

Thank you for the opportunity to provide continuing Input on this project before your approval.

Background

I have been involved with the potential development of this site for many years. I have visited the site several times, and as the Forest Biologist, I was responsible for helping make sure the Forest Service took care of imperiled species and other wildlife in their management of the adjacent Forest Service parcels.

I was a US Forest Service Wildlife Biologist responsible for wildlife in the San Bernardino Mountains for 30 years prior to retirement. For that entire time I worked with the County to jointly plan for and manage the land cooperatively to allow for reasonable development while maintaining the natural functioning ecosystem. The naturalness of the mountains is what makes the San Bernardino Mountains special to millions of residents and visitors as well as wildlife.

Problems with Decision and Recommendation of Planning Commission

The analysis and environmental documents do not meet the intent or the letter of CEQA. They are deficient in analysis of impacts, alternative consideration and evaluation, public involvement, full disclosure, and consideration of substantial public and agency input. In addition, required regulatory agency permits are pending that may severely alter the final project. Approving this project before permitting is not appropriate.

- the environmental documents severely underestimate the importance of the site impacts to wildlife, especially species that are threatened such as the southern rubber boa, California spotted owl, San Bernardino Mountain flying squirrel, and mountain lion. Problems with the under-estimation of impacts has been made clear in public and agency comment by experts and it was ignored and trivialized in the final EIR. The entire site is excellent habitat for all of these species, not just the acreage that has been identified as suitable. It is all suitable and high quality for all of the species of concern.

- the environmental documents underestimate the impacts of the loss of some of the highest quality old growth Mixed conifer forest habitat left on the mountain. In light of the fires in the last 20 years which have removed much of the forested area on the mountain, the analysis needs to recognize the importance of the proposed loss of this dwindling habitat type.

- the County and project proponent made no effort to really consider any off-site alternative, or an on-site alternative that would not be such a severe alteration of the habitat. Since the County is proposing a huge water diversion of Rimforest water down Little Bear Creek, the County and the church will need to mitigate significant impacts of the massive joint church/flood control project. The County has land on the mountain that should be evaluated for potential church site as an alternative. This could avoid doing the massive grading and filling required for the church project. Then the Church could be relocated to a better site and the Rimforest drain project could be conducted in the most natural and environmentally sensitive manner. Instead of the mountaintop removal and filling of the natural stream and its riparian habitat with dirt, minor modification of Little Bear Creek could be made to handle the flows and still have a naturally functioning stream.

- the documents fail to recognize the importance of the County recognized landscape linkage and wildlife corridor from the north side of the mountain to the south side right through the proposed project. For many species it is important to be able to move in search of food, water and cover throughout the year. This specific landscape linkage is important to mountain lion and spotted owls as well as hundreds of other more common species. This project and the interconnected flood control project will completely block this linkage and have regionally important impacts. This was made clear in the public comment period and ignored in the final EIR and response to comments.

- the County and the developer have not responded to a request to meet on the ground to look for ways to reduce the impact. Destroying old growth forest that is known habitat for imperiled species for athletic fields is totally counter to the past efforts by the County to manage the mountain to maintain forested areas and natural ecological function. Thirty years ago, the County was limiting new development to one dwelling unit per 2.5 acres as recommended by the southern Rubber Boa Advisory Committee, of which the County was a part. Putting a massive project in such critical habitat goes against all the efforts by the County to maintain naturalness in the mountains.

- the alternative of developing a sanctuary only on the flatter portion of the site has not been considered. Without the huge amount of grading and filling needed to put in athletic fields and gym, project impacts could be significantly reduced. More habitat for imperiled species could be protected and the critical landscape linkage/wildlife corridor could be protected. Little Bear Creek could be maintained in a more natural condition.

- Streambed alteration and endangered species take permits are required before construction and potential take of the species. Since this project and the Rimforest drainage project are interdependent, the two projects are connected and must be permitted in whole. A final project should not be approved by the County before the agency permitting and final permitted design is approved. The massive amount of cut and fill required to flatten the mountain and canyon may never be approved by the regulatory agencies.

- This is the wrong project for this area. Natural forest habitat is being lost annually due to fires and climate change. Destroying a significant amount of this rapidly decreasing habitat for athletic fields and parking lots is not an appropriate use and has not been adequately analyzed.

I request that you not approve the project as proposed. I ask that the developer, County Planning, and Flood Control work on an alternative site for the church and athletic fields that will allow preservation of the site's imperiled species habitat, old growth forest, near natural stream, and landscape linkage.

I request that an alternative with just a sanctuary be considered which could be located without a huge amount of cutting and filling while maintains some naturalness.

I request that the CEQA documents not be approved until they are made legally responsive to the issues and biological significance of the impacts,

Summary

If the Board of Supervisors approves this project as currently proposed, there is no way the courts would uphold the decision. The analysis of effects on imperiled species is woefully inadequate even though the importance of the site and unavoidable adverse effects on Threatened wildlife was clearly provided by species experts including biologists from San Bernardino Valley Audubon and California Dept. of Fish and Wildlife. The public involvement as documented in the final reports does not meet the legal requirements for CEQA. There was no real response to public and agency comments regarding wildlife and scientifically based impacts, and the need for redesign in at least some alternatives. This CEQA process has only been a justification exercise for a pre-determined outcome. That does not meet the legally required standard for CEQA. I recommend you delay a decision that will end up costing the proponent more money with no resulting project approval.

Please involve me in further efforts to make the project more compatible with wildlife and ecosystem health.

Steve Loe, Certified Wildlife Biologist (TWS)