY

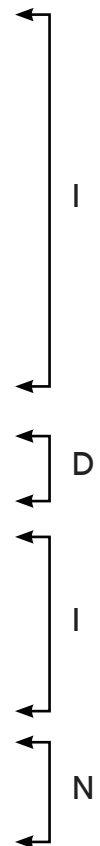
The Project involves the development of a church campus on an undeveloped property in the Rim Forest community of unincorporated San Bernardino County. The church campus would include an assembly building/children’s ministry, a youth center gymnasium, a maintenance building/caretaker unit, a 600-seat worship center, various recreational fields and facilities, and parking. The facilities would be developed on approximately 13.6 acres of a 27.12-acre property.

The proposed Project would result in the development of approximately 13.6 acres (50%) of the Project site 6.4 acres of structures, drives, walks, and drainage features; 7.2 acres of sports fields, play areas, recreation, landscaping, and landscaped manufactured slopes). The remaining 13.5 acres (50%) of the site would be retained as open space, including hiking trails, fuel modification zones, and undisturbed forested areas.”

I consider the above land use description an over use of this property due to threatened species and traffic concerns. It does not fit in with our mountain ambience.

Vehicular access onto the Project site would be provided by a private driveway connecting to Highway 18. A secondary emergency access would connect with Highway 18 approximately 400 feet east of the proposed driveway. The proposed Project would provide a total of 311 parking spaces, which would meet and exceed the County’s Development Code minimum parking requirements¹.

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.

O

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 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. We are losing our threatened species and must take steps to preserve our mountain wildlife.

G

TRAFFIC

Threshold a: The Project would conflict with the level of service for several intersections within the Project’s traffic study area under all traffic scenarios.

H

The heaviest traffic would be on Sundays. This is a major day for tourists to be leaving the mountains. The installation of two traffic lights and the future of other 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.

Project would widen the northern side of SR-18 for an approximately 600-foot segment of the roadway along the Project site’s frontage adjacent to the access driveway (approximately 300 feet in each direction from the driveway) by 26 feet to accommodate an eastbound left-turn lane and a westbound deceleration/acceleration lane. **P. 2-19**

I

Such a widening has an urbanized look. It is an inappropriate widening for the mountain communities.

P

The proposed Project is calculated to result in a total of 390 peak hour trips on Saturdays, 394 peak hour trips on Sundays, 657 daily trips on Saturdays, and 1,112 daily trips on Sundays. (Translutions, Inc., 2018, p. 5)

H

Such volume of traffic 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 which is already heavy on the weekends.

A. Lake Arrowhead Community Plan

The LACP includes goals and policies that are refinements to those provided in the County General Plan and are generally designed to preserve the small-town mountain character of the LACP. The LACP includes goals and policies within the Land Use, Circulation and Infrastructure, Conservation, Open Space, and Safety.

D

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



5.0 OTHER CEQA CONSIDERATIONS

5.1 SIGNIFICANT UNAVOIDABLE IMPACTS

CEQA Guidelines Section 15126.2(b) requires that an EIR describe significant environmental impacts that cannot be avoided, including those effects that can be mitigated but not reduced to a less-than-significant level.

Following is a summary of the impacts that were concluded to be significant and unavoidable. These impacts are also described in detail in Chapter 2.1, *Environmental Setting*, of this Draft Revised EIR.

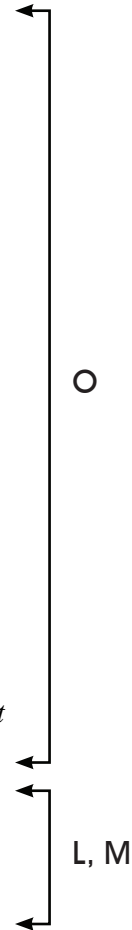
5.1.1 BIOLOGICAL RESOURCES

The Project would result in the removal of low to moderate quality habitat for the southern rubber boa, San Bernardino flying squirrel, and California spotted owl. These three species are categorized as special-status.

Therefore, the Project would have a substantial adverse effect species identified as special status by the California Department of Fish and Game or US Fish and Wildlife. At the Project level, impacts to the southern rubber boa, San Bernardino flying squirrel, and California spotted owl would be mitigated to a level below significance; however, at the regional level, impacts would remain **cumulatively significant and unavoidable**.

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

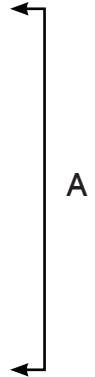


Comment Letter #203

From: [Dana Weaver](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods development
Date: Monday, February 25, 2019 2:54:30 PM

Our Church has been on this mountain serving our community for nearly 30 years and has owned this land for more than fifteen years. We have patiently completed every environmental study the county has required of us with the highest integrity and complete thoroughness. At our current location, we have outgrown our facilities and are very limited on space for all the mid-week activities we offer.

This is not a land grab. We simply want to build on our property to better serve our entire mountain community. All of this will be done with the utmost care for our mountain, our natural environment, and our community needs. The vision for all of the buildings is with a mountain motif design and ambiance that all of us up here value so much. We are a mountain church that is known for opening our facilities for community use and needs, and helping in any way we can. We have a staff that loves and cares for the entire mountain community from the littlest babies, to our children, youth, families, and our senior adults. The positive impact for our community will be enormous. Please consider our heart for this mountain community in balance with this beautiful mountain that we all love and cherish.



Sent from my iPad



Comment Letter #204

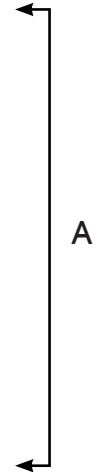
From: [JOSEPH WEAVER](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods
Date: Monday, February 25, 2019 6:42:57 PM

<tom.nieves@lus.sbcounty.gov<<mailto:tom.nieves@lus.sbcounty.gov>>>

Subject: Church of the Woods development

Our Church has been on this mountain serving our community for nearly 30 years and has owned this land for more than fifteen years. We have patiently completed every environmental study the county has required of us with the highest integrity and complete thoroughness. At our current location, we have outgrown our facilities and are very limited on space for all the mid-week activities we offer.

This is not a land grab. We simply want to build on our property to better serve our entire mountain community. All of this will be done with the utmost care for our mountain, our natural environment, and our community needs. The vision for all of the buildings is with a mountain motif design and ambiance that all of us up here value so much. We are a mountain church that is known for opening our facilities for community use and needs, and helping in any way we can. We have a staff that loves and cares for the entire mountain community from the littlest babies, to our children, youth, families, and our senior adults. The positive impact for our community will be enormous. Please consider our heart for this mountain community in balance with this beautiful mountain that we all love and cherish.



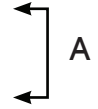


Comment Letter #205

From: [JOSEPH WEAVER](#)
To: [Nieves, Tom](#)
Subject: Church of the woods
Date: Monday, February 25, 2019 6:47:34 PM

I fully support the proposed project.

Sent from my iPad





Comment Letter #206

From: [Joe Weaver](#)
To: [Nieves, Tom](#)
Subject: Church of the Woods Project
Date: Monday, February 25, 2019 6:52:08 PM

I fully support the proposed project. It's time to reenergize this community by furnishing additional sports fields.



Sent from my iPad



Comment Letter #207

County of San Bernardino
Land Use Services Department
Tom Nieves; Planner
385 North Arrowhead Ave 1st Floor
San Bernardino, CA 92415
909.387.5036
909.387.3223
Tom.Nieves@lus.sbcounty.gov

Regarding;
Applicant; Church of the Woods
Project; P201700270/CUP
Assessor Parcel; #0336-101-06

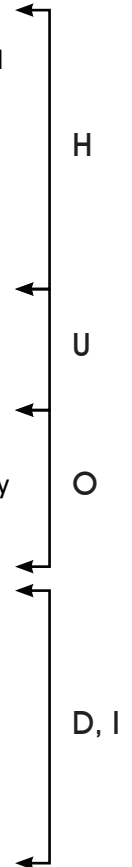
Dear Sir:

I am writing to you regarding the planned project for the Church of the Woods located in Rimforest, CA.

I am disputing the construction of this project as the location of the facility and construction and length of construction as this will cause traffic issues and probable accidents both fatal and non- fatal on Highway 18. As this is a main pass-way for residents and tourists for Lake Gregory, Lake Arrowhead and Big Bear resorts. The highway is already congested during holidays and winter months with a fatal accident reported every holiday weekend. The construction, the transportation of building materials, the workers will all contribute to congestion in the residential area of Rimforest as myself and other residents will be delayed in our normal day to day lives.

Rimforest is known within the Mountain community as the foggiest area with low to no visibility at times during multiple seasons in the year. This will contribute to additional vehicle or pedestrian accidents due to unknown driving ability in severe weather conditions. The planned facility will drastically reduce and claim wildlife habitat, destroying a natural stream flow and thousands of acres of forest. Church of the Woods claims this will not leave a footprint on this land yet they will be destroying trees, land, animals and wildlife habitats. They will destroy the forest to put buildings and concrete. There will be more car traffic, exhaust fumes, and people coming through this small community of Rimforest.

I reside in Rimforest, I bought my home in the Mountains deliberately moving away from the congestion of the city, yet Church of the Woods is willing to betray the fundamental livelihood of the Rimforest residents to put a Mega Church up. As their congregation currently houses 300 people they want to expand on property destroyed to accommodate upwards of 1000 people. Church of the Woods also claims they would benefit the community, yet this is specifically a Church facility and would only be accessible to church attendees. This does not contribute to the Mountain community or the local population, this only contributes to the wants of the church. As a church they would be having multiple services a week, this being



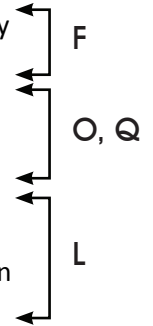


noise pollution to the local Rimforest residents as we would be hearing every service, every day and night of services with no option of turning the noise off.

The safety of local residents and tourists will be compromised during construction and completed construction of the facility as more vehicles will be commuting on the small 2 lane highway 18. Regardless of more lights installed, there will be more accidents, and loss of life.

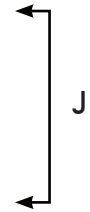
This project is not beneficial to our community in this lot/district zoning. The Rimforest community does not benefit nor do we want in any way the building of this facility.

I do not agree with the construction of this facility and will challenge the start of construction in every way possible.



Thank you,

Holly Young
 1148 Scenic Way
 Rimforest, CA 92378
 Holly.64@hotmail.com
 951-567-4924





Comment Letter #208

From: Lawrence Dillard, Jr. <lawrence_dillard@yahoo.com>
Sent: Tuesday, March 05, 2019 10:45 AM
To: Nieves, Tom <Tom.Nieves@lus.sbcounty.gov>
Subject: No mega church please

Dear Mr. Nieves,

Please do the right thing.

I'm a good, voting, tax paying citizen of this great state of California. I value our natural landscapes and the animals that reside here.

Please accept this comment letter on the Church of the Woods Draft Revised Environmental Impact Report (SCH No. 2004031114). We are **excited to see this campus developed and enthusiastically support it because of its multiple social benefits**, which include, but are not limited to:

It provides **much needed resources for our whole mountain community** with ball fields, a place for youth to hang out and find healthy recreation, family-friendly playgrounds for kids, meeting rooms for people to use, coffee shop to relax and fellowship, an amphitheater for events and an accessible staging area for emergency needs of firefighters and first responders (if necessary).

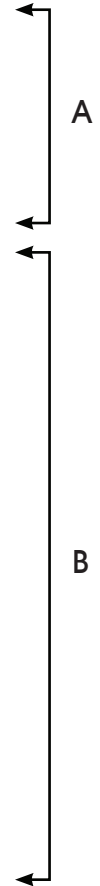
It brings a **new church campus that includes worship facilities for spiritual impact of biblical truths**, a youth center with a multi-use gymnasium, children's ministry rooms with age appropriate playgrounds, outdoor courts for fun activities and a sports field to play soccer or baseball.

It will give relief of the space constraints in the **current residential area of the existing Church of the Woods facility**.

This project will **capitalize on the beauty of our mountain and honor the environmental ambiance of our forest area**.

It offers various public groups a place to gather, practice, use and enjoy. Overall, **this project would greatly benefit not only the Church, but also the entire San Bernardino mountain area**. Thank you for your time and consideration.

Regards,
Lawrence Dillard, Jr.





Comment Letter #209

Tom Nieves, County Planner

Dear Mr. Nieves

I saw in last week's Mountain News the notice regarding the Church of the Woods Draft Revised Environmental Impact Report (SCH No. 2004031114). I fully support this project, and here is why:

The current location of the church is in a residential neighborhood with no possibility of expansion. No ability to add space for recreation or sports fields. And no possibility for additional parking, meaning additional parking is on the street making it difficult for others to drive or walk in the area. Also this makes it difficult for those living in the area to enjoy the peace and quiet they come to expect in their neighborhood.

A new facility on the proposed site will allow additional space for ball fields and recreational space for the entire mountain community. It will give youth a place to enjoy organized events. It will also provide families a place to gather for picnics and other family outings and events.

The planned development of the site has been carefully thought out, with attention to the natural surroundings. It will be a facility with the additional space the congregation needs to provide for the activities and events necessary for the spiritual development of all ages. It will also provide space for those in the community to plan events, such as weddings and family events and parties.

It is my belief that the development of the site will benefit both the church and the community in providing additional space dedicated to the well-being of everyone.

Your consideration for the approval of this site development would be greatly appreciated.

Sincerely,

Richard Craig

Blue Jay, CA





Comment Letter #210

Nancy Taylor
P.O. Box 655
Lake Arrowhead, CA 92352

LAND USE SERVICES DEPARTMENT
FEB 21 2019
COUNTY OF SAN BERNARDINO

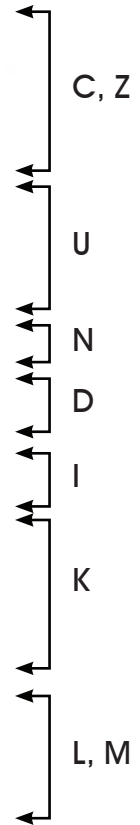
Tom Nieves, Planner
Land Use Services Dept.
385 N. Arrowhead Ave., first floor
San Bernardino, CA 92415

RE: Church of the Woods Project in Rimforest

Dear Mr. Nieves,

This letter is to state my opposition to the proposed Church of the Woods project in Rimforest. I oppose this project for these reasons:

1. The project will utterly destroy a pristine mountain glade. The size and scope of the project will produce an urban-style development incompatible with our mountain environment. The forest COW proposes to demolish is home to a primary feeder stream to Lake Arrowhead threatening wildlife as well as the lake and the water we drink. This land is home to mountain wildlife and is a significant wildlife corridor.
2. This project is located on Highway 18 in an area prone to thick fog. The traffic to and from the development will disrupt traffic on Highway 18, our main mountain transportation artery. The proposal is for a traffic light to facilitate ingress and egress, but it will also snare traffic on the 18 and present serious danger when ice and fog blanket the area.
3. The proposed parking appears to be inadequate, and there is no safe parking in the surrounding areas.
4. This project will adversely affect the businesses on our mountain that depend on tourism. This suburban-style project is what folks come to our mountain to escape.
5. There are other ballfields in the area. The fields at Rim High School are just a short distance away. Why destroy a mountain environment to build another?
6. Finally, the area is geologically unstable. Just a few yards south of the proposed project, a major slide occurred in 1992-1993. I believe that part of the remediation from that slide involved work on the proposed site. Major grading and leveling of the site as proposed cannot possibly make the area more stable. Indeed, is it possible that such earth movement could actually contribute to further collapse of the hillside endangering Highway 18?



This project is wrong, wrong for this site! My hope continues to be that the Church of the Woods leaders will realize this and consider building their huge church elsewhere allowing us all to continue to be able to marvel at the glory of the mountain dell that God created. I urge you to reject this proposal.

Sincerely,

Nancy Taylor
(909) 744-4691
ntaylor2@earthlink.net



Comment Letter #211

County of San Bernardino
Land Use Services Dept.
385 North Arrowhead Ave., 1st Floor
San Bernardino, CA 92415

LAND USE SERVICES DEPARTMENT

FEB 28 2019

COUNTY OF SAN BERNARDINO

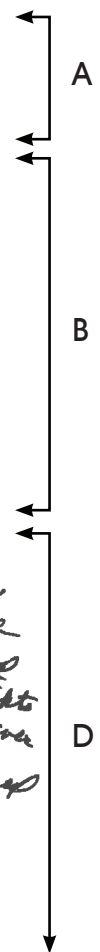
Re: New Project
"Smile In the Woods"
Rim Forest, CA

To Whom it may concern

My wife and I are very much in favor of this project!

In addition, this projects positive contributions to the community would bring, I am informed that it would require stop lights to be installed in at least two intersections. One being Daley Canyon Road. At the present, the speed limit all the way through the busy business section of Rim Forest is 45 MPH. Way to fast for such a heavily business district! It should be 25 MPH max.

One evening, on my way home (in Lake Arrowhead) in the fog, I was waiting to make a left turn onto Daley Canyon. I was watching the headlights of the cars coming towards me on Highway 18 and when there was a clearing I proceeded to make my left turn. all of a sudden, my headlights showed an on coming car right in front of me. The driver of that car did not have his head light on. We stopped inches away from each other. Had there been stop lights installed, this would not have happened. We were lucky! Others have not been so fortunate!





I cannot wait for this project to be approved and started. I believe it will save lives in several ways.

↑
D
CONT.
↓

Thank you,

*L. Jerry Thompson
P.O. Box 2143
Lake Arrowhead, CA 92352*

↑
J
↓



Comment Letter #212

Dear County of San Bernardino Land Use Services Department,

I am writing to you today to respectfully ask you to deny the proposed Church of the Woods project. I have lived in the mountains since 1976 and have taught school in Rim of the World Unified School District since the 1987-1988 school year. The mountains are my home. I have witnessed a lot of change in my years on our "hill", but I truly believe the proposed Church of the Woods project would be detrimental to our community.

←
←
D, L

I have a Master's Degree in Environmental Education from Cal State San Bernardino, and for many years have participated in the Pathways to Stewardship program with the National Forestry Service. I have worked diligently to instill within my students a respect for nature and a preservation of our environment. This proposed plan with its additional signal lights and loss of habitat goes against everything that I have taught my students. We need to act as stewards of the environment, and not permit the development of a site that is home to endangered species.

←
←
L

I am proud to say that I live in a place where there is one signal light in a twenty-mile radius. We used to have two signal lights, but the one near the Village was quickly taken out. There was a proposed Royal Ranger site on Highway 189, which is now a wonderful trail, managed by the Mountain Land and Trust. The large development on Grass Valley Road never took off but scarred the land. The area that Church of the Woods is looking at can flood, even with all the trees in place. Ask Cal Trans what their yard looked like on Christmas Day 2013. A leveling of this area and deforestation to create parking lots will lead to massive run-offs for the communities of Agua Fria and Blue Jay.

←
←
D, L, W

There is no need for the development of this land. I urge you to deny this plan, as it has been denied in the past. Nothing has changed, the potential problems still exist, and this project would damage our environment.

Respectfully,

Tina West

(909) 336-6024

Box 3, Blue Jay, CA 92317



MASTER RESPONSES TO COMMENT LETTERS 11 – 212

The following master responses A. to II. address Comment Letters 11-212. The master responses address frequently raised comments in a comprehensive manner such that point-by-point responses to each individual comment letter is not necessary. The CEQA Guidelines do not specify any particular format for responses to comment, and any format is adequate, including a master response format, provided the responses comply with the requirements of CEQA Statute § 21091(d) and CEQA Guidelines Section 15088.

A.

The County acknowledges comments of support for the proposed Project. The comments will be taken into consideration by the County's Planning Commission during deliberations on the Project and FEIR. No revisions to the DREIR are required in order to respond to these comments.

B.

The County acknowledges comments regarding the proposed Project's features and merits. The comments will be taken into consideration by the County's Planning Commission during deliberations on the Project and FEIR. No revisions to the DREIR are required in order to respond to these comments.

C.

The DREIR describes the existing condition of the Project site as containing hillside and trees and indicates that grading and tree removals will occur in the Project's development footprint as part of Project-related construction. Approximately 50% of the Project site (totaling 13.5 acres) would remain as natural open space (DREIR page 2-20). The Grading and the removal of trees associated with the Project's construction on approximately 50% of the site are inherent parts of the proposed Project evaluated in the DREIR and are evaluated as such throughout the environmental analyses contained in the DREIR, particularly but not exclusively in DREIR Section 3.C, *Aesthetics*, and Section 3.C, *Biological Resources*. No revisions to the DREIR are required in order to respond to these comments.

D.

The County acknowledges all general comments and specific comments regarding the character of the community and the activities of its residents and visitors. These comments do not present substantive comment on the DREIR's analysis and no revisions to the DREIR are required in order to respond to these general comments.

E.

The County acknowledges all general comments and comments regarding the quality of life experienced in the community. These comments do not present substantive comment on the DREIR's analysis and no revisions to the DREIR are required in order to respond to these general comments.

F.

The proposed Project's potential noise impacts are addressed in DREIR Section 3.H, *Noise*, which is based on a technical noise impact analysis prepared by HDR and appended to the DREIR as *Technical Appendix G*. As



demonstrated in DREIR Subsection 3.H.7, the proposed Project's operational activities would not exceed the exterior noise level standards established by the County's Development Code. Additionally, Table 3.H-10, *Estimated Noise Level Changes on Local Roadways Due to Project – Existing Year*, illustrates the noise level changes that would result from Project-related traffic, which are concluded to be less than significant. Regarding construction noise, the DREIR concluded that construction noise will be significant and unavoidable. No revisions to the DREIR are required in order to respond to these comments.

G.

The Project's impacts to biological resources are addressed in DREIR Section 3.C, *Biological Resources*. Mitigation measures are identified to reduce the Project's direct impacts to biological resources to below thresholds of significance but the DREIR concludes that impacts to biological resources would remain significant and unavoidable on a cumulatively considerable basis following the implementation of mitigation measures.

The County acknowledges commenters' opinions regarding the thoroughness of the Project's habitat assessment and the adequacy of the DREIR's analysis of the Project's impacts to biological resources. According to the Project's habitat assessment dated July 2018 and prepared by Element Consulting (ELMT) (DREIR *Technical Appendix C*), ELMT conducted two field surveys of the Project site. The first field survey was conducted on November 29, 2017, and the second was conducted on February 8, 2018. The findings from these field surveys are discussed throughout DREIR Section 3.C, *Biological Resources*. None of the species of concern (Southern Rubber Boa (SRB), San Bernardino Flying Squirrel (SBFS), and California Spotted Owl (CSO)) have been observed on site since 2007; however, the DREIR acknowledges that there is a moderate or low potential for these species to occur on the site and mitigation measures would be required (DREIR pp. 3.C-20 – 3.C-21).

The County has revised Subsection 3.C.4.4 of the DREIR to clarify why habitat sustainability assessments were prepared to address potential impacts to the SRB, SBFS, and CSO. The revisions made are indicated in Section F.3, *Additions, Corrections, and Revisions* of this FEIR. As stated in DREIR Subsection 3.C.4.4, *Special-Status Wildlife Species*, the Project site has a low potential to support the long-eared owl (*Asio otus*). As such, a habitat sustainability assessment was not conducted nor required for the long-eared owl.

Focused or protocol surveys for wildlife species are used to determine the presence or absence of that species within the survey boundaries. There are several species, however, where even strict adherence to conducting protocol surveys may not provide a reasonable determination whether the species is present on a site or not. Such species as California tiger salamander and Mohave ground squirrel are seldom seen even during favorable survey seasons and the USFWS and CDFW will often not accept negative surveys as substantial evidence of absence from a site. Instead, these agencies will require projects to assume presence of that species and require project applicants to work with the agencies to determine mitigation based on the potential presence on the Church of the Woods site was made based on the quality of the existing habitat for that species. Such is the case here with SRB, an extremely secretive species that seldom emerges into open habitat where it can be seen. Following this accepted practice, the assumption of presence and the determination of mitigation based on the suitability of onsite habitat. Using this methodology, areas with moderate or higher quality habitat are assumed to be occupied and mitigated through the acquisition of an incidental take permit (ITP) from CDFW, while impacts to low quality habitat are considered less than significant. Because the habitat on the Project site is assumed to be occupied, focused surveys are not needed to disclose and mitigate for the Project's impacts. Similar considerations apply to habitat for the CSO and SBFS.



The analysis in DREIR Section 3.C, *Biological Resources*, also includes an evaluation of the Project's potential impacts associated with fuel modification, human disturbance, and lighting. The Project's impacts to biological resources related to artificial lighting and human disturbance are specifically addressed on DREIR p. 3.C-23. The DREIR and concludes that these indirect effects would be less than significant (refer to the analysis of DREIR Section 3.C, Threshold d.). Regarding fuel modification, when compared to the habitat suitability exhibits of the Project's habitat assessment (Exhibits 8 through 10 of DREIR *Technical Appendix C*), FEIR Figure F-2, *Revised Proposed Physical Disturbance*, illustrates that the Project's fuel modification zones (FMZ) 3 would disturb portions of low-quality habitat for SRB and moderate-quality habitat for SBFS and CSO. In these areas, all dead logs, branches, litter, and decaying organic material (i.e., leaves, needles, and woody material) would be removed from the ground and some thinning and pruning of trees and shrubs would also occur. Ongoing periodic maintenance would be required in the FMZ 3 area to ensure that the conditions of this zone are met. The FMZ 3 areas are not anticipated to substantially affect the areas protected under DREIR MM-3.C1(a) of MM-3.C1(b). The habitat to be permanently preserved on the Project site would include higher quality habitat than the habitat that would be impacted by the Project.

Mitigation Measure MM-3.C1(a) requires preconstruction surveys for SRB, SBFS and CSO, and further requires that any vegetation clearing and/or rough grading activities in the area where sensitive species are present must be halted until a suitable buffer has been established as identified by the Project Biologist. Vegetation clearing and/or rough grading activities shall only be allowed to commence within the buffer area once the approved biologist makes a determination that the species is no longer present. This measure would preclude temporary impacts to sensitive species during construction, including indirect impacts due to noise. The Project proposes to mitigate impacts to generally lower quality habitat for sensitive species with a potential to occur on site with generally higher quality habitat at a 1:1 ratio. Additional mitigation may occur as part of the required acquisition of an ITP from CDFW, although at this time the County finds that a 1:1 ratio mitigating lower quality habitat with higher quality habitat is adequate to reduce the Project's impacts to less-than-significant levels.

H.

Existing and future traffic volumes on State Route 18 are documented DREIR Section 3.I, *Transportation and Circulation*, which are calculated based on a Traffic Impact Analysis (TIA) technical report prepared by Translutions, Inc. and appended to the DREIR as *Technical Appendix H*.

Access to the Project site would be provided via State Route 18. The Project does not propose to utilize Scenic Way or Bear Springs Road for direct access, as these roadways only serve a local residential community. As part of the proposed Project, a traffic signal would be installed at the intersection of the Project's proposed access driveway and State Route 18. Based on review of the site plan (DREIR Figure 2-7 on DREIR p. 2-18), the new traffic signal on State Route 18 will include 300 feet of stopping sight distance approaching from the west (downgrade) and over 300 feet of stopping sight distance from the east (upgrade), which the County has determined is adequate stopping sight distance between the Project's proposed driveway and curves on State Route 18.

In regards to other intersections, State Route 18 is under the jurisdiction of Caltrans, and not the County of San Bernardino. The County has no authority to compel or require other agencies to enact mitigation measures or to approve the construction of improvements. Notwithstanding, if approved by Caltrans, the Project Applicant would be obligated to construct traffic signals at the intersections of Bear Springs Road at State Route 198 and Pine Avenue at State Route 18 prior to the issuance of an occupancy permit for the Project. In addition, the Project Applicant would be required to contribute fair-share funding to Caltrans for improvements at five



additional intersections (identified as Intersection Nos. 8, 10, 11, 17, and 18 in DREIR Section 3.I) if Caltrans adopts a fee program or funding mechanism to which the Project Applicant can contribute. Caltrans will require that appropriate signage be posted to notify drivers of traffic signals ahead per the U.S. Department of Transportation Manual on Uniform Traffic Control Devices (MUTCD) Sign W3-3 or similar³ and is expected to synchronize the signal timing to facilitate smooth traffic flow on State Route 18 to allocate the appropriate green time to the preferred movements. Because the County cannot assure that Caltrans will implement the signal and signage improvements, however, the Project’s cumulatively considerable impacts to transportation facilities is identified as a significant and unavoidable impact in the DREIR.

As disclosed by the DREIR in Section 3.I, *Transportation and Circulation*, the Project would result in significant impacts to a total of seven intersections. Comments indicating the majority of the Project’s study area facilities are under the jurisdiction of Caltrans is correct, and the DREIR acknowledges significant and unavoidable impacts to Caltrans facilities specifically because the County does not have the jurisdictional authority to direct Caltrans to allow for the required improvements (i.e., installation of traffic signals) and Caltrans has no fee program available for cumulatively-considerable impacts to Caltrans facilities. With respect to weekday traffic, the Project’s weekday trip generation including the 600-seat church and soccer field would generate 7 a.m. peak hour trips and 34 p.m. peak hour trips based on rates from ITE’s Trip Generation (10th Edition). The trip generation is included below. Consistent with the San Bernardino County Transportation Authority’s Guidelines for CMP Traffic Impact Analysis Reports in San Bernardino County, the analysis of off-site intersections at which the Project is forecast to add 50 or more peak hour trips were included in the TIA. Since the weekday a.m. and p.m. peak hours do not add 50 or more peak hour trips to any CMP facility or Caltrans facility, the weekday a.m. and p.m. peak hours were not included in the TIA and impacts during weekdays would be less than significant.

Table A - Project Trip Generation (Weekdays)

Land Use	Units	AM			PM			Daily
		In	Out	Total	In	Out	Total	
Soccer Complex	1 Field ¹							
Trip Generation Rates ²		0.475	0.515	0.99	6.736	9.694	16.430	71.330
PCE Inbound/Outbound Splits		48%	52%	100%	41%	59%	100%	50%/50%
Trip Generation		0	1	1	7	10	16	71
Church	600 Seats ²							
Trip Generation Rates ²		0.005	0.005	0.010	0.015	0.015	0.030	0.440
PCE Inbound/Outbound Splits		50%	50%	100%	50%	50%	100%	50%/50%
Trip Generation		3	3	6	9	9	18	264
Total Trip Generation		3	4	7	16	19	34	335

¹ Rates based on peak hour of the generator for Land Use 488 "Soccer Complex" from Institute of Transportation Engineers (ITE) *Trip Generation*, (10th Edition).

² Rates based on peak hour of the generator for Land Use 560 "Church" from ITE *Trip Generation*, (10th Edition).

I.

Details regarding the proposed Project’s purpose and operating characteristics are discussed in Section 2.0, *Project Description*. Specifically, Section 2.3, *Statement of Objectives*, provides a list of objectives the proposed Project intends to achieve. The County acknowledges the existing number of places of worship in

³ <https://mutcd.fhwa.dot.gov/htm/2009/part2/part2c.htm>



the local community. The Church of the Woods is currently located at 1410 Calgary Drive, Lake Arrowhead, and the Project entails the development a new facility to continue and expand the existing operation in a new location.

The County acknowledges all general comments, opinions, and positions expressed in these comments. While the County staff and decision makers will take the comments, opinions, and positions regarding the proposed Project and Project site into consideration, these comments do identify any specific deficiencies in the analysis disclosed in the DREIR. No revisions to the DREIR are required in order to respond to these comments.

J.

The County acknowledges commenters' contact information. As commenting parties on the DREIR, the agencies, groups, and individuals that have supplied contact information will be added to the County's notification list for public notices regarding the proposed Project.

K.

DREIR Figure 2-7, *Proposed Site Plan*, and Figure 2-9, *Proposed Physical Disturbances*, showed the proposed Project's grading plan and identified the areas within the Project site that were proposed to be disturbed to construct the Project and its structures. The proposed limits of grading have not changed since the DREIR was published. However, since the time the DREIR was circulated for public review and in response to public comments, the Project Applicant made modifications to the Conditional Use Permit Site Plan & Preliminary Grading Plan which reduces the fuel management disturbance area beyond the limits of grading from approximately 1.9 acres to approximately 0.66 acres. The revised Conditional Use Permit Site Plan & Preliminary Grading Plan relocates the caretaker/maintenance building from the northern boundary of the western parking lot to the eastern boundary of the central parking lot. A copy of the modified Conditional Use Permit Site Plan & Preliminary Grading Plan is shown as Figure F-1, *Revised Site Plan*. A copy of the modified limits of physical disturbance is provided as Figure F-2, *Revised Proposed Physical Disturbances*.

As concluded in DREIR Section 3.D, *Geology and Soils*, grading activities as proposed by the Project would result in less-than-significant impacts associated with geology and soils inclusive of erosion and sedimentation following the incorporation of mitigation measures. Subsection 3.D.5 provides a detailed analysis of the proposed Project's potential impacts to geology and soils. These comments do not identify any specific deficiencies in the analysis disclosed in the DREIR. No revisions are required in order to respond to these comments.

L.

The County acknowledges all general comments, opinions, positions, and comments of opposition to the proposed Project. The comments will be taken into consideration by the County's Planning Commission during deliberations on the Project and FEIR. These comments do identify any specific deficiencies in the analysis disclosed in the DREIR. No revisions to the DREIR are required in order to respond to these comments.

M.

The potential alternative sites to locate the proposed Project are not owned or controlled by the Project Applicant, nor does the Project Applicant have the reasonable ability to control or acquire the sites. DREIR



Section 4.0, *Alternatives*, provides three alternatives to the proposed Project. DREIR Section 4.0 analyzes a No Project/No Development Alternative, a No Project/Feasible Development Alternative, and a Reduced Project/Alternative Site Design Alternative. DREIR Section 4.0 identifies the Reduced Project/Alternative Site Design as the environmentally superior alternative. Under the rule of reason, an EIR need discuss only those alternatives necessary to permit a reasoned choice, as provided by CEQA Guidelines § 15126.6(f). The alternatives presented in DREIR Section 4.0 provide a reasoned choice. Additionally, the commenter fails to suggest any other feasible alternatives to the Project. No revisions to the DREIR are required in order to respond to this comment.

N.

As shown on the Project's proposed site plan, depicted as DREIR Figure 2-7, the proposed Project would accommodate up to 600 people and provide 311 parking spaces (approximately 2 people per car), whereas the Project is only required to accommodate a total of 200 parking spaces (approximately 3 people per car) per the County Development Code. The County has determined based on the proposed operating characteristics of the facility and maximum seating capacity, that the proposed Project would provide adequate parking. No revisions to the DREIR are required to respond to this comment.

O.

A summary of the proposed Project's impacts to the environmental topics addressed in the DREIR are presented in Table 0.0-1, *Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation*, of Section 0.0, *Executive Summary*. Mitigation has been applied in the DREIR to reduce the Project's significant environmental impacts to the greatest feasible extent; however, impacts associated with construction noise, cumulatively-considerable traffic impacts, and cumulatively considerable biological resources impacts remain significant and unavoidable following the implementation of feasible mitigation. Although the proposed Project would result in significant and unavoidable impacts that cannot be feasibly mitigated, these comments do not identify any deficiencies in the analysis disclosed in the DREIR. No revisions to the DREIR are required in order to respond to this comment.

P.

The proposed Project's potential impacts related to aesthetics are analyzed in DREIR Section 3.A, *Aesthetics*. As discussed in DREIR Section 3.A.4, according to California Department of Transportation's California Scenic Highway Mapping System, State Route 18 is not identified as an Officially Designated State or County Scenic Highway; therefore, the proposed Project would not have the potential to result in significant impacts to resources within the corridor of a State scenic highway. Regardless, the DREIR recognizes that State Route 18 is a scenic route, presents an analysis of potential aesthetic impacts, and concludes that the proposed Project would not significantly affect the views looking south experienced from State Route 18. As discussed in DREIR Subsection 3.A.4, the proposed Project would include the installation of landscaping that would complement the existing plant communities found on-site and that would partially screen views of the proposed buildings and secure the integrity of the site's visual character. No revisions to the DREIR are required in order to respond to these comments.

Q.

To address construction traffic, the County has added the following mitigation measure to the FEIR:



MM-3.I-4 Prior to the issuance of grading permits, building permits, or improvement plans for frontage improvements along SR-18, the Project Applicant shall prepare and the County of San Bernardino shall approve a temporary traffic control plan. The temporary traffic control plan shall comply with the applicable requirements of the California Manual on Uniform Traffic Control Devices. A requirement to comply with the temporary traffic control plan shall be noted on all construction documents and also shall be specified in bid documents issued to prospective construction contractors.

R.

The County acknowledges comments regarding crime. There is no evidence to suggest that development of the proposed Project would increase crime, leading to significant environmental effects. While the County staff and decision makers will take the comments into consideration, the comments regarding crime do not identify any specific deficiencies in the analysis disclosed in the DREIR. No revisions to the DREIR are required in order to respond to these comments.

S.

Economic effects are not considered physical impacts to the environment in and of themselves. Economic effects must manifest into, or be related to a physical change, in order to be analyzed under CEQA per CEQA Guidelines § 15382. While the County staff and decision makers will take economic effects into consideration, including deliberation on the FEIR's Findings and Statement of Overriding Considerations, these comments do not identify any significant environmental issues and no revisions to the DREIR are required in order to respond to these comments.

T.

As discussed throughout the DREIR, the proposed Project would result in less-than-significant impacts to aesthetics, air quality, hazards, land use, and greenhouse gas emissions; less-than-significant impacts with mitigation to geology and soils and hydrology and water quality; significant and unavoidable impacts due to construction noise, and significant and unavoidable cumulatively considerable impacts to transportation and circulation (should Caltrans not assure improvements to State Route 18) and biological resources. As discussed in Subsection 5.7, *Effects Not Found to be Significant*, the proposed Project would result in no impacts or less-than-significant impacts to agricultural resources, cultural resources, mineral resources, population and housing, recreation, tribal cultural resources, and utilities and service systems. The DREIR identifies mitigation measures, where applicable, that the Project would be obligated to implement to reduce significant impacts to a feasible extent and to levels of less than significant where possible.

A summary of the proposed Project's mitigation measures is provided in Table 0.0-1, *Summary of Environmental Impacts, Mitigation Measures and Levels of Significance After Mitigation*, of Section 0.0, *Executive Summary*, of the DREIR. Additionally, as stated in DREIR Section 1.0, *Introduction*, a "less-than-significant impact" means that an adverse change in the physical environment would occur but the change would not be substantial or potentially substantial and would not exceed the threshold(s) of significance established by the County of San Bernardino serving as CEQA Lead Agency for the proposed Project. No revisions to the DRIER are required in order to respond to these comments.



U.

The saturation flow rates and other analysis parameters used in the Project's Traffic Impact Analysis (TIA) (DREIR *Technical Appendix H*) are based on the Highway Capacity Manual, which uses survey data from the entire United States (including areas with rain, fog, snow, and sun). While it is correct that winter conditions and lower visibility result in slowing of traffic, the background (without Project) traffic is also slowed down. Therefore, on an incremental basis, the Project's impacts remain unchanged under winter and summer conditions.

V.

The County finds that the Project's revised Evacuation Plan, included in the FEIR as *Technical Appendix E3*, provides substantial evidence that emergency egress from the Project site and local area can be accomplished in a manner that provides for the safety of both Project occupants and the surrounding community. In the event of a wildland fire in the area, the Project site would most likely be utilized as an evacuation center, as the Project's expansive irrigated open space areas would provide opportunities for sheltering in place, similar to the high school or middle school. The proposed sports field and large open areas within the Project site could be used to stage people, cars, and fire trucks. Furthermore, the amount of traffic along SR-18 during an emergency would not substantially increase, if at all, as a result of the Project because worshipers and other patrons of the Project are likely to reside in the local area and would utilize the same evacuation routes with or without the proposed Project, including SR-18. No revisions to the DREIR are required in order to respond to these comments.

W.

The proposed Project's impacts related to biological resources and hydrology and drainage are analyzed in Section 3.C, *Biological Resources*, and Section 3.F, *Hydrology and Water Quality*, respectively. The storm drain referred to in these comments is planned by the San Bernardino County Flood Control District as part of a regional erosion control project called the "Rimforest Storm Drain Project," which underwent an independent CEQA review with EIR certification by the San Bernardino County Board of Supervisors on May 23, 2017 (SCH No. 2015051070). Following public review of the Church of the Woods DREIR, the Project Applicant has agreed to schedule construction of the Church of the Woods Project after the County installs all components of the San Bernardino County Flood Control District's Rimforest Storm Drain project that would affect either the Church of the Woods Project or Project site. Revisions to the DREIR to reflect this commitment of the Project Applicant are identified in Section F.3, *Additions, Corrections, and Revisions*, of the Final EIR. With this revision, no impacts to jurisdictional waters or wetlands would occur with implementation of the Church of the Woods Project.

The Rimforest Storm Drain Project is planned on a ±9.81-acre area located immediately north of the Project site and would extend through the Project site towards and would continue beneath State Route 18. The Rimforest Storm Drain project is a regional project that would be completed prior to implementation of the proposed Project and would be maintained by the County of San Bernardino. Impacts to the environment as a result of the Rimforest Storm Drain project are analyzed in the certified Rimforest Storm Drain project EIR. This regional storm drain project is designed to accept developed flows from the proposed Church of the Woods Project, but is planned to be installed by the County Flood Control District completely independently from the Church of the Woods and regardless if Church of the Woods is developed or not. This storm drain will be installed and maintained by the San Bernardino County Flood Control District.



Impacts to water quality and drainage are evaluated in DREIR Section 3.F, *Hydrology and Water Quality*, which demonstrates that the proposed Project's impacts would be less than significant with mitigation and completion of the Rimforest Storm Drain project and the Project's proposed drainage plan. The proposed Project also would result less than significant impacts to hydrology and water quality due to compliance with regulatory requirements. The regulatory requirements applicable to the proposed Project are described in Subsection 3.F.9.1, *Applicable County Regulations and Development Requirements*. Notably, water quality concerns would be addressed by the Project as required by the County's National Pollutant Discharge Elimination System (NPDES) permit, which requires the preparation and implementation of a Storm Water Pollution Prevention Program (SWPPP) during construction and a Water Quality Management Plan (WQMP) during long-term operations.

The proposed Project's impacts to the drainage pattern of the Project site also are addressed in DREIR Section 3.F. As disclosed, the total area that encompasses the off-site and on-site drainage areas would result in a slight increase in the peak rate of runoff to 551.39 cubic feet per second (cfs) from 550.15 cfs as compared to the undeveloped conditions, which represents a 1.24 cfs increase within the total drainage area. This represents a nominal increase of 0.002% as compared to existing conditions, thereby indicating the Project has no potential to cause or contribute to new or increased flood hazards downstream, including within the Blue Jay business district and other areas. Furthermore, drainage facilities to be constructed as part of the County Flood Control District's Rimforest Storm Drain project have been designed to accommodate drainage within the area without causing or contributing to flood hazards in downstream areas. No revisions to the DREIR are required in order to respond to this comment.

X.

The County acknowledges the fire risks in the local area. DREIR Subsection 3.E.1.1, *Wildland Fire Hazard*, includes a discussion of the wildland fire hazard risks in the Project area. As discussed in DREIR Subsection 3.E.5, *Project Features*, the Project is designed to meet the San Bernardino County Fire Department (SBCFD) standards for fire protection. In order to comply with San Bernardino County requirements for fire hazard control, fuel modification zones (FMZs) would be established around buildings on the developed portions of the Project site. FMZ 1 is required to extend to 10 feet from buildings and FMZ 2 is required to extend to 30 feet from buildings. No FMZ 1 or 2 areas would occur beyond the Project's limits of grading. FMZ 3 is required to extend 200 feet from the Project's proposed on-site buildings, which would all occur within the Project's limits of grading with the exception of approximately 0.66 acres that would extend into areas of the site beyond the limits of grading. In these areas, all dead logs, branches, litter, and decaying organic material (i.e., leaves, needles, and woody material) would be removed from the ground within FMZ 3. Thinning and pruning of trees and shrubs would also occur within FMZ 3. Ongoing periodic maintenance would be required in the FMZ 3 area to ensure that the conditions of this zone are met.

The Project also would be subject to compliance with water main, fire hydrant and fire flow standards, fire sprinklers and fire alarm system requirements, approved emergency/evacuation road access plans, an Evacuation Plan, and a host of other requirements to support compliance with the Uniform Fire Code, the Fire Safety (FS) Overlay, and all applicable statutes, codes, ordinances, and conditions of the SBCFD. Refer to DREIR *Technical Appendix E2* for a copy of the Project's conditions and requirements pertaining to wildfire protection. The County finds that compliance with these requirements, as would be enforced by the County and the SBCFD, would provide for an appropriate level of safety for future structures and occupants of the Project in the event of wildland fire hazards.



Y.

Although it is not required by CEQA, the County has responded to comment letters received following the close of the public review period. The County acknowledges the commenter's request for a public forum; the commenter may present their concern in person during the Project's Planning Commission Hearing. No revisions to the DREIR are required in order to respond to this comment.

Z.

The proposed Project would not result in any impacts to Little Bear Creek, and this comment does not identify any deficiencies in the analysis disclosed in the DREIR. No further response is required.

AA.

The proposed Project's water supply analysis is discussed under DREIR Subsection 3.F.6.1. Based on a "will-serve" letter issued by the Crestline-Lake Arrowhead Water Agency (CLAWA), CLAWA has indicated that it has water available to meet the future demand of the Project, including water demand from irrigation. Additionally, an updated will-serve letter provided by CLAWA, stating that the agency has an adequate water supply to serve the Project is provided as *Technical Appendix J* to this FEIR. The DREIR is not required to analyze the water usage or environmental impacts of other projects, such as the Nestle bottling company; the Crestline-Lake Arrowhead Water Agency has confirmed that there is adequate water to supply the proposed Project even when considering cumulative demands on water resources. No revisions to the DREIR are required in order to respond to this comment.

BB.

A description of the proposed Project, including the intended uses for proposed buildings, is provided in DREIR Section 2.0, *Project Description*.

CC.

The DREIR was prepared in full compliance with the California Environmental Quality Act (CEQA) Statute and Guidelines. The DREIR's conclusions are based on substantial evidence in the public record. The County maintains that the DREIR complied with the requirements of CEQA and thoroughly disclosed, evaluated, and mitigated (as feasible) the proposed Project's potential significant impacts to the environment.

DD.

The CEQA Guidelines § 15002(a) list among CEQA's purposes (1) the identification of ways in which environmental damage can be avoided or reduced and (2) the prevention of damage to the environment by adoption of project alternatives or mitigation measures. In addition to its basic purposes, CEQA also provides for balancing environmental concerns with other social goals. For example, if a significant adverse environmental impact cannot be mitigated, a public agency may still approve a project if the agency adopts a statement of overriding considerations, supported by substantial evidence in the record, in which it finds that the benefits of the project outweigh the potential environmental damage. See CEQA Guidelines § 15093. Based on evidence in the Project's administrative record and by the independent judgment of the County of San Bernardino, serving as the CEQA Lead Agency concerning the proposed Project, the EIR contains an accurate description of the proposed Project's expected environmental impacts. The County's decision makers will



consider adoption of a Statement of Overriding Considerations regarding the Project's significant and unavoidable effects. Please also refer to Response to Comment O.

EE.

The Project's Habitat Assessment (DREIR *Technical Appendix C*) includes a discussion of jurisdictional areas. As noted therein, approximately 0.05 acre (852 linear feet) of Corps/Regional Board jurisdiction (non-wetland waters) and approximately 0.10 acre (852 linear feet) of CDFW jurisdiction (streambed/riparian) occur within the Project's impact footprint. However, the Project would not be implemented until after completion of the County's Rimforest Storm Drain project, which will eliminate all jurisdictional areas within the Project's impact footprint. Thus, upon development of the Project as proposed, there would be no impacts to jurisdictional waters or wetlands, as documented in DREIR Section 3.C, *Biological Resources*. Additionally, impacts associated with jurisdictional waters and wetlands were evaluated in the EIR prepared for the Rimforest Storm Drain project (SCH No. 2015051070), and the County is responsible for implementing the mitigation requirements specified therein for impacts to jurisdictional waters and wetlands. No revisions to the DREIR are required in order to respond to this comment.

FF.

The County acknowledges these general comments about land use. These comments do not identify any environmental issues, nor do the comments identify any deficiencies in the analysis disclosed in the DREIR. No further response is required.

GG.

As analyzed in DREIR Subsection 3.B, *Air Quality*, the proposed Project's long-term air pollutant impacts are associated with mobile sources as a result of vehicular trips generated by the proposed Project and stationary sources from on-site energy consumption. As shown in DREIR Table 3.B-6, *Summary of Operational Emissions*, the Project's air pollutant impacts are calculated to be less than significant.

HH.

The County has responded to all written comments received on the DREIR, including those that arrived after the close of the DREIR public review period.

II.

The County acknowledges that the commenter has previously commented. The County is exercising the discretion authorized by CEQA Guidelines § 15088.5(f)(1), specifically stating that it will not be responding to comments made during the public review of the 2010 Draft EIR. The DREIR was prepared in full compliance with the CEQA, State CEQA Guidelines, and the County of San Bernardino Guidelines, including project definition, foreseeable impacts, and feasible mitigation measures. No revisions to the DREIR are required in order to respond to this comment.



F.3 ADDITIONS, CORRECTIONS, AND REVISIONS

Substantive changes made to the text, tables, and/or exhibits of the DREIR in response to public comments on the DREIR are discussed below and/or itemized in Table F-2. Additions are shown in Table F-2 as underlined text and deletions shown as ~~stricken~~ text. Minor typographical corrections are not listed. No corrections or additions made to the DREIR are considered substantial new information requiring recirculation or additional environmental review under CEQA Guidelines §15088.5.

Table F-2 Errata Table of Additions, Corrections, and Revisions

Page(s)	Section	Additions, Corrections, and Revisions
0-1	0.0, Executive Summary	In response to Comment 10-20, the following information is clarified in the FEIR to indicate that the proposed Project would not include a trail. The remaining 13.5 acres (50%) of the site would be retained as open space, including hiking trails , fuel modification zones, and undisturbed forested areas.
0-4	0.0, Executive Summary	In response to Comment 10-20 of Comment Letter 10, the following typographical error was addressed: This alternative would also minimize disturbance of natural vegetation and increase the setback between proposed playfields and existing residential uses located along the Project’s southwestern boundary while also substantially avoiding alteration of the natural drainage that runs from the southwest to the northeast corner of the site. In addition, no temporary outdoor amphitheater would occur under this alternative.
2-2	2.0, Project Description	In response to Comment 5-3, 8-3, 10-56, and W of Comment Letter 5, Comment Letter 8, Comment Letter 10, and Comment Letters 11 - 212, respectively, the following information is clarified in the FEIR to indicate that the proposed Project would not be implemented prior to the completion of the Rimforest Storm Drain project: The Project has been designed to be constructed either prior to or following the implementation of the Rimforest Storm Drain project; thus, this DREIR evaluates both scenarios. In areas where implementation of the Rimforest Storm Drain project will physically impact the Project site (approximately 0.10 acres as documented in the Rimforest Storm Drain Project project Final EIR; SCH No. 2015051070), this DREIR bases its impact assessments to those 0.10 acres on conditions that occur <u>will exist following</u> both with and without the implementation of the Rimforest Storm Drain project.
2-13	2.0, Project Description	In response to Comment 5-8 of Comment Letter 5, the following information is added to clarify that the Project site is under the jurisdiction of the Lahontan RWQCB:



Page(s)	Section	Additions, Corrections, and Revisions
		<p>The Although the Project site is on the boundary of the Lahontan and Santa Ana Basin Plan boundaries, the Project site is located within the purview of the Santa Ana Regional <u>Lahontan Regional</u> Water Quality Control Board (RWQCB). The Lahontan<u>Santa Ana</u> RWQCB's Water Quality Control Plan for the Lahontan<u>Santa Ana</u> River Basin (Region 68; most recently updated in 2011) is the governing water quality plan for the region which set forth goals and objectives for protecting water quality within the region.</p>
2-17	2.0, Project Description	<p>In response to comments about fuel management impacts to biological resources, the Project Applicant moved the proposed location of the maintenance/caretakers building to reduce fuel management requirements beyond the limits of grading. Refer to FEIR Figure F-1, Revised Site Plan. The FEIR text has been revised as follows:</p> <p>Additionally, a 1,500-sq. ft. two-story building that would serve as a maintenance building, caretaker residence, and lavatory facilities would be developed on the southwest <u>central</u> portion of the Project site.</p>
2-19 – 2-20	2.0, Project Description	<p>In response to Comment 5-3, 8-3, 10-56, and W of Comment Letter 5, Comment Letter 8, Comment Letter 10, and Comment Letters 11 - 212, respectively, the following information is clarified in the FEIR to indicate that the proposed Project would not be implemented prior to the completion of the Rimforest Storm Drain project:</p> <p>Water service would be provided by a lateral extension from the existing 12-inch water main located in Daley Canyon Road approximately 100 feet north of and parallel with the north boundary of the Project site. The point of connection would be on the west side of Daley Canyon Road. Because the San Bernardino County's Rimforest Storm Drain project will be constructed prior to the Church of the Woods Project,; the proposed water lateral would be located within the access road of the Storm Drain Project. The proposed lateral would extend southerly approximately 150 feet from the point of connection to a point within the Project boundary. Water would be distributed throughout the developed portion of the Project site through the proposed 10 inch on site water line that would extend in a southerly direction from the point of connection in Daley Canyon Road to the northeasterly area of the developed site. The alignment of this lateral will be adjusted in the field to avoid large trees.</p> <p>If the San Bernardino County Rimforest Storm Drain Project is constructed prior to the Church of the Woods Project, the water lateral would be located within the access road of the Storm Drain Project.</p>
2-20 – 2-21, 2-23	2.0, Project Description	<p>In response to Comment 5-3, 8-3, 10-56, and W of Comment Letter 5, Comment Letter 8, Comment Letter 10, and Comment Letters 11 - 212, respectively, the following information is clarified in the FEIR to indicate that</p>



Page(s)	Section	Additions, Corrections, and Revisions
		<p>the proposed Project would not be implemented prior to the completion of the Rimforest Storm Drain project:</p> <p>The proposed 40-foot SBCFCD easement would accommodate the on-site subsurface flood control improvements to be constructed by San Bernardino County as part of SBCFCD’s Rimforest Storm Drain Project, which would <u>will</u> convey storm water flows from off-site areas north of the Project site through the Project site and ultimately connect to a future improved SBCFCD storm drain facility within SR-18. The on-site SBCFCD storm drain facility improvements would <u>will</u> include the installation and operation of a 750-foot long, 7260-inch reinforced concrete pipe (RCP) and located within the 40-foot-wide SBCFCD easement shown on Figure 2-7. Because the proposed Project’s drainage plan is dependent on connecting to facilities that will be installed as part of San Bernardino County’s Rimforest Storm Drain Project<u>project</u>, the Church of the Woods Project is proposed to be constructed concurrent with or following installation of these regional drainage improvements. However, in the event that the proposed Church of the Woods Project is constructed prior to implementation of the Rimforest Storm Drain project, the Project Applicant would be responsible for constructing the on-site portions of the Rimforest Storm Drain project, consisting of a 750-foot long, 60-inch RCP located the 40-foot wide SBCFCD easement shown on Figure 2-7. During the interim period following development of the proposed Church of the Woods Project and preceding completion of the Rimforest Storm Drain project, storm water would sheet flow through the impervious surfaces of the Project site in a northeasterly direction. In the event that the Project Applicant constructs the on-site portions of the Rimforest Storm Drain project, the Project Applicant would be required to obtain a Clean Water Act (CWA) Section 404 permit from the United States Army Corps of Engineers (USACE) and a Section 1602 Streambed Alteration Agreement from the CDFW. The facilities to be installed as part of the Rim Forest Storm Drain Project are covered in the Rim Forest Storm Drain Project EIR (SCH No. 2015051070).</p>
2-23	2.0, Project Description	<p>In response to Comment 5-3, 8-3, 10-56, and W of Comment Letter 5, Comment Letter 8, Comment Letter 10, and Comment Letters 11 - 212, respectively, the following information is clarified in the FEIR to indicate that the proposed Project would not be implemented prior to the completion of the Rimforest Storm Drain project:</p> <p>1. Grading Activities</p> <p><u>In compliance with a Condition of Approval (COA) that the County will place on the Project, construction of the proposed Project is only permitted following the construction of San Bernardino County’s Rimforest Storm Drain project.</u></p>



Page(s)	Section	Additions, Corrections, and Revisions
2.24, 2-26	2.0, Project Description	<p>In response to the Project Applicant’s proposed relocation of the maintenance/ caretakers building, fuel management requirements beyond the Project’s limits of grading, would be reduced from approximately 1.9 acres to approximately 0.66 acres. As such, the following information regarding the proposed Project’s fuel modification zones is revised in the FEIR:</p> <p>In order to comply with San Bernardino County requirements for fire hazard control, fuel modification zones (FMZs) would be established around <u>buildings on the</u> developed portions of the Project site. that would encompass a total of approximately 1.9 acres. Of the 1.9 acres of FMZs, 85.07 sq. ft. would be categorized as defensible space zone 2 (hereafter referred to as “FMZ 2”), while 80,550.48 sq. ft. would be categorized as defensible space zone 3 (hereafter referred to as “FMZ 3”). The fuel modification requirements within each FMZ are discussed below. It should be noted that the FMZs associated with the Project would not extend off site.</p> <p><u>FMZ 2 is required to</u> would extend to 30 feet from <u>buildings, and no FMZ 2 areas would occur beyond the Project’s limits of grading, the northwest corner of the proposed maintenance building/caretaker’s residence. All dead logs, branches, litter, and any decaying organic material (i.e., leaves, needles, and woody material) would be removed from the ground within FMZ 2. Additionally, FMZ 2 would require the thinning of trees and removal of some trees to maintain spacing of 20 to 30 feet between tree stems. Within FMZ 2, shrubs would be thinned to provide adequate clearance between shrubs and maintenance of shrub height, and shrub pruning would be undertaken to minimize fuel continuity. Trees within FMZ 2 would be pruned to a height of 15 feet above ground level. Ongoing periodic maintenance would be required in the FMZ 2 area to ensure that the conditions of this zone are met.</u></p> <p><u>FMZ 3 would</u> is required to extend 200 feet from the Project’s proposed on-site buildings, <u>which would all occur within the Project’s limits of grading with the exception of approximately 0.66 acres that would extend into areas of the site beyond the limits of grading.</u> In these areas, all dead logs, branches, litter, and decaying organic material (i.e., leaves, needles, and woody material) would be removed from the ground within FMZ 3. Standing dead material, stems, vines, and non-productive trees would be removed from FMZ 3. Thinning and pruning of trees and shrubs would also occur within FMZ 3. Ongoing periodic maintenance would be required in the FMZ 2 <u>3</u> area to ensure that the conditions of this zone are met.</p>
2-31 – 2-32 Table 2-5	2.0 Project Description	<p>The following information is clarified in the FEIR to indicate that the San Bernardino County Planning Commission is the final approving body for the proposed Project:</p>



Page(s)	Section	Additions, Corrections, and Revisions												
		<p>The Planning Commission will make advisory recommendations to the Board of Supervisors on whether to approve, approve with changes, or deny the proposed Project's CUP. The Board of Supervisors will consider the information contained in the Final Revised EIR and the EIR's Administrative Record in its decision-making processes and will approve or deny the Project's CUP. Upon approval or conditional approval of the above-described Project actions and upon certification of the Final Revised EIR by the Board of Supervisors <u>Planning Commission</u>, the County would conduct administrative reviews and grant subsequent permits and approvals to implement Project requirements and conditions of approval.</p> <table border="1"> <thead> <tr> <th>Public Agency</th> <th>Approvals and Decisions</th> </tr> </thead> <tbody> <tr> <td colspan="2">County of San Bernardino</td> </tr> <tr> <td colspan="2">Proposed Project – San Bernardino County Discretionary Approvals</td> </tr> <tr> <td>San Bernardino Planning Commission</td> <td> <ul style="list-style-type: none"> • Provide recommendations to the San Bernardino County Board of Supervisors regarding certification of the Project's DREIR. • Provide recommendations to the San Bernardino County Board of Supervisors whether to approve CUP No. P201700270. </td> </tr> <tr> <td>San Bernardino Board of Supervisors <u>Planning Commission</u></td> <td> <ul style="list-style-type: none"> • Reject or certify required DREIR along with appropriate CEQA Findings. • Approve, conditionally approve, or deny the Conditional Use Permit No. P201700270. </td> </tr> </tbody> </table>	Public Agency	Approvals and Decisions	County of San Bernardino		Proposed Project – San Bernardino County Discretionary Approvals		San Bernardino Planning Commission	<ul style="list-style-type: none"> • Provide recommendations to the San Bernardino County Board of Supervisors regarding certification of the Project's DREIR. • Provide recommendations to the San Bernardino County Board of Supervisors whether to approve CUP No. P201700270. 	San Bernardino Board of Supervisors <u>Planning Commission</u>	<ul style="list-style-type: none"> • Reject or certify required DREIR along with appropriate CEQA Findings. • Approve, conditionally approve, or deny the Conditional Use Permit No. P201700270. 		
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2-32	2.0, Project Description	<p>In response to Comment 5-8 of Comment Letter 5, the following information is added to clarify that the Project would require a 401 Water Quality Certification from the Lahontan RWQCB. Additionally, in response to Comment 10-56 of Comment Letter 10, the CWA Section 404 permit from the USACE and Section 1602 Streambed Alteration Agreement with the CDFW have been removed because the proposed Project would not be implemented prior to the completion of the Rimforest Storm Drain project and would not have the potential to impact the onsite drainage feature:</p> <table border="1"> <thead> <tr> <th>Public Agency</th> <th>Approvals and Decisions</th> </tr> </thead> <tbody> <tr> <td colspan="2">Other Agencies – Subsequent Approvals and Permits</td> </tr> <tr> <td>California Department of Fish and Wildlife</td> <td> <ul style="list-style-type: none"> • Issuance of Incidental Take Permits, as may be appropriate. • Section 1602 Streambed Alteration Agreement[†] </td> </tr> <tr> <td>State Water Resources Control Board</td> <td> <ul style="list-style-type: none"> • Approve NPDES Permit. </td> </tr> <tr> <td>California Water Boards – Lahontan RWQCB</td> <td> <ul style="list-style-type: none"> • <u>401 Water Quality Certification</u> </td> </tr> <tr> <td>United States Army Corps of Engineers (USACE)</td> <td> <ul style="list-style-type: none"> • Clean Water Act (CWA) Section 404 permit[†] </td> </tr> </tbody> </table> <p>Notes:</p>	Public Agency	Approvals and Decisions	Other Agencies – Subsequent Approvals and Permits		California Department of Fish and Wildlife	<ul style="list-style-type: none"> • Issuance of Incidental Take Permits, as may be appropriate. • Section 1602 Streambed Alteration Agreement[†] 	State Water Resources Control Board	<ul style="list-style-type: none"> • Approve NPDES Permit. 	California Water Boards – Lahontan RWQCB	<ul style="list-style-type: none"> • <u>401 Water Quality Certification</u> 	United States Army Corps of Engineers (USACE)	<ul style="list-style-type: none"> • Clean Water Act (CWA) Section 404 permit[†]
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Page(s)	Section	Additions, Corrections, and Revisions
		<p>1 — Indicates permits that would need to be obtained in the event that implementation of the Project occurs prior to completion of the Rimforest Storm Drain Project.</p>
<p>3.B-23 – 3.B-24 Table 0-1</p>	<p>3.B, Air Quality 0.0, Executive Summary</p>	<p>In response to Comment 2-9 of Comment Letter 2 the following information and mitigation measure is added to the FEIR:</p> <p><u>The Project would not exceed the SCAQMD Regional or LST thresholds for any criteria pollutants during Project construction; thus, mitigation is not required. Notwithstanding, and although not required by CEQA, the Project shall incorporate the following mitigation measure to reduce Project construction-related air pollutant emissions.</u></p> <p><u>MM-3.B1 Prior to the issuance of a grading permit or a building permit, the County shall verify that the following notes are included on the construction document(s). These notes also shall be specified in bid documents issued to construction contractors. The Project’s construction contractors shall be required to ensure compliance with the notes and permit periodic inspection of the construction site by County of San Bernardino staff or its designee to confirm compliance.</u></p> <ul style="list-style-type: none"> • <u>“During construction, all construction equipment (>150 horsepower) shall be Environmental Protection Agency (EPA)/California Air Resources Board (CARB) Tier 3 compliant or better. The construction contractor shall keep a log of all construction equipment greater than 150 horsepower demonstrating compliance with this requirement, and the log shall be made available for inspection by San Bernardino County upon request.”</u> • <u>“Construction equipment engines (>150 horsepower) shall be maintained in good condition and in proper tune per manufacturer’s specification for the duration of construction. Maintenance records shall be made available for inspection by San Bernardino County upon request.”</u> • <u>“All diesel-fueled trucks hauling materials to and from the construction site shall comply with CARB’s 2010 engine emission standards.”</u> • <u>“Signs shall be posted at the construction site entry and on the construction site stating that vehicle engine idling is limited to 5 minutes or less.”</u>
<p>3.C-12</p>	<p>3.C, Biological Resources</p>	<p>In response to Comment G for Comment Letters 11-212, the following information is added to the FEIR:</p>



Page(s)	Section	Additions, Corrections, and Revisions
		<p><u>Due to their regional significance and their potential occurrence on the Project site, habitat assessments were conducted for southern rubber boa, San Bernardino flying squirrel, and California spotted owl.</u></p>
3.C-20 – 3.C-21	3.C, Biological Resources	<p>In response to Comment 10-58 of Comment Letter 10, the following information is added to the FEIR:</p> <p>1. Southern Rubber Boa Development of the Project would result in impacts to the loss of approximately 8.64 acres of low-quality southern rubber boa habitat and <u>impacts to 0.66 acres of low-quality habitat for the Project’s Fuel Management Zone 3 (FMZ 3).</u></p> <p>2. San Bernardino Flying Squirrel Development of the Project would result in impacts to the loss of approximately 2.56 acres of low-quality habitat and approximately 4.61 acres of moderate quality San Bernardino flying squirrel habitat and <u>impacts to 0.57 acres of moderate quality habitat and 0.05 acres of low-quality habitat for the Project’s Fuel Management Zone 3 (FMZ 3).</u></p> <p>3. California Spotted Owl Development of the Project would result in impacts to the loss of approximately 2.56 acres of low-quality habitat and approximately 4.61 acres of moderate habitat and <u>impacts to 0.57 acres of moderate quality habitat for the Project’s Fuel Management Zone 3 (FMZ 3).</u></p>
3.C-22	3.C., Biological Resources	<p>In response to Comment 5-3, 8-3, 10-56, and W of Comment Letter 5, Comment Letter 8, Comment Letter 10, and Comment Letters 11 - 212, respectively, the following information is clarified in the FEIR to indicate that the proposed Project would not be implemented prior to the completion of the Rimforest Storm Drain project:</p> <p>A single drainage feature containing riparian habitat was observed within the southwest portion of the Project site during the ELMT field surveys. This drainage feature is tributary to Little Bear Creek and Lake Arrowhead. Because this drainage feature possesses surface hydrologic connection to downstream “water of the United States,” the drainage feature falls under the regulatory authority of the Corps, RWQCB, and CDFW. The drainage feature is included in the County’s Rimforest Storm Drain Project project, which is anticipated to would be installed prior to the proposed Church of the Woods Project. The County would be responsible for acquiring the necessary permits to include the jurisdictional waters in their impact footprint for the storm drain project. Approximately 0.05-acre of Corps/ RWQCB jurisdiction waters and approximately 0.10-acre of CDFW jurisdiction waters would be permanently impacted by development of the Rimforest Storm Drain Project project and mitigation</p>



Page(s)	Section	Additions, Corrections, and Revisions
		<p>would be the responsibility of the County. Under this scenarioAs 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. <u>Accordingly, impacts to riparian habitat would be less than significant.</u></p> <p>In the event that development of the Church of the Woods Project precedes the installation of the Rimforest Storm Drain Project, implementation of the proposed Church of the Woods Project would result in significant and direct impacts to the on-site drainage feature. The Project Applicant would be responsible for acquiring the necessary permits to impact the jurisdictional waters in the Project’s development footprint and the Church of the Woods Project Applicant would be required to implement mitigation.</p>
<p>3.C-23– 3.C-25, 3.C-27</p> <p>Table 0-1</p>	<p>3.C, Biological Resources</p> <p>0.0, Executive Summary</p>	<p>In response to Comment 5-3, 8-3, 10-56, and W of Comment Letter 5, Comment Letter 8, Comment Letter 10, and Comment Letters 11 - 212, respectively, the following information is clarified in the FEIR to indicate that the proposed Project would not be implemented prior to the completion of the Rimforest Storm Drain project:</p> <p>3. Wetlands</p> <p>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. Additionally, aApproximately 0.05-acre of non-wetland waters Corps/RWQCB jurisdiction and approximately 0.10-acre of streambed/riparian waters CDFW jurisdiction would be permanently impacted by the proposed Project’s development are located within the Project site, neither of which consists of wetlands. However—Additionally.—However, as previously identified under Threshold c), the <u>drainage feature is included in the County’s Rimforest Storm Drain project; therefore, the County would be responsible for acquiring the Project would be responsible for the permits necessary permits to impact the riparian habitat and would be required to implement any associated mitigation requirements. in the development footprint and implement mitigation only if this area has not already been impacted by San Bernardino County’s Rimforest Storm Drain Project. Therefore, B</u>because no wetlands were observed on the Project site <u>and no jurisdictional areas would occur within the Project’s impact footprint, the Project does not have the potential to impact federally protected wetlands. Therefore, Project-related impacts to federally protected wetlands would not occur and no mitigation is required.</u></p>



		<p>3.C.9 Cumulative Impacts</p> <p>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. Approximately 8.8% ($[58,472 \text{ acres} / 665,753 \text{ acres}] \times 100$) of the land in the San Bernardino National Forest is identified by the Forest Service as zones of Developed Area Interface. This zone includes areas adjacent to communities or concentrated use areas and developed sites with more scattered or isolated community infrastructure. The acreage of habitat impacted by the Project combined with related development in the area represents far less than 1% of the 8.8% of land within the forest that is potentially subject to future development. Additionally, <u>the Project would not result in any impacts to jurisdictional waters of the State and or U.S., while significant at the Project level, would be mitigated to a less than significant level through permitting requirements with the RWQCBACOE and CDFW. The same permitting requirements and mitigation would be applicable to other related projects, and the combined areas of unavoidable impact would be small in relation to the overall areas of jurisdictional waters with the National Forest, the vast majority being protected public lands. As such, with permit compliance, cumulative impacts on jurisdictional waters are considered less than significant.</u></p> <p>3.C.10 Significance of Impact Before Mitigation</p> <p>Threshold b and c: <u>Less-than-Significant Potentially Significant and Direct Impact.</u> If the proposed Project is implemented prior to the installation of the San Bernardino County Rimforest Storm Drain Project, the proposed Project would result in significant and direct impacts to 0.05 acres of jurisdictional waters under Corps and RWQCB jurisdiction and 0.10 acres under CDFW jurisdiction, and mitigation would be required. Alternatively, if Because the Rimforest Storm Drain Projectproject would be is implemented before implementation of the proposed Project, the Storm Drain Project would havewill eliminated the on-site jurisdictional waters, and the Project would have not impact to any jurisdictional waters. Accordingly, impacts would be less than significant.</p> <p>3.C.11.1 Mitigation Measures</p> <p>MM-3.C2(e) Prior to the issuance of any grading plan prior to the start of any on-site construction of facilities associated with the Rimforest Flood Control Project, the Project Applicant shall provide evidence to the Public Works Director or their designee and the Development Services Director or their designee that the Project Applicant has secured the following regulatory approvals: Clean Water Act (CWA) Section 404 Nationwide</p>
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Page(s)	Section	Additions, Corrections, and Revisions
		<p>Permit No. 39: Commercial and Institutional Developments, CWA Section 401 Water Quality Certification, and California Department of Fish and Wildlife (CDFW) Section 1602 Lake or Streambed Alteration Agreement.</p> <p>3.C.12 Level of Significance After Mitigation Threshold b and c: Less than Significant Impact. Following the implementation of the Mitigation Measure MM-3.C2(c), impacts to jurisdictional waters would be reduced to a level below significance.</p>
<p>3.D-8, 3.D-18</p>	<p>3.D, Geology and Soils</p>	<p>In response to Comment 10-10 of Comment Letter 10, the following information is added to identify the specific Section of Chapter 83.08 of San Bernardino County Development Code the hillside grading standards are in and identify the specific hillside grading standards.</p> <p>Additionally, Chapter 83.08.040 of the San Bernardino County Development Code (Title 8 of the San Bernardino County Code) sets forth regulations for hillside grading standards, <u>which include standards for landform grading and revegetation of manufactured slopes.</u></p> <p>3.D.8.1 Applicable County Regulations and Design Requirements</p> <ul style="list-style-type: none"> The Project is required to comply with the standards established in Chapter 83.08.040, <i>Hillside Grading Standards</i>.
<p>3.E-5</p>	<p>3.E, Hazards</p>	<p>In response to the relocation of the caretakers building, fuel management requirements beyond the Project’s limits of grading were reduced from approximately 1.9 acres to approximately 0.66 acres. As such, the following information regarding the proposed Project’s fuel modification zones is revised in the FEIR:</p> <p><u>In order to comply with San Bernardino County requirements for fire hazard control, fuel modification zones (FMZs) would be established around buildings on the developed portions of the Project site. The proposed Project would require the implantation of fuel modification zones (FMZs) is a requirement of the Project that would include approximately 1.9 acres of the Project site. Of the 1.9 acres of FMZs, 85.07 sq. ft. would be categorized as defensible space zone 2 (hereafter referred to as “FMZ 2”), while 80,550.48 sq. ft. would be categorized as defensible space zone 3 (hereafter referred to as “FMZ 3”). The proposed fuel modifications would not extend off-site.</u></p> <p><u>FMZ 2 is required to extend to 30 feet from buildings, and no FMZ 2 areas would occur beyond the Project’s limits of grading. the northwest corner of the proposed maintenance building/caretaker’s residence. All dead logs, branches, litter, and any decaying organic material (i.e., leaves,</u></p>



Page(s)	Section	Additions, Corrections, and Revisions
		<p>needles, and woody material) would be removed from the ground within FMZ 2. Trees are required to be thinned or removed so that there is approximately 20 to 30 feet of distance between tree stems. FMZ 3 would <u>is required to extend 200 feet from the Project’s proposed on-site buildings, which would all occur within the Project’s limits of grading with the exception of approximately 0.66 acres that would extend into areas of the site beyond the limits of grading. In these areas, all dead logs, branches, litter, and decaying organic material (i.e., leaves, needles, and woody material) would be removed from the ground within FMZ 3. Standing dead material, stems, vines, and non-productive trees would be removed from FMZ 3, with some tree thinning and pruning as necessary.</u></p>
3.E-8	3.E, Hazards	<p>In response to the relocation of the caretakers building, fuel management requirements beyond the Project’s limits of grading were reduced from approximately 1.9 acres to approximately 0.66 acres. As such, the following information regarding the proposed Project’s potential impacts associated with wildland fire have been made in the FEIR:</p> <p>Upon completion of the final phase, a permanent fuel modification area would be maintained on the Project site and assured through ongoing maintenance by the on-site caretaker. <u>In order to comply with San Bernardino County requirements for fire hazard control, fuel modification zones (FMZs) would be established around buildings on the developed portions of the Project site. FMZ 2 is required to extend to 30 feet from buildings, and no FMZ 2 areas would occur beyond the Project’s limits of grading. FMZ 3 is required to extend 200 feet from the Project’s proposed on-site buildings, which would all occur within the Project’s limits of grading with the exception of approximately 0.66 acres that would extend into areas of the site beyond the limits of grading. In these areas, all dead logs, branches, litter, and decaying organic material (i.e., leaves, needles, and woody material) would be removed from the ground within FMZ 3. Standing dead material, stems, vines, and non-productive trees would be removed from FMZ 3. Thinning and pruning of trees and shrubs would also occur within FMZ 3. Ongoing periodic maintenance would be required in the FMZ 2 3 area to ensure that the conditions of this zone are met. A Preliminary Fuel Modification Plan for the proposed Project requires brush clearance within 100 feet of all proposed structures. Compliance with the requirements of the approved FMZ Fuel Management Plan would help reduce the potential risk of fire on-site and protect the site from fires that have the potential to begin in the proposed Project area. The Fuel Modification Plan proposes to remove leaf litter, and other potentially flammable hazards, as well as thin out or remove trees so that there are 20 to 30 feet between tree stems (Payson, E. T., 2017a, p. 6). To date, the Project has been designed to meet or exceed requirements established by the SBCFD and USFS.</u></p>



Page(s)	Section	Additions, Corrections, and Revisions
3.F-1	3.F, Hydrology and Water Quality	<p>In response to Comment 5-8 of Comment Letter 5, the following information is added to clarify that the Project site is under the jurisdiction of the Lahontan RWQCB:</p> <p>The Project site and vicinity lie within the Mojave Watershed boundary, which is located entirely within San Bernardino County and includes approximately 1,600 square miles of total drainage. Approximately 210 square miles of this drainage area are located in the San Bernardino Mountains, which are the headwaters for the Mojave River system. Elevations within the watershed range from approximately 8,500 feet above mean sea level (amsl) at Butler Peak (approximately 15 miles east of the Project site) in the San Bernardino Mountains to 1,400 feet amsl at Afton Canyon near the terminus of the Mojave River (approximately 40 miles northeast of the City of Barstow just east of Interstate 15). Although, the Project site is located within the boundary of the Lahontan RWQCB. Therefore, and Santa Ana Basin Plan, the Santa Ana <u>Lahontan RWQCB's Water Quality Control Plan for the Lahontan Santa Ana River Region Basin (Region 68)</u> is the governing water quality plan for the region.</p>
3.F-3	3.F, Hydrology and Water Quality	<p>In response to Comment 5-3, 8-3, 10-56, and W of Comment Letter 5, Comment Letter 8, Comment Letter 10, and Comment Letters 11 - 212, respectively, the following information is clarified in the FEIR to indicate that the proposed Project would not be implemented prior to the completion of the Rimforest Storm Drain project:</p> <p>The Rimforest Storm Drain Pproject is expected to be under construction completed prior to the development of the proposed Project. However, there remains a potential for the proposed Project's construction to be initiated prior to the County's planned Rimforest Storm Drain Project. Under this scenario, the proposed Project would construct a part of the proposed Rimforest Storm Drain Project's Pine Avenue culvert system, which would initiate at an existing storm drain located at the southwest corner of the Project site. Therefore, under this scenario it is anticipated that flows associated with the proposed Rimforest Storm Drain Project would be transmitted through the proposed Project's storm drain system and discharged into the proposed Rimforest Storm Drain Project's attenuation basin(s) located north of the Project site's northeast corner and within Little Bear Creek.</p>
3.F-4 – 3.F-5	3.F, Hydrology and Water Quality	<p>In response to Comment 5-3 and 5-7 of Comment Letter 5, the following information is added to the FEIR:</p> <p><u>However, it should be noted that discharges of any water pollutants in excess of regulatory standards into any waterway would constitute a violation of the Basin Plan, unless otherwise permitted.</u></p>



Page(s)	Section	Additions, Corrections, and Revisions
3.F-21	3.F, Hydrology and Water Quality	<p>In response to Comment 5-3, 8-3, 10-56, and W of Comment Letter 5, Comment Letter 8, Comment Letter 10, and Comment Letters 11 - 212, respectively, the following information is clarified in the FEIR to indicate that the proposed Project would not be implemented prior to the completion of the Rimforest Storm Drain project:</p> <p>Under existing conditions, offsite flows enter the Project site at the southwest corner of the Project site, north of SR-18. Flows entering the site from the southwest corner would be intercepted by the Project's proposed 60 inch storm drain pipe. The pipe would consist of a 60 inch reinforced concrete pipe (RCP) and would be approximately 750 feet in length. This pipe is proposed to continue through the fill area located in the southwest corner. The proposed 60 inch storm drain would be adequate to convey flows generated by a 100 year storm event. The San Bernardino County Flood Control District has planned to develop their Rimforest Storm Drain project to be built on approximately 10 acres immediately north and northwest of the Project site. The Rimforest Storm Drain project would install a 72-inch storm drain, to be built in place of the proposed Project's 60 inch storm drain. The Rimforest Storm Drain project proposes to divert more water through their storm drain that what currently drains to the area. The proposed Project's 60 inch pipe and the Rimforest Storm Drain project's 72 inch pipe would be the same storm drain. It is anticipated that the Rimforest Storm Drain project would be constructed prior to the implementation of the proposed Project and, as such, the storm drain located in the Project site's southwest corner would be constructed as a 72 inch storm drain. Moreover, coordination between the proposed Project and the Rimforest Storm Drain project concluded that the storm drain would be constructed as a 72 inch storm drain.</p> <p>The proposed Project's storm drain improvements also include energy dissipaters at the outlet for of the Project's proposed 60 inch RCP and the concrete lined channel; depressed landscaped areas (infiltration basins) to facilitate infiltration and mitigate runoff; and storm drain filters.</p>
3.F-23	3.F, Hydrology and Water Quality	<p>In response to Comment 5-3, 8-3, 10-56, and W of Comment Letter 5, Comment Letter 8, Comment Letter 10, and Comment Letters 11 - 212, respectively, the following information is added to and/or deleted from the FEIR to clarify that the future storm drain would be 72 inches instead of 60 inches.</p> <p>Additionally, fossil filters would be installed in the storm drain inlet to the 72<u>60</u>-inch reinforced concrete pipe.</p>
3.F-23	3.F, Hydrology and Water Quality	<p>In response to Comment 5-3 of Comment Letter 5, the following information is added to the FEIR:</p>



Page(s)	Section	Additions, Corrections, and Revisions
		<p><u>The Project site contains an abandoned and capped groundwater well owned by BBMWD. The on-site groundwater well shall be destroyed by the Project Applicant, pursuant to Public Health and Safety Code, Part 9.5, Section 115700.</u></p>
<p>3.F-24 – 3.F-25 Table 0-1</p>	<p>3.F, Hydrology and Water Quality 0.0, Executive Summary</p>	<p>In response to Comment 5-3, 8-3, 10-56, and W of Comment Letter 5, Comment Letter 8, Comment Letter 10, and Comment Letters 11 - 212, respectively, the following information is clarified in the FEIR to indicate that the proposed Project would not be implemented prior to the completion of the Rimforest Storm Drain project:</p> <p><u>The San Bernardino County Flood Control District plans to implement the proposed Rimforest Storm Drain project on 10 acres located north and northwest of the Project site. The proposed Rimforest Flood Control project proposes a 72-inch storm, which would divert more water through the storm drain than occurs under existing conditions. It is anticipated that the Rimforest Flood Control project would be constructed prior to the implementation of the proposed Project, and that the Project’s storm drain system would connect to the County-installed storm drain. Similar to existing conditions, off-site drainage flows during operation of the Project would continue to enter the site at the north and northwestern portions of the Project site. As the proposed Project would result in a fill of the natural drainage course in the southwest corner of the site, a new 60-inch reinforced concrete storm drain pipe would be installed at a the southwest corner of the site to intercept off site flows. The new 750 foot long storm drain pipe would extend through the Project’s proposed development area and would generally parallel the proposed sewer alignment. Approximately midway through the Project site, the proposed storm drain would discharge into the existing natural drainage area and flow northeasterly through the Project site. The Project design includes energy dissipaters at the outlet of the 7260-inch storm drain pipe to prevent erosion and maintain flow velocities that are similar to existing conditions. The flows entering the site at Flow Entrance B on the north boundary line would be left in their natural condition and discharge into the natural drainage course that would be preserved within the Project site. The San Bernardino County Flood Control District also plans to implement the proposed Rimforest Storm Drain Project on 10 acres located north and northwest of the Project site. The proposed Rimforest Flood Control project proposes a 72 inch storm drain to be built in place of the proposed Project’s 60 inch pipe. The Flood Control’s project proposes to divert more water through this storm drain than under existing conditions. The proposed Project’s 60-inch pipe and the proposed Rimforest Flood project’s 72 inch pipe would comprise the same storm drain. It is anticipated that the Rimforest Flood project would be constructed prior to the implementation of the proposed Project and the proposed storm drain would be constructed as a 72-inch storm drain. Additionally, coordination between the proposed Project and Rimforest Storm Drain project</u></p>



Page(s)	Section	Additions, Corrections, and Revisions
		<p>concluded that, in all likelihood, the proposed Project's storm drain would be constructed as a 72-inch storm drain.</p>
<p>3.G-21, 3.G-42</p>	<p>3.G, Land Use and Planning 0.0, Executive Summary</p>	<p>In response to Comment 10-13 of Comment Letter 10, the following information is added to the FEIR:</p> <p>1. County of San Bernardino General Plan The relationship of the proposed Project to the relevant goals and policies of the County of San Bernardino General Plan identified above are presented in Table 3.G-1, San Bernardino General Plan Consistency Analysis. As identified on this table, the proposed Project would conflict with General Plan Policy M/CI 1.1 related to levels of service (<u>LOS</u>) on Project area roadways. Accordingly, the Project would result in a significant land use impact to the environmental only due to the conflict with General Plan Policy M/CI 1.1. The Project would not conflict with any other policies in the General Plan adopted for the purpose of avoiding or mitigating an environmental effect. <u>As discussed in detail in DREIR Section 3.I, Transportation and Circulation, the Project would result in direct and cumulatively considerable traffic impacts and would require mitigation. Mitigation must have a proportional nexus to the Project's impacts, and as such, the Project would install traffic signals, upon approval from Caltrans, at the Bear Springs Road/State Route 18 intersection and Pine Avenue/State Route 18 intersection and the Project would be required to pay fair share fees to Caltrans, which Caltrans would use install circulation improvements to address its impacts. Because there is no assurance that Caltrans would install the improvements in the timeframe necessary to ensure target LOS maintenance, DREIR Section 3.I concludes that traffic impacts would be significant and unavoidable. Because General Plan Policy M/CI 1.1 addresses this issue and a significant and unavoidable land use impact is identified, this conclusion duplicates the impacts identified in DREIR Section 3.I.</u></p> <p>2. Lake Arrowhead Community Plan The Project would not conflict with any other policies in the Lake Arrowhead Community Plan adopted for the purpose of avoiding or mitigating an environmental effect. <u>As discussed in detail in DREIR Section 3.I, Transportation and Circulation, the Project would result in direct and cumulatively considerable traffic impacts and would require mitigation. Mitigation must have a proportional nexus to the Project's impacts, and as such, the Project would install traffic signals, upon approval from Caltrans, at the Bear Springs Road/State Route 18 intersection and Pine Avenue/State Route 18 intersection and the Project would be required to pay fair share fees to Caltrans, which Caltrans would use install circulation improvements to address its impacts. Because there is no assurance that Caltrans would install the improvements in the timeframe necessary to ensure target LOS maintenance, DREIR Section 3.I concludes that traffic impacts would be significant and unavoidable.</u></p>



Page(s)	Section	Additions, Corrections, and Revisions
		<p><u>Because General Plan Policy LA/CI 1.1 addresses this issue and a significant and unavoidable land use impact is identified, this conclusion duplicates the impacts identified in DREIR Section 3.I.</u></p>
<p>3.I-19 – 3.I-20 Table 0-1</p>	<p>3.I, Transportation and Circulation 0.0, Executive Summary</p>	<p>In response to Comments 10-37 to 10-39 of Comment Letter 10, the following mitigation measures are added to the FEIR:</p> <p><u>MM-3.I-3 During the hours of 7 a.m. to 9 a.m. and 4 p.m. to 6 p.m., construction traffic shall be minimized. No more than 50 total passenger-car-equivalent trips per hour (inbound and outbound combined) may enter or exit the construction site during these periods. The construction contractor shall be responsible for monitoring the entries and exits during these time periods to ensure compliance and permit periodic inspection of the construction site by the County of San Bernardino or its designee to further ensure compliance. A requirement to comply with this restriction shall be noted on all construction documents and also shall be specified in bid documents issued to prospective construction contractors. Passenger-car-equivalents shall be counted as follows:</u></p> <ul style="list-style-type: none"> • <u>Passenger Vehicle – 1 PCE</u> • <u>2 Axle Truck – 1.5 PCE</u> • <u>3 Axle Truck – 2 PCE</u> • <u>4+ Axle Truck – 3 PCE</u> <p><u>MM-3.I-4 Prior to the issuance of grading permits, building permits, or improvement plans for frontage improvements along SR-18, the Project Applicant shall prepare and the County of San Bernardino shall approve a temporary traffic control plan. The temporary traffic control plan shall comply with the applicable requirements of the California Manual on Uniform Traffic Control Devices. A requirement to comply with the temporary traffic control plan shall be noted on all construction documents and also shall be specified in bid documents issued to prospective construction contractors.</u></p> <p><u>MM-3.I-5 All heavy-duty construction equipment and vehicles shall be staged interior to the construction site. The parking or storage of construction equipment and vehicles on SR-18 is prohibited. The construction contractor shall be responsible for ensuring compliance and permit periodic inspection of the construction site by the County of San Bernardino or its designee to further ensure compliance. A requirement to comply with this provision shall be noted on all construction documents and also shall be specified in bid documents issued to prospective construction contractors.</u></p>
<p>3.I-24, 3.I-26</p>	<p>3.I, Transportation</p>	<p>In response to Comment 3-8 of Comment Letter 3, the following Tables have been revised in the FEIR and Technical Appendix H to show that the Tables indicate “Yes” in the Project Impact column for the Bear Springs Road/SR-</p>



Page(s)	Section	Additions, Corrections, and Revisions
Appendix H 18, 22	and Circulation Technical Appendix H	18 Intersection, identifying that the Project would have a significant impact at this intersection location.: Table 3.I-2 Existing Intersection Levels of Service (Technical Appendix Table D) Table 3.I-4 Opening Year (2018) Intersection Levels of Service (Technical Appendix Table E)
4-4, 4-6, 4-7, 4-11	4.0, Alternatives	<p>The following information is clarified in the FEIR to indicate that the proposed Project has no potential to impact jurisdictional waters:</p> <p>Alternative 1: No Project/No Build Alternative</p> <p>C. Biological Resources Under this alternative, no construction activities would occur on the Project site. As such, there would be no direct impacts to jurisdictional waters, southern rubber boa habitat, San Bernardino flying squirrel that were identified for the proposed Project.</p> <p>Alternative 2: No Project/Feasible Development Alternative</p> <p>C. Biological Resources Therefore, based on the reduction in the amount of land that would be physically disturbed by the implementation of this alternative, this alternative would reduce or avoid the significant impacts to jurisdictional waters and the cumulatively considerable significant and unavoidable impacts to southern rubber boa habitat, and the San Bernardino flying squirrel that were identified for the proposed Project.</p> <p>F. Hydrology, Water Quality, and Water Supply Erosion, surface water runoff, and water quality impacts from construction and operation would be reduced due to the smaller area of site disturbance and impervious surface. In addition, impacts to jurisdictional waters would be likely to be avoided. Water demand associated with the reduced building size and manufacturing use could be similar or greater than the proposed Project, but is expected to be within Crestline-Lake Arrowhead Water Agency projections.</p> <p>Alternative 3: Reduced Project/Alternative Site Design Alternative</p> <p>C. Biological Resources Therefore, this alternative would reduce impacts on jurisdictional waters, southern rubber boa habitat, and the San Bernardino flying squirrel that were identified for the proposed Project.</p>



Page(s)	Section	Additions, Corrections, and Revisions
5-2	5.0, Other CEQA Considerations	<p>In response to Comment 10-13 of Comment Letter 10, the following information is added to the FEIR to repeat that the Project’s transportation/traffic impact is inconsistent with a General Plan Policy:</p> <p><u>5.1.4 Land Use</u></p> <p><u>The Project would result in an inconsistency with San Bernardino General Plan Policy M/CI 1.1 and Lake Arrowhead Community Plan Policy LA.CI 1.1 due to the Project’s significant and unavoidable transportation and circulation impacts identified above. The Project would incorporate the mitigation measures identified in DREIR Section 3.I; however, impacts would remain significant and unavoidable. Because General Plan Policy M/CI 1.1 addresses this issue and a significant and unavoidable land use impact is identified, this conclusion duplicates the impacts identified in DREIR Section 3.I.</u></p>
Technical Appendix E1	n/a	<p>The following document is added to the FEIR as Technical Appendix E1 to supplement information presented in the DREIR:</p> <p>Timothy E. Paysen, Phd, Environmental Consultant. 20179. <i>Evacuation Plan Church of the Woods Site (Revised April 2019)</i>. JulyApril.</p>
Technical Appendix F1	n/a	<p>The following document is added to the FEIR as Technical Appendix F1 to supplement information presented in the DREIR:</p> <p><u>William J. McKeever, Inc. 2019. <i>Addendum to Drainage Study</i>. June 3, 2019.</u></p>
Technical Appendix I	n/a	<p>The following document is added to the FEIR as Technical Appendix I to reaffirm the water agency’s ability to service the Project:</p> <p><u>Crestline-Lake Arrowhead Water Agency. 2019. <i>Water Service to Church of the Woods (APN 336-101-06)</i>. February 13, 2019.</u></p>

F.4 NO RECIRCULATION OF THE DRAFT REVISED EIR

CEQA Guidelines Section 15088.5 describes the conditions under which a DEIR that was circulated for public review is required to be re-circulated for additional public review and comment. CEQA Guidelines Section 15088.5 states that new information added to a DEIR is not significant unless the DEIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation includes, for example, a disclosure showing that:

- a. A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.



- b. A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
- c. A feasible project alternative or mitigation measure considerably different from the others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.
- d. The DEIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.

As summarized in Table F-2, *Additions, Corrections, and Revisions to the Draft REIR*, and based on the comment letters and responses presented in the Responses to Comments (above), there were no public comments or changes to the text or analysis contained in the DREIR that resulted in the identification of any new significant environmental effect or a substantial increase in the severity of an environmental effects that were disclosed in the DREIR. Based on comments received on the DREIR, no new significant environmental effects would result due to revisions to the Project's mitigation measures or the addition of mitigation measures. Additionally, the DREIR was fundamentally and basically adequate, and all conclusions within the DREIR were supported by evidence provided within the DREIR or the administrative record for the proposed Project. Furthermore, public comment letters on the DREIR did not identify any feasible alternatives to the proposed Project.

Based on the foregoing, additional recirculation of the DREIR is not warranted according to the guidance set forth in Section 15088.5 of the CEQA Guidelines.

ATTACHMENT A
UPDATED FORESTERS REPORT

July 11, 2019

Church of the Woods
PATRICK HOPKINS
909-890-2550 OFFICE
520 TENNESSEE ST.
REDLANDS, CA 92373

This letter serves as an update to the "Foresters Report" completed by John Hatcher and James Bridges in March, 2003.

The Church of the Woods property is now 27 acres in size following the sale of 10 acres to the San Bernardino County Flood Control. As stated in the original report, the property consists of Sierra Mixed Conifer with scattered hardwood species.

The property received hazardous fuels reduction treatment in 2005 and again in approximately 2013. I visited the property on July 8, 2019 and observed that the past fuel reduction operations are still effective in reducing the fire hazard and promoting forest health. However, it is my professional opinion that the property will need additional hazardous fuels reduction treatment in the next five years.

No inventory data was collected during the visit to the property, but will likely be completed during the next entry for fuels reduction. Very little mortality was observed at this time which indicates that past thinning operations and fuels reduction are, in fact, promoting forest health.

I encourage the Church of the Woods to seek funding through the NRCS when additional treatments become necessary and have a new forest management plan completed, as well.

I am available to discuss further and as necessary at my contact information, below.

Sincerely,

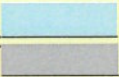
A handwritten signature in blue ink that reads "Tim Morin". The signature is written in a cursive style and is positioned above a faint, light blue rectangular stamp.

Timothy D. Morin, RPF #2505
Woodsman489@gmail.com
951-692-1747

ATTACHMENT B
REVISED WATER QUALITY MANAGEMENT PLAN CALCULATIONS AND SITE PLAN

Santa Ana Watershed - BMP Design Flow Rate, Q_{BMP}

Legend:



Required Entries

Calculated Cells

(Note this worksheet shall only be used in conjunction with BMP designs from the LID BMP Design Handbook)

Company Name	Church of the Woods	Date	1/2/2020
Designed by	WJ McKeever Inc	Case No	
Company Project Number/Name			

BMP Identification

BMP NAME / ID Caltrans BMP

Must match Name/ID used on BMP Design Calculation Sheet

Design Rainfall Depth

Design Rainfall Intensity I = 0.20 in/hr

Drainage Management Area Tabulation

Insert additional rows if needed to accommodate all DMAs draining to the BMP

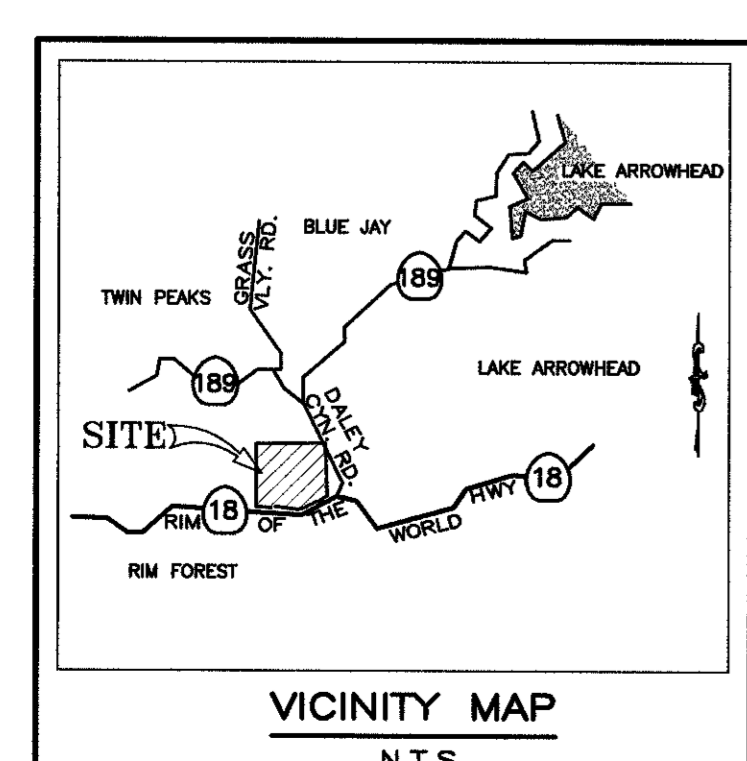
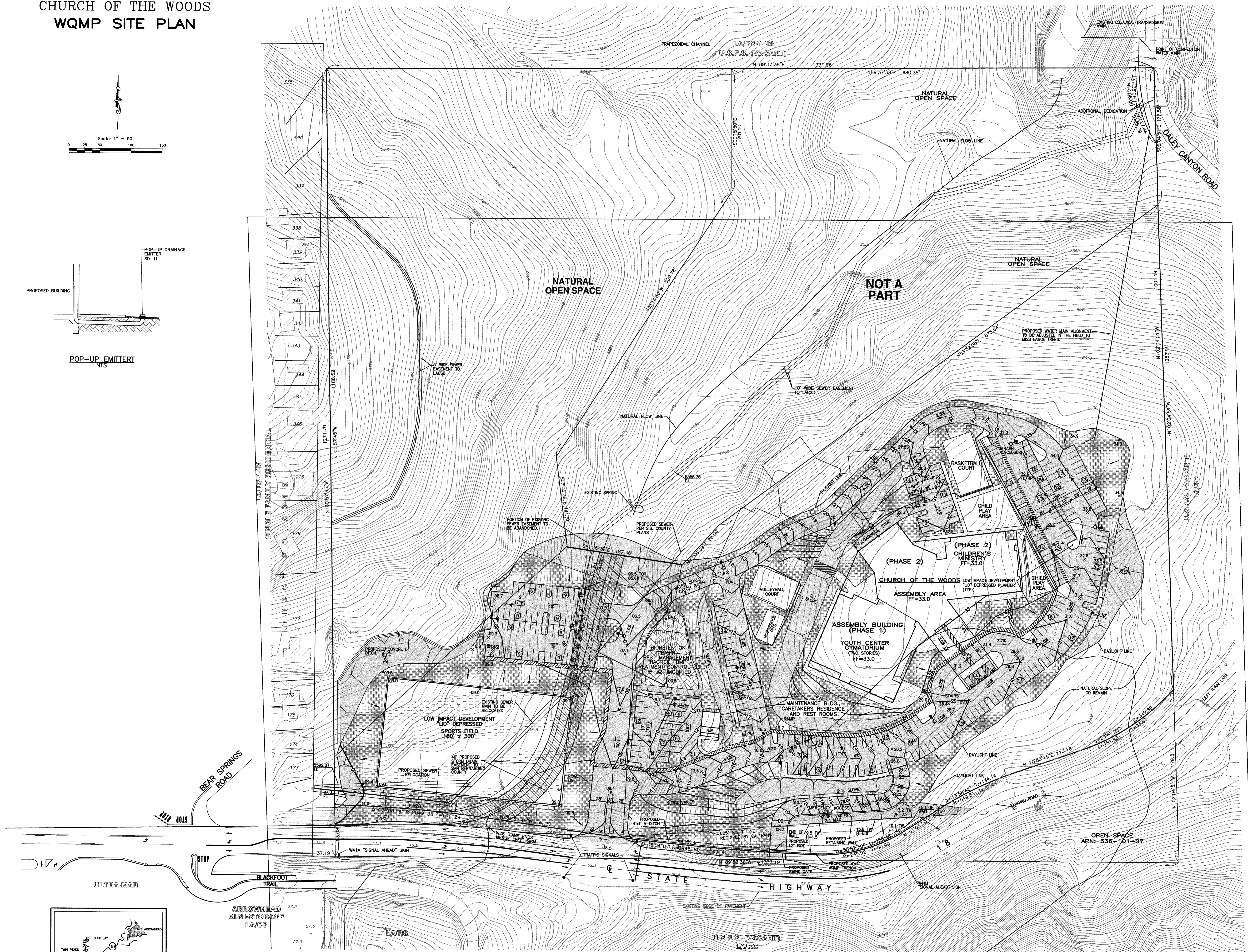
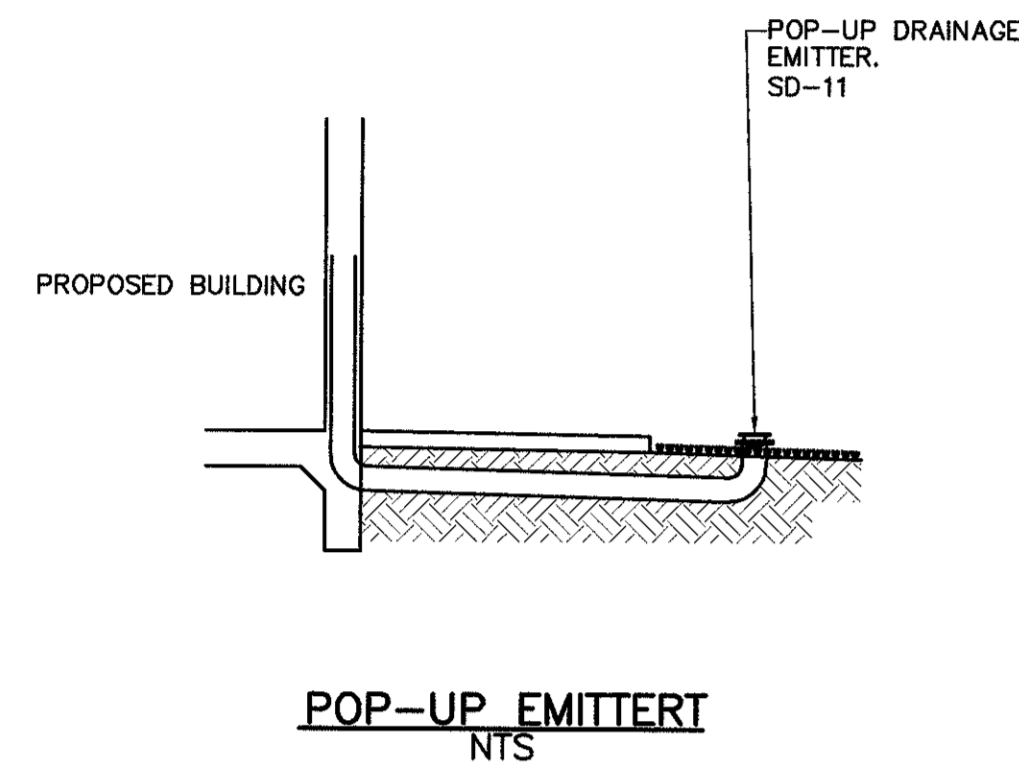
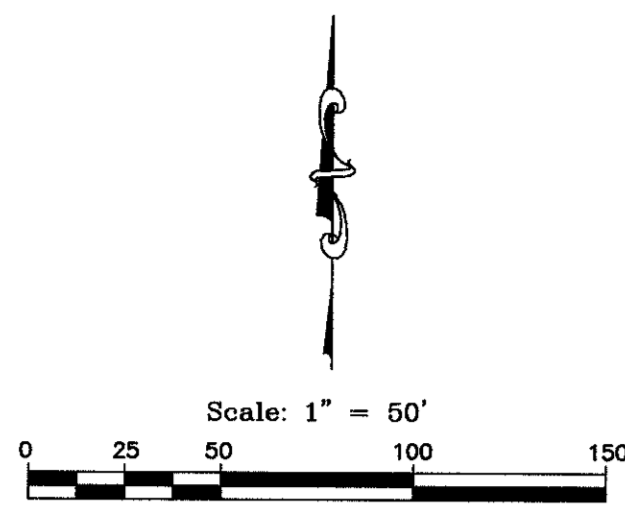
DMA Type/ID	DMA Area (square feet)	Post-Project Surface Type (use pull-down menu)	Effective Imperivous Fraction, I_f	DMA Runoff Factor	DMA Areas x Runoff Factor	Design Rainfall Intensity (in/hr)	Design Flow Rate (cfs)	Proposed Flow Rate (cfs)
	53248.15	Concrete or Asphalt	1	0.89	47497.3			
	53248.15		Total		47497.3	0.20	0.2	

DMAs

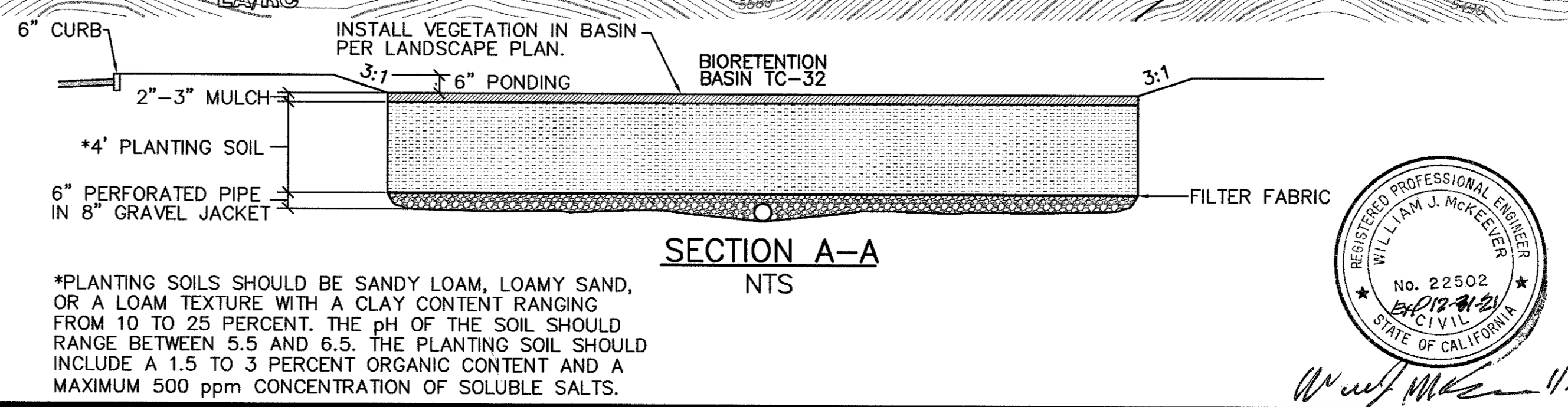
Proposed Volume must be greater than the Design Capture Volume

Notes:

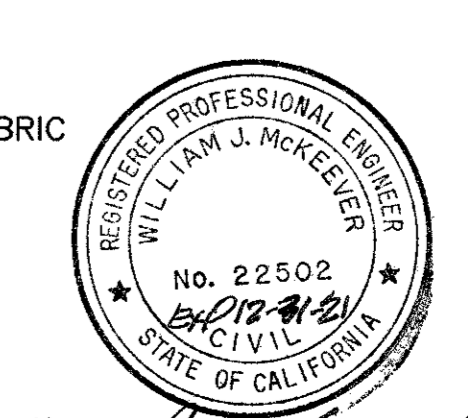
CHURCH OF THE WOODS
WQMP SITE PLAN



- LEGEND:**
- INDICATES PLAY FIELD
 - INDICATES ORNAMENTAL LANDSCAPE
 - INDICATES LANDSCAPED MANUFACTURED SLOPE
 - INDICATES GRAVEL SHOULDER (HIGHWAY 18)
 - INDICATES NATURAL AREA
 - INDICATES BIORETENTION BASIN
 - INDICATES 6" TUBULAR STEEL FENCE
 - INDICATES ROOF DRAIN AND POP-UP EMITTER
 - INDICATES WATER QUALITY INLET WITH INSERT



*PLANTING SOILS SHOULD BE SANDY LOAM, LOAMY SAND, OR A LOAM TEXTURE WITH A CLAY CONTENT RANGING FROM 10 TO 25 PERCENT. THE pH OF THE SOIL SHOULD RANGE BETWEEN 5.5 AND 6.5. THE PLANTING SOIL SHOULD INCLUDE A 1.5 TO 3 PERCENT ORGANIC CONTENT AND A MAXIMUM 500 ppm CONCENTRATION OF SOLUBLE SALTS.



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REVISIONS
1-3-20

ATTACHMENT C
CHANGES TO THE DRAFT REVISED EIR



EIR Technical Appendices (bound separately)

- Appendix A Notice of Preparation and Initial Study, Notice of Preparation Comments, Previous Staff Report, and Additional Comments
- Appendix B HDR. 2018. *Air Quality and Greenhouse Gas Analysis Church of the Woods*. April
- Appendix C Element Consulting. 2018. *Church of the Woods Project Habitat Assessment*. July
- Appendix D1 LOR Geotechnical Group, Inc. 2017. *Geotechnical Update, Church of the Woods, Rimforest Area, San Bernardino County, California*. March
- Appendix D2 W.J McKeever Inc. 2017. *Church of the Woods Earthwork Analysis Report*. June
- Appendix E1 Timothy E. Paysen, PhD, Environmental Consultant. 201~~9~~⁷. *Evacuation Plan Church of the Woods Site (Revised April 2019)*. ~~July~~^{April}
- Appendix E2 Timothy E. Paysen, PhD, Environmental Consultant. 2017. *Fuel Modification Plan Church of the Woods Site*. July
- Appendix F W.J. McKeever, Inc. 2018. *Preliminary Drainage Study and Additional Water Supply Information Church of the Woods*. April
- Appendix F1 W J. McKeever, Inc. 2019. *Addendum to Drainage Study*. June
- Appendix G HDR. *Noise and Vibration Impact Assessment Church of the Woods*. July
- Appendix H Translutions, Inc. 2018. *Church of the Woods Traffic Impact Analysis and Supplemental Correspondence*. September
- Appendix I Crestline-Lake Arrowhead Water Agency. 2019. *Water Service to Church of the Woods (APN 336-101-06)*. February



0.0 EXECUTIVE SUMMARY

In accordance with CEQA Guidelines Section 15123, this Chapter of the Draft Revised Environmental Impact Report (DREIR) provides a brief description of the Project; identification of significant effects and proposed mitigation measures or alternatives that would reduce or avoid those effects; areas of controversy known to the lead agency; and issues to be resolved including the choice among alternatives and whether and how to mitigate the significant effects.

0.1 BACKGROUND SUMMARY

The environmental review process for the proposed Church of the Woods Project (Project) began in 2003, with a project of larger scope. A Mitigated Negative Declaration (MND) was prepared, and on May 20, 2004, the San Bernardino County Planning Commission approved the Project and adopted the MND. On May 28, 2004, an appeal was filed and the Project Applicant resubmitted a smaller project design by removing the proposed on-site school. On February 14, 2005, the County of San Bernardino (County) circulated the Notice of Preparation (NOP) to the State Clearinghouse (SCH), Office of Planning and Research (OPR), responsible agencies, and other interested parties. A Draft EIR was prepared and circulated for public review and comment from April 14, 2010 to June 17, 2010 (2010 Draft EIR). During the review period, the County received comments in opposition of the Project. The County took no further action on the Project at that time.

The County of San Bernardino made the decision to prepare a Revised EIR pursuant to CEQA Guidelines Section 15088.5(a) as a result of the availability of new information. The County determined that a Draft Revised EIR (DREIR) is necessary because approximately eight years have elapsed since the circulation of the 2010 Draft EIR for public review and existing conditions should be reevaluated. A DREIR is also necessary to address the change in conditions resulting from the County of San Bernardino, Department of Public Works' purchase of a portion of land contained within the initial Project proposal to develop the Rimforest Storm Drain pProject. The Rimforest Storm Drain pProject was subject to an independent CEQA review and the EIR (SCH No. 2015051070) was certified by the County Board of Supervisors on May 23, 2017. Furthermore, a DREIR is necessary to reflect the revisions and modifications to the proposed Project's site plan. For the reasons stated above, the County of San Bernardino has elected to prepare a DREIR and to recirculate the entire document.

0.2 PROJECT SUMMARY

The Project involves the development of a church campus on an undeveloped property in the Rim Forest community of unincorporated San Bernardino County. The church campus would include an assembly building/children's ministry, a youth center gymnasium, a maintenance building/caretaker unit, a 600-seat worship center, various recreational fields and facilities, and parking. The facilities would be developed on approximately 13.6 acres of a 27.12-acre property.

The proposed Project would result in the development of approximately 13.6 acres (50%) of the Project site (6.4 acres of structures, drives, walks, and drainage features; 7.2 acres of sports fields, play areas, recreation, landscaping, and landscaped manufactured slopes). The remaining 13.5 acres (50%) of the site would be retained as open space, including ~~hiking trails~~, fuel modification zones, and undisturbed forested areas.



Therefore, the No Project/Feasible Development Alternative assumes the potential development of 10,000 square feet of manufacturing or warehouse use due to the site's physical constraints. This alternative would be constructed on approximately 5 acres of the Project site and is based on the provisions for development within the Community Industrial (IC) District.

Reduced Project/Alternative Site Design Alternative: The Reduced Project/Alternative Site Design Alternative would reduce the major components and capacity of the Project by approximately 25% while avoiding grading and disturbance of natural vegetation within an approximately 200-foot setback along Highway 18. Grading and clearance of vegetation along the highway would be limited to what is required to construct the entry and emergency access roads. This alternative would also minimize disturbance of natural vegetation and increase the setback between proposed playfields and existing residential uses located along the Project's southwestern boundary while also substantially avoiding alteration of the natural drainage that runs from the southwest to the northeast corner of the site. ~~In addition, no temporary outdoor amphitheater would occur under this alternative.~~

Environmentally Superior Alternative: The Reduced Project/Alternative Site Design would be the environmentally superior alternative. This alternative would reduce impacts on aesthetics, air quality, land use, and noise to a greater extent than the No Project/Feasible Development Alternative and the proposed Project. The rest of the impacts would be similar to the proposed Project.

0.6 SUMMARY OF IMPACTS AND MITIGATION MEASURES

Table 0.0-1 beginning on page 0-5 presents a summary of the environmental impacts associated with the proposed Project, the mitigation measures that would reduce or avoid those effects, and the level of significance of the impacts following implementation of the mitigation measures.



Environmental Impact	Mitigation Measures	Level of Significance After Mitigation
<p>would be consistent with the Community Industrial development standards enforced by the San Bernardino County General Plan and would be subject to a Conditional Use Permit.</p>		
<p><u>Threshold b and c:</u> Project-related construction would not violate any air quality standard or contribute substantially to an existing or projected air quality violation. The Project would not result in a net increase of any criteria pollutant for which the Project region is in non-attainment under applicable federal or State ambient air quality standard. The Project would not emit substantial concentrations of CO, SOX, NOX, ROG, PM10, or PM2.5 during long-term operation and would not cause or contribute to an existing or projected air quality violation, on either a direct or cumulatively considerable basis. <u>The Project would not exceed the SCAQMD Regional or LST thresholds for any criteria pollutants during Project construction. Notwithstanding, and although not required by CEQA, the Project shall incorporate MM-3.B1 to reduce Project construction-related air pollution emissions</u></p>	<p>No mitigation is required. <u>MM-3.B1 Prior to the issuance of a grading permit or a building permit, the County shall verify that the following notes are included on the construction document(s). These notes also shall be specified in bid documents issued to construction contractors. The Project's construction contractors shall be required to ensure compliance with the notes and permit periodic inspection of the construction site by County of San Bernardino staff or its designee to confirm compliance.</u></p> <ul style="list-style-type: none"> <u>"During construction, all construction equipment (>150 horsepower) shall be Environmental Protection Agency (EPA)/California Air Resources Board (CARB) Tier 3 compliant or better. The construction contractor shall keep a log of all construction equipment greater than 150 horsepower demonstrating compliance with this requirement, and the log shall be made available for inspection by San Bernardino County upon request."</u> <u>"Construction equipment engines (>150 horsepower) shall be maintained in good condition and in proper tune per manufacturer's specification for the duration of construction. Maintenance records shall be made available for inspection by San Bernardino County upon request."</u> 	<p>Less-than-Significant Impact</p>



Environmental Impact	Mitigation Measures	Level of Significance After Mitigation
	<ul style="list-style-type: none"> • <u>“All diesel-fueled trucks hauling materials to and from the construction site shall comply with CARB’s 2010 engine emission standards.”</u> • <u>“Signs shall be posted at the construction site entry and on the construction site stating that vehicle engine idling is limited to 5 minutes or less.”</u> 	
<p><u>Threshold d:</u> Construction of the Project would not result in the exposure of any sensitive receptors to substantial pollutant concentrations. Operational emissions would not exceed the SCAQMD’s LSTs for any criteria pollutant at the nearest sensitive receptor. The Project would not result in a new or contribute to CO Hot Spots. Project generated traffic trips are not anticipated to result in CO concentrations exceeding the State or federal CO standards</p>	<p>No mitigation is required.</p>	<p>Less-than-Significant Impact</p>
<p><u>Threshold e:</u> The Project could produce odors during construction; however, standard construction practices would minimize odors. During long-term operation, the proposed Project would include a church campus with sports fields and sport courts, which are not typically associated with objectionable odors. The proposed Project would be required to comply with SCAQMD Rule 402, which prohibits the discharge of odorous emissions.</p>	<p>No mitigation is required.</p>	<p>Less-than-Significant Impact</p>
<p><i>C. Biological Resources</i></p>		
<p><u>Threshold a:</u> The Project site contains suitable habitat for three special-status species in the region, which include the Southern Rubber Boa, California Spotted Owl, and San Bernardino Flying Squirrel. Implementation of the Project would result in the direct removal of suitable habitat for these species. The Project site and the surrounding area has</p>	<p>MM-3.C1(a)A Prior to the issuance of any grading permits, the Project Applicant shall provide evidence to the Public Works Director or their designee, and the that the Development Services Director or their designee <u>has confirmed</u>; that</p>	<p>Cumulatively Considerable</p>



Environmental Impact	Mitigation Measures	Level of Significance After Mitigation
	term Management Plan. The long-term management plan shall be submitted to CDFW for review and approval.	
<p><u>Threshold b and c:</u> A single drainage feature containing riparian habitat is located within the southwest portion of the Project site. This drainage feature does not contain any wetland or wetland vegetation. The drainage feature is proposed to be a part of the County’s Rimforest Storm from Storm Drain Project project; however, the proposed Project has the potential to be implemented prior to the County’s Storm Drain Project. The Project has the potential to result in direct impacts to the riparian habitat. The Project would not result in any impacts to jurisdictional waters of the State of U.S. The Project site does not contain any special-status plant species and it predominantly contains a mixed conifer forest plant community, which is relatively common for the San Bernardino Mountains. The Project would remove common plant species that are abundant in the region.</p>	<p><u>No mitigation is required.</u> MM 3.C2(e) Prior to the issuance of any grading plan prior to the start of any on-site construction of facilities associated with the Rimforest Flood Control Project, the Project Applicant shall provide evidence to the Public Works Director or their designee and the Development Services Director or their designee that the Project Applicant has secured the following regulatory approvals: Clean Water Act (CWA) Section 404 Nationwide Permit No. 39: Commercial and Institutional Developments, CWA Section 401 Water Quality Certification, and California Department of Fish and Wildlife (CDFW) Section 1602 Lake or Streambed Alteration Agreement.</p>	<p>Less-than-Significant Impact with Mitigation</p>
<p><u>Threshold e:</u> The proposed Project would not result in significant conflicts with any applicable policy established by the San Bernardino General Plan or Lake Arrowhead Community Plan. Additionally, neither does the San Bernardino General Plan nor the Lake Arrowhead Community Plan have a tree preservation policy or ordinance.</p>	<p>No mitigation is required.</p>	<p>Less-than-Significant Impact</p>
<p><u>Threshold f:</u> The Project site is located within the Lake Arrowhead Community Plan, which is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approval local, regional, or state HCP. No HCPs have been approved and none are in the process of approval for the lands within the San Bernardino Mountains.</p>	<p>No mitigation is required.</p>	<p>Less-than-Significant Impact</p>



Environmental Impact	Mitigation Measures	Level of Significance After Mitigation
	implemented during Project grading and construction activities.	
<p><u>Threshold b:</u> Grading activities associated with the proposed Project would temporarily expose underlying soils in the Project’s grading footprint to water and air, which would increase erosion susceptibility. The Project would be required to obtain coverage under NPDES permit for construction activities. Additionally, the Project would be required to prepare a SWPPP that would address construction fencing, sand bags, and other erosion control features. The Project would also comply with SCAQMD Rule 403 – Fugitive Dust, which would minimize wind related erosion. Following construction, wind and water erosion on the Project site would be minimized, as previously disturbed areas would be landscaped. A bioretention basin would be developed at the south-central portion of the Project site and would receive storm water flows. The Project would be required to prepare and submit a Project specific SWPPP and Final WQMP, which would identify and implement an effective combination of erosion control and sediment control measures.</p>	No mitigation is required.	Less-than-Significant Impact
<p><u>Threshold c:</u> The Project site is located in an area that is susceptible to landslides. The Project would be designed and constructed to incorporate the recommendations of the Project specific geotechnical investigation and would not create conditions that would result in the occurrence of an on- site or off-site landslide. The sloped areas of the Project site may potentially be susceptible to lateral spreading. The Rimforest Storm Drain Project<u>project</u> is anticipated to commence prior to the proposed Project and would remove or recompact soils susceptible to lateral spreading and liquefaction. However, it is unknown whether the Storm Drain p<u>Project</u> would<u>will</u> remove all the soils susceptible to lateral spreading and liquefaction. Therefore, there would be a potential for the Project site to contain soils</p>	<p>MM 3.D-1 shall apply.</p> <p>MM 3.D-2 MM 3.D-2—Prior to the issuance of any grading permit, the San Bernardino County Building Official shall confirm that the Grading Plan incorporates specific measures from the required design-level Project-specific geotechnical investigation to address lateral spreading. The geotechnical investigation report shall comport with the provisions established in Chapter 87.08, Soils Reports, and Chapter 88.02, Soil and Water Conservation, of the San Bernardino County Code. Remedial measures shall be undertaken</p>	Less-than-Significant Impact with Mitigation



Environmental Impact	Mitigation Measures	Level of Significance After Mitigation
water and limited amount of water within the fractures of the bedrock.		
<p><u>Threshold c, d, and e:</u> The Project would alter the Project site and would result in a nominal increase in the overall drainage area's Q value. <u>Because the proposed Project would be constructed following the San Bernardino Rimforest Storm Drain project,</u> Onsite flows would be discharged to the existing drainage course (as modified by the Rimforest Flood Control Project) and overall topography would not be substantially altered by Project development.</p>	No mitigation is required.	Less-than-Significant
<p><u>Threshold a and f:</u> The Project would be required to submit a SWPPP to address erosion control and water quality measures during and after construction to obtain a NPDES construction general permit. The Project would implement and monitor BMPs to support the elimination or reduction of pollutants to comply with applicable water quality standards. The Project prepared a Project specific WQMP that identifies operational structural and non-structural BMPs that would be incorporated into the Project's operation and maintenance.</p>	No mitigation is required.	Less-than-Significant Impact
<p><u>Threshold g and h:</u> According to the FEMA Flood Insurance Rate Map No. 06071C7955H, the Project site is not located within a special flood hazard zone area that is subject to inundation by a 1% annual flood. Additionally, the proposed Project is a commercial development and would include on housing facility to accommodate the on-site caretaker. The on-site water drainage system would convey storm water to the natural drainage feature in a similar manner that occurs under existing conditions.</p>	No mitigation is required.	Less-than-Significant Impact
<p><u>Threshold i:</u> The Project site is not located within a special flood hazard area subject to a 100-year flooding event nor is the Project site within an area subject to the protection of levees. Additionally, the County's General Plan Hazards</p>	No mitigation is required	Less-than-Significant Impact



Environmental Impact	Mitigation Measures	Level of Significance After Mitigation
<p>Overlay does not identify any portions of the Project site to be impacted by flooding as a result of a dam or levee failure.</p>		
<p><u>Threshold j:</u> The Project does not propose the construction of any large bodies of water or located near a large body of water that could be affected by a seiche. The Project site’s potential to be affected by a tsunami is non-existent. The Project site is located more than 50 miles from the Pacific Ocean and is approximately 5,680 feet amsl. The Project site does contain soils that are susceptible to landslides. Therefore, the Project has the potential to expose people and structures to landslide or mudslide events.</p>	<p>Mitigation Measures MM 3.D-1 and MM 3.D-2 shall apply</p>	<p>Less-than-Significant Impact with Mitigation</p>
<p>G. Land Use</p>		
<p><u>Threshold b:</u> The Project would not be inconsistent with any of the policies of the San Bernardino County General Plan <u>Policy M/CI 1.1</u>, and Lake Arrowhead Community Plan <u>Policy LA/CI 1.1</u>, both related to levels of service on Project area roadways. The Project would be consistent with the San Bernardino County Development Code <u>and</u>, or the San Bernardino National Forest Land Management Plan. The Project <u>also</u> would be consistent with the 2016-2040 RP/SCS policies, strategies, and objectives.</p>	<p>No mitigation is required. <u>Mitigation Measures MM 3.I-1 and MM 3.I-2 shall apply.</u></p>	<p>Less than Significant Impact <u>Significant and Unavoidable</u></p>
<p>H. Noise</p>		
<p><u>Threshold a, c, d.</u> Temporary construction noise has the potential to generate excessive noise levels that may affect nearby sensitive receptors. Project operational noise is not anticipated to generate excessive noise nor expose sensitive receptors to excessive noise. The noise level increase due to Project operation would not be perceptible by the human auditory system.</p>	<p>MM-H-1: Prior to the issuance of a grading permit, the County of San Bernardino Building Official shall ensure that the following notes are included on all grading plans and shall be enforced by the construction contractor during all excavation and grading activities:</p> <ol style="list-style-type: none"> 1. During all site excavation and grading, the Construction Contractor shall equip all construction equipment, fixed or mobile, with 	<p>Significant and Unavoidable</p>



Environmental Impact	Mitigation Measures	Level of Significance After Mitigation
	<p>intersection. The Project’s fair share of this improvement is 32.3%.</p> <p><u>MM-3.I-3</u> During the hours of 7 a.m. to 9 a.m. and 4 p.m. to 6 p.m., construction traffic shall be minimized. No more than 50 total passenger-car-equivalent trips per hour (inbound and outbound combined) may enter or exit the construction site during these periods. The construction contractor shall be responsible for monitoring the entries and exits during these time periods to ensure compliance and permit periodic inspection of the construction site by the County of San Bernardino or its designee to further ensure compliance. A requirement to comply with this restriction shall be noted on all construction documents and also shall be specified in bid documents issued to prospective construction contractors. Passenger-car-equivalents shall be counted as follows:</p> <ul style="list-style-type: none"> • Passenger Vehicle – 1 PCE • 2 Axle Truck – 1.5 PCE • 3 Axle Truck – 2 PCE • 4+ Axle Truck – 3 PCE <p><u>MM-3.I-4</u> Prior to the issuance of grading permits, building permits, or improvement plans for frontage improvements along SR-18, the Project Applicant shall prepare and the County of San Bernardino shall approve a temporary traffic control plan. The temporary traffic control plan shall comply with the applicable requirements of the</p>	



Environmental Impact	Mitigation Measures	Level of Significance After Mitigation
	<p><u>California Manual on Uniform Traffic Control Devices. A requirement to comply with the temporary traffic control plan shall be noted on all construction documents and also shall be specified in bid documents issued to prospective construction contractors.</u></p> <p><u>MM-3.I-5 All heavy-duty construction equipment and vehicles shall be staged interior to the construction site. The parking or storage of construction equipment and vehicles on SR-18 is prohibited. The construction contractor shall be responsible for ensuring compliance and permit periodic inspection of the construction site by the County of San Bernardino or its designee to further ensure compliance. A requirement to comply with this provision shall be noted on all construction documents and also shall be specified in bid documents issued to prospective construction contractors.</u></p>	
<p><u>Threshold b:</u> The Project’s traffic study area included 18 intersections, three of which are under the jurisdiction of the County of San Bernardino. The remaining 15 intersections are under the jurisdiction of Caltrans. The Project would impact several intersections under the jurisdiction of Caltrans. The Project would not result in significant impacts to intersections under the jurisdiction of the County as part of the CMP.</p>	<p>No mitigation is required.</p>	<p>Less-than-Significant Impact</p>
<p><u>Threshold c:</u> The Project does not include an air travel component; therefore, air traffic volumes would not be changed as a result of the Project. The Project is not located within the vicinity of an airport, airstrip, or helipad.</p>	<p>No mitigation is required.</p>	<p>Less-than-Significant Impact</p>



Guidelines Section 15150 and is available for public review at the physical location and website referenced in DREIR Section 6.0, *References*.

For the reasons described above, deviation from the use of the March 2005 NOP date to a more recent date of April 2017 to establish the environmental baseline for purposes of evaluation in this DREIR is appropriate in order to present a fair and accurate description of the Project's expected environmental impacts. The Project has been designed to be constructed ~~either prior to or~~ following the implementation of the Rimforest Storm Drain project; ~~thus, this DREIR evaluates both scenarios~~. In areas where implementation of the Rimforest Storm Drain project will physically impact the Project site (approximately 0.10 acres as documented in the Rimforest Storm Drain ~~Project~~ Final EIR; SCH No. 2015051070), this DREIR bases its impact assessments to those 0.10 acres on conditions that ~~occur will exist following both with and without the~~ implementation of the Rimforest Storm Drain ~~project~~.

As required by CEQA Guidelines Section 15125(c), the environmental setting should identify any inconsistencies between a proposed project and applicable general, specific, or regional plans, and place special emphasis on resources that are rare or unique to that region and would be affected by the Project. Refer to Subsection 2.1.5, *Planning Context*, for additional information about applicable plans. Regarding rare and unique resources, the Project site is located in the forested mountain community of Rimforest. Biological resources located on the Project site are not rare or unique to the Project site because the surrounding area also contains these resources. This DREIR acknowledges that several plant and animal species identified on the Project site and that occur in the surrounding area are documented by the United States Fish and Wildlife Service (USFWS), California Department of Fish and Wildlife (CDFW), and/or United States Forest Service (USFS) as endangered, threatened, or sensitive. Refer to Subsection 3.C, *Biological Resources*, for additional information.

2.1.1 REGIONAL SETTING AND LOCATION

The Project is proposed to be developed on an approximately 27.12-acre property located in the Rimforest community, an unincorporated area of San Bernardino County located in the San Bernardino Mountains. As shown on Figure 2-1, *Regional Map*, the Project site is located immediately north of State Route 18 (SR-18), approximately 0.5 mile south of State Route 189 (SR-189), and approximately 1.2 miles west of State Route 173 (SR-173). The City of San Bernardino is located approximately 4.5 miles to the south of the Project site. The Project site is located approximately 1.5 miles to the southwest of the Lake Arrowhead reservoir.

2.1.2 LOCAL SETTING AND LOCATION

As depicted on Figure 2-2, *Vicinity Map*, the Project site is located in the northeast portion of the unincorporated community of Rimforest in the western portion of unincorporated San Bernardino County, California. The Project site is located within the San Bernardino National Forest, a United States National Forest that encompasses about 823,816 acres of portions of the San Bernardino Mountains, San Jacinto Mountains, and Santa Rosa Mountains. Approximately 82% of the San Bernardino National Forest is federally-owned. The Project site is privately-owned and is located in the San Bernardino Mountains portion of the San Bernardino National Forest, situated immediately north of SR-18, east of Bear Springs Road, and west of Daley Canyon Road. The Project site lies within Section 29, Township 2 North, Range 3 West,



A previous Engineering Geology and Soils Engineering Investigation was performed at the Project site in 2001 by LOR Geotechnical Group, Inc., which identified the site as being underlain by granitic bedrock overlain by a thick layer of colluvial and topsoil materials. In the central portion of the Project site, the depth of colluvium was observed to thicken with units of older alluvium overlying the bedrock. Exposed bedrock was observed along the western edge of the Project site, which typically consisted of a medium grained quartz monzonite. Typically, bedrock at the Project site was observed to be covered by several feet of colluvial soils. The majority of the Project site is covered by a thick layer of organic topsoil. (LOR, 2001, pp. 7-8)

The San Bernardino County General Plan Geologic Hazard Overlays Map depicts the Project site as being located within an area subject to moderate to high landslide susceptibility. (San Bernardino County, 2010a)

Refer to DREIR Subsection 3.D, *Geology and Soils*, for a detailed discussion of the geology and soils of the Project site.

2.1.10 HYDROLOGIC SETTING

The Project site is located within the Mojave Watershed, which is located entirely within San Bernardino County and includes approximately 1,600 square miles of total drainage. Approximately 210 square miles of this drainage area are located in the San Bernardino Mountains, which are the headwaters for the Mojave River system. ~~The Although the Project site is on the boundary of the Lahontan and Santa Ana Basin Plan boundaries, the~~ Project site is located within the purview of the ~~Santa Ana Regional~~ Lahontan Regional Water Quality Control Board (RWQCB). The ~~Lahontan Santa Ana~~ RWQCB's Water Quality Control Plan for the ~~Lahontan Santa Ana River~~ Basin (Region ~~68; most recently updated in 2011~~) is the governing water quality plan for the region which set forth goals and objectives for protecting water quality within the region.

Under existing conditions, the Project site receives off-site storm water flows from the properties to the west via sheet flow, and on-site storm water flows are conveyed to the on-site natural drainage course located on the south-central portion of the Project site. On-site flows contained within the natural drainage course exit the Project site at the northeast corner. The natural drainage course continues in a northerly direction along Daley Canyon Road. Flows within the natural drainage course that traverses the Project site are tributary to the headwaters of Little Bear Creek, which flows approximately 1.5 miles to discharge to the Lake Arrowhead reservoir.

According to the Federal Emergency Management Agency (FEMA) Flood Insurance Rate Maps (FIRM) Nos. 06071C7955H, effective on 08/28/2008, the Project site is not located within a special flood hazard area subject to inundation by the 1% annual flood (100-year flood). The entirety of the Project site is located within FEMA Flood Zone D, which correlates with areas in which flood hazards remains undetermined.

Under existing conditions, an abandoned groundwater well owned by the Big Bear Municipal Water District (BBMWD) is present on the southwest portion of the Project site.

Refer to DREIR Subsection 3.F, *Hydrology and Water Quality*, for a detailed discussion of the Project site's hydrological setting.



to existing off-site utility lines within SR-18 (abuts the Project site to the south), as well as a connection to the existing water main in Daley Canyon Road. The Project also proposes to construct a driveway entrance to the site along SR-18 that would include a signalized three-way intersection as well as an unsignalized emergency access driveway. A summary of the discretionary approval sought by the Project Applicant from the County of San Bernardino is provided below. Additional discretionary and administrative actions that would be necessary to implement the proposed Project are listed in Table 2-5, *Matrix of Project Approvals/Permits*, at the end of this DREIR section.

2.4.1 CONDITIONAL USE PERMIT (CUP P201700270)

A CUP is the discretionary approval required by the County of San Bernardino to implement the Project. According to Section 85.06.010 of the San Bernardino County Development Code, a CUP provides a process for reviewing uses and activities that may be appropriate in the applicable land use zoning district (i.e., development of a church campus in the IC zoning district), but whose effects on a site and its surroundings cannot be determined before being proposed for a specific site (San Bernardino County, 2018, Section 85.06.010). The component parts of the Project's CUP application are described in further detail in the subsections below.

A. *Site Plan*

1. *Proposed Buildings*

The Project's CUP application includes a site plan for the Church of the Woods development, which is depicted on Figure 2-7, *Proposed Site Plan*. Additionally, the components of the Project's site plan are summarized in Table 2-1, *Site Plan Statistical Abstract*. The site plan shows the southern portion of the Project site would be developed with a church campus that would include a two-story building consisting of a 27,364-sq. ft. gymnasium and a 41,037-sq. ft. assembly building/children's ministry on the southeast portion of the Project site. Additionally, a 1,500-sq. ft. two-story building that would serve as a maintenance building, caretaker residence, and lavatory facilities would be developed on the southwest-central portion of the Project site.

2. *Lighting*

The Project would include pole-mounted lighting within the parking lot areas, internal roadways, and pedestrian walkways. Lighting fixtures would not be provided at the 54,000-sq. ft. sports field, sports courts, or the children's play areas. The parking lot lighting would be placed atop approximately 20-foot tall lighting poles bound to concrete bases (bases would stand 3 feet above ground elevation) with single or multiple fixtures. In addition, the buildings would include exterior wall-mounted lighting for entryways and low-level lighting would be provided along the pathways. All outdoor lighting would be shielded and directed on site in compliance with Development Code Section 83.07.040 (Glare and Outdoor Lighting – Mountain and Desert Regions).



Table 2-1 Site Plan Statistical Abstract

Project Summary		
Project Component	Square Feet (sq. ft.)	Percentage of Project
Building Coverage (Footprint)	46,309 sq. ft.	3.9%
Driveways and Parking	199,478 sq. ft.	16.9%
Concrete Walks and Patios	26,200 sq. ft.	2.2%
Sports Courts	9,508 sq. ft.	0.8%
Sports Field	54,000 sq. ft.	4.6%
Landscape Area	182,960 sq. ft.	15.5%
Landscape Slopes	66,133 sq. ft.	5.6%
Water Quality Basin	7,838 sq. ft.	0.6%
Natural Area	588,937	49.9%
<i>Total Project Area:</i>	<i>1,181,363 sq. ft.</i>	<i>100.0%</i>

Source: (Project Applicant, 2018)

3. Circulation and Parking

The developed portion of the Project site would include several internal drive aisles and parking lot areas that would include a total of 311 parking stalls (200 required). Primary vehicular access onto the Project site would be provided by a driveway constructed in the central portion of the Project site’s frontage along SR-18. The proposed Project would widen the northern side of SR-18 for an approximately 600-foot segment of the roadway along the Project site’s frontage adjacent to the access driveway (approximately 300 feet in each direction from the driveway) by 26 feet to accommodate an eastbound left-turn lane and a westbound deceleration/acceleration lane. In addition, the Project would install a traffic signal at the proposed driveway (three-way intersection). A secondary emergency access (egress only) would occur at SR-18 approximately 325 feet to the east of the proposed access driveway. Entry monumentation signage would be installed at the driveway entry to the Project site. Access to the site would be controlled by gates at the entry, which would be closed and locked when no activities are scheduled at the facility. A total of 26,200 sq. ft. of pedestrian walkways and outdoor patios would be constructed on the Project site.

4. Water and Waste Water Conveyance Facilities

Water service would be provided by a lateral extension from the existing 12-inch water main located in Daley Canyon Road approximately 100 feet north of and parallel with the north boundary of the Project site. ~~The point of connection would be on the west side of Daley Canyon Road. Because the San Bernardino County’s Rimforest Storm Drain project will be constructed prior to the Church of the Woods Project,; the proposed water lateral would be located within the access road of the Storm Drain Project. The proposed lateral would extend southerly approximately 150 feet from the point of connection to a point within the Project boundary. Water would be distributed throughout the developed portion of the Project site through the proposed 10-inch on-site water line that would extend in a southerly direction from the point of connection in Daley Canyon Road to the northeasterly area of the developed site. The alignment of this lateral will be adjusted in the field to avoid large trees.~~



~~If the San Bernardino County Rimforest Storm Drain Project is constructed prior to the Church of the Woods Project, the water lateral would be located within the access road of the Storm Drain Project.~~

There is an existing 8-inch sewer main within a 10-foot sewer main easement located on the southwest portion of the Project site. The Project proposes to relocate this existing sewer main to avoid conflicts with the Storm Drain Project and excessive depths from the finish grade of the Project to the existing sewer main. A 15-foot wide sewer easement is proposed to be granted to Lake Arrowhead Community Services District for the new sewer main location. The relocation of the existing sewer main and easement would begin where the existing sewer crosses the west boundary line of the Project site, near the southwest corner. The relocation would progress in a northeasterly and northerly direction and connect to the existing sewer main and easement approximately 600 feet north of SR-18.

5. Open Space, Landscaped Areas, and Recreation Features

As depicted on Figure 2-7 and Figure 2-8, *Conceptual Landscape Plan*, the Project site would include a total of 182,960 sq. ft. of landscaped areas and 66,133 sq. ft. of landscaped manufactured slopes. Additionally, approximately 50% of the Project site (totaling 13.5 acres or 588,937 sq. ft.) would remain as natural open space.

The Project includes the development of a low-impact development (LID) 54,000-sq. ft. sports field on the southwest portion of the Project site. In addition, a total of 9,508 sq. ft. of sports courts are proposed at the Project site, which would include a horseshoe pit and volleyball court in the central portion of the church campus, and a basketball court and two child play areas on the east portion of the church campus.

6. Drainage Plan

To alleviate flooding and erosion hazards in the Rimforest community, the County of San Bernardino approved the Rimforest Storm Drain project in May 2017. As such, regional storm drain improvements are expected to occur in the area, a portion of which will pass through the southwestern portion of the Project site. In total, the Rimforest Storm Drain project will physically impact approximately 0.10 acres of the Project site as documented in the Rimforest Storm Drain ~~Project~~ Final EIR (SCH No. 2015051070). To accommodate development associated with the proposed Project, a network of drainage lines and water quality catch basins are proposed on the Project site to accommodate storm water runoff flows. As depicted on Figure 2-7, a bioretention basin would be developed on the south-central portion of the Project site to capture storm water runoff from the northern and eastern portions of the Project site. The bioretention basin is designed to slow and treat on-site storm water runoff before it is discharged to the San Bernardino County Flood Control District (SBCFCD) storm drain system. Additionally, the proposed on-site landscaped areas and the sports field proposed on the southwest portion of the Project site are designed to infiltrate storm water as a part of the Project's drainage plan.

As shown on Figure 2-7, the Project proposes a 40-foot storm drain easement for the SBCFCD that would traverse the southwest portion of the Project site in a northeasterly to southwesterly orientation. The proposed 40-foot SBCFCD easement would accommodate the on-site subsurface flood control improvements to be constructed by San Bernardino County as part of SBCFCD's Rimforest Storm Drain ~~P~~project, which ~~would~~ will convey storm water flows from off-site areas north of the Project site through the Project site and ultimately connect to a future improved SBCFCD storm drain facility within SR-18. The on-site SBCFCD



storm drain facility improvements ~~would~~ will include the installation and operation of a 750-foot long, ~~72~~60-inch reinforced concrete pipe (RCP) and located within the 40-foot-wide SBCFCD easement shown on Figure 2-7. Because the proposed Project's drainage plan is dependent on connecting to facilities that will be installed as part of San Bernardino County's Rimforest Storm Drain ~~Project~~ project, the Church of the Woods Project is proposed to be constructed concurrent with or following installation of these regional drainage improvements. ~~However, in the event that the proposed Church of the Woods Project is constructed prior to implementation of the~~



~~Rimforest Storm Drain project, the Project Applicant would be responsible for constructing the on-site portions of the Rimforest Storm Drain project, consisting of a 750-foot long, 60-inch RCP located the 40-foot wide SBCFCD easement shown on Figure 2-7. During the interim period following development of the proposed Church of the Woods Project and preceding completion of the Rimforest Storm Drain project, storm water would sheet flow through the impervious surfaces of the Project site in a northeasterly direction. In the event that the Project Applicant constructs the on-site portions of the Rimforest Storm Drain project, the Project Applicant would be required to obtain a Clean Water Act (CWA) Section 404 permit from the United States Army Corps of Engineers (USACE) and a Section 1602 Streambed Alteration Agreement from the CDFW. The facilities to be installed as part of the Rim Forest Storm Drain Project are covered in the Rim Forest Storm Drain Project EIR (SCH No. 2015051070).~~

2.5 PROJECT CONSTRUCTION AND OPERATIONAL CHARACTERISTICS

2.5.1 CONSTRUCTION DETAILS

A. Proposed Physical Disturbances

1. Grading Activities

In compliance with a Condition of Approval (COA) that the County will place on the Project, construction of the proposed Project is only permitted following the construction of San Bernardino County’s Rimforest Storm Drain project. Physical disturbances necessary to implement the proposed Project are depicted on Figure 2-9, *Proposed Physical Disturbances*. As shown, the Project would disturb approximately 16.9 acres as a result of grading, including approximately 0.10 acre that will have been previously disturbed by San Bernardino County to install regional drainage improvements as part of the Rimforest Storm Drain project. According to the *Church of the Woods Earthwork Analysis Report (DREIR Technical Appendix D2)*, preliminary grading quantities are calculated to be 195,297 cubic yards of excavation or cut materials and 119,313 cubic yards of fill material (W.J. McKeever Inc., Appendix F). Excavated materials would be placed in the southwestern and northwestern portions of the Project site for construction of the sports fields, entry, and parking areas. Additionally, the Earthwork Analysis (*DREIR Technical Appendix D2*) calculated that per the Engineering Geology and Soils Report (LOR, 2001; *DREIR Technical Appendix D1*), there is approximately 42,368 cubic yards of material on the Project site consisting of highly organic topsoil that is not considered suitable for reuse as engineered fill. This unsuitable material would be transported to Heaps Peak Transfer Station by truck as part of the Project’s construction process. Once at the transfer station, materials are loaded into larger trucks and transferred to the Mid-Valley Landfill for disposal. After removal of unsuitable material, remedial grading shrinkage, and mass excavation shrinkage, the Project site would be balanced by adjusting the grades in the area of the proposed sports field, entry load, and parking lots proposed on the western portion of the Project site.

Off-site grading would be required to install a water main extending from the northeast Project site boundary to the existing water main located along Daley Canyon Road. The proposed water main would require the excavation of a trench measuring approximately 2 feet wide by 3 feet deep. Along the southern Project site boundary, small areas of off-site grading would be required to implement slope stabilization measures, implement landscape improvements along the Project site’s frontage with SR-18, and construct the proposed emergency access from SR-18. No other on- or off-site physical ground disturbances are anticipated from Project implementation.



2. Fuel Modification Zones

In order to comply with San Bernardino County requirements for fire hazard control, fuel modification zones (FMZs) would be established around buildings on the developed portions of the Project site. ~~that would encompass a total of approximately 1.9 acres. Of the 1.9 acres of FMZs, 85.07 sq. ft. would be categorized as defensible space zone 2 (hereafter referred to as “FMZ 2”), while 80,550.48 sq. ft. would be categorized as defensible space zone 3 (hereafter referred to as “FMZ 3”). The fuel modification requirements within each FMZ are discussed below. It should be noted that the FMZs associated with the Project would not extend off-site.~~

~~FMZ 2 is required to would extend to 30 feet from buildings, and no FMZ 2 areas would occur beyond the Project’s limits of grading. the northwest corner of the proposed maintenance building/caretaker’s residence. All dead logs, branches, litter, and any decaying organic material (i.e., leaves, needles, and woody material) would be removed from the ground within FMZ 2. Additionally, FMZ 2 would require the thinning~~



~~material) would be removed from the ground within FMZ 2. Additionally, FMZ 2 would require the thinning of trees and removal of some trees to maintain spacing of 20 to 30 feet between tree stems. Within FMZ 2, of trees and removal of some trees to maintain spacing of 20 to 30 feet between tree stems. Within FMZ 2, shrubs would be thinned to provide adequate clearance between shrubs and maintenance of shrub height, and shrub pruning would be undertaken to minimize fuel continuity. Trees within FMZ 2 would be pruned to a height of 15 feet above ground level. Ongoing periodic maintenance would be required in the FMZ 2 area to ensure that the conditions of this zone are met.~~

FMZ 3 ~~would~~ is required to extend 200 feet from the Project’s proposed on-site buildings, which would all occur within the Project’s limits of grading with the exception of approximately 0.66 acres that would extend into areas of the site beyond the limits of grading. ~~In these areas, a~~All dead logs, branches, litter, and decaying organic material (i.e., leaves, needles, and woody material) would be removed from the ground within FMZ 3. Standing dead material, stems, vines, and non-productive trees would be removed from FMZ 3. Thinning and pruning of trees and shrubs would also occur within FMZ 3. Ongoing periodic maintenance would be required in the FMZ ~~2-3~~ area to ensure that the conditions of this zone are met.

B. Timing and Phasing of Construction

The Project is proposed to be constructed in two (2) phases, as follows. Because the Project’s drainage system is dependent on prior installation of the regional Rimforest Storm Drain project by the County of San Bernardino, the Project’s expected dates of completion indicated below may be adjusted to account for scheduling of the Rimforest Storm Drain project, but would be no earlier than indicated:

- Phase 1 (2018) – Construction of a 27,364-sq. ft. assembly building housing a youth center/gymnasium, 54,000-sq. ft. sports field, sports courts, child play areas, internal circulation roadways, pedestrian walkways, landscaped areas, parking; and
- Phase 2 (2021) – Construction of a 41,037-sq. ft. addition to the assembly building that would include an assembly area and children’s ministry, as well as a 1,500-sq. ft. maintenance building/caretaker residence.

Table 2-2, *Expected Project Construction* below provides the anticipated construction schedule for the proposed Project. Table 2-3, *Construction Equipment Assumptions*, provides a list of construction equipment anticipated to be used during each construction phase. Figure 2-10, *Project Phasing Plan*, illustrates which components of the Project would be constructed during Phase 1 and Phase 2 of the Project.



5,000 gallons/net acre per day obtained from Table 4-1-2, which yielded a water demand of approximately 27,200.5 gallons per day (0.08 acre-feet per day) or 9,928,167.6 gallons per year (30.3 acre-feet per year).

D. Wastewater Treatment Demand

In order to calculate the quantity of wastewater that the Project would generate, wastewater generation rates were requested from LACSD. However, LACSD responded to the request stating that no wastewater generation rates are available that could be used to estimate wastewater generation for proposed developments within the LACSD (Lippert, 2017). Additionally, neither the San Bernardino County General Plan nor the San Bernardino County General Plan Final EIR contain wastewater generation rates that could be utilized to estimate the quantity of wastewater that would be generated by the Project. Table 4-2-1, *Sewer Generation Factors*, of the Water Agencies’ Standards Design Guidelines for Water and Sewer Facilities, identifies a wastewater demand factor of 200 to 1,200 gallons per day (GPD) per gross acre for “Institutional” land uses, and a wastewater demand factor of 200 to 250 GPD per gross acre for residential land uses (WAS, 2014, Table 4-2-1). In order to calculate the total wastewater treatment demand for the Project, the most conservative institutional land use wastewater generation rate (1,200 GPD per gross acre) was multiplied by 3.8 acres (equivalent to the total acreage of the proposed development [27.12 acres] minus the acreage of the natural open space [13.5 acres] minus the acreage of the proposed on-site residence [0.034]), and the most conservative residential land use wastewater generation rate (250 GPD per gross acre) was multiplied by the acreage of the proposed on-site residence (0.034 acres). The resulting wastewater treatment demand values (16,279 GPD for the proposed church facilities and 8.5 GPD for the proposed on-site caretaker’s residence) were added together to obtain the Project’s total wastewater treatment demand value of 16,288 GPD, or 5.9 million gallons per year.

2.6 SUMMARY OF REQUESTED ACTIONS

The County of San Bernardino has primary approval responsibility for the proposed Project. As such, the County serves as the Lead Agency for this DREIR pursuant to CEQA Guidelines Section 15050. Accordingly, the County’s Planning Commission will hold a public hearing to consider the Final ~~Revised~~-EIR and the Project’s CUP. The Planning Commission will ~~make advisory recommendations to the Board of Supervisors on whether to approve, approve with changes, or deny the proposed Project’s CUP. The Board of Supervisors will~~ consider the information contained in the Final ~~Revised~~-EIR and the EIR’s Administrative Record in its decision-making processes and will approve or deny the Project’s CUP. Upon approval or conditional approval of the above-described Project actions and upon certification of the Final ~~Revised~~-EIR by the ~~Board of Supervisors~~Planning Commission, the County would conduct administrative reviews and grant subsequent permits and approvals to implement Project requirements and conditions of approval. A list of the primary actions under County jurisdiction is provided in Table 2-5, *Matrix of Project Approvals/Permits*.

2.7 RELATED ENVIRONMENTAL REVIEW AND CONSULTATION REQUIREMENTS

Subsequent to approval of CUP Application No. P201700270, additional discretionary actions may be necessary to implement the proposed Project. These include, but are not limited to, building permits, grading permits, encroachment permits/road improvements, drainage infrastructure improvements, water and sewer infrastructure improvements, and storm water permit(s) (NPDES). Table 2-5 provides a summary of the agencies responsible for subsequent discretionary approvals associated with the Project. The required DREIR



will cover all federal, state, and local government approvals which may be needed to construct or implement the Project, whether explicitly noted in Table 2-5 or not (CEQA Guidelines § 15124[d]).

Table 2-5 Matrix of Project Approvals/Permits

Public Agency	Approvals and Decisions
County of San Bernardino	
Proposed Project – San Bernardino County Discretionary Approvals	
San Bernardino Planning Commission	<ul style="list-style-type: none"> Provide recommendations to the San Bernardino County Board of Supervisors regarding certification of the Project's DREIR. Provide recommendations to the San Bernardino County Board of Supervisors whether to approve CUP No. P201700270.
San Bernardino Board of Supervisors Planning Commission	<ul style="list-style-type: none"> Reject or certify required DREIR along with appropriate CEQA Findings. Approve, conditionally approve, or deny the Conditional Use Permit No. P201700270.
Subsequent San Bernardino County Discretionary and Ministerial Approvals	
San Bernardino County Subsequent Implementing Approvals: Land Use Services Department Planning Division and/or Building & Safety	<ul style="list-style-type: none"> Approve implementing Final Maps, Plot Plans, and/or Site Plans as may be appropriate. Issue Grading Permits. Issue Building Permits. Approve Road Improvement Plans. Issue Encroachment Permits.
Other Agencies – Subsequent Approvals and Permits	
California Department of Transportation	<ul style="list-style-type: none"> Approve Road Improvement Plans. Issue Encroachment Permits.
California Department of Fish and Wildlife	<ul style="list-style-type: none"> Issuance of Incidental Take Permits, as may be appropriate. Section 1602 Streambed Alteration Agreement[†]
State Water Resources Control Board	<ul style="list-style-type: none"> Approve NPDES Permit.
California Water Boards – Lahontan RWQCB	<ul style="list-style-type: none"> 401 Water Quality Certification
United States Army Corps of Engineers (USACE)	<ul style="list-style-type: none"> Clean Water Act (CWA) Section 404 permit[†]

Notes:

[†]—Indicates permits that would need to be obtained in the event that implementation of the Project occurs prior to completion of the Rimforest Storm Drain Project.



3.B.8 MITIGATION MEASURES

3.B.8.1 APPLICABLE COUNTY REGULATIONS AND DESIGN REQUIREMENTS

The following are applicable regulations and design requirements that will be imposed on the Project by San Bernardino County pursuant to the County's Development Code or that are required regulatory requirements imposed by other agencies. Although these requirements technically do not meet CEQA's definition for mitigation because they are regulatory requirements, they are specified herein to document required Project compliance with applicable mandatory regulations.

- The Project will comply with Section 83.01.040(b) of Chapter 83.01.040, *Air Quality*, of the County's Development Code requiring permits from either the Mojave Desert Air Quality Management District or the SCAQMD.
- The Project will comply with the provisions of SCAQMD Rule 403, "Fugitive Dust." In compliance with Rule 403, Project contractors will be required to implement best available dust control measures during construction activities that generate fugitive dust, such as earth moving and stockpiling activities, grading, and equipment travel on unpaved roads.
- The Project will comply with the provisions of SCAQMD Rule 1186 "PM10 Emissions from Paved and Unpaved Roads and Livestock Operations" and Rule 1186.1, "Less-Polluting Street Sweepers." In compliance with Rules 1186 and 1186.1, Project contractors will be required to reduce the release of criteria pollutant emissions into the atmosphere during the operation of construction vehicles on paved and unpaved roads.
- The Project will comply with the provisions of SCAQMD Rule 1113, "Architectural Coatings." In compliance with Rule 1113, Project contractors will be required to limit the release of volatile organic compounds (VOCs) into the atmosphere during painting and application of other surface coatings.
- The Project will comply with SCAQMD Rule 431.2, "Sulfur Content of Liquid Fuels." In compliance with Rule 431.2, Project contractors will be required to limit the release of sulfur dioxide (SO_x) into the atmosphere from the burning of fuel.
- The Project will comply with California Code of Regulations Title 13, Division 3, Chapter 1, Article 4.5, Section 2025, "Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen and Other Criteria Pollutants, from In-Use Heavy-Duty Diesel-Fueled Vehicles" and California Code of Regulations Title 13, Division 3, Chapter 10, Article 1, Section 2485, "Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling." In compliance with these regulations, Project contractors must prohibit diesel-fueled construction equipment from idling for more than five (5) minutes.

3.B.8.2 MITIGATION MEASURES

Impacts would be less than significant and mitigation is not required. The Project would not exceed the SCAQMD Regional or LST thresholds for any criteria pollutants during Project construction; thus, mitigation



is not required. Notwithstanding, and although not required by CEQA, the Project shall incorporate the following mitigation measure to reduce Project construction-related air-pollution emissions.

MM-3.B1 Prior to the issuance of a grading permit or a building permit, the County shall verify that the following notes are included on the construction document(s). These notes also shall be specified in bid documents issued to construction contractors. The Project's construction contractors shall be required to ensure compliance with the notes and permit periodic inspection of the construction site by County of San Bernardino staff or its designee to confirm compliance.

- “During construction, all construction equipment (>150 horsepower) shall be Environmental Protection Agency (EPA)/California Air Resources Board (CARB) Tier 3 compliant or better. The construction contractor shall keep a log of all construction equipment greater than 150 horsepower demonstrating compliance with this requirement, and the log shall be made available for inspection by San Bernardino County upon request.”
- “Construction equipment engines (>150 horsepower) shall be maintained in good condition and in proper tune per manufacturer's specification for the duration of construction. Maintenance records shall be made available for inspection by San Bernardino County upon request.”
- “All diesel-fueled trucks hauling materials to and from the construction site shall comply with CARB's 2010 engine emission standards.”
- “Signs shall be posted at the construction site entry and on the construction site stating that vehicle engine idling is limited to 5 minutes or less.”



special-status plan species are presumed to be absent from the Project site based on habitat requirements, the availability and quality of habitat required for each species, and known distributions.

3.C.4.4 SPECIAL-STATUS WILDLIFE SPECIES

Sensitive wildlife species include those listed, or are candidates for listing by the USFWS and CDFW, and CDFW species of special concern.⁵ Several special-status wildlife species were reported in the CNDDDB from the vicinity. A summary of sensitive wildlife species recognized by the CNDDDB and ELMT as observed or potentially present on the Project site is presented in Table C-1, *Potentially Occurring Special Status Biological Resources*, in Appendix C of the ELMT report included in DREIR *Technical Appendix C*. All sensitive species with at least a moderate potential of occurring on-site are indicated as such in the table. Some species are not expected on-site due to the lack of suitable habitat. In a few cases, comments are provided as further explanation.

No special-status wildlife species were directly observed during the ELMT field surveys; however, based on habitat requirements for specific species and the availability and quality of habitats needed by each species, the Project site possesses a low to moderate potential to support the San Bernardino flying squirrel, southern rubber boa, and California spotted owl; and a low potential to support the olive-sided flycatcher (*Contopus cooperi*), purple martin (*Progne subis*), long-eared owl (*Asio otus*), bald eagle (*Haliaeetus leucocephalus*), California mountain kingsnake (*Lampropeltis zonata [parvirubra]*), and white-eared pocket mouse (*Perognathus alticolus alticolus*). Due to their regional significance and their potential occurrence on the Project site, habitat assessments were conducted for southern rubber boa, San Bernardino flying squirrel, and California spotted owl. All remaining special-status wildlife species identified in the CNDDDB are presumed to be absent from the Project site based on habitat requirements, the availability and quality of habitat required by each species, and known distributions.

3.C.5 REGULATORY FRAMEWORK

As part of the proposed Project's environmental review and approval, there are a number of performance criteria and standard conditions that must be met. Among these are those that relate to Federal and State regulating agencies for impacts to wetlands, riparian habitats, and stream courses and local policies related to bark beetle infestation, impacts to native plants and trees, and open space designations and wildlife movement corridors.

3.C.5.1 FEDERAL

A. Federal Clean Water Act, Section 404

Section 404 of the Clean Water Act (CWA) regulates the discharge of dredged material, placement of fill material, or excavation within "waters of the United State." and authorizes the Secretary of the Army, through the Corps of Engineers, to issue permits for such actions. "waters of the United States" are defined by the CWA as "rivers, creeks, streams, and lakes extending to their headwaters and any associated wetlands." Wetlands are defined by the CWA as "areas that are inundated or saturated by surface or groundwater at a

⁵ California Department of Fish and Game, Biogeographic Data Branch, California Natural Diversity Database. February 2008. *Special Animals*. 60 pp.



policies, or regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?

1. *Southern Rubber Boa*

The Project site is located within the boundaries of historic southern rubber boa habitat.²² Although no sensitive reptile species were observed in the study area, the study area does support potential southern rubber boa habitat. A habitat suitability assessment was conducted by Leatherman BioConsulting, Inc. on January 25, 2018, which determined that the Project site contains approximately 1.65 acres of high-quality habitat in the northeast corner; approximately 2.18 acres of moderate quality habitat in the western portion; and the remaining portions of the site contain approximately 18.21 acres of low quality and approximately 5.08 acres of unsuitable habitat for the southern rubber boa. Development of the Project would result in impacts to the removal of approximately 8.64 acres of low-quality southern rubber boa habitat and impacts to 0.66 acres of low-quality habitat for the Project's Fuel Management Zone 3 (FMZ 3).

The southern rubber boa is a State-listed threatened species that is an uncommon resident in montane conifer communities. The southern rubber boa is not likely to occur within the development footprint of the Project site. However, based on the known habitat requirements of the species and the proximity to known populations, this species may be present on-site and may be impacted by proposed construction and related human activities. Therefore, impacts to this sensitive species are considered potentially significant and mitigation is required.

2. *San Bernardino Flying Squirrel*

The San Bernardino flying squirrel was observed within the boundaries of the Project site during trapping surveys conducted in 2003. However, the most recent trapping surveys conducted in 2007 by PCR Services Corporation did not observe the species on the Project site or in the Project site's vicinity. In February 2018, ELMT conducted a habitat suitability assessment and determined that there is no area on-site that was determined to possess high quality San Bernardino flying squirrel habitat. The ELMT habitat assessment did determine approximately 10.07 acres of moderate quality habitat that occurs in the northern and eastern portions of the Project site. The remaining portions of the site contain approximately 10.51 acres of low-quality habitat and approximately 6.54 acres of unsuitable habitat for the species. Development of the Project would result in impacts to the removal of approximately 2.56 acres of low-quality habitat and approximately 4.61 acres of moderate quality San Bernardino flying squirrel habitat and impacts to 0.57 acre of moderate quality habitat and 0.05 acre of low-quality habitat for the Project's Fuel Management Zone 3 (FMZ 3).

The San Bernardino flying squirrel is a State-listed species of concern that has a high potential to occur within the Project site's vicinity. The San Bernardino flying squirrel is not likely to occur within the development footprint of the Project. However, based on the known habitat requirements of the species and the proximity to known populations, this species may be present on-site and may be impacted by proposed construction and related human activities. Therefore, impacts to this sensitive species are considered potentially significant and mitigation is required.

²² *San Bernardino County Official Land Use Plan, General Plan Biotic Resource Overlay, available at: <http://www.co.san-bernardino.ca.us/landuseservices/General%20Plan%20Update/Mapping/Default.asp>*



3. *California Spotted Owl*

Tanner Environmental Services performed a presence/absence and reproductive survey for the California spotted owl for the Project between March 30 and June 6, 2007. During the survey, one male California spotted owl was observed foraging within the southeast portion of the Project site; however, the male was not found either roosting or nesting on the Project site. In February 2018, ELMT conducted a habitat assessment for the California spotted owl and determined that the Project site contains approximately 10.47 acres of moderate quality habitat located in the northeastern portion. The remainder of the Project site contains approximately 10.11 acres of low-quality habitat and approximately 7.10 acres of unsuitable habitat. Development of the Project would result in ~~impacts to the removal of~~ approximately 2.56 acres of low-quality habitat and approximately 4.61 acres of moderate habitat and impacts to 0.57 acre of moderate quality habitat for the Project's Fuel Management Zone 3 (FMZ 3).

This is a State-listed species of concern and has a high potential to occur within the Project's vicinity. The California spotted owl is not likely to occur within the development footprint of the Project site. However, based on the known habitat requirements of the species and the proximity to known populations, this species may be present on-site and may be impacted by proposed construction and related human activities. Therefore, impacts to this sensitive species are considered potentially significant and mitigation is required.

4. *Nesting Birds*

The Project site and surrounding area has the potential to provide refuge and cover from predators, perching sites, and favorable conditions for avian nesting which could be impacted by Project-related construction activities. Nesting birds are protected by the Migratory Bird Treaty Act (MBTA) and CFGC; therefore, disturbance to active bird nest is strictly prohibited. The Project's construction activities would be required by law to comply with the MBTA and CFGC regulations related to nesting birds. Mandatory compliance with these regulatory requirements would ensure that impacts are less than significant. If construction occurs between February 1st and August 31st, a pre-construction clearance survey for nesting birds should be conducted within three days of the start of any vegetation removal or ground disturbing activities. If no active nests are observed on-site, the biologist conducting the survey should document a negative survey with a brief letter indicating that no impacts to active avian nest would occur. However, if an active avian nest is observed during the pre-construction survey, construction activities would stay outside of a 300-foot buffer around the active nest; for listed raptor species, this buffer should be expanded to 500 feet. A biological monitor should be present to delineate and monitor the active nest to ensure nesting behavior is not adversely affected by construction activities. Once the young have fledged and left the nest, or the nest becomes inactive under natural conditions, construction activities within the buffer area can occur. Implementation of the aforementioned procedures would ensure that active nests and nesting behaviors are not adversely affected by Project-related construction activities; therefore, impacts to nesting birds would be less-than-significant.



Threshold b) *Have substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?*

Threshold c) *Have substantial adverse effect on State or Federal-protected wetlands as defined by Section 404 of the Clean Water Act (including but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?*

1. Riparian Habitat

A single drainage feature containing riparian habitat was observed within the southwest portion of the Project site during the ELMT field surveys. This drainage feature is tributary to Little Bear Creek and Lake Arrowhead. Because this drainage feature possesses surface hydrologic connection to downstream “water of the United States,” the drainage feature falls under the regulatory authority of the Corps, RWQCB, and CDFW. The drainage feature is included in the County’s Rimforest Storm Drain ~~Projectproject~~, which ~~is anticipated to~~would be installed prior to the proposed Church of the Woods Project. The County would be responsible for acquiring the necessary permits to include the jurisdictional waters in their impact footprint for the storm drain project. Approximately 0.05-acre of Corps/ RWQCB jurisdiction waters and approximately 0.10-acre of CDFW jurisdiction waters would be permanently impacted by development of the Rimforest Storm Drain ~~Projectproject~~ and mitigation would be the responsibility of the County. ~~Under this scenario~~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 ~~Pproject~~. Accordingly, impacts to riparian habitat would be less than significant.

~~In the event that development of the Church of the Woods Project precedes the installation of the Rimforest Storm Drain Project, implementation of the proposed Church of the Woods Project would result in significant and direct impacts to the on-site drainage feature. The Project Applicant would be responsible for acquiring the necessary permits to impact the jurisdictional waters in the Project’s development footprint and the Church of the Woods Project Applicant would be required to implement mitigation.~~

2. Sensitive Natural Communities

Several special-status plant species surveys were conducted on the Project site by two consulting firms, TCL and ELMT. During the surveys conducted by ELMT in 2018, an emphasis was placed on the CNPS listed Palmer’s mariposa-lily, lemon lily, and Parish’s yampah for their low potential to occur on the Project site. No special-status plants species were observed during the ELMT plant surveys. Moreover, all remaining special-status plant species are presumed to be absent from the Project site based on habitat requirements, the availability and quality of habitat, and known distributions. Therefore, implementation of the Project would result in less-than-significant impacts to special-status plant species.

The approximately 27.12-acre Project site is located within a mixed conifer forest plant community, which is relatively common for the San Bernardino Mountains. Approximately 99% of the Project site is comprised of the mixed conifer forest plant community and the remaining 1% is comprised of riparian scrub. The Project’s proposed development would occur within the southern and central portion of the Project site, which would result in the direct removal of common plant communities and common plant species from these portions of the Project site. Moreover, the common plant community and species present on the Project site occur in large



numbers throughout the region. Additionally, the Project does not entail any development on the northern and western portions of the Project site. These portions of the Project site would remain as undisturbed open space. Therefore, the implementation of the Project would result the removal of a relatively small portion of the plant community and plant species located on-site. Accordingly, impacts to the regional plant communities and plant species in this regard would be less-than-significant.

3. Wetlands

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. ~~Additionally, a~~ approximately 0.05-acre of non-wetland waters Corps/RWQCB jurisdiction and approximately 0.10-acre of streambed/riparian waters CDFW jurisdiction ~~would be permanently impacted by the proposed Project's development~~ are located within the Project site, ~~neither of which consists of wetlands.~~ ~~Additionally, However,~~ as previously identified under Threshold c), the drainage feature is included in the County's Rimforest Storm Drain project; therefore, the County would be responsible for acquiring the Project would be responsible for the permits necessary permits to impact the riparian habitat and would be required to implement any associated mitigation requirements. ~~in the development footprint and implement mitigation only if this area has not already been impacted by San Bernardino County's Rimforest Storm Drain Project.~~ ~~Therefore, B~~ because no wetlands were observed on the Project site and no jurisdictional areas would occur within the Project's impact footprint, the Project does not have the potential to impact federally protected wetlands. Therefore, Project-related impacts to federally protected wetlands would not occur and no mitigation is required.

Threshold d) *Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?*

Indirect effects of the Project would include temporary increased human activity and increased ambient noise levels during construction. Temporary disruption of habitat for common wildlife species during construction would not represent a permanent or regionally significant impact. Additionally, indirect Project-related operational impacts would include increased human activity, increase ambient noise, higher artificial evening light levels, and increased threats of wildlife mortality by traffic. Although these impacts would be adverse, by themselves they are not reasonably expected to reduce common wildlife populations below self-sustaining levels in the region due to the region's abundance of suitable habitat for the common wildlife populations. Therefore, the elimination or disruption of habitat for these species that are found on the Project site would result in less-than-significant impacts to the region's wildlife population.

The Project site is located immediately east of the San Bernardino County designated Strawberry Creek wildlife corridor. The Strawberry Creek corridor provides movement opportunities from the City of San Bernardino through the San Bernardino Mountains to the Mojave River. This wildlife corridor is constrained in areas by private ownership and wildlife movement would be impeded by Project-related disturbance. However, the northern and western portions of the Project site would remain undisturbed and continue to provide movement opportunities for wildlife. Therefore, implementation of the Project would result in less-than-significant impacts to wildlife movement and wildlife corridors.



Threshold e) Conflict with any approved or adopted local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?

The Project site is located within the Rimforest Community and is within the jurisdiction of the Lake Arrowhead Community Planning Area²³. DREIR Section 3.G, *Land Use*, provides an extensive analysis of the proposed Project’s consistency with all applicable local and regional policies, and concludes that the Project would not result in any significant conflicts with any policy, including the policies related to the protection of biological resources. In addition, the Rimforest Community does not have a tree preservation policy or ordinance. Therefore, implementation of the Project would result in no impacts to policies related to the protection of biological resources and tree preservation and no mitigation is required.

Threshold f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, state habitat conservation plan?

As described above, the Project site is located within the Lake Arrowhead Community Planning Area. This Community Planning Area is not located within an adopted HCP, Natural Community Conservation Plan, or other approved local, regional, or state HCPs. Additionally, no habitat conservation plans have been approved and none are currently in the process of approval for the lands within the San Bernardino Mountains. Therefore, development of the Project site would not conflict with an existing HCP and no mitigation is required.

3.C.9 CUMULATIVE IMPACTS

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. Approximately 8.8% ($[58,472 \text{ acres}/665,753 \text{ acres}] \times 100$) of the land in the San Bernardino National Forest is identified by the Forest Service as zones of Developed Area Interface.²⁴ This zone includes areas adjacent to communities or concentrated use areas and developed sites with more scattered or isolated community infrastructure. The acreage of habitat impacted by the Project combined with related development in the area represents far less than 1% of the 8.8% of land within the forest that is potentially subject to future development. Additionally, ~~the Project would not result in any impacts to jurisdictional waters of the State and/or U.S., while significant at the Project level, would be mitigated to a less than significant level through permitting requirements with the RWQCBACOE and CDFW. The same permitting requirements and mitigation would be applicable to other related projects, and the combined areas of unavoidable impact would be small in relation to the overall~~

²³ Lake Arrowhead Community Plan, April 12, 2007. Available at: <http://www.sbcounty.gov/Uploads/lus/CommunityPlans/LakeArrowheadCP.pdf>

²⁴ U.S. Department of Agriculture. Forest Service, Pacific Southwest Region, 2005. Revised Land Management Plans and Final Environmental Impact Statement.



~~areas of jurisdictional waters with the National Forest, the vast majority being protected public lands. As such, with permit compliance,~~ cumulative impacts on jurisdictional waters are considered less than significant.

Moreover, at the Project-level impacts to the southern rubber boa would be mitigated to a level below significance; however, at a cumulative-level impacts would be considered cumulatively significant due to the direct loss of habitat for this State-listed threatened species. In addition, impacts at the Project-level to the two State species of concern, San Bernardino flying squirrel and California spotted owl, would be mitigated to a level below significance; yet, on a cumulative-level impacts would be considered cumulatively significant due to the direct loss of habitat.

3.C.10 SIGNIFICANCE OF IMPACTS BEFORE MITIGATION

Threshold a: Significant and Direct Impact. The Project would result in the removal of low to moderate quality habitat for the southern rubber boa, San Bernardino flying squirrel, and California spotted owl. These species are categorized as special-status. Therefore, the Project would have a substantial adverse effect on three species identified as special status by the California Department of Fish and Wildlife or U.S. Department of Fish and Wildlife and mitigation is required to reduce impacts to the aforementioned species. Impacts are considered direct and cumulatively considerable.

Threshold b and c: ~~Less-than-Significant Potentially Significant and Direct Impact.~~ ~~If the proposed Project is implemented prior to the installation of the San Bernardino County Rimforest Storm Drain Project, the proposed Project would result in significant and direct impacts to 0.05 acres of jurisdictional waters under Corps and RWQCB jurisdiction and 0.10 acres under CDFW jurisdiction, and mitigation would be required. Alternatively, if Because the Rimforest Storm Drain ~~Project~~project would be ~~is~~ implemented before implementation of the proposed Project, the Storm Drain Project ~~would have~~will eliminated the on-site jurisdictional waters, and the Project would ~~have~~ ~~not~~ impact ~~to any~~ jurisdictional waters. Accordingly, impacts would be less than significant.~~

Threshold d: Less-than-Significant Impact. The Project site is located immediately east of the Strawberry Creek wildlife corridor. The Project has the potential to impede wildlife movement due to Project-related disturbances; however, the northern and western portions of the Project site, which are adjacent to the Strawberry Creek corridor, would remain undisturbed and retained as on-site natural open space. These portions of the Project site would provide movement opportunities for wildlife. Therefore, the Project would result in less-than-significant impacts to wildlife movement and wildlife corridors.

Threshold e: Less-than-Significant Impact. The proposed Project would not conflict with any local policies or ordinances protecting biological resources. Impacts are considered less-than-significant.

Threshold f: Less-than-Significant Impact. The proposed Project would not conflict with an adopted local, regional, or state habitat conservation plan. Impacts are considered less-than-significant.



3.C.11 MITIGATION MEASURES

3.C.11.1 APPLICABLE COUNTY REGULATIONS AND DESIGN REQUIREMENTS

There are no applicable regulations and design requirements that are required by San Bernardino County related to biological resources.

3.C.11.2 MITIGATION MEASURES

The following mitigation measures address potentially significant adverse impacts from implementation of the proposed Project.

MM-3.C1(a) Prior to the issuance of any grading permits, the Project Applicant shall provide evidence ~~to the Public Works Director or their designee, and that~~ the Development Services Director or their designee has confirmed, that the following actions have or will be implemented.

- A pre-construction clearance survey for southern rubber boa, San Bernardino flying squirrel and California spotted owl shall be conducted at the Project site by an approved biologist no less than 30 days prior to any ground disturbing activities.
- A copy of the results of the pre-construction survey (and any additional surveys) shall be provided to the San Bernardino County Planning Department prior to the issuance of a grading permit or the granting of any authorization for any vegetation clearing and ground disturbance activities at the Project site.
 - If the results are negative, the County may issue the grading permit.
 - If southern rubber boa, San Bernardino Flying squirrel or California spotted owl are detected on-site during the preconstruction clearance survey(s), the Project Biologist shall notify the California Department of Fish and Wildlife (CDFW) immediately.
- An approved biologist shall be onsite during all vegetation clearing and rough grading. In the event that southern rubber boa, San Bernardino Flying squirrel or California spotted owl are detected on-site during vegetation clearing or rough grading activities, the approved biologist shall have authority to halt vegetation clearing and/or rough grading activities until remedial measures determined by the Project Biologist are implemented and until a suitable buffer has been established as identified by the Project Biologist. Vegetation clearing and/or rough grading activities shall only be allowed to commence within the buffer area once the approved biologist makes a determination that the species is no longer present.

MM-3.C1(b) Prior to the issuance of any grading permits, the Project Applicant shall provide evidence to the Public Works Director or their designee and the Development Services Director and their designee that the Project Applicant has provided for the permanent preservation and management in perpetuity of 13.40 acres of onsite habitat that supports a total of 1.65 available onsite acres of high-quality southern rubber boa habitat, 2.18 acres of moderate quality



southern rubber boa habitat and 9.57 acres of low quality southern rubber boa habitat, 5.45 acres of moderate quality San Bernardino flying squirrel habitat and 7.95 acres of low-quality San Bernardino flying squirrel habitat; and 5.85 acres of moderate-quality California spotted owl habitat and 7.55 acres of low-quality California spotted owl habitat. The onsite habitat shall be permanently protected through the recordation of a CDFW-approved conservation easement, the selection of a CDFW-approved conservation management entity and by funding a “non-wasting” endowment that provides for the costs associated with any initial improvements and management actions as defined in a Long-term Management Plan. The long-term management plan shall be submitted to CDFW for review and approval.

~~MM 3.C2(e) Prior to the issuance of any grading plan prior to the start of any on-site construction of facilities associated with the Rimforest Flood Control Project, the Project Applicant shall provide evidence to the Public Works Director or their designee and the Development Services Director or their designee that the Project Applicant has secured the following regulatory approvals: Clean Water Act (CWA) Section 404 Nationwide Permit No. 39: Commercial and Institutional Developments, CWA Section 401 Water Quality Certification, and California Department of Fish and Wildlife (CDFW) Section 1602 Lake or Streambed Alteration Agreement.~~

3.C.12 LEVEL OF SIGNIFICANCE AFTER MITIGATION

Threshold a: Cumulatively Considerable. At the Project level, impacts to the southern rubber boa, San Bernardino flying squirrel, and California spotted owl would be mitigated to a level below significance; however, at the regional level, impacts would remain cumulatively significant and unavoidable because the Project would be directly removing suitable habitat for these special-status species.

~~Threshold b and c: Less than Significant Impact. Following the implementation of the Mitigation Measure MM 3.C2(e), impacts to jurisdictional waters would be reduced to a level below significance.~~



3.D.2.2 REGIONAL

A. San Bernardino Development County Code

San Bernardino County Building Regulations (Title 6, Division 3) set forth required provisions for implementation of the CALGreen (Chapter 1, Sections 63.0101 to 63.0104), and compliance with the general provisions for CALGreen (Chapter 8, Sections 63.0801 to 63.0810). Additionally, Chapter 83.08.040 of the San Bernardino County Development Code (Title 8 of the San Bernardino County Code) sets forth regulations for hillside grading standards, which include standards for landform grading and revegetation of manufactured slopes. In addition, Chapter 88.02 of the San Bernardino County Development Code establishes requirements for dust control and reduction of soil erosion.

As shown on County Geologic Hazard Overlay Map FH23 C, the southern portion of the Project site is located within an area of “moderate to high” landslide susceptibility (San Bernardino County, 2010a). Because the Project is located in an area that is susceptible to landslide activity, the Project would be subject to the provisions of Chapter 82.15, Geologic Hazard (GH) Overlay of the County Development Code. Section 82.15.0303 of the County Development Code requires the preparation of a detailed geologic study for development proposed within the GH Overlay that addresses the following:

- Areas of faulting;
- Areas of slope stability;
- Areas of liquefaction susceptibility;
- Areas of potential seiche; and
- Areas of adverse soil conditions.

The Project site is also located within the Fire Safety (FS) Overlay, Fire Safety Area 1, which includes land within the San Bernardino National Forest and is characterized by moderate to steep terrain (San Bernardino County, 2010b). Development within the FS Overlay would be subject to additional standards specified in Chapter 82.13 of the County Development Code. Specific requirements of Chapter 82.13 include the preparation of a slope analysis, a preliminary grading plan, a fuel modification plan, and a Soil Erosion and Sediment Control Plan to control the potential for accelerated erosion due to development activity. The components of the Soil Erosion and Sediment Control Plan are described in further detail in DREIR Subsection 3.F, *Hydrology, Water Quality, and Water Supply*. These components of the County Development Code would apply to the Project for the purposes of eliminating and preventing conditions of accelerated erosion that could result in degradation of water quality, damage to property, loss of topsoil and vegetation cover, and increased danger from flooding and the deposition of sediments and associated nutrients.

3.D.3 THRESHOLDS OF SIGNIFICANCE

The following significance criteria for geology and soils are based on Appendix G of the State CEQA Guidelines and adjusted for relevance to this analysis based on local conditions and the project description. Using these thresholds, the proposed Project would have a significant impact related to geology and soils if it would result in any of the following:



the exception of the on-site valley areas. However, compliance with the seismic requirements of State and local building and safety codes (i.e. CALGreen and the County Development Code, respectively) would reduce impacts associated with subsidence to levels that are less than significant. The potential for liquefaction at the Project site is considered minimal, with the exception of the on-site valley areas on the southwest portion of the Project site where there is a potential for liquefaction to occur. Accordingly, impacts associated with liquefaction would be considered potentially significant. Based on the presence of older alluvial soils overlying the granitic bedrock at the Project site, there is the potential for the on-site soils to be susceptible to collapse. Impacts associated with collapsible soils at the Project site are considered significant and require mitigation.

Threshold d): Less-than-Significant Impact. The Project's Engineering Geology and Soils Engineering Investigation (DREIR *Technical Appendix D*) conducted by LOR encountered granular soils in the upper materials, which are considered to have very low expansion potential. Based on the very low expansion potential of the on-site soils, impacts associated with expansive soils would be less than significant.

3.D.8 MITIGATION MEASURES

3.D.8.1 APPLICABLE COUNTY REGULATION AND DESIGN REQUIREMENTS

The following are applicable regulations and design requirements that will be imposed on the Project by San Bernardino County pursuant to the County's Development Code. Although these requirements technically do not meet CEQA's definition for mitigation because they are regulatory requirements, they are specified herein to document required Project compliance with applicable County regulations.

- The Project is required to comply with the standards established in Chapter 83.08.040, *Hillside Grading Standards*.
- The Project is required to prepare and submit a Stormwater Pollution Prevention Plan in accordance with the requirements of Section 85.11.030, *Erosion Control Plan and Inspection Required*, of the San Bernardino County Development Code.
- The Project is required to comply with the standards established in Chapter 88.02, *Soil and Water Conservation* of the San Bernardino County Development Code.

3.D.8.2 MITIGATION MEASURES

MM 3.D-1 Prior to issuance of any grading permit, the San Bernardino County Building Official or their designee shall confirm that the Grading Plan incorporates specific measures from the required design-level geotechnical investigation which shall, at a minimum, address landslides, liquefaction, lateral spreading, and collapsible soils. The geotechnical investigation report and the measures that shall be included as notes on the Grading Plan and shall comport with the provisions established in Chapter 87.08, *Soils Reports*, and Chapter 88.02, *Soil and Water Conservation*, of the San Bernardino County Code. Remedial measures to address landslides may include, but not be limited to: removal, repositioning, embedment, anchoring of boulders; installation of catchment fences; and construction in accordance with the recommendations of



and fuel modification plan requirements, an evaluation of a Project-specific Evacuation Plan, prepared by the Timothy E. Paysen, PhD, Environmental Consultant (Paysen), and an evaluation of a Fuel Modification plan prepared by Paysen. The Project-specific Evacuation Plan and Fuel Modification Plan are included as *Technical Appendix E1* and *Technical Appendix E2*, respectively.

3.E.5 PROJECT FEATURES

The SBCFD has established a comprehensive set of fire protection planning requirements which are standard conditions that the proposed Project must demonstrate compliance with prior to Project approval, site grading, issuance of a building permit, and occupancy. These standard conditions, as well as non-standard conditions (including preparation and approval of an evacuation plan), would be included as part of the proposed Project to be reviewed and approved by the SBCFD prior to the issuance of construction permits.

In order to comply with San Bernardino County requirements for fire hazard control, fuel modification zones (FMZs) would be established around buildings on the developed portions of the Project site.

~~The proposed Project would require the implantation of fuel modification zones (FMZs) is a requirement of the Project that would include approximately 1.9 acres of the Project site. Of the 1.9 acres of FMZs, 85.07 sq. ft. would be categorized as defensible space zone 2 (hereafter referred to as "FMZ 2"), while 80,550.48 sq. ft. would be categorized as defensible space zone 3 (hereafter referred to as "FMZ 3"). The proposed fuel modifications would not extend off-site. FMZ 2 would is required to extend to 30 feet from buildings, and no FMZ 2 areas would occur beyond the Project's limits of grading. the northwest corner of the proposed maintenance building/caretaker's residence. All dead logs, branches, litter, and any decaying organic material (i.e., leaves, needles, and woody material) would be removed from the ground within FMZ 2. Trees are required to be thinned or removed so that there is approximately 20 to 30 feet of distance between tree stems. FMZ 3 would is required to extend 200 feet from the Project's proposed on-site buildings, which would all occur within the Project's limits of grading with the exception of approximately 0.66 acres that would extend into areas of the site beyond the limits of grading. In these areas, a-~~ All dead logs, branches, litter, and decaying organic material (i.e., leaves, needles, and woody material) would be removed from the ground within FMZ 3. Standing dead material, stems, vines, and non-productive trees would be removed from FMZ 3, with some tree thinning and pruning as necessary. (Payson, E. T., 2017a)

The standard and non-standard conditions and requirements for fire prevention include: provision of a permanent fuel modification zone, compliance with water main, fire hydrant and fire flow standards, fire sprinklers and fire alarm systems, approved emergency/evacuation road access plans, an evacuation plan, and a host of other requirements to support compliance with the Uniform Fire Code, the FS Overlay, and all applicable statutes, codes, ordinances and conditions of the SBCFD. Refer to *Technical Appendix E2* for a copy of the Project's conditions and requirements pertaining to wildfire protection.



The SBCFD has established a set of standard conditions for fire protection planning requirements including provisions of a fuel modification area, emergency evacuation/access plans, water system plans and a host of other features. Under SBCFD Standards, phased projects are required to provide temporary fuel modification areas during each phase of the Project.

Upon completion of the final phase, a permanent fuel modification area would be maintained on the Project site and assured through ongoing maintenance by the on-site caretaker. In order to comply with San Bernardino County requirements for fire hazard control, fuel modification zones (FMZs) would be established around buildings on the developed portions of the Project site. FMZ 2 is required to extend to 30 feet from buildings, and no FMZ 2 areas would occur beyond the Project’s limits of grading. FMZ 3 is required to extend 200 feet from the Project’s proposed on-site buildings, which would all occur within the Project’s limits of grading with the exception of approximately 0.66 acres that would extend into areas of the site beyond the limits of grading. In these areas, all dead logs, branches, litter, and decaying organic material (i.e., leaves, needles, and woody material) would be removed from the ground within FMZ 3. Standing dead material, stems, vines, and non-productive trees would be removed from FMZ 3. Thinning and pruning of trees and shrubs would also occur within FMZ 3. Ongoing periodic maintenance would be required in the FMZ 2 3 area to ensure that the conditions of this zone are met. A Preliminary Fuel Modification Plan for the proposed Project requires brush clearance within 100 feet of all proposed structures. Compliance with the requirements of the approved FMZ Fuel Management Plan would help reduce the potential risk of fire on-site and protect the site from fires that have the potential to begin in the proposed Project area. ~~The Fuel Modification Plan proposes to remove leaf litter, and other potentially flammable hazards, as well as thin out or remove trees so that there are 20 to 30 feet between tree stems~~ (Payson, E. T., 2017a, p. 6). To date, the Project has been designed to meet or exceed requirements established by the SBCFD and USFS. The design features incorporated into the Project, along with other mandatory requirements imposed by the SBCFD, would assist in fire protection and prevention by reducing (1) impacts to fire protection services, (2) the risk of exposure to wildland fire hazards, and (3) the potential for fire accidents and the spread of fire. Proof of compliance with applicable fire protection planning requirements would be required as a standard condition of Project approval, site grading, issuance of building permit, and Project occupancy. Accordingly, the potential impacts of the Project relative to fire hazards would be less than significant.

- Threshold c)** *For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?*
- Threshold d)** *For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?*

The Project site is located approximately 11.0 miles south of the Hesperia Airport and 25 miles northeast of the Ontario International Airport (Google Earth, 2018). Additionally, according to the San Bernardino General Plan Hazards Overlay Map, the Project site is not located within an Airport Safety Review Area; therefore, the Project does not have the potential to expose people residing or working in the Project area to hazards associated with public airport or private airstrips. (San Bernardino County, 2010) No impact would occur.



3.F HYDROLOGY AND WATER QUALITY

This Subsection addresses the proposed Project’s potential to impact drainage patterns, groundwater supply and recharge, and surface and groundwater water quality during both Project construction and operation. This Subsection also provides an analysis of water supply based on the proposed Project’s estimated water demand. Information regarding groundwater hydrology is based on an Engineering Geology and Soils Investigation, dated November 2001, prepared by LOR Geotechnical Group, Inc., which is included as *Technical Appendix D* of this DREIR. The analysis of surface drainage impacts is based on a Drainage Study included as *Technical Appendix F*, dated July 2005 (revised April 2018), prepared by W.J. McKeever, Inc. Information pertaining to water quality is based on a Project site -specific *Water Quality Management Plan (WQMP)* included as Appendix I of DREIR *Technical Appendix F*. The analysis of water demand for the Project is based on the Water Service Requirement calculations, dated July 18, 2006, prepared by W.J. McKeever, Inc (PCR, 2010b, Technical Appendix F).

3.F.1 ENVIRONMENTAL SETTING

3.F.1.1 EXISTING HYDROLOGICAL CONDITIONS

A. Regional

The Project site and vicinity lie within the Mojave Watershed boundary, which is located entirely within San Bernardino County and includes approximately 1,600 square miles of total drainage. Approximately 210 square miles of this drainage area are located in the San Bernardino Mountains, which are the headwaters for the Mojave River system.¹ Elevations within the watershed range from approximately 8,500 feet above mean sea level (amsl) at Butler Peak (approximately 15 miles east of the Project site) in the San Bernardino Mountains to 1,400 feet amsl at Afton Canyon near the terminus of the Mojave River (approximately 40 miles northeast of the City of Barstow just east of Interstate 15). ~~Although, the Project site is located within the boundary of the Lahontan-RWQCB. Therefore and Santa Ana Basin Plan, the Santa Ana Lahontan RWQCB’s Water Quality Control Plan for the Lahontan Santa Ana River Region Basin (Region 68) is the governing water quality plan for the region.~~

According to the United States Geological Survey (USGS) Report 2011-5234, the Mojave River Watershed can be divided into sub-basins based on hydrologic features. The five hydrologic sub-basins include: (1) Alto; (2) Oeste; (3) Centro; (4) Baja, and (5) Este. The Project site is located within the Alto sub-basin, which is the southernmost of the sub-basins in the watershed. (USGS, 2011)

B. Off-site

The off-site watershed areas that contribute runoff to the Project site are generally located to the west of the site. The off-site tributary areas are illustrated on the map labeled “Drainage Map Undeveloped” contained in Appendix F of the Project site’s Drainage Study (DREIR *Technical Appendix F*). Generally, the offsite watershed consists of vacant forested land, residential areas and limited commercial development. The off-site watershed is categorized into sub-areas, or nodes, for the purpose of the analysis that was conducted in the

¹ Maxwell, Christopher R., *A Watershed Management Approach to Assessment of Water Quality and Development of Revised Water Quality Standards for the Ground Waters of the Mojave River Floodplain*, 2000.



D. Rimforest Flood Control Project

The County of San Bernardino has approved plans in place to construct and maintain a series of drainage facilities to address notable erosion and landsliding events that occur in the southern Rimforest Community. The approved Rimforest Storm Drain ~~p~~Project is planned to restore drainage runoff from north of SR-18 into Little Bear Creek, which subsequently drains into Lake Arrowhead. The Rimforest Storm Drain ~~p~~Project would be constructed in two (2) phases. Phase 1 would include approximately 0.8 miles of flood control improvements, comprised of approximately 0.2 miles of channel/basin and approximately 0.6 miles of pipe culvert and appurtenances. Phase 1 improvements would convey runoff from the Rimforest Community to Little Bear Creek in a northeasterly direction. Phase 2 of the Rimforest Storm Drain ~~P~~project would include the installation of a culvert system to direct runoff from Pine Avenue and under SR-18 to join flows restored by Phase 1 to Little Bear Creek. The Phase 2 culvert system would include street inlets and storm drains within Rimforest. The Rimforest Storm Drain ~~p~~Project's proposed Pine Avenue culvert system (discharge point) would be located within the southwest corner of the proposed Church of the Woods' Project site.

The Rimforest Storm Drain ~~P~~project is expected to be ~~under construction~~completed prior to the development of the proposed Project. ~~However, there remains a potential for the proposed Project's construction to be initiated prior to the County's planned Rimforest Storm Drain Project. Under this scenario, the proposed Project would construct a part of the proposed Rimforest Storm Drain Project's Pine Avenue culvert system, which would initiate at an existing storm drain located at the southwest corner of the Project site. Therefore, under this scenario it is anticipated that flows associated with the proposed Rimforest Storm Drain Project would be transmitted through the proposed Project's storm drain system and discharged into the proposed Rimforest Storm Drain Project's attenuation basin(s) located north of the Project site's northeast corner and within Little Bear Creek.~~

3.F.1.2 WATER QUALITY

A. Surface Water Quality

A net effect of development can be to increase pollutant export over naturally occurring conditions. The impact of the higher export can be on the adjacent water bodies and also on the downstream receiving waters. An important consideration in evaluating storm water quality from a project is to assess if it impairs the beneficial use to the receiving waters. Receiving waters can assimilate a limited quantity of various constituent elements, however, there are thresholds beyond which the measured amount becomes a pollutant and results in an undesirable impact. Background of these standard water quality categories provides an understanding of typical impacts.

Sediment - Sediment is made up of tiny soil particles that are washed or blown into surface waters and is the major pollutant by volume in surface water. Suspended soil particles can cause the water to look cloudy or turbid. The fine sediment particles also act as a vehicle to transport other pollutants including nutrients, trace metals, and hydrocarbons. Construction sites are typically a large source of sediment.

Nutrients - Nitrogen, phosphorous, and potassium are the major nutrients used for fertilizing landscaped areas. Heavy use of commercial fertilizers can result in discharge of nutrients to water bodies where they may cause excessive algae growth.



Trace Metals - Trace metals are primarily a concern because of their toxic effects on aquatic life and their potential to contaminate drinking water supplies. The most common trace metals found in runoff are lead, zinc, and copper. Fallout from automobile emissions is a major source of lead in urban areas. Materials such as galvanized metals, paint, or preserved wood may also contain metals.

Oil and Grease - Oil and grease contain a wide variety of hydrocarbons some of which could be toxic to aquatic life even in low concentrations. These materials initially float on water and create the familiar rainbow-colored film. Hydrocarbons have a strong affinity for sediment and quickly become absorbed to it. The major sources of hydrocarbons are through leakage of crankcase oil and other lubricating agents from automobiles. High hydrocarbon levels are typically found in the runoff from parking lots, roads, and service stations.

Other Toxic Chemicals - If improperly stored and/or disposed of, synthetic organic compounds (such as adhesives, cleaners, sealants, and solvents) could have a significant impact on receiving waters.

Miscellaneous Wastes - These may include wash water from concrete mixers, paints and painting equipment cleaning activities, solid wastes from land clearing activities, wood and paper material from packaging of building material, and sanitary wastes. Improper/illegal disposal of these wastes can lead to polluted waterways.

The quantity of a material in the environment and its characteristics determine the degree of availability as a pollutant in surface runoff. In a developed environment, the quantity of certain pollutants in the environment is a function of the intensity of the land use. For instance, a high density of automobile traffic makes a number of potential pollutants (such as lead and hydrocarbons) more available. The availability of a material, such as a fertilizer, is a function of the quantity and the manner in which it is applied. Applying fertilizer in quantities that exceed plant needs leaves the excess nutrients available for loss to surface or ground water.

The physical properties and chemical constituents of water traditionally have served as the primary means for monitoring and evaluating water quality. Evaluating the condition of water through a water quality standard refers to its physical, chemical, or biological characteristics. Water quality parameters for storm water comprise a long list and are classified in many ways. In many cases, the concentration of pollutant is needed to assess a water quality problem, instead of the annual pollutant loads. Some of the typical physical, chemical or biological characteristics used to evaluate the quality of the surface runoff include dissolved oxygen, biochemical oxygen demand, chemical oxygen demand, total dissolved solids (TDS), pH, alkalinity, specific conductance, turbidity, nitrogen, and phosphorus levels.

Currently, the Project site is undeveloped consisting of hilly to steep mountain terrain largely covered by montane coniferous forest. The expected pollutants in the existing condition storm water runoff from the site include sediments, trash and other miscellaneous debris from infrequent human activity on the site.

As discussed above, the Project site is located at the headwater of Little Bear Creek, which flows to Lake Arrowhead. According to the most recent CWA Section 303(d) List of Water Quality Limited Segments, approved by the United States Environmental Protection Agency (USEPA) in October 2011, neither Little Bear Creek nor Lake Arrowhead were identified as a water quality limited or “impaired” waterbody where water quality standards and/or receiving water beneficial uses have not been met (SRWCB, 2011). However,



it should be noted that discharges of any water pollutants in excess of regulatory standards into any waterway would constitute a violation of the Basin Plan, unless otherwise permitted.

3.F.1.3 GROUNDWATER QUALITY

There is no current data on the groundwater quality beneath the Project site. However, as discussed below, the Engineering Geology and Soils Investigation (*Technical Appendix D* of this DREIR) concludes that the groundwater at the site is anticipated to consist of insignificant amounts of perched water and limited amounts of water within the fractures of the bedrock.

3.F.1.4 EXISTING WATER SUPPLY

A. Crestline-Lake Arrowhead Water Agency

The Project site is located within the boundaries of the Crestline-Lake Arrowhead Water Agency (CLAWA). CLAWA’s primary water supply source is the California State Water Project (SWP), with a secondary water source in Houston Creek. Table 3.F-1, *Current and Projected Water Supplies (acre-feet per year)*, depicts the Agency’s estimated long-term water delivery schedule. As shown in this table, CLAWA’s long-term projection for water supply is approximately 3,961 acre-feet (AF) per year. (CLAWA, 2011, p. 26).

Table 3.F-1 Current and Projected Water Supplies (acre-feet per year)

Water Supply Sources	2010	2015	2020	2025	2035
Available from DWR ^{1,2}	2,900	3,480	3,480	3,480	3,480
Locally produced groundwater	0	0	0	0	0
Local Surface Water ³	481	481	481	481	481
Transfers					
Exchanges In					
Recycled Water	0	0	0	0	0
Other					
Total	3,381	3,961	3,961	3,961	3,961

¹ 2010 availability based upon approved Department of Water Resources (DWR) allocation percentage of 50%.

² Future availability based upon State Water Project (SWP) long-term reliability of 60%.

³ Average total surface water available from Houston Creek via Lake Silverwood from 1989-2010.

Source: (CLAWA, 2011, Table 5)



C. Water Quality

Existing storm water quality is qualitatively discussed, as there is no measured data on storm water quality for the Project site. For purposes of the surface water quality analysis, impacts are assessed by evaluating the types of pollutants and/or effects on water quality likely to be associated with construction and operation of the Project, and how and where they would be conveyed. With this basis, the potential for Project generated pollutants to impact sensitive receiving waters is assessed. Where potential impacts are identified, relevant Project design features and/or BMPs identified in Appendix I of the Drainage Study (revised April 2018) (DREIR *Technical Appendix F*) prepared for the Project and regulatory permits/requirements are considered.

3.F.5 PROJECT FEATURES

Under existing conditions, offsite flows enter the Project site at the southwest corner of the Project site, north of SR-18. ~~Flows entering the site from the southwest corner would be intercepted by the Project's proposed 60-inch storm drain pipe. The pipe would consist of a 60-inch reinforced concrete pipe (RCP) and would be approximately 750 feet in length. This pipe is proposed to continue through the fill area located in the southwest corner. The proposed 60-inch storm drain would be adequate to convey flows generated by a 100-year storm event.~~ The San Bernardino County Flood Control District has planned to develop their Rimforest Storm Drain project to be built on approximately 10 ~~acres~~ immediately north and northwest of the Project site. The Rimforest Storm Drain project would install a 72-inch storm drain. ~~to be built in place of the proposed Project's 60-inch storm drain.~~ The Rimforest Storm Drain project proposes to divert more water through their storm drain that what currently drains to the area. ~~The proposed Project's 60-inch pipe and the Rimforest Storm Drain project's 72-inch pipe would be the same storm drain. It is anticipated that the Rimforest Storm Drain project would be constructed prior to the implementation of the proposed Project and, as such, the storm drain located in the Project site's southwest corner would be constructed as a 72-inch storm drain. Moreover, coordination between the proposed Project and the Rimforest Storm Drain project concluded that the storm drain would be constructed as a 72-inch storm drain.~~

~~The proposed Project's storm drain improvements also include energy dissipaters at the outlet for of the Project's proposed 60-inch RCP and the concrete-lined channel; depressed landscaped areas (infiltration basins) to facilitate infiltration and mitigate runoff; and storm drain filters.~~

Approximately 6.8 acres of the site would include landscaping associated with the manufactured slope areas, an athletic field, and other ornamental landscaping. Landscaped areas would incorporate native, drought-tolerant vegetation and, where applicable, utilize a computerized irrigation system to increase water efficiency of the irrigation system to ensure that no nuisance water exits the Project site.



As stated in the Environmental Setting section, the groundwater at the site is anticipated to consist of insignificant amounts of perched water and limited amounts of water within the fractures of the bedrock. Thus, construction activities, including grading, are not anticipated to encounter significant amounts of groundwater. Nonetheless, since the Project would comply with regulatory requirements, including the Construction General Permit that requires implementation of BMPs identified in a SWPPP, surface water that may percolate into the soil would not adversely affect groundwater on- or off-site.

In summary, construction activities associated with the proposed Project would have a short-term impact on water quality impacts, however, this impact would be less than significant due to compliance with regulatory requirements, including the Construction General Permit that requires implementation of BMPs identified in a SWPPP would reduce short-term construction impacts to water quality to a less than significant level.

2. Operational Conditions

On May 2, 2011, W.J. McKeever, Inc. prepared a Project-site specific WQMP in accordance with the San Bernardino County’s WQMP for Urban Runoff. According to the site-specific WQMP, the anticipated pollutants of concern generated by the Project site’s post-development conditions include bacteria/virus, heavy metals, nutrients, pesticides, organic compounds, sediments, trash and debris, oxygen demanding substances, and oil and grease.

The Project’s WQMP (See Appendix I of *Technical Appendix F*) identifies operational structural and non-structural BMP’s that would be incorporated into the Project’s operation and maintenance. The WQMP’s structural BMPs consists of depressed landscape areas (i.e. athletic field, parking areas, assembly area) and storm drain filters. The Project proposes to construct a bioretention basin in the central portion of the Project site, north of the southern parking area. Additionally, fossil filters would be installed in the storm drain inlet to the ~~7260~~-inch reinforced concrete pipe. Initial “first flush” flows from most of the parking and driveways areas would be directed to “grassy swales” within the landscaped areas within the parking areas, assembly buildings, and manufactured slopes. The WQMP’s non-structural BMPs include the education of property owners, employee training, street sweeping, landscaping maintenance, irrigation maintenance, filter inspection, litter control, and catch basin inspection. The WQMP is based on the San Bernardino County WQMP Guidelines and NPDES permits that took effect as of January 2004. Compliance with the NPDES permit, WQMP standards would reduce long-term operational surface water quality impacts to a less than significant level.

Threshold b) *Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production of rate or pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted?)*

The Project does not propose the direct use or extraction of groundwater. No wells are proposed. The Project site contains an abandoned and capped groundwater well owned by BBMWD. The on-site groundwater well shall be destroyed by the Project Applicant, pursuant to Public Health and Safety Code, Part 9.5, Section 115700.



The groundwater at the site consists of small amounts of perched water and limited amounts of water within the fractures of the bedrock. Accordingly, the potential for the Project to substantially deplete groundwater supplies through the means of groundwater extraction or increasing direct consumption of potable groundwater is less-than-significant.

Approximately 25% of the entire Project site would consist of impervious surfaces. The developed portion of the Project site would consist of 50% permeable and 50% impervious surfaces, which may affect the ability for groundwater recharge to occur at the Project. Initial “first flush” flows would be directed to grassy swales within the landscaped areas. The landscaped areas and athletic field would act as infiltration beds to mitigate the increased runoff due to the impervious areas. As such, no drainage outlets would be needed for these areas. These landscaped areas would facilitate the process of groundwater recharge similar to the existing conditions before the remaining flows are conveyed to the natural drainage system that occurs within the center of the Project site. Furthermore, the hard, non-porous nature of the underlying bedrock at the Project site tends to abate groundwater flows, with the exception of limited amounts of water perched over the bedrock or found within the fractures of the bedrock. The Project would not substantially interfere with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table. Impacts would be less-than-significant.

- Threshold c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner that would result in substantial erosion or siltation on- or off-site?*
- Threshold d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site?*
- Threshold e) Create or contribute runoff water that would exceed the capacity of existing or planned storm water drainage systems or provide substantial additional sources of polluted runoff?*

The San Bernardino County Flood Control District plans to implement the proposed Rimforest Storm Drain project on 10 acres located north and northwest of the Project site. The proposed Rimforest Flood Control project proposes a 72-inch storm, which would divert more water through the storm drain than occurs under existing conditions. It is anticipated that the Rimforest Flood Control project would be constructed prior to the implementation of the proposed Project, and that the Project’s storm drain system would connect to the County-installed storm drain. Similar to existing conditions, off-site drainage flows during operation of the Project would continue to enter the site at the north and northwestern portions of the Project site. ~~As the proposed Project would result in a fill of the natural drainage course in the southwest corner of the site, a new 60-inch reinforced concrete storm drain pipe would be installed at a the southwest corner of the site to intercept off site flows.~~ The new ~~750-foot long~~ storm drain pipe would extend through the Project’s proposed development area and would generally parallel the proposed sewer alignment. Approximately midway through the Project site, the proposed storm drain would discharge into the existing natural drainage area and flow northeasterly through the Project site. The Project design includes energy dissipaters at the outlet of the ~~7260-~~ inch storm drain pipe to prevent erosion and maintain flow velocities that are similar to existing conditions. The flows entering the site at Flow Entrance B on the north boundary line would be left in their natural condition and discharge into the natural drainage course that would be preserved within the Project site. ~~The~~



~~San Bernardino County Flood Control District also plans to implement the proposed Rimforest Storm Drain Project on 10 acres located north and northwest of the Project site. The proposed Rimforest Flood Control project proposes a 72-inch storm drain to be built in place of the proposed Project's 60-inch pipe. The Flood Control's project proposes to divert more water through this storm drain than under existing conditions. The proposed Project's 60-inch pipe and the proposed Rimforest Flood project's 72-inch pipe would comprise the same storm drain. It is anticipated that the Rimforest Flood project would be constructed prior to the implementation of the proposed Project and the proposed storm drain would be constructed as a 72-inch storm drain. Additionally, coordination between the proposed Project and Rimforest Storm Drain project concluded that, in all likelihood, the proposed Project's storm drain would be constructed as a 72-inch storm drain.~~

Currently, the area of the Project site proposed for development consists of steep mountainous slopes. Based on data provided in the Drainage Study (DREIR *Technical Appendix F*), the Q value for the developed conditions would decrease to 67.64 cfs from 68.18 cfs as compared to undeveloped conditions, which represents a 0.54 cfs reduction in the peak stormwater flows that would be discharged from the Project site when compared to the existing condition. Grading of the site would create flatter areas (i.e., athletic field, landscaped areas) where the steep slopes previously existed and would cause the "time of concentration" of stormwater flows to decrease such that the effects of incorporating impervious surfaces would be outweighed. However, the total area that encompasses the off-site and on-site drainage areas would result in a slight increase to 551.39 cfs from 550.15 cfs as compared to the undeveloped conditions, which represents a 1.24 cfs increase within the total drainage area. The difference in flow would be caused by the modification to the drainage area topography of the Project site. The developed area would increase the Project area's flow rates due to flattening the slopes at the top of the Project site. The decreased flow from the on-site drainage study included in the Project's Drainage Study illustrate that Project development would not substantially increase the Q value for the portion of the drainage area that occurs within the Project site whereas the slight increase to the overall stormwater flows within the drainage area would represent a nominal increase (0.002%) when compared to the existing condition. (W.J. McKeever, 2018). Therefore, impacts associated storm water runoff due to the development of the Project would be less-than-significant.

Onsite flows would be discharged to the same drainage course (as modified by the Rimforest Storm Drain Project) as under existing conditions and the overall drainage area topography would not be substantially altered by development of the Project. Therefore, because the drainage pattern of the site or area would not be substantially altered, the Project would not substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or off-site. In addition, because the Project would implement short- and long-term water quality controls (i.e., BMPs and a Soil Erosion and Sediment Control Plan) consistent with applicable regulatory requirements, the Project would not result in substantial erosion/siltation on- or off-site during both construction and operation. Thus, less-than-significant impacts regarding hydrology and drainage would occur.



significant land use impact to the environmental only due to the conflict with General Plan Policy M/CI 1.1. The Project would not conflict with any other policies in the General Plan adopted for the purpose of avoiding or mitigating an environmental effect. As discussed in detail in DREIR Section 3.I, *Transportation and Circulation*, the Project would result in direct and cumulatively considerable traffic impacts and would require mitigation. Mitigation must have a proportional nexus to the Project's impacts, and as such, the Project would install traffic signals, upon approval from Caltrans, at the Bear Springs Road/State Route 18 intersection and Pine Avenue/State Route 18 intersection and the Project would be required to pay fair share fees to Caltrans, which Caltrans would use install circulation improvements to address its impacts. Because there is no assurance that Caltrans would install the improvements in the timeframe necessary to ensure target LOS maintenance, DREIR Section 3.I concludes that traffic impacts would be significant and unavoidable. Because General Plan Policy M/CI 1.1 addresses this issue and a significant and unavoidable land use impact is identified, this conclusion duplicates the impacts identified in DREIR Section 3.I.



2. *Lake Arrowhead Community Plan*

A consistency analysis of the proposed Project to the relevant policies of the Lake Arrowhead Community Plan is presented in Table 3.G-2, *Relationship of Project to Relevant Lake Arrowhead Community Plan Policies*. As described in Table 3.G-2, the proposed Project would conflict with Lake Arrowhead Community Plan Policy LA/CI 1.1 related to levels of service on Project area roadways. The Project would not conflict with any other policies in the Lake Arrowhead Community Plan. Accordingly, the Project would result in a significant land use impact due to the resulting environmental effect of conflicting with the Lake Arrowhead Community Plan Policy LA/CI 1.1. The Project would not conflict with any other policies in the Lake Arrowhead Community Plan adopted for the purpose of avoiding or mitigating an environmental effect. As discussed in detail in DREIR Section 3.I, *Transportation and Circulation*, the Project would result in direct and cumulatively considerable traffic impacts and would require mitigation. Mitigation must have a proportional nexus to the Project's impacts, and as such, the Project would install traffic signals, upon approval from Caltrans, at the Bear Springs Road/State Route 18 intersection and Pine Avenue/State Route 18 intersection and the Project would be required to pay fair share fees to Caltrans, which Caltrans would use install circulation improvements to address its impacts. Because there is no assurance that Caltrans would install the improvements in the timeframe necessary to ensure target LOS maintenance, DREIR Section 3.I concludes that traffic impacts would be significant and unavoidable. Because General Plan Policy LA/CI 1.1 addresses this issue and a significant and unavoidable land use impact is identified, this conclusion duplicates the impacts identified in DREIR Section 3.I.

3. *County of San Bernardino Development Code – Community Industrial (IC) District*

The Project's proposed lot size, setbacks, FAR, lot coverage, and building heights would conform to the development standards applicable to the IC District within the Mountain Region. However, the Project's use as a church facility within the IC District would require the County to approve a CUP. Pursuant to Section 85.06.040 of the San Bernardino County Development Code, prior to the County's approval of the proposed CUP, findings must be made by the Planning Commission verifying the adequacy of the site for the uses proposed; the adequacy of site access; the lack of substantial adverse effects on abutting properties; consistency with the goals, maps, policies, and standards of the General Plan and any applicable community or specific plan; the existence or availability of supporting infrastructure; and that the design of the site has considered the use of solar energy systems and passive or natural heating and cooling opportunities (San Bernardino County, 2018, Section 85.06.040). As demonstrated in Table 3.G-1, *San Bernardino General Plan Consistency*, and Table 3.G-2, *Relationship of Project to Relevant Lake Arrowhead Community Plan Policies*, the proposed Project would be consistent with the policies of the General Plan and Lake Arrowhead Community Plan, respectively.



- Intersection #18 – Pine Avenue/State Route 18: install a traffic signal at the intersection.

Mitigation for Cumulatively Considerable Impacts

MM 3.I-2 In the event that Caltrans prepares a valid study, as defined below, that identifies fair share contribution funding sources attributable to and paid from private and public development to supplement other regional and State funding sources necessary undertake improvements to intersections along SR-18 and/or SR-189 in the Project study area, then the Project Applicant shall use reasonable efforts to pay the applicable fair share amount to Caltrans for the below-listed intersections.

The study shall include fair share contributions related to private and/or public development based on nexus requirements contained in the Mitigation Fee Act (Government Code Sections 66000 et seq.) and 14 Cal. Code of Regs. Section 15126.4(a)(4) and, to this end, the study shall recognize that impacts to Caltrans SR-18 and/or SR-189 facilities that are not attributable to development located within unincorporated San Bernardino County that are not required to pay in excess of such developments’ fair share obligations. The fee study shall also be compliant with Government Code Section 66001(g) and any other applicable provisions of law. The study shall set forth a timeline and other relevant criteria for implementation of the recommendations contained within the study to the extent the other agencies agree to participate in the fee study program. Specifically, the fair share fee payment required by this Mitigation Measure shall be used by Caltrans to make the following improvements in accordance with the recommendations identified in the Traffic Impact Analysis (TIA) prepared by Translutions, Inc., dated September 12, 2018:

- Daley Canyon Road/State Route 189 (Intersection #8): install a traffic signal at the intersection. The Project’s fair share of this improvement shall be 58.7%
- Daley Canyon Road/State Route 18 (Intersection #10): install a traffic signal at the intersection. The Project’s fair share of this improvement shall be 48.3%.
- Daley Canyon Access Road/State Route 18 (Intersection #11): install a traffic signal at the intersection. The Project’s fair share of this improvement is 30.3%.
- State Route 173/State Route 18 (Intersection #17): install a traffic signal at the intersection. The Project’s fair share of this improvement is 22.0%.
- Pine Avenue/State Route 18 (Intersection #18): install a traffic signal at the intersection. The Project’s fair share of this improvement is 32.3%.

Mitigation for Impacts Occurring During Project Construction

MM 3.I-3 During the hours of 7 a.m. to 9 a.m. and 4 p.m. to 6 p.m., construction traffic shall be minimized. No more than 50 total passenger-car-equivalent trips per hour (inbound and outbound combined) may enter or exit the construction site during these periods. The construction contractor shall be responsible for monitoring the entries and exits during these time periods to ensure compliance and permit periodic inspection of the construction site by



the County of San Bernardino or its designee to further ensure compliance. A requirement to comply with this restriction shall be noted on all construction documents and also shall be specified in bid documents issued to prospective construction contractors. Passenger-car-equivalents shall be counted as follows:

- Passenger Vehicle – 1 PCE
- 2 Axle Truck – 1.5 PCE
- 3 Axle Truck – 2 PCE
- 4+ Axle Truck – 3 PCE

MM 3.I-4 Prior to the issuance of grading permits, building permits, or improvement plans for frontage improvements along SR-18, the Project Applicant shall prepare and the County of San Bernardino shall approve a temporary traffic control plan. The temporary traffic control plan shall comply with the applicable requirements of the California Manual on Uniform Traffic Control Devices. A requirement to comply with the temporary traffic control plan shall be noted on all construction documents and also shall be specified in bid documents issued to prospective construction contractors.

MM 3.I-5 All heavy-duty construction equipment and vehicles shall be staged interior to the construction site. The parking or storage of construction equipment and vehicles on SR-18 is prohibited. The construction contractor shall be responsible for ensuring compliance and permit periodic inspection of the construction site by the County of San Bernardino or its designee to further ensure compliance. A requirement to comply with this provision shall be noted on all construction documents and also shall be specified in bid documents issued to prospective construction contractors.

3.1.9 SIGNIFICANCE OF IMPACTS AFTER MITIGATION

Threshold a: Significant and Unavoidable Direct and Cumulatively Considerable Impacts. Provided below is a summary of the significance of the Project’s impacts to transportation and traffic following implementation of the Applicable County Regulatory Requirements and Mitigation Measures MM 3.I-1 and MM 3.I-2.

Existing Plus Project Scenario

Mitigation Measure MM 3.I-1 would require the Project to construct traffic signals at the intersections of Bear Springs Road/State Route 18 (Intersection #4) and Pine Avenue/State Route 18 (Intersection #18) if permitted by Caltrans. As shown on Table 3.I-7, *Existing Plus Project with Improvements Intersection Levels of Service*, implementation of Mitigation Measure MM 3.I-1 would fully reduce to the Project’s direct impacts to Intersection #4 and the Project’s direct impacts to Intersection #18 under the Existing Plus Project scenario to a level below significance, respectively. However, Intersections #4 and #18 are both under the jurisdiction of Caltrans and the timing of the improvement to both intersections that is required to achieve an acceptable LOS is outside of the jurisdictional authority of the County of San Bernardino; as such, the Project’s impacts to the Intersections #4 and #18 would be significant and unavoidable in the event that Caltrans does not allow traffic signals or does not assure their installation prior to the commencement of the Project’s operation.



Table 3.I-2 Existing Intersection Levels of Service

Intersection	LOS Standard	Control	Without Project				With Project				Project Impact
			Saturday Peak Hour		Sunday Peak Hour		Saturday Peak Hour		Sunday Peak Hour		
			Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	
1. Crest Forest Drive/State Route 18	D	TWSC	18.2	C	18.5	C	19.7	C	19.8	C	NO
2. Lake Gregory Drive/State Route 189	D	TWSC	16.5	C	13.3	B	18.3	C	14.2	B	NO
3. Lake Gregory Drive/State Route 18	D	Signal	23.4	C	23.7	C	23.6	C	23.4	C	NO
4. Bear Springs Road/State Route 18	D	TWSC	40.2	E *	30.5	D	61.4	F *	46.1	E *	YES
5. Project Driveway/State Route 18	D	Signal	<i>Future Intersection</i>				15.9	B	16.9	B	NO
6. Lake Forest Drive/Grass Valley Road	C	TWSC	9.9	A	10.8	B	9.9	A	10.6	B	NO
7. State Route 189/Grass Valley Road	D	TWSC	17.1	C	15.7	C	19.5	C	17.7	C	NO
8. Daley Canyon Road/State Route 189	D	AWSC	17.9	C	13.3	B	28.7	D	17.3	C	NO
9. Daley Canyon Road/Daley Canyon Access Road	C	TWSC	11.3	B	10.8	B	12.4	B	12.1	B	NO
10. Daley Canyon Road/State Route 18	D	TWSC	13.4	B	16.2	C	16.9	C	24.9	C	NO
11. Daley Canyon Access Road/State Route 18	D	TWSC	21.8	C	17.6	C	26.6	D	20.9	C	NO
12. Bay Road/State Route 189	D	AWSC	13.3	B	10.3	B	14.8	B	11.2	B	NO
13. Bay Road/Little Bear Road	C	TWSC	9.7	A	9.9	A	9.8	A	10.0	A	NO
14. Rocky Point Road/State Route 189	D	TWSC	11.6	B	10.1	B	11.2	B	9.8	A	NO
15. Greenway Drive/State Route 189	D	TWSC	15.8	C	9.5	A	16.9	C	11.6	B	NO
16. State Route 173/Crest Estates Drive	D	TWSC	9.8	A	11.2	B	11.3	B	11.7	B	NO
17. State Route 173/State Route 18	D	TWSC	22.5	C	13.7	B	27.0	D	15.0	B	NO
18. Pine Avenue/State Route 18	D	TWSC	32.7	D	27.2	D	37.7	E *	32.0	D	YES

Notes:

- * Exceeds LOS Standard
- TWSC = Two-Way Stop Control; For TWSC intersections, reported delay is for worst-case approach/movement.
- LOS = Level of Service

Intersection	LOS Standard	Control	Without Project				With Project				Project Impact
			Saturday Peak Hour		Sunday Peak Hour		Saturday Peak Hour		Sunday Peak Hour		
			Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	
1. Crest Forest Drive/State Route 18	D	TWSC	18.2	C	18.5	C	19.7	C	19.8	C	NO
2. Lake Gregory Drive/State Route 189	D	TWSC	16.5	C	13.3	B	18.3	C	14.2	B	NO
3. Lake Gregory Drive/State Route 18	D	Signal	23.4	C	23.7	C	23.6	C	23.4	C	NO
4. Bear Springs Road/State Route 18	D	TWSC	40.2	E *	30.5	D	61.4	F *	46.1	E *	NO
5. Project Driveway/State Route 18	D	Signal	<i>Future Intersection</i>				15.9	B	16.9	B	NO
6. Lake Forest Drive/Grass Valley Road	C	TWSC	9.9	A	10.8	B	9.9	A	10.6	B	NO
7. State Route 189/Grass Valley Road	D	TWSC	17.1	C	15.7	C	19.5	C	17.7	C	NO
8. Daley Canyon Road/State Route 189	D	AWSC	17.9	C	13.3	B	28.7	D	17.3	C	NO
9. Daley Canyon Road/Daley Canyon Access Road	C	TWSC	11.3	B	10.8	B	12.4	B	12.1	B	NO
10. Daley Canyon Road/State Route 18	D	TWSC	13.4	B	16.2	C	16.9	C	24.9	C	NO
11. Daley Canyon Access Road/State Route 18	D	TWSC	21.8	C	17.6	C	26.6	D	20.9	C	NO
12. Bay Road/State Route 189	D	AWSC	13.3	B	10.3	B	14.8	B	11.2	B	NO
13. Bay Road/Little Bear Road	C	TWSC	9.7	A	9.9	A	9.8	A	10.0	A	NO
14. Rocky Point Road/State Route 189	D	TWSC	11.6	B	10.1	B	11.2	B	9.8	A	NO
15. Greenway Drive/State Route 189	D	TWSC	15.8	C	9.5	A	16.9	C	11.6	B	NO
16. State Route 173/Crest Estates Drive	D	TWSC	9.8	A	11.2	B	11.3	B	11.7	B	NO
17. State Route 173/State Route 18	D	TWSC	22.5	C	13.7	B	27.0	D	15.0	B	NO
18. Pine Avenue/State Route 18	D	TWSC	32.7	D	27.2	D	37.7	E *	32.0	D	YES

Source: (Translutions, Inc., 2018, Table D)



Table 3.I-4 Opening Year (2018) Intersection Levels of Service

Intersection	LOS Standard	Control	Without Project				With Project				Project Impact
			Saturday Peak Hour		Sunday Peak Hour		Saturday Peak Hour		Sunday Peak Hour		
			Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	
1. Crest Forest Drive/State Route 18	D	TWSC	18.5	C	18.8	C	20.1	C	20.1	C	NO
2. Lake Gregory Drive/State Route 189	D	TWSC	16.8	C	13.3	B	18.7	C	14.3	B	NO
3. Lake Gregory Drive/State Route 18	D	Signal	23.4	C	23.5	C	23.6	C	23.2	C	NO
4. Bear Springs Road/State Route 18	D	TWSC	40.9	E *	30.9	D	63.2	F *	47.0	E *	YES
5. Project Driveway/State Route 18	D	Signal	<i>Future Intersection</i>				16.0	B	17.0	B	NO
6. Lake Forest Drive/Grass Valley Road	C	TWSC	9.9	A	10.8	B	9.9	A	10.6	B	NO
7. State Route 189/Grass Valley Road	D	TWSC	17.1	C	15.7	C	19.6	C	17.9	C	NO
8. Daley Canyon Road/State Route 189	D	AWSC	18.1	C	13.4	B	29.2	D	17.6	C	NO
9. Daley Canyon Road/Daley Canyon Access Road	C	TWSC	11.4	B	10.8	B	12.5	B	12.1	B	NO
10. Daley Canyon Road/State Route 18	D	TWSC	13.5	B	16.5	C	17.0	C	25.7	D	NO
11. Daley Canyon Access Road/State Route 18	D	TWSC	22.3	C	18.0	C	27.2	D	21.4	C	NO
12. Bay Road/State Route 189	D	AWSC	13.3	B	10.4	B	14.8	B	11.2	B	NO
13. Bay Road/Little Bear Road	C	TWSC	9.7	A	9.9	A	9.8	A	10.1	B	NO
14. Rocky Point Road/State Route 189	D	TWSC	11.6	B	10.1	B	11.2	B	9.8	A	NO
15. Greenway Drive/State Route 189	D	TWSC	15.8	C	9.5	A	16.9	C	11.6	B	NO
16. State Route 173/Crest Estates Drive	D	TWSC	9.8	A	11.2	B	11.3	B	11.7	B	NO
17. State Route 173/State Route 18	D	TWSC	23.4	C	13.9	B	28.7	D	15.3	C	NO
18. Pine Avenue/State Route 18	D	TWSC	32.9	D	27.6	D	38.7	E *	32.6	D	YES

Notes:

- * Exceeds LOS Standard
- TWSC = Two-Way Stop Control; For TWSC intersections, reported delay is for worst-case approach/movement.
- LOS = Level of Service

Intersection	LOS Standard	Control	Without Project				With Project				Project Impact
			Saturday Peak Hour		Sunday Peak Hour		Saturday Peak Hour		Sunday Peak Hour		
			Delay	LOS	Delay	LOS	Delay	LOS	Delay	LOS	
1. Crest Forest Drive/State Route 18	D	TWSC	18.5	C	18.8	C	20.1	C	20.1	C	NO
2. Lake Gregory Drive/State Route 189	D	TWSC	16.8	C	13.3	B	18.7	C	14.3	B	NO
3. Lake Gregory Drive/State Route 18	D	Signal	23.4	C	23.5	C	23.6	C	23.2	C	NO
4. Bear Springs Road/State Route 18	D	TWSC	40.9	E *	30.9	D	63.2	F *	47.0	E *	NO
5. Project Driveway/State Route 18	D	Signal	<i>Future Intersection</i>				16.0	B	17.0	B	NO
6. Lake Forest Drive/Grass Valley Road	C	TWSC	9.9	A	10.8	B	9.9	A	10.6	B	NO
7. State Route 189/Grass Valley Road	D	TWSC	17.1	C	15.7	C	19.6	C	17.9	C	NO
8. Daley Canyon Road/State Route 189	D	AWSC	18.1	C	13.4	B	29.2	D	17.6	C	NO
9. Daley Canyon Road/Daley Canyon Access Road	C	TWSC	11.4	B	10.8	B	12.5	B	12.1	B	NO
10. Daley Canyon Road/State Route 18	D	TWSC	13.5	B	16.5	C	17.0	C	25.7	D	NO
11. Daley Canyon Access Road/State Route 18	D	TWSC	22.3	C	18.0	C	27.2	D	21.4	C	NO
12. Bay Road/State Route 189	D	AWSC	13.3	B	10.4	B	14.8	B	11.2	B	NO
13. Bay Road/Little Bear Road	C	TWSC	9.7	A	9.9	A	9.8	A	10.1	B	NO
14. Rocky Point Road/State Route 189	D	TWSC	11.6	B	10.1	B	11.2	B	9.8	A	NO
15. Greenway Drive/State Route 189	D	TWSC	15.8	C	9.5	A	16.9	C	11.6	B	NO
16. State Route 173/Crest Estates Drive	D	TWSC	9.8	A	11.2	B	11.3	B	11.7	B	NO
17. State Route 173/State Route 18	D	TWSC	23.4	C	13.9	B	28.7	D	15.3	C	NO
18. Pine Avenue/State Route 18	D	TWSC	32.9	D	27.6	D	38.7	E *	32.6	D	YES

Notes:

- * Exceeds LOS Standard
- TWSC = Two-Way Stop Control; For TWSC intersections, reported delay is for worst-case approach/movement.
- LOS = Level of Service

Source: (Translutions, Inc., 2018, Table E)



C. Biological Resources

Under this alternative, no construction activities would occur on the Project site. As such, there would be no direct impacts to ~~jurisdictional waters~~, southern rubber boa habitat, San Bernardino flying squirrel that were identified for the proposed Project. In addition, significant unavoidable cumulative impacts on the southern rubber boa and the San Bernardino flying squirrel would be avoided under this alternative. Therefore, impacts to biological resources would be avoided under this alternative.

D. Geology and Soils

Under this alternative, grading activities, soil erosion, and exposure of people and structures to potential seismic and landslide activities would not occur. Although these impacts would occur under the proposed Project, they would be less than significant with implementation of the mitigation measures identified in Subsection 3.D of this REIR. Nevertheless, geology and soils impacts would be reduced under this alternative than those identified for the proposed Project.

E. Hazards and Hazardous Materials

Under this alternative, demand on fire protection services and water systems (to meet fire flow requirements) would be avoided. In addition, this alternative would have no effect on emergency access and evacuation. Although development of the proposed Project would increase demand for fire protection services and infrastructure and potentially expose people and structures to wildland fire hazards, these impacts would be less than significant with adherence to standard and non-standard conditions of approval imposed by the Crest Forest Fire Protection District (CFFPD). Nonetheless, these impacts identified for the proposed Project would be less under the No Project/No Build Alternative.

F. Hydrology, Water Quality, and Water Supply

In contrast to the proposed Project, under this alternative, potential impacts on hydrology and drainage, water supply, and water quality would not occur. Erosion, surface water runoff, and water quality impacts from construction and operation impacts would be avoided. Furthermore, no additional water demand would be generated. Although impacts related to hydrology, water quality, and water supply were considered less than significant for the proposed Project, these impacts would be less under the No Project/No Build Alternative.

G. Land Use

Under this alternative, the Project site would remain in its existing condition as undeveloped, forested land with hilly to steep terrain. As there would be no development at the Project site there would be no requirement for a conditional use permit under the No Project/No Build Alternative. Therefore, impacts related to land use issues would be less under this alternative than those identified for the proposed Project.

H. Noise

Under this alternative, construction and development of the proposed Project would not occur. As there would be no operation of construction equipment on the Project site, this alternative would avoid the significant unavoidable construction noise impacts as well as the less-than-significant operational noise impacts that



have slopes less than 1%, thereby meeting the minimum lot size requirements of the IC District. Both areas within the Project site that would have a slope of less than 10% occur along the southern boundary of the Project site, just north of Highway 18. It is also estimated for purposes of this analysis and based on the type of land use subject to a Minor Use Permit that the maximum building area would not exceed 10,000 square feet of manufacturing or warehouse use and that the development would occur within 5.0 acres in the southern/central portion of the Project site.

4.2.2 IMPACT ANALYSIS

A. Aesthetics

Under this alternative only 5.0 acres would be developed with a manufacturing or warehouse use, reducing the amount of grading, tree removal and building coverage that would occur in comparison to the proposed project. Depending on the final site design, these uses may not be visible from Highway 18 (a scenic highway). However, some grading would be required to provide site access that would be visible from Highway 18. Although manufacturing or warehouse operations are required to be fully screened or enclosed, and although this structure would be constructed within a smaller development envelope compared to the proposed Project, the nature of the manufacturing/warehouse use combined with the location of the development adjacent to Highway 18 could result in an increase in the potential for a significant visual impact. Therefore, aesthetic impacts would be greater under this alternative.

B. Air Quality

Under the proposed Project, impacts associated with air quality would be less than significant during Project construction and operation. The implementation of this alternative would result in a reduction in construction emissions due to the reduction of the amount of grading that would be required as well as the reduction of the duration of construction activities that would occur compared to the larger proposed Project. As a result, this alternative would incrementally reduce the proposed Project's less-than-significant construction air quality emissions. Similarly, the less-than-significant operational emissions identified for the proposed Project would be incrementally reduced under this alternative, due to a smaller building area and fewer vehicular trips associated with the land use. However, a manufacturing or warehouse use would change the vehicle fleet mix and generate additional heavy-duty truck trips, thereby increasing diesel PM₁₀ and PM_{2.5} emissions. In addition, a warehouse or manufacturing use could potentially introduce other sources of toxic air emissions, resulting in greater air toxic operation impacts than identified for the proposed Project. A manufacturing or warehouse use could also result in odor impacts, which were not identified for the proposed Project. Considering all of the above, overall construction and operation air quality impacts associated with the No Project/Feasible Development Alternative would be less than identified for the proposed Project, primarily due to the reduced Project size.

C. Biological Resources

Under this alternative, development of the site would be limited to five acres. Therefore, based on the reduction in the amount of land that would be physically disturbed by the implementation of this alternative, this alternative would reduce or avoid ~~the significant impacts to jurisdictional waters and~~ the cumulatively considerable significant and unavoidable impacts to southern rubber boa habitat, and the San Bernardino flying



squirrel that were identified for the proposed Project. Accordingly, the overall impacts on biological resources would be less under this alternative than identified for the proposed Project.

D. Geology and Soils

This alternative would involve construction of a 10,000 square foot building on 5.0 acres for manufacturing or warehouse use. Compared to the proposed Project, this alternative would reduce the area of site disturbance and number of people and structures exposed to potential geologic hazards and would avoid development within the small landslide area in the southeastern portion of the site. Therefore, this alternative would further reduce the less-than-significant geology and soils impacts and avoid a potentially significant impact related to landslides and slope stability identified for the proposed Project.

E. Hazards and Hazardous Materials

This alternative would reduce demand on fire protection services and water systems due to the reduced size and intensity of development. However, this alternative would still be located in a high fire hazard area and a manufacturing or warehouse use could introduce new sources of flammable materials and potentially increase fire hazard. Similar to the proposed Project, these impacts would be less than significant with adherence to standard and non-standard conditions of approval imposed by the CFFPD.

F. Hydrology, Water Quality, and Water Supply

Under this alternative, potential impacts on hydrology and drainage, water supply, and water quality would be reduced compared to the proposed Project. Erosion, surface water runoff, and water quality impacts from construction and operation would be reduced due to the smaller area of site disturbance and impervious surface. ~~In addition, impacts to jurisdictional waters would be likely to be avoided.~~ Water demand associated with the reduced building size and manufacturing use could be similar or greater than the proposed Project, but is expected to be within Crestline-Lake Arrowhead Water Agency projections. Therefore, impacts associated with hydrology would be less than significant and less than the proposed Project. However, similar to the proposed Project, compliance with regulatory requirements for the National Pollutant Discharge Elimination System (NPDES), Regional Water Quality Control Board (RWQCB), and County of San Bernardino would ensure that these impacts would be less than significant.

G. Land Use

Under this alternative, development would be limited to a 10,000 square foot manufacturing or warehouse building on 5.0 acres. Development of this alternative would require a Minor Use Permit. Approval of a Minor Use Permit would require the following findings: the size and shape of the site is adequate for the proposed use; the site has adequate access; the proposed use would not have a substantial adverse effect on abutting property; the proposed use is consistent with the General Plan; there is supporting infrastructure to accommodate the proposed development; the lawful conditions stated in the approval are deemed necessary to protect the public health and general welfare; and the site has the potential for the use of solar energy systems and passive heating and cooling. Additional findings are also required before approving a Minor Use Permit: that standards or conditions would adequately mitigate environmental impacts; the Project does not include phased development; and the Project is not likely to result in controversy.



Less than significant operational emissions identified for the proposed Project would be further reduced under this alternative, due to the reduction in building area and fewer vehicle trips. Therefore, construction and operation air quality impacts associated with the Reduced Project/Alternative Site Design Alternative would be less than identified for the proposed Project.

C. Biological Resources

Under this alternative, development of the site would be limited to 20.34-acres and would reduce the amount of disturbance of vegetation within an approximately 200-foot setback along Highway 18. Therefore, this alternative would reduce impacts on ~~jurisdictional waters~~, southern rubber boa habitat, and the San Bernardino flying squirrel that were identified for the proposed Project. Although disturbance of these habitats would be reduced or avoided, compared to the proposed Project, the loss of habitat would still be considered a cumulatively considerable significant unavoidable impact. Overall impacts on biological resources would be less under this alternative than identified for the proposed Project.

D. Geology and Soils

This alternative would reduce the overall grading and disturbance of the site and reduce the number of people and structures exposed to potential geologic hazards compared to the proposed Project. Grading within an approximately 200 foot setback along Highway 18 would be limited to the construction of the entry and emergency access roads. As such, this alternative would avoid a potentially significant impact associated with development within the small landslide area that would occur under the proposed Project. This alternative would further reduce the less-than-significant geology and soils impacts associated with seismicity, liquefaction, settlement, soil expansiveness, and soil erosion that were identified for the proposed Project.

E. Hazards and Hazardous Materials

This alternative would reduce demand on fire protection services and water systems due to the reduced size of the larger buildings and intensity of development on the Project site. However, like the proposed Project, this alternative could potentially expose people and structures to wildland fire hazards. Similar to the proposed Project, these impacts would be less than significant with adherence to standard and non-standard conditions of approval imposed by the SBCFD.

F. Hydrology, Water Quality, and Water Supply

Under this alternative, potential impacts on hydrology and drainage, water supply, and water quality would be reduced compared to the proposed Project. Erosion, surface water runoff, and water quality impacts from construction and operation would be reduced due to the reduction in the area of site disturbance and corresponding decrease in the amount of impervious surface. Due to the reduced building area and congregation water demand would also be reduced compared to the proposed Project. Similar to the proposed Project, compliance with regulatory requirements would ensure that impacts on water quality would be less than significant. Overall, impacts associated with hydrology would be less than significant and less than the proposed Project.



Project beings to contribute traffic to the affected facilities. Accordingly, under the Opening Year (2018) scenario, the Project’s direct and cumulatively considerable impacts to the State Highway facilities would be significant and unavoidable.

5.1.4 LAND USE

The Project would result in an inconsistency with San Bernardino General Plan Policy M/CI 1.1 and Lake Arrowhead Community Plan Policy LA.CI 1.1 due to the Project’s significant and unavoidable transportation and circulation impacts identified above. The Project would incorporate the mitigation measures identified in DREIR Section 3.I; however, impacts would remain significant and unavoidable. Because General Plan Policy M/CI 1.1 addresses this issue and a significant and unavoidable land use impact is identified, this conclusion duplicates the impacts identified in DREIR Section 3.I.

5.2 REASONS WHY THE PROJECT IS BEING PROPOSED, NOTWITHSTANDING SIGNIFICANT UNAVOIDABLE IMPACTS

In addition to identification of the Project’s significant unavoidable impacts, CEQA Guidelines Section 15126.2(b) also requires that the reasons why the Project is being proposed, notwithstanding these impacts, be described. The reasons why this particular Project has been proposed are grounded in a comprehensive listing of Project objectives included in Chapter 2.0, *Project Description*, of this Draft DREIR. In general, the objectives of the proposed Project are to expand the existing Church of the Woods facilities to relieve space constraints; meet present and anticipated congregational needs for worship services, bible study, social gatherings, and recreational activities; provide meeting, and recreational facilities for local public and private organizations; retain 49.9% of the site as natural open space; and incorporate energy reduction, sustainable building practices, and water conservation into Project design and operation.

5.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines Section 15126.2(c) indicates that “[u]ses of nonrenewable resources during the initial and continued phases of the Project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the Project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified.”

The Project would necessarily consume limited, slowly renewable, and non-renewable resources. This consumption would occur during the construction phase of the Project and would continue throughout its operational lifetime. The proposed development would require a commitment of resources that would include: (1) building materials; (2) fuel and operational materials/resources; and (3) the transportation of goods and people to and from the Project site. Construction of the Project would require the consumption of resources that are not replenishable or which may renew so slowly as to be considered non-renewable. These resources would include the following construction supplies: certain types of lumber and other forest products; aggregate materials used in concrete and asphalt such as sand, gravel, and stone; metals such as steel, copper, and lead;



6.0 REFERENCES

6.1 DOCUMENTS APPENDED TO THIS DREIR

The following reports, studies, and supporting documentation were used in preparing the Church of the Woods Draft Revised EIR and are bound separately as Technical Appendices. A copy of the Technical Appendices is available for review at the County of San Bernardino Land Use Services Department, located at 385 North Arrowhead Avenue, San Bernardino, CA 92415.

Appendix A Notice of Preparation and Initial Study, Notice of Preparation Comments, Previous Staff Report, and Additional Comments

Appendix B Air Quality and Greenhouse Gas Analysis

Appendix C Habitat Assessment

Appendix D1 Geotechnical Update Report

Appendix D2 Earthwork Analysis Report

Appendix E1 Evacuation Plan [\(Revised April 2019\)](#)

Appendix E2 Fuel Modification Plan

Appendix F Drainage Study and Additional Water Supply Information

[Appendix F1 Addendum to Drainage Study](#)

Appendix G Noise and Vibration Impact Assessment

Appendix H Traffic Impact Analysis and Supplemental Correspondence

[Appendix I Updated Water Will Serve Letter](#)

DOCUMENTS INCORPORATED BY REFERENCE

The following reports, studies, and supporting documentation were used in the preparation of this DREIR and are incorporated by reference within this DREIR. A copy of the following reports, studies, and supporting documentation is a matter of public record and is generally available to the public at the location listed below and also are available for review at the County of San Bernardino Land Use Services Department, located at 385 North Arrowhead Avenue, San Bernardino, CA 92415..

Blaney, Megan, Public Information Officer, Office of Emergency Services, telephone conversation, June 23, 2009.

California Environmental Quality Act (CEQA), Public Resources Code Section 21000 et seq.