

SECTION 1: INTRODUCTION

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

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

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

This Final EIR document is organized as follows:

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

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

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

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

1.1 - Background and History

1.1.1 - Original Project EIR—2005

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

1.1.2 - 2010 Revised and Recirculated Project EIR No. 1

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

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

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

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

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

1.1.3 - 2011 Revised and Recirculated Project EIR No. 2

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

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

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

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

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

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

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

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

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

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

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

1.1.4 - 2020 Final EIR

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

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