FINAL MITIGATED NEGATIVE DECLARATION

for the

HUME SOCAL CAMPGROUND EXPANSION PROJECT

Lead Agency:

County of San Bernardino
Land Use Services Department
385 N. Arrowhead Avenue, 1st Floor
San Bernardino, CA 92415

Applicant:

Hume Lake Christian Camps
5545 Hume Lake Road
Fresno, CA 93727

Prepared By:

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September 2026

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1.0 INTRODUCTION

1.1 Introduction

The County of San Bernardino (County) has prepared this Final Mitigated Negative Declaration (MND) in compliance with the California Environmental Quality Act (CEQA) for the Hume SoCal Campground Expansion Project (Project). The County is required, following completion of an Initial Study/Mitigated Negative Declaration (IS/MND) (State Clearinghouse No. 2025110453), to provide public agencies with jurisdiction and the general public with an opportunity to review and comment on the IS/MND. The IS/MND was circulated for public review from November 13, 2025 through January 16, 2026. The preceding Table of Contents lists all persons, organizations, and public agencies that commented on the IS/MND.

The County has reviewed and considered comments on environmental issues received during the public review period. Although CEQA does not require written responses to comments for a Mitigated Negative Declaration, the County has prepared written responses to comments received in order to clarify the environmental analysis and assist decision makers and the public with their understanding of the environmental analysis. These responses focus on environmental issues raised in comments and reflect the County's good-faith consideration of the comments received. Responses to comments are provided in **Section 2.0, Comments and Responses**.

Where responses to comments or internal review identified the need for clarifications, corrections, or minor revisions to the IS/MND, such changes are provided in **Section 3.0, Errata**. Added or modified text is shown by double underlining (example), while deleted text is shown by striking (~~example~~). The revisions and errata do not introduce new avoidable significant environmental effects, do not require new mitigation measures to reduce impacts to a less-than-significant level, and therefore do not constitute substantial revisions requiring recirculation of the IS/MND pursuant to CEQA Guidelines Section 15073.5.

CEQA Guidelines Section 15074 provides that, prior to approving a project, the decision-making body shall consider the proposed Mitigated Negative Declaration together with any comments received during the public review process. Accordingly, the MND consists of:

(a) The Initial Study and Mitigated Negative Declaration, including revisions and errata;

(b) Comments received on the IS/MND during the public review period;

(c) A list of persons, organizations, and public agencies commenting on the IS/MND;

(d) The County's consideration of environmental issues raised in comments, including written responses provided for informational purposes; and

(e) Any other information added by the Lead Agency.

Written responses to comments have been provided to public agencies and other commenters who submitted comments on the IS/MND. The IS/MND, including comments, responses, and errata, will be made available to the general public through the County's Land Use Services Department and on the County's website prior to consideration by the Planning Commission.

The IS/MND, along with other relevant information and public testimony received at the Planning Commission and County Board of Supervisors public hearings, will be considered by the County's Board of Supervisors. Next, the Planning Commission would recommend MND certification and Project approval to the County Board of Supervisors.

1.2 Organization of MND

This MND provides the requisite information required under CEQA and is organized as follows:

- **Section 1.0: Introduction.** This section provides an introduction to the MND, including the requirements under CEQA, the organization of the document, as well as a summary of the CEQA process activities to date.
- **Section 2.0: Comments and Responses.** This section provides a list of public agencies, organizations, and individuals who commented on the IS/MND, a copy of each written comment received, and a written response demonstrating good-faith consideration.
- **Section 3.0: Errata to the IS/MND.** This section presents clarifications, amplifications, and insignificant modifications to the MND, identifying revisions to the text of the document.

1.3 CEQA Process History

The County has complied with relevant Public Resources Code provisions and CEQA Guidelines regarding the preparation and processing of the Project MND. A brief summary of the Project's CEQA process is as follows:

- A Notice of Availability (NOA) and Notice of Intent (NOI) informing interested parties and agencies of the Project's IS/MND and comment period was distributed on November 12, 2025.
- A Notice of Completion (NOC), the IS/MND, and NOA/NOI were distributed for public review and comment for a 64-day period, beginning November 13, 2025. The public review period closed on January 16, 2025.
- A neighborhood meeting was held at the Project site on December 20, 2025.

1.4 Changes to the IS/MND

As previously stated, **Section 3.0, Errata**, details the changes to the IS/MND. In response to public comments and relevant information, text changes have been made to IS/MND sections to clarify and amplify the analysis or mitigation measures, and to make insignificant modifications to the IS/MND. These changes do not alter the conclusions of the IS/MND, and all potential environmental impacts remain mitigable to a less than significant level. The revisions and additional information included in the Errata do not constitute new avoidable significant environmental effects, do not result in a substantial increase in the severity of any environmental impact, and do not require new or revised mitigation measures to reduce impacts to a less-than-significant level. No new or more severe impacts have been identified as a result of these revisions. Accordingly, the changes do not warrant recirculation of the IS/MND pursuant to California Public Resources Code Section 21092.1 and CEQA Guidelines Section 15073.5.

As discussed herein and as elaborated upon in the Responses to Comments, none of the clarifications or modifications presented in the Errata reflect identification of a new avoidable significant environmental effect, a determination that proposed mitigation measures would be insufficient to reduce impacts to a less-than-significant level, or the need for additional feasible project alternatives or mitigation measures. Nor does the Errata indicate that the IS/MND was so fundamentally inadequate or conclusory that meaningful public review and comment were precluded.

In all cases, the clarifications and minor revisions included in the Errata support the existing environmental analysis and conclusions, respond to issues raised by commenters, and do not identify new or substantially more severe environmental impacts beyond those previously disclosed. Therefore, the public has not been deprived of a meaningful opportunity to comment on a substantial adverse environmental effect of the Project or on a feasible project alternative or mitigation measure. Instead, the information added supports the existing analysis and conclusions and responds to inquiries made from commenters.

CEQA Guidelines Section 15073.5 describes the circumstances under which recirculation of a negative declaration, including a Mitigated Negative Declaration is required prior to adoption, stating in part:

"(a) A lead agency is required to recirculate a negative declaration when the document must be substantially revised after public notice of its availability has been given pursuant to Section 15072, but prior to its adoption.

(b) A 'substantial revision' means:

(1) A new, avoidable significant effect is identified and mitigation measures or project revisions must be added to reduce the impact to insignificance; or

(2) The lead agency determines that the proposed mitigation measures or project revisions will not reduce impacts to a less-than-significant level.

(c) Recirculation is not required where the changes merely clarify, amplify, or make insignificant modifications to the negative declaration."

2.0 COMMENTS AND RESPONSES TO DRAFT ISMND

This Section includes all comments received by the County on the Draft Initial Study/Mitigated Negative Declaration (IS/MND), including written comments and comments submitted online via email to the County. The County circulated the Draft IS/MND as required by CEQA. The review period ran for 64 days from November 13, 2025, through January 16, 2026.

2.1 Introduction to Comments and Responses

During the public review period for the Initial Study/Mitigated Negative Declaration (IS/MND), the Lead Agency received written comments from the parties listed in Table 2-1. Copies of the written comments, as transmitted to the Lead Agency, are included in this Section for reference and have been annotated with the assigned letter along with a number for each comment. Each comment is followed by a written response which corresponds to each commenter.

Table 2-1: IS/MND Commenters

Reference	Commenter	Date
Regional		
R1	CAL FIRE, San Bernardino David Haas	January 5, 2026
R2	California Department of Fish and Wildlife Kim Freeburn, Environmental Program Manager	January 7, 2026
R3	San Bernardino County Department of Public Works Nancy Sonsonetti, Supervising Planner Chris Nguyen, Engineering Manager	January 7, 2026
R4	San Bernardino County Fire Protection District Curtis Markloff	January 7, 2026
R5	U.S. Fish and Wildlife Service, Palm Springs Shaun Olson, Wildlife Biologist	January 6, 2026
Local		
L1	Arrowbear Park County Water District Chris Dumas, General Manager	January 6, 2026
L2	Crestline-Lake Arrowhead Water Agency Jennifer Spindler, General Manager	November 19, 2025
L3	Crestline-Lake Arrowhead Water Agency Jennifer Spindler, General Manager	January 6, 2026
L4	Green Valley Mutual Water Company Steve Brandt, General Manager	January 5, 2026
L5	Running Springs Water District Chris Jones, General Manager	November 21, 2025
L6	Running Springs Water District Chris Jones, General Manager	January 6, 2026
Organizations/Interested Parties		
O1	Concerned Residents of Running Springs	January 6, 2026
O2	GVL Disaster Team Kathleen Benjamin, Coordinator	December 17, 2025
O3	GVL Recreation, Inc. Board of Directors:	December 18, 2025

	Jerry Miller, President Bergen Moore, Vice President Kathleen Benjamin, Secretary/Treasurer Donna Mammone, Director Amy Cook, Director	
O4	GVL Recreation, Mountain Community Alliance, GVL Disaster Team, Community Businesses, and Local Residents of Green Valley Lake, California Pat Huckaby, Chairperson Kathy Benjamin, Secretary/Treasurer, Project Coordinator	December 17, 2025
O5	Institute for Watershed Resiliency Jennifer B. Alford, Director	January 6, 2026
O6	Mountain Community Alliance Patrick Huckaby, President	December 3, 2025
O7	Mountain Rim Fire Safe Council Laura Dyberg	January 6, 2026
O8	Save Our Forest Association Kevin P. Bundy, Shute, Mihaly & Weinberger LLP Shasta Fields, Shute, Mihaly & Weinberger LLP Kristi Bascom, Shute, Mihaly & Weinberger LLP	January 7, 2026
O9	Save Our Forest Association, Inc. Hugh A. Bialecki, President	December 22, 2025
O10	Save Our Forest Association, Inc. Hugh A. Bialecki, President	November 20, 2025
O11	Save Our Forest Association, Inc. Hugh A. Bialecki, President	January 7, 2026
O12	Save Our Forest Association, Inc. Hugh A. Bialecki, President	January 15, 2026
O13	Sierra Club, San Bernardino Mountains Group Steven Farrell – Chair	November 26, 2025
O14	Sierra Club, San Bernardino Mountains Group – San Gorgonio Chapter Steven Farrell – Chair	N/A
O15	Western Christian Schools Kathy Scheenstra, Director of Community & Student Life Brandon Doolittle, Principal, Western Christian High School John Attwood, Head of Schools	January 6, 2026
General Public		
G1	Albert Espinoza	January 6, 2026
G2	Alex Davis	January 6, 2026
G3	Alexis Dickson	January 5, 2026
G4	Amanda Lopez	December 16, 2025
G5	Amanda Lopez	January 2, 2026
G6	Amy Cook	December 30, 2025
G7	Andrea Pereira	January 5, 2026
G8	Angelique Womack	January 4, 2026
G9	Ann K. Zald	January 4, 2026
G10	Avery Wilhite-Medina	January 2, 2026
G11	Barbara Basham	January 12, 2026
G12	Beverly Bernice Voelkelt	January 14, 2026

G13	Bob Mull	January 16, 2026
G14	Brad and Karen Theriault	January 7, 2026
G15	Brenna Cunningham	December 11, 2025
G16	Brenna Cunningham	January 7, 2026
G17	Brett Jensen	January 5, 2026
G18	Briana Lynn	December 30, 2025
G19	Bruce Phillips	January 5, 2026
G20	Carlo Luzzi	January 7, 2026
G21	Caroline Lee	January 4, 2026
G22	Catherine Beckman	January 2, 2026
G23	Chad Castor	January 2, 2026
G24	Chris Tanton	January 7, 2026
G25	Christina Sogi	January 6, 2026
G26	Cindy Lawrence	January 14, 2026
G27	Craig Steele	December 22, 2025
G28	Dan and Lauryl Schumacher	January 7, 2026
G29	Daniel and Kathy Cortez	January 7, 2026
G30	Danielle Shapira and Matt	January 5, 2026
G31	Dan Kohne	January 17, 2026
G32	D'Anne Goatcher	January 5, 2026
G33	Dave and Lori Clapper	January 5, 2026
G34	Dave Gumpertz	January 5, 2026
G35	Dave Rainey	December 15, 2025
G36	David A. Burt	January 5, 2026
G37	David A. Burt	January 5, 2026
G38	Dennis Foster	November 19, 2025
G39	Dino Luzzi/Anne Luzzi	N/A
G40	Elias and Nadia Barhoum	January 5, 2026
G41	Emilie Reagan	January 7, 2026
G42	Eric Hooker	December 24, 2025
G43	Eric Toth	January 1, 2026
G44	Erick Sheldon	January 5, 2026
G45	Ernie Poulin	January 13, 2026
G46	Eugene and Lori Medina	January 6, 2026
G47	Eun Ah Kim	January 16, 2026
G48	Eve Sinclair	December 10, 2025
G49	Gabriel Cristales	January 6, 2026
G50	Gina Galbo	December 11, 2025
G51	Gloria McNamara	January 14, 2026
G52	Grace Lopez	December 15, 2025
G53	Grace Lopez	January 1, 2026
G54	Grace Monsma	January 4, 2026
G55	Guy and Susan Bredesen	January 7, 2026
G56	Jadwiga Hescox	January 5, 2026
G57	James Higgins	January 6, 2026
G58	Jan Jones	January 2, 2026
G59	Jean Konnoff	January 7, 2026
G60	Jeff Stanners	January 2, 2026
G61	Jennie Seidewand	January 7, 2026
G62	Jeremiah Brenner	January 7, 2026

G63	Jerry and Kathleen Benjamin	N/A
G64	Jessie Birschbach	January 2, 2026
G65	Jillian Gomez	December 21, 2025
G66	Jim Stone	January 6, 2026
G67	Jodi Walters	January 2, 2026
G68	John A. Giarelli	January 2, 2026
G69	Joseph Parcells	January 5, 2026
G70	Joyce Deniz	January 7, 2026
G71	Juan M. Armenta	January 2, 2026
G72	Juan M. Armenta	January 2, 2026
G73	Judy and Kip Gomez	November 22, 2025
G74	Judy and Kip Gomez	December 18, 2025
G75	Judy Gomez	November 22, 2025
G76	Julia Irving Gregory	January 7, 2026
G77	Justine Whitehead	January 4, 2026
G78	Kari Helton	January 2, 2026
G79	Kayliegh Rashad	January 6, 2026
G80	Kersey Orton	January 7, 2026
G81	Kevin Cunningham	January 5, 2026
G82	Kip Gomez	January 6, 2026
G83	Kristy Miller	N/A
G84	Kylie Buchanan	January 7, 2026
G85	Leah DeSoucy	January 5, 2026
G86	Lee DeBrabander	December 23, 2025
G87	Leilani Wood	January 2, 2026
G88	Leslie A. Rossiter	January 5, 2026
G89	Lorenzo Cervantes	January 5, 2026
G90	Lorri DeBrabander	December 26, 2025
G91	Marcia Priest and Don Cowgill	January 6, 2026
G92	Margeret Cashion	January 2, 2026
G93	Margeret Cashion	January 18, 2026
G94	Matthew and Tiffany Medina	January 6, 2026
G95	Matthew Ele	November 18, 2025
G96	Matthew Ele	December 13, 2025
G97	Maureen Mann	January 16, 2026
G98	Meghan Scoggins	January 2, 2026
G99	Michael Ploessel	January 16, 2026
G100	Mike and Claudia Pohl	January 2, 2026
G101	Mike and Julia Rappleyea	January 4, 2026
G102	Miro Galbo	December 12, 2025
G103	Nancy J. Walters	December 9, 2025
G104	Nancy Kevorkian	N/A
G105	Nancy Kevorkian	November 24, 2025
G106	Nancy Larsh	January 7, 2026
G107	Nancy Russell	January 14, 2026
G108	Natalie Lopez	December 15, 2025
G109	Natalie Lopez	December 30, 2025
G110	Natalie Reinert	January 5, 2026
G111	Nate Medina	N/A
G112	Nathan Nikolas Guerra	January 7, 2026

G113	Nick Zalenski	January 7, 2026
G114	Nicole Mitescu	December 16, 2025
G115	Nicole Mitescu	January 2, 2026
G116	Oren Siegel	November 25, 2025
G117	Patrick Huckaby	December 3, 2025
G118	Patti Huber	January 6, 2026
G119	Patti L Clarkson	January 7, 2026
G120	Paul Lackey	January 6, 2026
G121	Randy Varela	January 8, 2026
G122	Rbstuff@charter.net	January 7, 2026
G123	Reneemibeck@gmail.com	January 5, 2026
G124	Richard Luczyski	December 12, 2025
G125	Richard Luczyski	January 10, 2026
G126	Richard Watts	January 6, 2026
G127	Robert & Jolene Sedita Jr.	January 6, 2026
G128	Robert Perrill	January 6, 2026
G129	Robert Sedita Sr.	January 6, 2026
G130	Robert Stepp	January 6, 2026
G131	Ron Pearne	December 5, 2025
G132	Sandra Huckaby	November 17, 2025
G133	Sandy Ellis	December 4, 2025
G134	Sara Green	January 7, 2026
G135	Sarah Brennan	January 2, 2026
G136	Sean Ratliff	January 7, 2026
G137	Seth Scoubart	January 2, 2026
G138	Sharon Arvilla	December 13, 2025
G139	Sharon DiSanto	December 16, 2025
G140	Sonia A. Montoya	January 7, 2026
G141	Stephen A. Mueller	January 5, 2026
G142	Steve Loe	December 3, 2025
G143	Steve Loe	January 5, 2026
G144	Steven Benz	December 11, 2025
G145	Sue Walker	November 25, 2025
G146	Susan Carl	January 7, 2026
G147	Terry and Diane Murphy	December 16, 2025
G148	Tessa Dicx	January 7, 2026
G149	Thomas and Julie Vance	January 5, 2026
G150	Thomas Lawrence	January 3, 2026
G151	Thu Buu and Lyle Such	January 4, 2026
G152	Tim Callahan	January 4, 2026
G153	Timothy Krantz	January 4, 2026
G154	Todd Arnett	January 5, 2026
G155	Tommy Tomblin	January 3, 2026
G156	Toni Frederick	January 2, 2026
G157	Tyler Lambert-Perkins	January 7, 2026
G158	Tyler Reed	January 5, 2026
G159	William and Marguriette Bowden	January 5, 2026

2.2 Master Responses

Topic and Reference	Response
Transportation/Traffic	The Transportation Section of the IS/MND prepared a Traffic Analysis that is included as **Appendix J** of the IS/MND and determined that traffic conditions, existing road infrastructure and access would be adequate to service the expanded Project site. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. As evaluated in the IS/MND (**Section 4, Transportation**), the Project would not modify existing roadways, and Project-related traffic would not create a significant hazard or adversely affect emergency access. A Traffic Signal Warrant Analysis was conducted and determined the Project would not result in traffic generation requiring additional traffic signals in the area. Additionally, there are no sight distances issues as there are no steep grades or obstructive landscaping that are proposed. Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road, and one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. As proposed, the Project would not increase slopes onto Green Valley Lake Road compared to existing conditions, nor would Project implementation introduce new hazards that exacerbate the existing slope of Green Valley Lake Road. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Seasonal weather conditions and snow removal are addressed by existing County road maintenance operations.
Wildfire	As analyzed in the IS/MND (**Section 4, Wildfire**) through **Appendix K: Emergency Plan and Procedures**, the Project site is located within a Very High Fire Hazard Severity Zone (VHFHSZ). The Project would be required to adhere to mitigation measure (MM) WF – 1, which ensures a comprehensive evacuation plan is utilized and would comply with all conditions of approval (COA) provided by fire jurisdictions. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on-site occupancy prior to peak hazards conditions. These procedures supplement fire code requirements

	and are reflected in the IS/MND's wildfire analysis. The Plan includes a four-phase plan when responding to an evacuation notification by government authority: Phase I - Evacuation Warning - Activate Evacuation Plan; Phase II - Evacuation Order - Alarm Sounds; Phase III – Evacuation; and Phase IV - Evacuation Location. The Plan also includes a Transportation Emergency Plan which is developed for the response to potential camper/guest transportation emergencies that might arise on mountainous roadways which are subject to roadway issues, including wildfires. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Wildfire impacts would be further reduced to less than significant with the implementation of MM WF - 2 and 3 which requires compliance with existing and proposed development standards such as undergrounded power lines. The measures also reduce risk through requiring fire-resistive plants. Furthermore, the Project is subject to the County FS Overlay that includes areas designated as extremely high fire hazard severity zones by CAL FIRE. Due to this, the Project would be subject to additional development standards (such as setback requirements, fuel modification zones, vehicular access, building separation, erosion and sediment control, and other design requirements) to provide greater public safety in these fire-prone areas. Each project located in the FS Overlay that goes through the entitlement process must submit a fuel modification plan that addresses fuel loading, ungraded slopes, maintenance, on-site water availability, and landscaping. In addition, each proposed development must comply with FS Overlay general development standards (County Development Code Section 82.13.050), including but not limited to: • Site and emergency access that requires a minimum of two points of ingress and egress, and minimum width of 26 feet of all-weather surface for roads; • Vehicular access to water sources, including ponds, lakes, swimming pools, reservoirs, and water storage tanks; and • Permanent fuel modification areas around a development projects or portions adjacent or exposed to hazardous fire areas. Lastly, a Preliminary Fire Fuel Modification Plan has been prepared for the Project. The Fuel Modification Plan designates Zones A, B, and C, which represent buffer zones around each structure extending to

	the property line. Zone A extends from the outer edge of the structure or appendage to 20 feet. Zone B extends 80 feet from the edge of Zone A, and Zone C extends up to 200 feet from the edge of Zone B. Each buffer zone includes landscaping, fuel load, and irrigation design considerations that would reduce the severity and progress of wildfire within the Project site.
Fire Service Capacity	The IS/MND (**Section 4, Public Services**) evaluates fire protection needs and concludes that the Project would not represent a potential need for expanded fire protection in the area or affect service and response times. SBC Fire already provides services for the Project site and has significant resources in place for the Project site. Since no new housing aside from seasonal/temporary housing for campground staff would be constructed as a result of this Project, and therefore no new permanent residents added to the HCAG area, the Project would not represent a potential need for expanded fire protection in the area or affect service and response times. Additionally, the Project would comply with the County Fire District Standards, California Fire Code (CFC) and CBC, including Project features that aid in fire safety and support fire suppression activities, such as fire sprinklers, paved access, and required aisle widths. Based on the Project site's proximity to two existing fire stations, the Project would be adequately served by fire protection services, and no new or expanded unplanned facilities would be required. Prior to commencement of any construction activities, and pursuant to the San Bernardino County Code of Ordinance Section 85.01, the Project design plans would be reviewed by all applicable local agencies, including the SBC Fire and RSFD, prior to approval of building permits to ensure compliance with the County's Development Codes and Ordinances, the HCAG area, and all applicable emergency response and fire safety requirements of the SBC Fire, RSFD, and the CFC. Overall, the Project would receive adequate fire protection services and would not result in adverse physical impacts associated with the provision of or need for new or physically altered fire protection facilities, and would not adversely affect service ratios, response times, or other performance objectives. Compliance with applicable local and state regulations would ensure that the Project implementation would result in a less than significant impact to fire protection services.
Biological Resources/Wildlife	Natural areas would be impacted by implementation of the Project; however, a large portion of the Project site would remain in its natural condition. Additionally, the Biological Resources Assessment, which is further described in the Biological Resources Section of the IS/MND, has determined that less than significant impacts would

	occur with implementation of mitigation measures (MM) BIO – 1 and -2 which require pre-construction clearance surveys and compliance with the Migratory Bird Treaty Act and California Fish and Game Code. No special-status plant species were observed during the field investigation. There is the potential for special-status plant species to be present on-site; however, of those identified, none are federally or state listed as endangered or threatened. No special-status animal species were observed during the field investigation. There is the potential for special-status animal species to be present on-site. Of those identified, the arroyo toad is listed as federally endangered; golden eagle is federally protected; southern rubber boa is listed as threated in California; and bald eagle is listed as endangered in California and is federally protected. MMs BIO-1 and -2 would be implemented to ensure proper screening for these and other potentially present special-status wildlife species.
Request for EIR	Under CEQA, the Lead Agency, San Bernardino County, determines the appropriate level of environmental review. The IS/MND evaluates all environmental topic areas required under CEQA and identifies compliance requirements and mitigation measures that reduce all potentially significant impacts to less than significant levels. There is not substantial evidence presented that the IS/MND is inadequate or that any significant unavoidable impacts would remain unmitigated. Therefore an Environmental Impact Report (EIR) is not required.
Economic/Social	CEQA does not treat economic or social effects as significant environmental impacts unless they result in an environmental impact. The IS/MND evaluates environmental effects. No new environmental effects are presented that were not addressed in the IS/MND. No revisions are necessary.
Additional Documentation	The IS/MND was prepared consistent with CEQA requirements and concludes that all potentially significant impacts can be reduced to less than significant levels with compliance with existing regulations and mitigation measures, where applicable. CEQA document selection and public-hearing requirements are determined by the Lead Agency. There is no new substantial evidence that the IS/MND is inadequate or that an EIR is required. No revisions to the IS/MND are warranted.
Public Hearing/Review	Public review periods for IS/MNDs are established by the Lead Agency. The Notice of Availability and Notice of Intent to adopt an IS/MND for the Hume SoCal Campground Extension public review and commenting began 11/13/2025 and closed with an extended deadline on 1/16/2026, during which an in-person neighborhood meeting was held on 12/20/25 by Kimley-Horn. Following the public comment period, a virtual meeting was held on 3/12/26 by Kimley-Horn. Both meetings offered a platform to get additional information on the Project and share questions and comments. Notices of the

	public review period and accompanying meetings were conducted with the Project's mailing list, which includes a buffer zone around the Project site, interested parties, and people who have requested to be notified regarding the Project.
Water	The IS/MND, consistent with CEQA, analyzes water supply (**Section 4, Utilities and Service Systems** and **Section 4, Hydrology and Water Quality**) through **Appendix B3: Water and Sewer Master Plan**, and the 1st Draft Water Supply Assessment (WSA). Following circulation of the Draft IS/MND, the WSA has been updated (refer to **Appendix B1: Revised Water Supply Assessment**). The revised WSA recommends that the existing on-site groundwater wells serve the camp up to phase 3. The three existing active domestic wells (Wells 1, 4, and 5) have a combined planning-level production capacity of approximately 163,440 GPD, which exceeds full buildout demand under the base case scenario by approximately 28 percent. The Revised WSA identifies an adequate water supply pathway through Phase 3 using the Camp's on-site wells and storage. Prior to proceeding with each phase, water quality and drawdown/recovery testing will confirm the wells, operating rates, and treatment included in the phase water strategy. Before issuance of the certificate of occupancy for the final Phase 3 improvements, the Camp will complete the required infrastructure improvements to establish the CLAWA connection and enable supplemental deliveries. After Phase 3, the Camp will prepare an annual water supplier expectations memorandum following CLAWA's receipt of its draft annual State Water Project allocation. The memorandum will identify the anticipated peak-period population, projected demand, available on-site supply, and any requested CLAWA deliveries for the upcoming year. During drought or low-allocation years, the planned guest/staff population may be required to be reduced if verified on-site supply and confirmed CLAWA deliveries are insufficient. The assessment demonstrates that sufficient water is available to serve the Project via groundwater wells through phase 3, after which the Project Applicant will prepare an annual water supplier expectations memorandum. The phased approach allows the Project to initiate construction and obtain building permits for initial phases based on the reliance of on-site wells, while concurrently formalizing the CLAWA service agreement for later phases. Should the connection with CLAWA be established, infrastructure improvements would be required, and a formal water service agreement with CLAWA would need to be executed. Therefore, MM UTL-2 would be added and implemented as follows: Prior to approval of the Phase III FDP Approval and/or an increase of total guest/staff population which exceeds 1,924 guests, as noted in the Hydraulic Evaluation, the following shall occur:

	A. As established in a separate agreement, Crestline-Lake Arrowhead Water Agency (CLAWA) shall design, install, and own an upsized water meter assembly and vault and Hume SoCal Campground (Hume) shall reimburse CLAWA for the same. Hume shall install further infrastructure improvements, designed as required and approved by CLAWA including the standards and criteria governing wholesale connections, prior to the issuance of the Certificate of Occupancy by San Bernardino County for the final building improvements associated with the construction of Phase III. These improvements shall include the following: • Lateral pipeline upsizing to allow for greater water delivery rates. • Upgrade of existing backflow prevention facilities to accommodate upsized water meter and associated lateral pipeline. • Install an additional on-site water tank to allow for reliable water deliveries. • All construction/improvement plans shall be submitted to both the County and CLAWA for review and approval prior to installation of improvements. B. After Phase III is completed, by October 1 of each year, Hume (or the campground's then-current operator if not Hume) shall prepare an expected peak period camper population (peak population anticipated during summer) and anticipated water supplier expectations memo to the satisfaction of CLAWA staff to determine anticipated water usage demands and service need for the upcoming water year. The guest/staff population and supplier expectations memo shall identify whether Hume anticipates requesting water from CLAWA based on its draft adequate water allocations from the California Department of Water Resources or, rather, if Hume anticipates providing water service from its on-site water storage tanks and other sources for that water

	year. During extremely low allocation years, or drought years as determined by CLAWA staff, CLAWA may reduce deliveries to Hume or cease them altogether in its discretion, and Hume may be required to reduce guest/staff population at the campground as a result. CLAWA commits to providing as much water to Hume as it can in any given water year while still meeting its obligations to other customers in its service area. The Project applicant has paid and delivered materials for a hydrologic study done by Albert A. Webb Associates for CLAWA, included as **Appendix M**: **Hydraulic Evaluation**. It is recommended that prior to proceeding with each phase, the Project Applicant complete drawdown, recovery testing, and updated water quality testing for the wells serving that phase and use the results to confirm the phase water supply strategy and any required treatment. Therefore, MM HYD-1 would be implemented as follows: The Applicant shall conduct well drawdown tests, recovery testing, and water quality retesting before proceeding with each phase, for the wells serving that phase, and use the results to confirm the phase water supply strategy and any required treatment. The County of San Bernardino is within the Lahontan RWQCB. Pursuant to the Clean Water Act, in 2009, the SWRCB issued a statewide general National Pollutant Discharge Elimination System (NPDES) Permit for stormwater discharges from construction sites (NPDES No. CAS000002). Under this permit, discharges of stormwater from construction sites with a disturbed area of one or more acres must obtain individual National Pollutant Discharge Elimination System (NPDES) permits or be covered by the General Permit—i.e., by filing a Notice of Intent with the SWRCB and developing and implementing a Storm Water Pollution Prevention Plan (SWPPP). Additionally, since the Project site is not located within the MS4 Phase I boundary, there are no proposed BMPs on site since storm water runoff is not required to be treated. There will be offsite drainage conveyed through the site through the various existing streams located within the site limits. The off-site runoff remains unchanged from the existing to the proposed and is not anticipated to cause any negative impacts downstream or to proposed infrastructure. Using the retention volume achieved from routing impervious areas to pervious areas, the proposed development is expected to generate negligible additional run-off downstream for

	storms up to the 100-year condition when compared to the existing condition. With implementation of the Preliminary Hydrology Study findings and compliance with the NPDES permit requirements, Project construction would not violate any water quality standards or waste discharge requirements, or otherwise substantially degrade surface or groundwater quality. There will be off-site drainage conveyed through the site through the various existing streams located within the site limits. The off-site runoff remains unchanged from the existing to the proposed condition and is not anticipated to cause any negative impacts downstream or to proposed infrastructure. Using the retention volume achieved from routing impervious areas to pervious areas, the proposed development is expected to generate negligible additional run-off downstream for storms up to the 100-year condition when compared to the existing condition. The IS/MND concludes that water-supply impacts would be less than significant with compliance with applicable standards and mitigation.
Noise	Noise impacts were evaluated in the IS/MND (**Section 4, Noise**), which found that construction and operational noise levels associated with the Project would comply with applicable County noise standards and would result in less than significant impacts. The nearest sensitive receptors are located at Camp Pondo, approximately 1,200 feet to the east. There are also single-family residential uses located approximately 1,540 feet to the south; however these residential uses are located on the opposite side of a hill and would be shielded from Project noise. Construction noise levels would not exceed the 85-dBA threshold at the nearest receptor. Additionally, compliance with Section 83.01.080(G) (Exempt Noise) of the County of San Bernardino Development Code would minimize impacts from construction noise, as construction would be limited to daytime hours. Construction noise may be generated by large trucks moving materials to and from the Project site. Grading would require approximately 157,415 cubic yards of export which would result in approximately 224 roundtrip truck hauling trips per day during the grading phase. Construction would result in approximately 171 worker trips per day. Noise generated from construction traffic would increase short-term noise; however, these noise levels are temporary and would cease once construction is complete. The trucks associated with construction would occur during the allowable hours

	for construction specified in the Development Code (7:00 a.m. to 7:00 p.m. on weekdays and Saturdays, excluding federal holidays). Trucks (including trucks hauling excavated material) would also occur during the allowable daytime hours only. The exterior noise standards for mobile sources near commercial land uses (Camp Pondo, the nearest sensitive receptor) are 60 dBA CNEL. Based on calculations, construction traffic noise would attenuate to 51.8 dBA. Therefore, although construction traffic may result in a barely perceptible increase to traffic noise, noise levels would not exceed the County's standard for mobile sources. As a result, construction traffic noise impacts would be less than significant. The primary operational noise sources associated with the campground would be an outdoor public address (PA) system, live music, campground noise, and off-site traffic noise. The proposed PA system for announcements, music, etc., would not exceed the County's 60 dBA threshold (daytime and nighttime) for commercial uses (Camp Pondo) from stationary noise sources. Furthermore, additional noise attenuation would be provided by surrounding intervening terrain between the Project site and sensitive receptors. Live music at the Project site would not exceed the County's 60 dBA threshold for commercial uses from stationary noise sources. Campground noise would be below the San Bernardino County's 60 dBA standard for commercial uses from stationary noise sources. Lastly, off-site traffic noise would not be sufficient to result in a permanent 3-dBA increase in ambient noise levels. Therefore, noise impacts associated with traffic would be less than significant.
Scale/Zoning	The Project is consistent with the existing HT/SD-RES zoning and Rural Living land use designation, which permits campground uses subject to County review. Following agency comments, public comments, and additional technical coordination with the water supplier (Crestline-Lake Arrowhead Water Agency [CLAWA]), the Applicant has reduced the Project's proposed maximum occupancy from approximately 3,000 to approximately 2,400 occupants. This refinement reduces the Project's maximum on-site population and associated impacts to water, wastewater, traffic, noise, and wildfire relative to the scenario evaluated in the circulated IS/MND. The IS/MND intentionally evaluated a conservative, worst-case scenario of operating conditions at 3,000 occupants. The Project would continue to include 5 phases, which would individually occur over many decades, gradually increasing capacity. Because the revised 2,400 occupancy limit is less impactful than the total analyzed in the IS/MND, the change does not create a new significant environmental effect, substantially increase the severity of a previously identified significant effect, or present new information of substantial

	importance. Accordingly, no further environmental review or recirculation is required, and all conclusions in the IS/MND remain valid or are more conservative under the reduced occupancy scenario.
Wastewater/Sewer	Following additional coordination, Appendix B2 has been revised and is included as **Appendix B2: Revised Sewer Feasibility Study**. The MND consistent with CEQA (**Section 4, Utilities and Service Systems** and **Section 4, Hydrology and Water Quality**) through **Appendix B2: Sewer Feasibility Study** and **Appendix B3: Water and Sewer Master Plan**, analyzes sewer capacity and incorporates mitigation measure (MM) UTL-1, which has been revised, and requires that prior to approval of each phase, the Project applicant shall evaluate the available treatment and disposal capacity of the approved on-site wastewater treatment plant (WWTP) to confirm adequate treatment capacity, disposal capacity, operational performance, regulatory compliance, and any improvements necessary to accommodate the proposed occupancy increase. Mitigation Measures UTL-1 and UTL-3 establish the on-site WWTP as the Project's primary wastewater treatment and disposal strategy and require the Applicant to demonstrate adequate wastewater treatment and disposal capacity prior to approval of the applicable Final Development Plan (FDP) and occupancy increases associated with each phase. The revised Sewer Feasibility Study concludes that the Camp may utilize, expand, and/or supplement the on-site wastewater treatment system through buildout of all phases. The on-site WWTP is subject to approval by the Lahontan Regional Water Quality Control Board, County Environmental Health Services, and other applicable regulatory agencies. If the on-site WWTP is not developed or approved, then occupancy shall remain limited to 300 guests, supported by the existing approved wastewater service infrastructure until an alternative wastewater solution has been identified, approved, and implemented. Additional service from RSWD may be utilized as a supplemental or alternative wastewater solution if RSWD confirms adequate treatment and conveyance capacity and any required infrastructure improvements are approved and constructed. As each phase advances, the required on-site treatment capacity will be confirmed based on the applicable Project flows, the selected advanced treatment system configuration, and regulatory requirements. Continued use of any portion of the RSWD system is an alternative strategy and will remain subject to available District capacity and RSWD approval. The revised Sewer Feasibility Study concludes that wastewater service availability for the Project is not

	contingent upon RSWD acceptance of additional Project wastewater flows. Implementation of MM UTL-1 and MM UTL-3 ensures that adequate wastewater treatment and disposal capacity is demonstrated prior to approval of each project phase and prior to occupancy increases associated with those phases. Overall wastewater-related impacts would be less than significant, and the Project would be constructed and operated in accordance with applicable guidelines and regulations and follow applicable mitigation measures.
Energy	It is expected that construction energy consumption associated with the Project would not be inefficient, wasteful, or unnecessary. The Project would not substantially affect existing energy or fuel supplies, or resources and new capacity would not be required. Refer to Tables 8 and 9 of the IS/MND on pages 90 and 91, respectively, for Project construction and operations energy consumption. The percentage increase Countywide in electricity use, diesel use, and gasoline use by the Project would be less than a tenth of a percent. Additionally, the Project would also be required to adhere to the provisions of CALGreen, which establishes planning and design standards for energy efficiency (in excess of the California Energy Code requirements). **Section 4, Energy**, concludes that all impacts would be less than significant.

2.3 Regional

R1 - CAL FIRE, San Bernardino

David Haas

STATE OF CALIFORNIA—NATURAL RESOURCES AGENCY Gavin Newsom, Governor

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January 5, 2026

CAL FIRE, Timber Harvesting, and the California Forest Practice Rules

On January 5, 2026, California Department of Forestry and Fire Protection (CAL FIRE) San Bernardino Unit Resource Management staff were made aware of the Hume SoCal Campground Expansion Project posted on CEQANet. Based on the documentation available on CEQANet, it appears the proposed project is subject to compliance with the California Forest Practice Rules.

CAL FIRE's Role in Timber Harvesting

CAL FIRE enforces the California Forest Practice Rules (FPRs), the laws that regulate logging on privately-owned lands in California. CAL FIRE ensures that private landowners abide by these laws when harvesting trees. Compliance with the FPRs applies to all commercial harvesting operations regardless of ownership size.

Commercial Harvesting Operations 1

Several criteria must be met to qualify timber harvesting as a commercial harvesting operation, as per the FPRs:

1. The land must qualify as TIMBERLAND: (Public Resource Code (PRC) §4526): "means land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available for, and capable of, growing a crop of trees of a COMMERCIAL SPECIES used to produce lumber & other forest products, including Christmas trees.
2. The species of trees being harvested must be COMMERCIAL SPECIES: §895.1 of the FPRs identifies COMMERCIAL SPECIES for each of the 3 Forest Districts in the state. In the Southern Forest District, some of these species include:
    a. Ponderosa, Coulter, Sugar, & Jeffrey Pine
    b. White & red fir
    c. Incense Cedar
    d. California black oak
3. TIMBER OPERATIONS must be conducted (PRC §4527): "means the cutting or removal, or both, of timber or other solid wood forest products, including Christmas trees, from TIMBERLANDS for COMMERCIAL PURPOSES, together with all the incidental work.

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

4. COMMERCIAL PURPOSES (as referenced in PRC §4527) includes: (A) the cutting or removal of trees that are processed into logs, lumber, or other wood products and offered for sale, barter, exchange, or trade, or (B) the cutting or removal of trees or other forest products during the conversion of TIMBERLANDS to land uses other than the growing of timber.

Conversion of Timberland

As per PRC §4621, "A person who owns timberlands that are to be devoted to uses other than the growing of timber shall file an application for conversion with the board (California Board of Forestry and Fire Protection). "Uses other than the growing of timber" includes, but is not limited to, "residential or commercial developments, production of other agricultural crops, recreational developments, ski developments, water development projects, and transportation projects" (PRC §4621(c)).

If more than 3 acres of Timberland are to be converted to a non-timber growing use, a Timber Harvest Plan and Timberland Conversion Permit must be prepared by a Registered Professional Forester (RPF) and submitted to the applicable CAL FIRE Review Team Office. If less than 3 acres of Timberland are to be converted to a non-timber growing use, and the other criteria identified in §1104.1 of the FPRs are met, a Less Than 3-Acre Conversion Exemption can be prepared by an RPF and submitted to the applicable CAL FIRE Review Team office.

For more information regarding compliance with the California Forest Practice Rules, it is recommended to consult with an RPF. A list of RPFs can be found at the following website: https://bof.fire.ca.gov/projects-and-programs/professional-foresters-registration/rpf-crm-rosters/. 1

If you have any other questions, comments, or concerns please do not hesitate to contact me.

Sincerely,

David Haas, RPF #2950
CAL FIRE San Bernardino Unit Forester
(909) 881-6955
David.Haas@fire.ca.gov

CC: Candyce Burnett, Kimley-Horn and Associates

R1 - Responses to CAL FIRE, San Bernardino

David Haas

R1-1 The comment is informatory in nature and provides information on timber harvesting and conversion of timber. The Project does not propose commercial harvesting of timber resources. The Project is required to conform with applicable local, regional, and State regulations including the California Forest Practice Rules. Additionally, the Project would remain compliant with County Development code Section 82.19.040 which limits removal of native vegetation including timber. The comment does not provide evidence that the IS/MND itself or its conclusions are inadequate. No further response is warranted.

R2 - California Department of Fish and Wildlife

Kim Freeburn, Environmental Program Manager

State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
Inland Deserts Region
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GAVIN NEWSOM, Governor
VALERIE TERMINI, Acting Director

January 7, 2026
Sent via e-mail

Elena Barragan, Senior Planner
San Bernardino County, Land Use Services Department
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San Bernardino, CA 92415
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Hume SoCal Campground Expansion Project (PROJECT)
MITIGATED NEGATIVE DECLARATION (MND)
SCH# 2025110453

Dear Elena Barragan:

The California Department of Fish and Wildlife (CDFW) received a Notice of Intent to Adopt an MND from San Bernardino County, Land Use Services Department (County) for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines.[1]

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

CDFW is California's **Trustee Agency** for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; CEQA Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources. 1

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. Code, § 1600 et seq.) Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

Proponent: San Bernardino County, Land Use Services Department

Objective: The Hume SoCal Campground Expansion Project is a proposal to enlarge the existing Hume SoCal Campground from the existing campground size of approximately 107 acres to approximately 252.1 acres – an addition of approximately 145 acres. The existing Hume SoCal Campground, owned by Calvary Chapel, currently accommodates approximately 300 persons, including campers, camp staff, and facility/office staff. The proposed expansion of Hume SoCal Campground and the increase in camp facilities

[1] CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

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would allow the Project to accommodate an additional approximately 2,700 persons for a maximum of approximately 3,000 campers, camp staff and facility/office staff.

Expansion of the campground would involve the construction/installation of new camp structures including residential dorms and semi-permanent tents, staff housing, dining/meeting halls, indoor/outdoor recreational facilities, and campground infrastructure (internal roads, pedestrian trails, etc.), and the addition of recreational activities and programming. The existing campground's structures, facilities, and amenities will continue to be used. The Project would be implemented in five phases.

Phase 1 of the Project would involve the development of facilities to be used as a Junior High Camp. Proposed residential structures within the Phase 1 area include an expanded welcome center, private administration and guest speaker residencies, staff housing, and student dormitories. Phase 1 also includes the development of a gymnasium, bus parking, a snack shop, a chapel, converting an existing chapel to a small meeting space, an expansion to the existing dining hall, a maintenance building, an amphitheater, and restrooms. Outdoor recreation facilities include grass quads. Existing and proposed facilities within Phase 1 would accommodate up to 988 guest occupants.

Phase 2 of the Project would involve the development of facilities to be used as a High School Camp. Proposed residential structures within the Phase 2 area include staff housing buildings, and student dormitories. Phase 2 also includes the development of a large dining hall, gymnasium, a chapel, amphitheater, and restrooms. Outdoor recreation facilities include grass quads, a swimming pool, and a recreation pond. Existing and proposed facilities within Phase 2 would accommodate up to 1,096 occupants.

Phase 3 would include the development of one adult lodge with included access road. Existing and proposed facilities within Phase 3 would accommodate up to 140 occupants. 1

Phase 4 of the Project would include the development of an Elementary Age Camp and associated facilities. Proposed residential structures within Phase 4 include semi-permanent insulated tent structures for students. Phase 4 also includes the development of restroom facilities with showers and an amphitheater. Outdoor recreation facilities include grass quads, a dining canopy, a swimming pool, and a recreation pond. Existing and proposed facilities within Phase 4 would accommodate up to 500 occupants.

Phase 5 of the Project proposes the creation of a tent-based youth camp, Wildwood Camp. Residential structures proposed for this phase consist of semi-permanent insulated tent structures. Phase 5 also includes the development of restroom facilities with showers and an amphitheater. Outdoor recreation facilities include grass quads, a dining canopy, a swimming pool, and a recreation pond. Existing and proposed facilities within Phase 5 would accommodate up to 130 occupants.

Location: The Project will be located within the San Bernardino Mountains in the unincorporated Community of Green Valley Lake, San Bernardino County, California. The Project site is approximately 0.4-mile northwest of State Route 18 (SR-18). The approximately 251-acre Project site is transected by Green Valley Lake Road and roughly centered around the existing Hume SoCal campground facility within Assessor's Parcel Numbers (APN) 0328-071-05, -07, and -10, and 0328-121-40 and -42

Timeframe: Implementation of Phase 1 would be constructed over approximately 1-5 years with capacity slowly rising from 300 occupants to 784 occupants at the end of the last year of construction. Implementation of Phase 2 would occur over approximately 5 years with capacity slowly rising from 784 occupants to 1,784 occupants over the 5-year interval. Implementation of Phase 3 would occur over approximately 5 years upon completion of Phase 2 with capacity slowly rising from 1,784 occupants to 1,924 occupants over the 5-year interval. Implementation of Phase 4 would occur over approximately 5 years upon completion of Phase 3 with capacity slowly rising from 1,924 occupants to 2,424 occupants over the 5-year interval. Implementation of Phase 5 would occur over approximately 5 years with capacity slowly rising from 2,424 occupants to 2,544 occupants

over the 5-year interval. The IS/MND did not specify when construction is projected to begin.

COMMENTS AND RECOMMENDATIONS

CDFW has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species (i.e., biological resources). CDFW offers the comments and recommendations below to assist San Bernardino County, Land Use Services Department (County) in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document. The MND has not adequately identified and disclosed the Project's impacts (i.e., direct, indirect, and cumulative) to biological resources and whether those impacts are less than significant. Additionally, pursuant to CEQA Guidelines, section 15097(f), CDFW has prepared a draft mitigation monitoring and reporting program (MMRP) for CDFW-recommended mitigation measures MM BIO-[A] through MM BIO-[L]. 1

I. Environmental Setting and Related Impact Shortcoming

COMMENT #1: Assessment of Biological Resources

IS/MND Document, Section #4.4, Pages #73-80 and Appendix A1: Biological Resources Assessment, Table C-1

Issue: The MND does not adequately identify the Project's significant, or potentially significant, impacts to biological resources.

Specific impact: The MND (p. 73) bases its analysis of impacts to biological resources on a biological resource assessment done on July 31, 2023 and August 2, 2023. It is important to note that Appendix A1 has contradictory information about the biological assessments; Section 1 (p. 1) states ELMT biologists conducted a field survey on July 31, 2023, and August 2, 2023, whereas Appendix A1, Section 2.2 (p. 6) states ELMT biologists conducted field investigations on March 22, April 18 and June 30, 2023. CDFW is concerned about the lack of consistency in the IS/MND. CDFW is also concerned that the scope and timing of the assessment may not be sufficient for the County to determine the extent and significance of Project-related impacts. As stated in the Biological Resource Assessment, "The purpose of the biological resources assessment is to characterize existing site conditions on the entire project site and to assess the probability of occurrence of special-status plant and wildlife species that could pose a constraint to project implementation" (p.1). Once the assessment has determined probability of occurrence, focused or protocol-level surveys should be performed for the detection of special-status species with the potential to occur on the Project site and in the surrounding area and to determine the level of occupancy and potential significance of impacts resulting from the Project. The results of the focused/protocol surveys should then be used to establish feasible mitigation measures to avoid the impacts, minimize the impacts to less than significant, or determine that minimization is infeasible, and the results of the surveys provided in the document. Absent findings of focused surveys, CDFW is concerned that the County has not adequately identified potentially significant impacts. 2

CDFW is concerned about the potential for the following special-status species to occur on or near the Project site and recommends focused surveys, following standard accepted protocols, be conducted and the results included in a revised CEQA document. The California Natural Diversity Database (CNDDB) and Biogeographic Information and Observation System (BIOS) indicate that occurrences of ESA-listed, CESA-listed, or other special-status species have been reported, or have the potential to occur, within a 3-mile radius of the Project area including, but not limited to, the following: **Plants**: ash-grey paintbrush (*Castilleja cinera*), Baldwin Lake linanthus (*Linanthus killipii*), Big Bear Valley woollypod (*Astragalus leucolobus*), lemon lily (*Lilium*

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parryi), Palmer's mariposa lily (*Calochortus palmeri* var. *palmeri*), Parish's alumroot (*Heuchera parishii*), Parish's yampah (*Perideridia parishii* ssp. *parishii*), San Bernardino Mountains dudleya (*Dudleya abramsii* ssp. *affinis*), San Bernardino Mountain's owl clover (*Castilleja lasiorhyncha*), southern jewelflower (*Streptanthus campestris*); **Birds**: bald eagle (*Haliaeetus leucocephalus*), California spotted owl (*Strix occidentalis occidentalis*), Cooper's hawk (*Astur cooperii*), golden eagle (*Aquila chrysaetos*), long-eared owl (*Asio otus*), olive-sided flycatcher (*Contopus cooperi*), purple martin (*Progne subis*); **Reptiles**: southern rubber boa (*Charina umbratica*), two-striped gartersnake (*Thamnophis hammondii*); **Amphibians**: arroyo toad (*Anaxyrus californicus*); **Mammals**: San Bernardino flying squirrel (*Glaucomys oregonensis californicus*), San Bernardino golden-mantled ground squirrel (*Callospermophilus lateralis bernardinus*), white-eared pocket mouse (*Perognathus alticolus alticolus*).

Recent surveys during the appropriate times of the year are needed to identify potential impacts to biological resources; inform appropriate avoidance, minimization, and mitigation measures; and determine whether impacts to biological resources have been mitigated to a level that is less than significant. Additionally, the MND should acknowledge that if the Project site is left vacant or left graded and inactive in the interim period between construction phases, environmental conditions may change. Grading and leaving a site inactive may result in the area becoming occupied by wildlife that utilize disturbed areas.

Evidence impact would be significant: Compliance with CEQA is predicated on a complete and accurate description of the environmental setting that may be affected by the proposed Project. CDFW is concerned that the assessment of the existing environmental setting with respect to biological resources has not been adequately analyzed in the MND. CDFW is concerned that without a complete and accurate description of the existing environmental setting, the MND likely provides an incomplete or inaccurate analysis of Project-related environmental impacts and whether those impacts have been mitigated to a level that is less than significant. Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a Project is critical to the assessment of environmental impacts, that special emphasis should be placed on environmental resources that are rare or unique to the region, and that significant environmental impacts of the proposed Project are adequately investigated and discussed. 2

Recommended Potentially Feasible Mitigation Measure: To establish the existing environmental setting with respect to biological resources, CDFW recommends that focused biological surveys be conducted as described in the following mitigation measure(s), mitigation measures to reduce impacts to less than significant be established, and all information provided in a revised CEQA document. If the County chooses to forego completion of focused surveys to support a revised CEQA document, CDFW recommends the County condition the following measure:

Mitigation Measure BIO-[A]: Assessment of Biological Resources

Prior to Project construction activities, a complete and recent inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within off-site areas with the potential to be affected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish and Game Code § 3511), will be completed. Species to be addressed should include all those which meet the CEQA definition of Endangered, Rare or Threatened Species (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. Focused species-specific surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Note that CDFW generally considers biological surveys for wildlife to be valid for a one-year period, and surveys for rare plants may be

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considered valid for a period of up to three years. Some aspects of the proposed Project warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought. 2

COMMENT #2: Special-Status Plants

IS/MND Document, Section #4.4, Page #74 and Appendix A1: Biological Resources Assessment, Table C-1

Issue: The MND does not adequately identify the Project's significant, or potentially significant, impacts to special-status plants (see Comment #1 for species).

Specific Impact: The MND (p. 74) indicates that no special-status plants were observed during the field assessments conducted in 2023, however, the MND (p. 74) also states that multiple special-status plant species have potential to occur within the Project site, including multiple that are CNPS ranks 2B or above. CDFW is concerned that the MND relies on a field assessment alone, and that focused, protocol presence/absence surveys were not conducted to identify special-status plants. Floristic assessments typically involve multiple visits to the Project site at various times of year to detect plants in various blooming seasons. Additionally, the general biological surveys that were conducted in 2023 occurred before Tropical Storm Hilary impacted the Project area (Appendix A1, p.1). As a result, that survey data may not accurately and completely describe the environmental setting that may be affected by the proposed Project, as conditions may have changed since the historic storm.

The MND (p. 74) continues to say "if any of the aforementioned special-status plant species were observed onsite, their small, isolated populations would not contribute meaningfully to the conservation of their relative species. No focused surveys are recommended." This claim is not substantiated with any evidence in the IS/MND nor Appendix A1. CEQA Guidelines require the IS/MND to provide a factually supported explanation as to why and how Project-related impacts to these populations of special-status plants "would not contribute meaningfully to the conservation of their species". 3

The aforementioned plant species have potential to be impacted by the Project activities, and the Project has not conducted any protocol-level, focused surveys to establish a baseline environmental setting. The Project has also not proposed any mitigation measures to reduce the impacts to levels less than significant.

Evidence impact would be significant: Compliance with CEQA is predicated on a complete and accurate description of the environmental setting that may be affected by the proposed Project. CDFW is concerned that the assessment of the existing environmental setting with respect to special-status plants has not been adequately analyzed in the MND. CDFW is concerned that without a complete and accurate description of the existing environmental setting, the MND likely provides an incomplete or inaccurate analysis of Project-related environmental impacts and whether those impacts have been mitigated to a level that is less than significant. Section 15125(c) of the CEQA Guidelines states that knowledge of the regional setting of a Project is critical to the assessment of environmental impacts, that special emphasis should be placed on environmental resources that are rare or unique to the region, and that significant environmental impacts of the proposed Project are adequately investigated and discussed. The California Rare Plant Rank 1B indicates plants that are rare, threatened, or endangered in California and elsewhere, and California Rare Plant Rank 2B indicates plants that are rare, threatened, or endangered in California but more common elsewhere. Impacts to these species must be analyzed during preparation of environmental documents relating to CEQA because they meet the definition of rare or endangered under CEQA Guidelines §15125 (c) and/or §15380.

Recommended Potentially Feasible Mitigation Measure: CDFW recommends a thorough, floristic-based assessment of special-status plants at the appropriate time(s)

of year be conducted, usually involving multiple visits to the Project area, as described below. CDFW recommends that a revised CEQA document include the results of recent floristic surveys as described in the following mitigation measure, as well as mitigation measures to reduce impacts to less than significant. If the County chooses to forego completion of focused surveys to support a revised CEQA document, CDFW recommends the County condition the following measure:

MM BIO-[B]: Special-Status Plants 3

Prior to Project initiation, a thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see https://www.wildlife.ca.gov/Conservation/Plants) shall be performed by a qualified biologist. Should any state-listed plant species be present in the Project area, the Project proponent shall obtain appropriate CESA authorization for those species prior to the start of Project activities. Should other special-status plants or natural communities be present in the Project area, on-site or off-site habitat restoration (whichever is applicable) and/or enhancement and preservation should be evaluated and discussed in detail. Where habitat preservation is not available on-site, off-site land acquisition, management, and preservation should be evaluated.

II. Mitigation Measure or Alternative and Related Impact Shortcoming

COMMENT #3: Nesting Birds

IS/MND Document, Appendix A1: Biological Resources Assessment, Section 4.4, Page #12

Issue: CDFW is concerned that the MND does not sufficiently identify Project impacts to nesting birds or ensure that impacts are reduced to a level less than significant.

Specific impact: The Biological Resources Assessment (p. 12) states "The onsite plant communities provide suitable foraging and nesting habitat for year-round and seasonal avian residents, as well as migrating songbirds that have adapted to the mountains." CDFW is concerned about the impacts to nesting birds including loss of nesting/foraging habitat and potential take from ground-disturbing activities and construction. Conducting work outside the peak nesting season is an important avoidance and minimization measure. CDFW also recommends the completion of nesting bird surveys *regardless* of the time of year to ensure that impacts to nesting birds are avoided. The timing of the nesting season varies greatly depending on several factors, such as bird species, weather conditions in any given year, and long-term climate changes (e.g., drought, warming, etc.). In response to warming, birds have been reported to breed earlier, thereby reducing temperatures that nests are exposed to during breeding and tracking shifts in availability of resources (Socolar et al., 2017). CDFW staff have observed that climate change conditions may result in nesting bird season occurring earlier and later in the year than historical nesting season dates. CDFW recommends that disturbance of occupied nests of migratory birds and raptors within the Project site and surrounding area be avoided any time birds are nesting onsite. CDFW therefore recommends the completion of nesting bird surveys *regardless of the time of year* to ensure compliance with all applicable laws pertaining to nesting and migratory birds. 4

Evidence impact would be significant: It is the Project proponent's responsibility to comply with all applicable laws related to nesting birds and birds of prey. Fish and Game Code sections 3503, 3503.5, and 3513 afford protective measures as follows: section 3503 states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by Fish and Game Code or any regulation made pursuant thereto. Fish and Game Code section 3503.5 makes it unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) or to take, possess, or destroy the nest or eggs of any such

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bird except as otherwise provided by Fish and Game Code or any regulation adopted pursuant thereto. Fish and Game Code section 3513 makes it unlawful to take or possess any migratory nongame bird except as provided by rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act of 1918, as amended (16 U.S.C. § 703 et seq.).

Recommended Potentially Feasible Mitigation Measure: CDFW recommends the County replace MM BIO-2 with the following measure for nesting birds in a revised CEQA document to ensure that impacts to nesting birds are reduced to less than significant:

MM BIO-[C]: Nesting Birds

Regardless of the time of year, nesting bird surveys shall be performed by a qualified avian biologist no more than 3 days prior to vegetation removal or ground-disturbing activities for all phases of Project construction. Preconstruction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified avian biologist will make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If active nests are found during the pre-construction nesting bird surveys, a qualified biologist shall establish an appropriate nest buffer to be marked on the ground. Nest buffers are species specific and shall be at least 300 feet for passerines and 500 feet for raptors. A smaller or larger buffer may be determined by the qualified biologist familiar with the nesting phenology of the nesting species and based on nest and buffer monitoring results. Construction activities may not occur inside the established buffers, which shall remain on site until a qualified biologist determines the young have fledged or the nest is no longer active. Active nests and adequacy of the established buffer distance shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance. 4

COMMENT #4: Bald and Golden Eagles

IS/MND Document, Appendix A1: Biological Resources Assessment, Section 4.7.2, Page #17

Issue: CDFW is concerned that the MND does not sufficiently identify Project impacts to bald and golden eagles or ensure that impacts are reduced to a level less than significant.

Specific impact: The Biological Resources Assessment (p. 17) states "The tall, mature trees provide suitable nesting habitat for both golden eagle and bald eagle, and the open, disturbed areas scattered throughout the Project site provide hunting opportunities for both raptor species. Additionally, bald eagle has been observed nearby." CDFW is concerned that the Project may result in direct and indirect impacts to bald and golden eagles. 5

Evidence impact would be significant: Bald eagle and golden eagle are fully protected species (Fish & G. Code, § 4700) and protected under The Bald and Golden Eagle Protection Act of 1940 (U.S.C. Title 16, Chapter 5A, Subchapter II, § 668 a d) and its subsequent amendments. Bald eagle is an endangered species pursuant to the California Endangered Species Act (Fish & G. Code, § 2050 et seq.).

Recommended Potentially Feasible Mitigation Measure: Because of the potential for Project activities to negatively impact bald and golden eagles, CDFW recommends the County complete surveys according to the measure below and include any survey findings, impact assessments, and any necessary mitigation measures in a revised CEQA document. If the County elects not to follow this approach, CDFW recommends

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the County include the following additional mitigation measure prior to adoption of the CEQA document:

MM BIO-[D]: Bald Eagle and Golden Eagle Breeding Surveys

Prior to Project activities, a qualified biologist shall conduct focused breeding surveys for bald eagle and golden eagle, following appropriate protocols: CDFW's Bald Eagle Nesting Territory Survey Form and Instructions (2010) and USFWS Interim Golden Eagle Inventory and Monitoring Protocols (Pagel et al. 2010). If nesting eagles are detected during the focused surveys, the qualified biologist and San Bernardino County shall coordinate with CDFW to develop avoidance and minimization measures to be reviewed by CDFW. Project disturbances will not occur within 0.5 mile of the active nest sites during breeding season (December 30 through July 1) or any disturbance if that action is shown to disturb the nesting eagles. The 0.5 mile no disturbance buffer will be maintained throughout the breeding season or until the young have fledged and are no longer dependent on the nest or parental care for survival. 5

COMMENT #5: California Spotted Owl

IS/MND Document, Appendix A1: Biological Resources Assessment, Section 4.7.2, Page #17-18

Issue: CDFW is concerned that the MND does not sufficiently identify Project impacts to California spotted owl or ensure that impacts are reduced to a level less than significant.

Specific impact: The Biological Resources Assessment (p. 18) states "The project site supports high quality habitat and generally primarily consists of undisturbed forested areas... The canopy varies in density, but there are many areas with closed canopy which is favorable for cover for the species. Additionally, there are many trees that are both tall and mature enough to provide nesting cavities and perching opportunities for this species. Therefore, it was determined that there is a high potential for California spotted owl to occur onsite." The California Natural Diversity Database (CNDDB) and Biogeographic Information and Observation System (BIOS) indicate that there are multiple California spotted owl observations as well as activity centers within and near the Project footprint. CDFW is concerned about the impacts to California spotted owl that could occur as a result of Project activities through construction as well as creation of defensible space leading to reduction in canopy cover, which is essential to habitat function. Further, Appendix A1, Table C-1 incorrectly states there are no historical California spotted owl nests within the Project site. The proposed location of the High School Age Camp (APN: 0328-121-40) overlaps with the location of a nest site for spotted owl territory SBD0155 (BIOS ds704). In addition, the IS/MND fails to analyze the loss and degradation of California spotted owl habitat from Project implementation considering Cumulative Impacts from regional development, fuel's reduction activities and loss of habitat from catastrophic fires within the San Bernardino Mountains. An MND is only appropriate when there is no substantial evidence that the Project may have a significant effect on the environment. 6

Evidence impact would be significant: Consistent with CEQA Guidelines, Section 15380, California spotted owl is a California Species of Special Concern, and the Coastal-Southern California Distinct Population Segment is proposed for listing as an endangered species under the federal Endangered Species Act. Spotted owls have been characterized as central-place foragers, where individuals forage over a wide area and subsequently return to a nest or roost location that is often centrally-located within the home range (Rosenberg and McKelvey, 1999). They require large blocks (100-600 acres) of mature forest with suitable nesting trees and snags (Forsman, 1976). California spotted owls are highly sensitive to habitat destruction; the greatest threats to California spotted owl include the loss, degradation, and fragmentation of habitat (Forsman, 1976). The loss and degradation of California spotted owl habitat

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could require a mandatory finding of significance by the County (CEQA Guidelines, § 15065).

Recommended Potentially Feasible Mitigation Measure: Because of the potential for Project activities to negatively impact California spotted owl, CDFW recommends the County complete surveys according to the measure below and include any survey findings, impact assessments, and any necessary mitigation measures in a revised CEQA document. If the County elects not to follow this approach, CDFW recommends the County include the following additional mitigation prior to adoption of the measure CEQA document:

MM BIO-[E]: California Spotted Owl

Prior to Project activities, a qualified biologist shall complete necessary surveys, impact assessments, and associated reports following the protocols provided within the *Protocol for Surveying Proposed Management Activities That May Impact Northern Spotted Owls* (USFWS, 2012). The Project shall not conduct any Project activities during the California spotted owl nesting season (February 1 to August 15) if owls could be present. California spotted owl nesting and/or roosting habitat is identified within 0.25 miles of Project site activities. Therefore, the Project shall develop a plan to completely avoid impacts to the species and submit it to CDFW for review and approval prior to commencing Project activities. Prior to Project activities, the qualified biologist shall evaluate the Project site and surrounding area for any known California spotted owl Activity Centers using CDFWs Spotted Owl Database (https://wildlife.ca.gov/Data/CNDDB/Spotted-Owl-Info). No Project activities shall occur within 0.25 miles from known California spotted owl Activity Center(s). These buffers should be maintained during the breeding season and until surveys that support probable absence, non-nesting, nest failure, or fledgling flight can be conducted. To compensate for the degradation and/or loss of California spotted owl habitat, the Project shall, no less than 3 months prior to the initiation of Project activities, acquire, permanently protect (through recordation of a conservation easement), and perpetually manage (through a long-term management plan and non-wasting endowment), suitable replacement habitat within the San Bernardino Mountains at no less than a 3:1 (mitigation-to-impact) ratio. 6

COMMENT #6: Southern Rubber Boa

IS/MND Document, Appendix A1: Biological Resources Assessment, Section 4.7.2, Page #18

Issue: CDFW is concerned that the MND does not sufficiently identify Project impacts to southern rubber boa or ensure that impacts are reduced to a level less than significant.

Specific impact: The Biological Resources Assessment (p. 18) states "The southern rubber boa (SRB) has been designated by the CDFW as a threatened species under the California Endangered Species Act and is also considered a sensitive species in the San Bernardino National Forest by the U.S. Forest Service." And continues "it was determined that the undisturbed areas on the project site has a moderate potential to support southern rubber boa." CDFW is concerned about the impacts to southern rubber boa that could occur as a result of Project activities. The Project proponent acknowledges that southern rubber boa have a moderate potential to occur within the Project site but does not provide sufficient mitigation measures to ensure impacts to southern rubber boa are less than significant. Detecting southern rubber boa requires protocol-level surveys, as general biological assessments are insufficient to detect all southern rubber boa that are present within the Project footprint. Southern rubber boa are in the duff layer and underground for the majority of the year and are very rarely found on the surface of the ground and therefore not reliably detectable by a general pre-construction survey. The IS/MND does not provide substantial evidence that MM 7

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BIO-1 is effective at reducing impacts to less than significant for southern rubber boa. Additionally, the IS/MND does not analyze the potential significant impacts on the environment from direct mortality of southern rubber boa through habitat loss and degradation from construction activities as well as long-term operation of the camp.

Evidence impact would be significant: Southern rubber boa is a threatened species pursuant to the California Endangered Species Act (Fish & G. Code, §§ 2050 et seq.). CESA prohibits the take (under Fish & G. Code, § 86, "take" means to hunt, pursue, catch, capture, or kill, or to attempt to hunt, pursue, catch, capture, or kill) of any endangered, threatened, or candidate species that results from a proposed Project, except as authorized by state law (Fish & G. Code, §§ 2080, 2085).

The greatest threats to southern rubber boa include development, increased recreational use in their habitat, timber harvesting practices, and habitat degradation. This species is endemic to the San Bernardino Mountains and San Jacinto Mountains of Southern California. Being limited to a small geographic area makes them vulnerable to potential impacts and particularly susceptible to localized extinction (Grismer, et al. 2022). The forest between Crestline and the Snow Valley Ski Resort has long been considered the best southern rubber boa habitat in the San Bernardino Mountains (Stewart, 1991). The proposed Project area directly overlaps with this prolific habitat. The IS/MND does not address the loss and degradation of southern rubber boa habitat overtime as a Cumulative Impact. An MND is only appropriate when there is no substantial evidence that the Project may have a significant effect on the environment. The mortality of southern rubber boas and loss and degradation of their habitat could require a mandatory finding of significance by the County (CEQA Guidelines, § 15065). 7

Recommended Potentially Feasible Mitigation Measure: Because of the potential for Project activities to negatively impact southern rubber boa, CDFW recommends the County conduct focused surveys following methodology agreed upon by CDFW and include any survey findings, impact assessments, and any necessary mitigation measures in a revised CEQA document. If the County elects not to follow this approach, CDFW recommends the County include the following additional mitigation measure prior to adoption of the CEQA document:

MM BIO-[F]: Southern Rubber Boa

Suitable habitat for Southern Rubber boa occurs throughout the Project site. As a result, Permittee shall ensure that impacts to southern rubber boa(s) are fully avoided through the implementation of CDFW-approved surveys and a protection plan that includes ongoing monitoring and establishment of avoidance measures. Because southern rubber boa are difficult to detect and the Project cannot ensure complete avoidance, the Project shall obtain CESA authorization prior to initiation of Project activities. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP), a consistency determination, or other permitting options (Fish and G. Code, §§ 2080.1, 2081, subds. (b), (c)). CDFW encourages early consultation, as significant modification to the proposed Project and avoidance, minimization, and mitigation measures may be necessary to obtain a CESA ITP. To compensate for the degradation and/or loss of southern rubber boa habitat, the Project shall, no less than 3 months prior to the initiation of Project activities, acquire, permanently protect (through recordation of a conservation easement), and perpetually manage (through a long-term management plan and non-wasting endowment), suitable replacement habitat within the San Bernardino Mountains at *no less* than a 3:1 (mitigation-to-impact) ratio, to be determined by CDFW to ensure impacts to southern rubber boa are fully mitigated, pursuant to CESA.

COMMENT #7: Arroyo Toad

IS/MND Document, Appendix A1: Biological Resources Assessment, Section 4.2.2, Page #11 8

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Issue: CDFW is concerned that the MND does not sufficiently identify Project impacts to arroyo toad or ensure that impacts are reduced to a level less than significant.

Specific impact: The Biological Resources Assessment (p. 11) states "The riparian plant community within the project site has the potential to provide suitable habitat for amphibian species known to occur within the San Bernardino Mountains. Common amphibian species that could potentially occur onsite include arroyo toad". CDFW is concerned about the impacts to arroyo toad that could occur as a result of Project activities.

Evidence impact would be significant: Consistent with CEQA Guidelines, Section 15380, arroyo toad is a California Species of Special Concern and is an endangered species pursuant to the federal Endangered Species Act.

Recommended Potentially Feasible Mitigation Measure: Because of the potential for Project activities to negatively impact arroyo toad, CDFW recommends the County complete surveys according to the measure below and include any survey findings, impact assessments, and any necessary mitigation measures in a revised CEQA document. If the County elects not to follow this approach, CDFW recommends the County include the following additional mitigation measure prior to adoption of the CEQA document: 8

MM BIO-[G]: Arroyo Toad

Prior to Project activities, a qualified biologist shall complete necessary surveys, impact assessments, and associated reports within all locations subject to Project site activities following the protocols provided within the *Survey Protocol for the Arroyo Toad* (USFWS 1999). The results of the survey shall be sent to CDFW and USFWS within one week of survey completion. If arroyo toads are identified, additional avoidance and minimization measures shall be established and implemented prior to the initiation of Project activities and in coordination with CDFW and USFWS. In addition, access path use shall occur during daylight hours (from 2 hours after sunrise to 2 hours before sunset) when amphibians are less frequent and no Project activities shall take place during the arroyo toad breeding season (March 1–July 31) within suitable arroyo toad breeding habitat.

COMMENT #8: Crotch's Bumble Bee

IS/MND Document, Appendix A1: Biological Resources Assessment, Table C-1

Issue: CDFW is concerned that the MND does not sufficiently identify Project impacts to Crotch's bumble bee or ensure that impacts are reduced to a level less than significant.

Specific Impact: Appendix A1 (Table C-1) states that the Project site does not contain suitable habitat for Crotch's bumble bee. However, Crotch's bumble bee has been recently sighted within the Project vicinity as reported on various citizen scientist platforms. Based on review of recent sightings and review of the property on Google Earth, it appears that suitable habitat for Crotch's bumble bee is present. However, surveys were not conducted as part of the MND nor were any measures for avoidance, minimization, or mitigation offered. The Project may result in temporal and permanent loss of suitable nesting and foraging habitat for Crotch's bumble bee. Project ground-disturbing activities and vegetation removal may cause death or injury of adults, eggs, and larva, burrow collapse, nest abandonment, and reduced nest success. Despite the presence of suitable Crotch's bumble bee habitat on site, the MND does not provide information as to what criteria would be used to conclude that the species is not present. Without adequate presence/absence surveys, ground disturbance and vegetation removal associated with Project implementation could result in impacts to the species. Project activities may result in temporal or permanent loss of colonies, and suitable nesting and foraging habitat. 9

Evidence impact would be significant: Crotch's bumble bee is a Candidate Endangered species under CESA. As a Candidate species, Crotch's bumble bee receives the same legal protection as Endangered or Threatened species under CESA (Fish & G. Code, § 2085). Accordingly, Crotch's bumble bee meets the CEQA definition of rare, threatened, or endangered species (CEQA Guidelines, § 15380). Therefore, take of Crotch's bumble bee could require a mandatory finding of significance by the County (CEQA Guidelines, § 15065).

Recommended Potentially Feasible Mitigation Measure: Because of the potential for Project activities to negatively impact Crotch's bumble bee, CDFW recommends the County complete surveys according to the measure below and include any survey findings, impact assessments, and any necessary mitigation measures in a revised CEQA document. If the County elects not to follow this approach, CDFW recommends the County include the following additional mitigation measure prior to adoption of the CEQA document:

MM BIO-[H]: Crotch's Bumble Bee

Within one year prior to vegetation removal and/or grading, a qualified entomologist familiar with Crotch's bumble bee shall perform surveys to determine the presence/absence of Crotch's bumble bee. Surveys should be conducted during flying season when the species is most likely to be detected above ground, between March 1 to September 1. Survey results, including negative findings, should be submitted to CDFW prior to implementing Project-related ground-disturbing activities. At minimum, a survey report should provide the following: A) A description and map of the survey area, focusing on areas that could provide suitable habitat for Crotch's bumble bee, showing surveyor(s) track lines to document that the entire site was covered during field surveys. B) Field survey conditions that include name(s) of qualified entomologist(s) and brief qualifications; date and time of survey; survey duration; general weather conditions; survey goals, and species searched. C) Map(s) showing the location of individuals and nests/colonies. D) A description of physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each individual and nest/colony is found. A sufficient description of biological conditions, primarily impacted habitat, should include native plant composition (e.g., density, cover, and abundance) within impacted habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species). If Crotch's bumble bee is detected, the Project shall obtain CESA authorization prior to initiation of Project activities. CDFW encourages early consultation, as significant modification to the proposed Project and avoidance, minimization, and mitigation measures may be necessary to obtain a CESA ITP. 9

COMMENT #9: Lake and Streambed Alteration (LSA) Agreement

IS/MND Document, Appendix A1: Biological Resources Assessment, Section 4.6, Page #13-15

Issue: The MND does not include mitigation measures to avoid or reduce impacts to streams and the associated resources to a level less than significant.

Specific impact: The Biological Resources Assessment (p. 13) states "Three perennial drainage features and four ephemeral drainage features were observed within the boundaries of the project site during the field delineation." Potential direct and indirect impacts to the streams and associated fish and wildlife resources resulting from Project activities are subject to notification under Fish and Game Code section 1602. 10

Evidence impact would be significant: Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may do one or more of the following: substantially divert or obstruct the natural flow of any river, stream, or lake; substantially change or use any material from the bed, channel or bank of any

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river, stream, or lake; or deposit debris, waste or other materials that could pass into any river, stream or lake. Note that "any river, stream or lake" includes those that are episodic (i.e., those that are dry for periods of time) as well as those that are perennial (i.e., those that flow year-round). This includes ephemeral streams, desert washes, and watercourses with a subsurface flow. It may also apply to work undertaken within the flood plain of a body of water. Upon receipt of a complete notification, CDFW determines if the proposed Project activities may substantially adversely affect existing fish and wildlife resources and whether a Lake and Streambed Alteration (LSA) Agreement is required. An LSA Agreement includes measures necessary to protect existing fish and wildlife resources. CDFW may suggest ways to modify the Project that would eliminate or reduce harmful impacts to fish and wildlife resources. CDFW's issuance of an LSA Agreement is a "project" subject to CEQA (see Pub. Resources Code § 21065). Early consultation with CDFW is recommended since modification of the proposed Project may be required to avoid or reduce impacts to fish and wildlife resources. To submit a Lake or Streambed Alteration notification, visit: https://wildlife.ca.gov/Conservation/Environmental-Review/LSA . 10

Recommended Potentially Feasible Mitigation Measure: Because of the potential for impacts to resources subject to Fish and Game Code section 1602, CDFW recommends the County include the following additional mitigation measure in a revised CEQA document to ensure that impacts to streams and associated fish and wildlife are reduced to a level less than significant:

MM BIO-[I]: CDFW's Lake and Stream Alteration (LSA) Program

Prior to Project activities and issuance of any grading permit, the Project shall obtain written correspondence from the California Department of Fish and Wildlife (CDFW) stating that notification under section 1602 of the Fish and Game Code is not required for the Project, *or* the Project shall obtain a CDFW-executed Lake and Streambed Alteration Agreement, authorizing impacts to Fish and Game Code section 1602 resources associated with the Project.

COMMENT #10: Construction Noise

IS/MND Document, Section #4.13, Page #126-133

Issue: The MND does not include an assessment of the impacts of construction noise on biological resources. Additionally, the MND does not include mitigation measures to avoid or reduce impacts to biological resources from construction noise to a level less than significant.

Specific impact: The MND (p. 127, Table 16: Typical Construction Equipment Noise Levels) indicates that noise levels will range between 76 and 88 dBA at 50 feet from Source. CDFW is concerned that the MND does not acknowledge or assess the impacts to biological resources that have potential to occur due to construction noise. Direct and indirect impacts may occur to nesting birds and other wildlife using habitat within and near the Project site. 11

Evidence impact would be significant: Construction may result in substantial noise through road use, equipment, and other Project-related activities. This may adversely affect wildlife species in several ways as wildlife responses to noise can occur at exposure levels of only 55 to 60 dB (Barber et al. 2009). Anthropogenic noise can disrupt the communication of many wildlife species including frogs, birds, and bats (Sun and Narins 2005, Patricelli and Blickley 2006, Gillam and McCracken 2007, Slabbekoorn and Ripmeester 2008). Noise can also affect predator-prey relationships as many nocturnal animals such as bats and owls primarily use auditory cures (i.e., hearing) to hunt. Additionally, many prey species increase their vigilance behavior when exposed to noise because they need to rely more on visual detection of predators when auditory cues may be masked by noise (Rabin et al. 2006, Quinn et al. 2017). Noise has also been shown to reduce the density of nesting birds (Francis et al. 2009)

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and cause increased stress that results in decreased immune responses (Kight and Swaddle 2011).

Recommended Potentially Feasible Mitigation Measure: Because of the potential for construction noise to negatively impact wildlife, CDFW recommends a revised CEQA document include a noise impact assessment and an analysis of impacts to biological resources accompanied by specific avoidance and minimization measures to ensure that impacts to wildlife are avoided or reduced to less than significant. Absent the completion of an analysis prior to the adoption of the CEQA document, CDFW recommends adding the following mitigation measure prior to adoption of the CEQA document: 11

MM BIO-[J]: Construction Noise

During all Project construction, the Project shall restrict use of equipment to hours least likely to disrupt wildlife (e.g., not at night or in early morning) and restrict use of generators except for temporary use in emergencies. Power to sites can be provided by solar PV (photovoltaic) systems, cogeneration systems (natural gas generator), small micro-hydroelectric systems, or small wind turbine systems. The Project shall ensure the use of noise suppression devices such as mufflers or enclosures for generators. Sounds generated from any means must be below the 55-60 dB range within 50-feet from the source.

COMMENT #11: Artificial Nighttime Lighting

IS/MND Document, Section #4.1 Page #54-55

Issue: The MND does not analyze impacts to biological resources from artificial nighttime lighting and includes no mitigation measures to avoid or reduce impacts to biological resources to a level less than significant.

Specific impact: The MND (p. 54-55) states construction will occur "between the hours of 7:00 a.m. to 7:00 p.m." and "Once operational, the buildings would use interior and exterior lighting." The MND does not provide any details regarding the use of artificial nighttime lighting or the impacts to biological resources resulting from the use of artificial nighttime lighting during construction and operation of the Project, and no mitigation measures are proposed. Designs for lighting to be used during operation of the Project should be included in a revised MND, along with details of artificial nighttime lighting to be used during construction. The direct and indirect impacts of artificial nighttime lighting on biological resources including migratory birds that fly at night, bats, and other nocturnal and crepuscular wildlife should be analyzed, and appropriate avoidance and minimization measures to reduce impacts to less than significant should be included in a revised MND. 12

Evidence impact would be significant: Artificial nighttime lighting often results in light pollution, which has the potential to significantly and adversely affect fish and wildlife. Artificial lighting alters ecological processes including, but not limited to, the temporal niches of species; the repair and recovery of physiological function; the measurement of time through interference with the detection of circadian and lunar and seasonal cycles; the detection of resources and natural enemies; and navigation (Gatson et al. 2013). Many species use photoperiod cues for communication including bird song (Miller 2006), determining when to begin foraging (Stone et al. 2009), behavioral thermoregulation (Beiswenger 1977), and migration (Longcore & Rich 2004). Phototaxis, a phenomenon that results in attraction and movement towards light, can disorient, entrap, and temporarily blind wildlife species that experience it (Longcore & Rich 2004).

Recommended Potentially Feasible Mitigation Measure: Because of the potential for artificial nighttime lighting to negatively impact wildlife, CDFW recommends a revised CEQA document include a light impact assessment and an analysis of impacts to biological resources accompanied by specific avoidance and minimization measures

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to ensure that impacts to wildlife are avoided or reduced to less than significant. Absent the completion of an analysis and inclusion of additional measures prior to the adoption of the CEQA document, CDFW recommends adding the following mitigation measure prior to adoption of the CEQA document:

MM BIO-[K]: Artificial Nighttime Lighting

During Project construction and operations over the lifetime of the Project, the Project shall eliminate all nonessential lighting throughout the Project area and avoid or limit the use of artificial light at night during the hours of dawn and dusk when many wildlife species are most active. The Project shall ensure that all lighting for the Project is fully shielded, cast downward and away from surrounding open-space areas, reduced in intensity to the greatest extent, and does not result in lighting trespass including glare into surrounding areas or upward into the night sky (see the International Dark-Sky Association standards at http://darksky.org/). San Bernardino County shall ensure use of LED lighting with a correlated color temperature of 3,000 Kelvins or less, proper disposal of hazardous waste, and recycling of lighting that contains toxic compounds with a qualified recycler. 12

COMMENT #12: Indirect Impacts from Maintenance Activities

Issue: The IS/MND fails to analyze the long-term indirect impacts of increased capacity, use and footprint of the camp on biological resources. Most notably, it is reasonably foreseeable that the camp will need to control rodent populations in and near the new facilities. Many facilities opt to use bait stations with anticoagulant rodenticide as a means to control rodents.

Specific impact: Both California spotted owl and southern rubber boa feed on rodents. Most rodent baits used in bait stations are multiple-dose rodenticides designed to feed rodents multiple times over several days in order for the rodenticide to build up to lethal levels. The rodents exposed to rodent bait may be preyed upon California spotted owl and southern rubber boa leading to non-target exposure of anticoagulants to these special-status species and other wildlife. Introducing rodenticide to the environment where California spotted owl and southern rubber boa occur present a reasonable foreseeable indirect impact to the environment.

Evidence impact would be significant: Consistent with CEQA Guidelines, Section 15380, California spotted owl is a California Species of Special Concern, and the Coastal-Southern California Distinct Population Segment is proposed for listing as an endangered species under the federal Endangered Species Act. Spotted owls have been characterized as central-place foragers, where individuals forage over a wide area and subsequently return to a nest or roost location that is often centrally-located within the home range (Rosenberg and McKelvey, 1999). They require large blocks (100-600 acres) of mature forest with suitable nesting trees and snags (Forsman, 1976). California spotted owls are highly sensitive to habitat destruction; the greatest threats to California spotted owl include the loss, degradation, and fragmentation of habitat (Forsman, 1976). Southern rubber boa is a threatened species pursuant to the California Endangered Species Act (Fish & G. Code, §§ 2050 et seq.). CESA prohibits the take (under Fish & G. Code, § 86, "take" means to hunt, pursue, catch, capture, or kill, or to attempt to hunt, pursue, catch, capture, or kill) of any endangered, threatened, or candidate species that results from a proposed Project, except as authorized by state law (Fish & G. Code, §§ 2080, 2085). 13

Recommended Potentially Feasible Mitigation Measure: Because of the potential for camp use, operations, and maintenance activities to negatively impact special-status species and other wildlife, CDFW recommends a revised CEQA document include an impact assessment for operations and maintenance activities and an analysis of impacts to biological resources accompanied by specific avoidance and minimization measures to ensure that impacts to wildlife are avoided or reduced to less than significant. Absent a thorough analysis of the potential impacts related to

maintenance, CDFW recommends adding the following mitigation measure prior to adoption of the CEQA document:

MM BIO-[L]: Avoidance of Rodenticide 13

Rodenticide shall not be used during Project construction, operations, and maintenance of the camp to avoid introducing rodenticides to the environment and exposing non-target species to anticoagulants and other poisons.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDB). The CNNDB field survey form can be filled out and submitted online at the following link: https://wildlife.ca.gov/Data/CNDDB/Submitting-Data. The types of information reported to CNDDB can be found at the following link: https://www.wildlife.ca.gov/Data/CNDDB/Plants-and-Animals. 14

ENVIRONMENTAL DOCUMENT FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the environmental document filing fee is required in order for the underlying Project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.) 15

CONCLUSION

CDFW appreciates the opportunity to comment on the MND to assist San Bernardino County, Land Use Services Department in identifying and mitigating Project impacts on biological resources. CDFW concludes that the MND lacks sufficient information for the Hume SoCal Expansion Project because it does not adequately identify or mitigate the Project's significant, or potentially significant, impacts to biological resources. A Mitigated Negative Declaration is only appropriate where there is no substantial evidence that the proposed Project may have a significant effect on the environment. As discussed in sections above, this Project may result in significant effects on the environment through habitat destruction and degradation, including degradation and loss of high-quality habitat upon which multiple protected species rely on.

The CEQA Guidelines indicate that recirculation is required when a new significant effect is identified and additional mitigation measures are necessary (§ 15073.5). CDFW recommends that the County conduct a complete assessment of biological resources, reassess the impacts of the Project on sensitive species and habitats, and reconsider whether additional mitigation measures and analysis as described in this letter should be added and whether an MND is the appropriate document in this case. 16

Questions regarding this letter or further coordination should be directed to Julia Charpek, Environmental Scientist, at 909.354.0937 or Julia.Charpek@wildlife.ca.gov .

Sincerely,

DocuSigned by:
Kim Freeburn
84F92FFEEFD24C8...

Kim Freeburn
Environmental Program Manager

Attachment 1: MMRP for CDFW-Proposed Mitigation Measures

ec:

Eric Kawamura-Chan, Senior Environmental Scientist (Supervisor), CDFW
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Attachment 1: Mitigation Monitoring and Reporting Program (MMRP) for Biological Resources

Mitigation Measure (MM) Description	Implementation Schedule	Responsible Parties
Mitigation Measure BIO-[A]: Assessment of Biological Resources Prior to Project construction activities, a complete and recent inventory of rare, threatened, endangered, and other sensitive species located within the Project footprint and within off-site areas with the potential to be affected, including California Species of Special Concern (CSSC) and California Fully Protected Species (Fish and Game Code § 3511), will be completed. Species to be addressed should include all those which meet the CEQA definition of Endangered, Rare or Threatened Species (CEQA Guidelines § 15380). The inventory should address seasonal variations in use of the Project area and should not be limited to resident species. Focused species-specific surveys, completed by a qualified biologist and conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable are required. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service, where necessary. Note that CDFW generally considers biological surveys for wildlife to be valid for a one-year period, and surveys for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project warrant periodic updated surveys for certain sensitive taxa, particularly if the Project is proposed to occur over a protracted time frame, or in phases, or if surveys are completed during periods of drought.	Prior to Project construction activities	San Bernardino County, Land Use Services Department
MM BIO-[B]: Special-Status Plants Prior to Project initiation, a thorough, recent, floristic-based assessment of special status plants and natural communities, following CDFW's Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (see https://www.wildlife.ca.gov/Conservation/Plants) shall be performed by a qualified biologist. Should any state-listed plant species be present in the Project area, the Project proponent shall obtain appropriate CESA authorization for those species prior to the start of Project activities. Should other special-status plants or natural communities be present in the Project area, on-site or off-site habitat restoration (whichever is applicable) and/or enhancement and preservation should be evaluated and discussed in detail. Where habitat preservation is not available on-site, off-site land acquisition, management, and preservation should be evaluated.	Prior to Project construction activities	San Bernardino County, Land Use Services Department
MM BIO-[C]: Nesting Birds Regardless of the time of year, nesting bird surveys shall be performed by a qualified avian biologist no more than 3 days prior to vegetation removal or ground-disturbing activities for all phases of Project construction. Preconstruction surveys shall focus on both direct and indirect evidence of nesting, including nest locations and nesting behavior. The qualified avian biologist will make every effort to avoid potential nest predation as a result of survey and monitoring efforts. If active nests are found during the pre-construction nesting bird surveys, a qualified biologist shall establish an appropriate nest buffer to be marked on the ground. Nest buffers are species specific and shall be at least 300 feet for passerines and 500 feet for raptors. A smaller or larger buffer may be determined by the qualified biologist familiar with the nesting phenology of the nesting species and based on nest and buffer monitoring results. Construction activities may not occur inside the established buffers, which shall remain on site until a qualified biologist determines the young have fledged or the nest is no longer active. Active nests and adequacy of the established buffer distance shall be monitored daily by the qualified biologist until the qualified biologist has determined the young have fledged or the Project has been completed. The qualified biologist has the authority to stop work if nesting pairs exhibit signs of disturbance.	No more than 3 days prior to vegetation clearing or ground-disturbing activities	San Bernardino County, Land Use Services Department
MM BIO-[D]: Bald Eagle and Golden Eagle Breeding Surveys Prior to Project activities, a qualified biologist shall conduct focused breeding surveys for bald eagle and golden eagle, following appropriate protocols: CDFW's Bald Eagle Nesting Territory Survey Form and Instructions (2010) and USFWS Interim Golden Eagle Inventory and Monitoring Protocols (Pagel et al. 2010). If nesting eagles are detected during the focused surveys, the qualified biologist and San Bernardino County shall coordinate with CDFW to develop avoidance and minimization measures to be reviewed by CDFW. Project disturbances will not occur within 0.5 mile of the active nest sites during breeding season (December 30 through July 1) or any disturbance if that action is shown to disturb the nesting eagles. The 0.5 mile no disturbance buffer will be maintained throughout the breeding season or until the young have fledged and are no longer dependent on the nest or parental care for survival.	Prior to Project construction activities	San Bernardino County, Land Use Services Department
MM BIO-[E]: California Spotted Owl Prior to Project activities, a qualified biologist shall complete necessary surveys, impact assessments, and associated reports following the protocols provided within the Protocol for Surveying Proposed Management Activities That May Impact Northern Spotted Owls (USFWS, 2012). The Project shall not conduct any Project activities during the California spotted owl nesting season (February 1 to August 15) if owls could be present. California spotted owl	Prior to Project construction activities	San Bernardino County, Land Use Services Department

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nesting and/or roosting habitat is identified within 0.25 miles of Project site activities. Therefore, the Project shall develop a plan to completely avoid impacts to the species and submit it to CDFW for review and approval prior to commencing Project activities. Prior to Project activities, the qualified biologist shall evaluate the Project site and surrounding area for any known California spotted owl Activity Centers using CDFWs Spotted Owl Database (https://wildlife.ca.gov/Data/CNDDB/Spotted-Owl-Info). No Project activities shall occur within 0.25 miles from known California spotted owl Activity Center(s). These buffers should be maintained during the breeding season and until surveys that support probable absence, non-nesting, nest failure, or fledgling flight can be conducted. To compensate for the degradation and/or loss of California spotted owl habitat, the Project shall, no less than 3 months prior to the initiation of Project activities, acquire, permanently protect (through recordation of a conservation easement), and perpetually manage (through a long-term management plan and non-wasting endowment), suitable replacement habitat within the San Bernardino Mountains at no less than a 3:1 (mitigation-to-impact) ratio.		
MM BIO-[F]: Southern Rubber Boa Suitable habitat for Southern Rubber boa occurs throughout the Project site. As a result, Permittee shall ensure that impacts to southern rubber boa(s) are fully avoided through the implementation of CDFW-approved surveys and a protection plan that includes ongoing monitoring and establishment of avoidance measures. Because southern rubber boa are difficult to detect and the Project cannot ensure complete avoidance, the Project shall obtain CESA authorization prior to initiation of Project activities. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP), a consistency determination, or other permitting options (Fish and G. Code, §§ 2080.1, 2081, subds. (b), (c)). CDFW encourages early consultation, as significant modification to the proposed Project and avoidance, minimization, and mitigation measures may be necessary to obtain a CESA ITP. To compensate for the degradation and/or loss of southern rubber boa habitat, the Project shall, no less than 3 months prior to the initiation of Project activities, acquire, permanently protect (through recordation of a conservation easement), and perpetually manage (through a long-term management plan and non-wasting endowment), suitable replacement habitat within the San Bernardino Mountains at *no less* than a 3:1 (mitigation-to-impact) ratio, to be determined by CDFW to ensure impacts to southern rubber boa are fully mitigated, pursuant to CESA.	Prior to Project construction activities	San Bernardino County, Land Use Services Department
MM BIO-[G]: Arroyo Toad Prior to Project activities, a qualified biologist shall complete necessary surveys, impact assessments, and associated reports within all locations subject to Project site activities following the protocols provided within the Survey Protocol for the Arroyo Toad (USFWS 1999). The results of the survey shall be sent to CDFW and USFWS within one week of survey completion. If arroyo toads are identified, additional avoidance and minimization measures shall be established and implemented prior to the initiation of Project activities and in coordination with CDFW and USFWS. In addition, access path use shall occur during daylight hours (from 2 hours after sunrise to 2 hours before sunset) when amphibians are less frequent and no Project activities shall take place during the arroyo toad breeding season (March 1–July 31) within suitable arroyo toad breeding habitat.	Prior to Project construction activities	San Bernardino County, Land Use Services Department
MM BIO-[H]: Crotch's Bumble Bee Within one year prior to vegetation removal and/or grading, a qualified entomologist familiar with Crotch's bumble bee shall perform surveys to determine the presence/absence of Crotch's bumble bee. Surveys should be conducted during flying season when the species is most likely to be detected above ground, between March 1 to September 1. Survey results, including negative findings, should be submitted to CDFW prior to implementing Project-related ground-disturbing activities. At minimum, a survey report should provide the following: A) A description and map of the survey area, focusing on areas that could provide suitable habitat for Crotch's bumble bee, showing surveyor(s) track lines to document that the entire site was covered during field surveys. B) Field survey conditions that include name(s) of qualified entomologist(s) and brief qualifications; date and time of survey; survey duration; general weather conditions; survey goals, and species searched. C) Map(s) showing the location of individuals and nests/colonies. D) A description of physical (e.g., soil, moisture, slope) and biological (e.g., plant composition) conditions where each individual and nest/colony is found. A sufficient description of biological conditions, primarily impacted habitat, should include native plant composition (e.g., density, cover, and abundance) within impacted habitat (e.g., species list separated by vegetation class; density, cover, and abundance of each species). If Crotch's bumble bee is detected, the Project shall obtain CESA authorization prior to initiation of Project activities. CDFW encourages early consultation, as significant modification to the proposed Project and avoidance, minimization, and mitigation measures may be necessary to obtain a CESA ITP.	Prior to Project construction activities	San Bernardino County, Land Use Services Department
MM BIO-[I]: CDFW's Lake and Stream Alteration (LSA) Program Prior to Project activities and issuance of any grading permit, the Project Sponsor shall obtain written correspondence from the California Department of	Prior to Project construction activities and	San Bernardino County, Land

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Elena Barragan, Senior Planner
San Bernardino County, Land Use Services Department
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Fish and Wildlife (CDFW) stating that notification under section 1602 of the Fish and Game Code is not required for the Project, or the Project Sponsor shall obtain a CDFW-executed Lake and Streambed Alteration Agreement, authorizing impacts to Fish and Game Code section 1602 resources associated with the Project.	issuance of any grading permit	Use Services Department
MM BIO-[J]: Construction Noise During all Project construction, San Bernardino County shall restrict use of equipment to hours least likely to disrupt wildlife (e.g., not at night or in early morning) and restrict use of generators except for temporary use in emergencies. Power to sites can be provided by solar PV (photovoltaic) systems, cogeneration systems (natural gas generator), small micro-hydroelectric systems, or small wind turbine systems. The County shall ensure the use of noise suppression devices such as mufflers or enclosures for generators. Sounds generated from any means must be below the 55-60 dB range within 50-feet from the source.	During all Project construction	San Bernardino County, Land Use Services Department
MM BIO-[K]: Artificial Nighttime Lighting During Project construction and operations over the lifetime of the Project, San Bernardino County shall eliminate all nonessential lighting throughout the Project area and avoid or limit the use of artificial light at night during the hours of dawn and dusk when many wildlife species are most active. San Bernardino County shall ensure that all lighting for the Project is fully shielded, cast downward and away from surrounding open-space areas, reduced in intensity to the greatest extent, and does not result in lighting trespass including glare into surrounding areas or upward into the night sky (see the International Dark-Sky Association standards at http://darksky.org/). San Bernardino County shall ensure use of LED lighting with a correlated color temperature of 3,000 Kelvins or less, proper disposal of hazardous waste, and recycling of lighting that contains toxic compounds with a qualified recycler.	During all Project construction and the lifetime of the Project	San Bernardino County, Land Use Services Department
MM BIO-[L]: Avoidance of Rodenticide Rodenticide shall not be used during Project construction, operations, and maintenance of the camp to avoid introducing rodenticides to the environment and exposing non-target species to anticoagulants and other poisons.	During all Project construction and the lifetime of the Project	San Bernardino County, Land Use Services Department

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R2 - Responses to California Department of Fish and Wildlife

Kim Freeburn, Environmental Program Manager

R2-1 The comment is introductory in nature. The comment provides an introduction, project summary, and details of the comment organization. No further response is required.

R2-2 The comment raises concerns about the consistency of the IS/MND **Appendix A1** and the appropriate determination of environmental baseline. The dates referred to in the appendix represent different field study sessions with July 31, 2023, and August 2, 2023, for analysis of habitat, and March 22, April 18, and June 30, 2023, evaluating plant communities. The IS/MND relies on a biological resources assessment prepared by qualified biologists that included review and multiple field visits conducted during the appropriate seasons to characterize habitat and assess potential species presence. CEQA does not require surveys to the degree mentioned for all special-status species for which there is no substantial evidence of likely occurrence. The IS/MND identifies potential species and incorporates MM's BIO-1 and BIO-2.

MM BIO-1 ensures that a preconstruction clearance survey will be conducted prior to any ground disturbance or vegetation removal activities that may disrupt special-status wildlife (arroyo toad, California spotted owl, southern rubber boa, San Bernardino flying squirrel). The proposed Project biologist shall ensure that impacts to any special-status wildlife observed during preconstruction clearance surveys are reduced or avoided, such that impacts are less than significant, this includes but is not limited to, avoidance buffers and relocation from harm's way. MM BIO-2 ensures compliance with the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code through the avoidance of site preparation activities, to the greatest extent possible, during the nesting season of potentially occurring native and migratory bird species, including the golden eagle, bald eagle, and California spotted owl. If Project development is proposed during the nesting/breeding season, a pre-activity field survey shall be conducted by a qualified biologist prior to ground-disturbing activities to determine if active nests of species protected by the MBTA or the California Fish and Game Code are present in the construction zone. If active nests are not located within the construction zone during the implementation of the Project and there is a buffer of 500 feet from an active listed species or raptor nest, 300 feet of other sensitive or protected bird nests (nonlisted), or 100 feet of sensitive or protected songbird nests, then construction activity may occur during the nesting/breeding season. However, if active nests are located during the pre-activity field survey, no grading or heavy equipment activity shall take place within at least 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected (under MBTA or California Fish and Game Code) bird nests (nonlisted), or within 100 feet of sensitive or protect songbird nests until the nest is no longer active.

The comment does not include evidence that the impact to special-status wildlife would be significant or that mitigation measures do not adequately address impacts. No further response is warranted.

R2-3 The comment raises concerns over the adequacy of analysis regarding special-status plants. The IS/MND evaluates special-status plant potential based on habitat suitability, regional records, and field observations. Field observations for plant communities were conducted on March 22, April 18, and June 30, 2023. CEQA does not require floristic surveys where habitat conditions and reconnaissance surveys indicate a low likelihood of occurrence. As discussed in the IS/MND (page 74), no special-status plant species were observed during the field investigations. A list of special-status plant species with the potential to occur is provided in the IS/MND; however, none of the listed special-status plant species are federally or state listed as endangered or threatened. Instead these species are designated with CNPS Rare Plant Ranks 4.2, 4.3, 2B.2, 1B.2, and 1B.3, which are not legally binding rankings. As such, if any of the special-status plant species were observed onsite, their small, isolated populations would not contribute meaningfully to the conservation of their relative species, and therefore, no focused surveys were recommended. No revisions are warranted.

R2-4 The comment raises concerns about the sufficiency of the identification and mitigation of potential impacts to nesting birds. The IS/MND includes a mitigation measure (MM BIO-2) requiring compliance with the Migratory Bird Treaty Act (MBTA) and Fish and Game Code (FGC), including pre-construction nesting bird surveys when work occurs during the nesting/breeding season (generally February 1 to August 31). This measure is consistent with CEQA practice. No revisions are warranted.

R2-5 The comment includes concerns about the sufficiency of the identification and mitigation of impacts to bald and golden eagles. The IS/MND identifies potential eagle habitat and requires compliance with all applicable federal and state regulations protecting fully protected species, including the MBTA, Bald and Golden Eagle Protection Act, and FGCs Sections 3511 and 3513. The biological assessment did not identify active nest sites within the Project footprint. Impacts would be less than significant with existing MMs BIO-1 and BIO-2 which require preconstruction clearance surveys for special-status wildlife and pre-activity field surveys for nesting birds, including the golden eagle and bald eagle, to ensure impacts to these species do not occur as a result of Project implementation. No revisions are warranted.

R2-6 The comment includes concerns about the sufficiency of the identification and mitigation of impacts to the California spotted owl. The IS/MND recognizes the potential for California spotted owl to occur and includes MMs BIO-1 and BIO-2. The Project would be constructed adjacent to previously disturbed areas that do not provide as high-quality habitat for California spotted owl as the undeveloped areas. Prior to implementation of each phase of the Project, a pre-construction clearance surveys for special-status wildlife and pre-activity field survey for nesting birds would be conducted to ensure California spotted owl have not inhabited the Project site. If California spotted owl presence is documented, MM BIO-2 identifies buffers to be implemented to protect nesting birds and migratory bird species, including the California spotted owl. No revisions are warranted.

R2-7 The comment includes concerns about the sufficiency of the identification and mitigation of impacts to the southern rubber boa. The Project would be constructed adjacent to previously disturbed areas, with development clustered on approximately 20 acres that do not provide as high of quality habitat for southern rubber boa as the undeveloped areas on the periphery of the Project site. The Project would be constructed adjacent to previously disturbed areas, reducing impacts to non-disturbed land which provides suitable habitat for southern rubber boa. To ensure the absence of southern rubber boa from site specific locations prior to grading activities, MM BIO-1 would be implemented. MM BIO-1 implements a pre-construction clearance survey to reduce or avoid any impacts to special-status wildlife, including the southern rubber boa, before ground disturbance. No revisions are warranted.

R2-8 The comment includes concerns about the sufficiency of the identification and mitigation of impacts to the arroyo toad. The arroyo toad was not observed on the Project site and is assumed absent. MM BIO-1 would be implemented out of an abundance of caution to ensure a pre-construction clearance survey for special-status wildlife, including the arroyo toad, is conducted. No revisions are warranted.

R2-9 The comment includes concerns about the sufficiency of the identification and mitigation of impacts to the Crotch's bumble bee. **Appendix A1: Biological Resources Assessment** provides Table C-1 – Potentially Occurring Special-Status Biological Resources, which notes Crotch's Bumble Bee is "presumed absent" because "no suitable habitat is present within the Project site." The comment includes speculation and opinionated accounts of Crotch's bumble bee in an undefined area near the site. The comment does not provide adequate evidence of Crotch's bumble bee occurring or having potential to occur on or near the site, and therefore, no revisions are warranted. Note that MM BIO-1 would be implemented to ensure a pre-construction clearance survey for special-status wildlife, including the bee, is conducted. No revisions are warranted.

R2-10 The comment includes concerns that the IS/MND does not identify mitigation to reduce potential impacts to streams and associated resources. The IS/MND (page 78) indicates that the onsite drainage features would qualify as waters of the United States under the jurisdiction of the USACE and would qualify as "waters of the State" under the regulatory authority of the RWQCB and CDFW. Any impacts to the on-site jurisdictional areas will require a USACE Clean Water Act Section 404 Permit, RWQCB CWA Section 401 Water Quality Certification, and a CDFW Section 1602 Lake and Streambed Alteration Agreement prior to Project implementation. Acquisition of necessary permits/agreements would reduce impacts regarding jurisdictional features to a level of less than significant. The IS/MND includes a Jurisdictional Delineation (JD) as **Appendix A2: Delineation of State and Federal Jurisdictional Waters**. The JD notes that based on the proposed design plan, "no impacts to CDFW jurisdictional areas are expected to occur from Project implementation." Additionally, the JD notes no impacts to USACE or RWQCB areas are expected to occur from Project implementation – as noted in the IS/MND – Biological Resources Impact c) (page 78). The comment does not provide evidence that meeting these regulatory requirements would still produce a significant environmental impact. No revisions are warranted.

R2-11 The comment includes a concern that the IS/MND does not include identification or mitigation of potential impacts related to construction noise on biological resources. The IS/MND concludes that the Project would not result in the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the Project in excess of County standards. The Project would be required to meet County noise guidelines during construction and operation. Additionally, compliance with Section 83.01.080(G) (Exempt Noise) of the County of San Bernardino Development Code would minimize impacts from construction noise, as construction would be limited to daytime hours (7:00 a.m. to 7:00 p.m.). The IS/MND includes an Acoustical Assessment as **Appendix I: Acoustical Assessment**, because the County does not identify specific noise level limits for construction the assessment leans on the Federal Transit Administration (FTA) threshold of 80 dbA and 85 dbA, which the Project would not exceed in relation to (1) construction, (2) construction traffic, or (3) operations – resulting in a less-than-significant noise impact.

R2-12 The comment asserts that the IS/MND does not analyze artificial nighttime lighting impacts to biological resources. As discussed in the IS/MND – Aesthetics Impact d) (page 54), the Project would comply with the County Light Trespass Ordinance which was adopted in December 2021. The ordinance requires light fixtures to be designed with shielding to contain lighting spillage within 0.1 footcandle for the Mountain Region.

Additionally, the Project would comply with County Building Code Standards (Section 150.003 Construction: Hours of Construction) that would limit construction hours to 7:00 a.m. to 7:00 p.m., with only seasonal nighttime lighting required.

Once operational, the buildings would use interior and exterior lighting. Consistent with Section 83.07.060 (Glare and Outdoor Lighting – Mountain and Desert Region) of the County's Development Code, all exterior lighting used on the Project site would be subject to the following requirements:

- Be fully shielded.
- Light pollution and trespass would be minimized through the use of directional lighting, fixture location, and height.
- Automated control systems such as motion sensors and timers.
- All outdoor lighting shall be extinguished by 11:00 p.m., close of business, or when people are no longer present in exterior areas, whichever is later.

Adherence to this Ordinance would minimize nighttime related lighting impacts to biological resources.

R2-13 The comment includes concerns regarding rodent control methods and associated impacts. CEQA does not require speculative analysis of future facility maintenance methods. Any pest control activities must comply with existing federal regulations, such as the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), which requires that rodenticide products be used in accordance with

the Environmental Protection Agency (EPA) regulations to prevent unreasonable adverse effects to the environment, including impacts to wildlife. Pesticide use is further regulated by the California Department of Pesticide Regulation pursuant to California Food and Agriculture Code Requirements and Title 3 of the California Code of Regulations. These regulations govern application, handling, and restrictions on pesticide use, including rodenticides. The IS/MND includes MM BIO-1 and BIO-2, which mitigate impacts to less than significant levels regarding the California spotted owl and southern rubber boa. Additionally, rodenticide was not identified within the IS/MND Hazards and Hazardous Materials section (page 109) for Impact a) and b) regarding hazardous material transport, use, disposal, or release into the environment. The Project does not propose the use of rodenticides. No revisions are warranted.

R2-14 The comment is informatory in nature. The Project will comply with standard reporting practices and coordinate with CDFW regarding biological survey results. No revisions are warranted.

R2-15 The comment is informatory in nature. The Project and Lead Agency will comply with all fees.

R2-16 The comment is conclusionary in nature. The comment includes concluding remarks, a summary, references, and an attachment. The total comment does not provide adequate evidence that revisions to the IS/MND are warranted (see above responses). Disagreement with the County's conclusions does not constitute substantial evidence of a significant impact. The County is not required to adopt the recommended MM set forth in the comment, and the IS/MND as it stands is consistent with CEQA and applicable guidelines.

R3 - San Bernardino County Department of Public Works

Nancy Sansonetti, Supervising Planner
Chris Nguyen, Engineering Manager

Main Office - 825 East Third Street, San Bernardino, CA 92415-0835 | Phone: 909.387.7910 Fax: 909.387.7911

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SAN BERNARDINO COUNTY

Department of Public Works
- Flood Control
- Operations
- Solid Waste Management
- Special Districts
- Surveyor
- Transportation

Noel Castillo, P.E.
Director

Byanka Velasco, P.E.
Assistant Director

David Doublet, M.S., P.E.
Assistant Director

January 7, 2026

Transmitted Via Email
File: 10(ENV)-4.01

Land Use Services Department
Attn: Elena Barragan
Planning Division
385 N. Arrowhead Ave 1st Floor
San Bernardino, CA 92415-0187
elena.barragan@lus.sbcounty.gov

RE: LUSD - NOTICE OF AVAILABILITY AND NOTICE OF INTENT TO ADOPT AN INITIAL STUDY/MITIGATED NEGATIVE DECLARATION FOR HUME SOCAL CAMPGROUND EXTENSION (PROJ-2024-00046)

Dear Ms. Barragan:

Thank you for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. **We received this request on December 02, 2026** and pursuant to our review, the following comments are provided: 1

Transportation Design Division (Chris Nguyen, Engineering Manager, 909-387-7940):

1. Green Valley Lake Road (Road No. 393250010).
2. MP Region: Mountain.
3. Cir. Element: Mountain Secondary Highway, ROW 60' min. of which 44' curb to curb (dike) width in its ultimate configuration is paved.
4. Ultimate roadway configuration is that of Two-Lane highway with access control – i.e.: left turn lane at intersections.
5. Design Capacity at Level of Service "C" is 10,000 vehicles per day. 2
6. Existing paved surface varies but is roughly 24' wide.
7. Road rights will need to be perfected - the existing roadway meanders in and outside of the existing 60' wide dedicated road right-of-way.
8. 2020/2021 WO H14993 Completed – 1" Paving Overlay.
9. Green Valley Lake Road capacity, shoulder width to address clear recovery requirements, along with ingress/egress to the proposed expanded facility is deferred to DPW/Traffic.
10. Primary concern is being needed to install and maintain metal beam guard railing or rigid barrier rail system along the route where clear recovery requirements are not met.

BOARD OF SUPERVISORS
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LUSD - NOTICE OF AVAILABILITY AND NOTICE OF INTENT TO ADOPT AN INITIAL STUDY/MITIGATED NEGATIVE DECLARATION FOR HUME SOCAL CAMPGROUND EXTENSION (PROJ-2024-00046)
January 7, 2026
Page **2** of **2**

We respectfully request to be included on the circulation list for all project notices, public reviews, or public hearings. In closing, I would like to thank you again for allowing the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project. Should you have any questions or need additional clarification, please contact the individuals who provided the specific comment, as listed above.

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Sincerely,

Nancy Sansonetti

Nancy Sansonetti, AICP
Supervising Planner
Environmental Management Division

R3 - Responses to San Bernardino County Department of Public Works

Nancy Sansonetti, Supervising Planner
Chris Nguyen, Engineering Manager

R3-1 The comment is introductory in nature. No further response is warranted.

R3-2 The comment is informatory in nature. No further response is warranted.

R3-3 The comment includes a request to be included in Project notice circulation. The County will add the San Bernardino County Department of Public Works to the distribution list.

R4 - San Bernardino County Fire Protection District

Curtis Markloff, Assistant Fire Marshal

From: Markloff, Curtis <CMarkloff@SBCFire.org>
Sent: Wednesday, January 7, 2026 4:24 PM
To: Barragan, Elena <Elena.Barragan@lus.sbcounty.gov>
Cc: Serrano, Jason <jserrano@sbcfire.org>
Subject: RE: Initial Study, PROJ-2024-00046 Hume SoCal Camp Expansion

INFORMATION: This email originated from another San Bernardino County email system. Please observe normal caution when opening content.

Assistant Chief Serrano has completed the review of the Environmental Impact Report (EIR) for the Camp Hume Project expansion. After thorough examination, it was noted that the report does not address critical considerations regarding emergency evacuation procedures. Specifically, the EIR lacks information on:

How the camp plans to evacuate approximately 3,000 individuals from the mountain during emergency events.

The designated evacuation routes to be used.

The estimated time required to complete a full evacuation.

The logistical challenges posed by tight turns along Green Valley Lake Road, which could significantly impact large vehicle maneuverability. 1

At full capacity, it is estimated that approximately 50 buses would be required to evacuate all campers and staff. This raises concerns about route feasibility, traffic congestion, and overall evacuation time under emergency conditions.

These elements are essential for ensuring life safety during emergencies and should be clearly outlined in the EIR.

If you need anything else, please do not hesitate to reach out to myself or Chief Jason Serrano.

Curtis.Markloff

Assistant.Fire.Marshal

Planning.and.Engineering

Office.of.the.Fire.Marshal.(Division.78)

San.Bernardino.County.Fire.Protection.District

❺6❺_❺7❹_8867

R4 - Response to San Bernardino County Fire Protection District

Curtis Markloff, Assistant Fire Marshal

R4-1 The comment misidentifies the type of environmental document prepared for the Project and lists concerns about wildfire emergency evacuation on local roadways. The Initial Study prepared for the Project found that potential impacts associated with the Project could, with mitigation, specifically MM WF-1, be reduced to less than significant levels. Because of this a Mitigated Negative Declaration was prepared in place of an Environmental Impact Report. Furthermore, all impacts related to wildfire and transportation would be less than significant. MM WF-1 ensures an Evacuation Plan and Working Guide is strongly implemented by the Project and is to be based on CAL FIRE'S "Ready, Set, Go!" model. The Evacuation Plan and Working Guide would be updated and submitted to Land Use Services for review and approval, upon completion of construction activities for each phase, to ensure adequate preparation for higher campground occupancy. MM WF-1 also ensures the Project will work with local fire agencies and hold annual fire safety and evacuation preparedness information meetings so that guests and employees can familiarize themselves with the plan. Refer to Master Responses – Transportation/Traffic and Wildfire, **Appendix K: Emergency Plan and Procedures**. The comment does not provide evidence that the IS/MND was inadequately prepared; no further response is warranted.

R5 - U.S. Fish and Wildlife Service, Palm Springs

Shaun Olson, Wildlife Biologist

From: Olson, Shaun E
To: Barragan, Elena
Cc: Cleary-Rose, Karin
Subject: Comments for PROJ-2024-00046, Hume SoCal Campground Extension
Date: Tuesday, January 6, 2026 4:21:04 PM

You don't often get email from shaun_olson@fws.gov. Learn why this is important

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hello,

We received a Notice of Availability (NOA) and Notice of Intent (NOI) to adopt an Initial Study/Mitigated Negative Declaration (IS/MND) for the Hume SoCal Campground Extension project (PROJ-2024-00046). The primary concern and mandate of the U.S. Fish and Wildlife Service is the protection of fish and wildlife resources and their habitats. The Service has a legal responsibility for the welfare of migratory birds, anadromous fish, and endangered animals and plants occurring in the United States. The Service is also responsible for administering the Federal Endangered Species Act (ESA) of 1973, as amended (16 U.S.C. 1531 et seq.) and the Migratory Bird Treaty Act (MBTA) of 1918, as amended (16 U.S.C. 703 et seq.). 1

Data obtained from the U.S. Forest Service indicate that there are two Coastal-Southern California spotted owl (Strix occidentalis occidentalis) territories that overlap the project. The project intersects with approximately 197 acres of one territory (SB155) and approximately 12 acres of the other territory (SB060). Territory SB155 will be affected by all phases of construction and continued use of the camp; most notably the nest stand, which abuts the northeast corner of parcel 0328-121-40. While the nest stand does not lie within the project footprint it is the most sensitive part of the territory. The portion of SB060 territory is in the northwest section of parcel 0328-071-10 and would be affected by phase 5 construction and continued camp use. 2

Currently the Coastal-Southern California distinct population segment of the spotted owl is a candidate for proposed listing as an endangered species. While the species is not yet Federally listed under the ESA, it is still covered by the MBTA. Therefore, we recommend the following to help minimize impacts to the two territories:

1: Prior to construction conduct a nighttime occupation survey with a minimum of three visits during the breeding season (Feb – Sep). These visits should be at least 7 days apart. If a breeding pair is present an avoidance buffer around the nesting area should be used. This buffer zone should encompass an area approximately 0.25 miles from the nest tree. 3

2: Maintain at least 50 percent canopy cover throughout the project area. 4

3: Keep all outdoor lighting shielded and pointing down. Lighting in the northeast corner of parcel 0328-121-40 should be pointed to the south and west, away from the nest stand. 5

4: Limit use of activity quads to daylight hours. 6

5: Limit outdoor live music events to daylight hours. 7

6: Avoid PA system use in the early evenings and at night. 8

7: Do not use rodenticides for rodent control; use mechanical traps. 9

Thank you for the opportunity to provide comments on the proposed project. Please feel free to contact me if you have any questions. 10

Shaun Olson
Wildlife Biologist
U.S. Fish and Wildlife Service
Palm Springs Fish & Wildlife Office
Inland Division
777 East Tahquitz Canyon Way, Suite 208
Palm Springs, CA 92262
760-257-8148

"We are a way for the Cosmos to know itself."
~ Carl Sagan

R5 - Responses to U.S. Fish and Wildlife Service, Palm Springs

Shaun Olson, Wildlife Biologist

R5-1 The comment is introductory in nature. No further response is required.

R5-2 The comment is informatory in nature and provides information of California spotted owl presence near the Project. Also, refer to below Response R5-3.

R5-3 The comment includes a recommended precaution regarding California spotted owl Territories, especially regarding preconstruction survey. The Project's impacts on biological resources were found, with mitigation, specifically MM BIO-1 and BIO-2, to be less than significant. MM BIO-1 ensures that a preconstruction clearance survey will be conducted prior to any ground disturbance or vegetation removal activities that may disrupt special-status wildlife. The proposed Project biologist shall ensure that impacts to any special-status wildlife observed during preconstruction clearance surveys are reduced or avoided, such that impacts are less than significant, this includes but is not limited to, avoidance buffers and relocation from harm's way. MM BIO-2 ensures compliance with the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code through the avoidance of site preparation activities, to the greatest extent possible, during the nesting season of potentially occurring native and migratory bird species, including the golden eagle, bald eagle, and California spotted owl. If Project development is proposed during the nesting/breeding season, a pre-activity field survey shall be conducted by a qualified biologist prior to ground-disturbing activities to determine if active nests of species protected by the MBTA or the California Fish and Game Code are present in the construction zone. If active nests are not located within the construction zone during the implementation of the Project and there is a buffer of 500 feet from an active listed species or raptor nest, 300 feet of other sensitive or protected bird nests (nonlisted), or 100 feet of sensitive or protected songbird nests, then construction activity may occur during the nesting/breeding season. However, if active nests are located during the pre-activity field survey, no grading or heavy equipment activity shall take place within at least 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected (under MBTA or California Fish and Game Code) bird nests (nonlisted), or within 100 feet of sensitive or protect songbird nests until the nest is no longer active.

The comment does not include evidence that the impact to special-status wildlife would be significant or that mitigation measures do not adequately address impacts. No further response is warranted.

R5-4 The comment includes a recommended precaution regarding California spotted owl Territories, especially regarding canopy cover. The Project's impacts on forestry resources were found to be less than significant. The Project site contains forest land. The majority of the Project site is classified as evergreen forest. The Project site is subject to the County's Open Space (OS) Overlay, as defined in County Development Code Section 82.19.030 Special Requirements for Natural Resources. As such, development of the Project would be subject to the unique OS Overlay development criteria (Section 82.19.040 Development Criteria within Scenic Areas), which

includes limitations on timber harvesting and the removal of native vegetation, especially timber. Therefore, with compliance with applicable local regulations, the Project would not result in the loss of forest land or conversion of forest land to non-forest use, and a less than significant impact would occur. The comment does not provide adequate evidence that any impacts are not adequately addressed or are significant and would warrant additional mitigation.

R5-5 The comment includes a recommended precaution regarding California spotted owl Territories, especially regarding light standards. The IS/MND evaluates the impacts of outdoor lighting and finds them to be less than significant. The Project would comply with the County Light Trespass Ordinance, which was adopted in December 2021. The ordinance requires light fixtures to be designed with shielding to contain lighting spillage within 0.1 footcandle for the Mountain Region. Consistent with Section 83.07.060 (Glare and Outdoor Lighting – Mountain and Desert Region) of the County's Development Code, all exterior lighting used on the Project site would be fully shielded, with trespass minimized by direction lighting, fixture location, and height. Automated control systems, such as motion sensors and times would be implemented. The comment does not provide substantial evidence that impacts to aesthetics or biological resources would be significant, and therefore, no changes to the IS/MND are warranted.

R5-6 The comment includes a recommended precaution regarding California spotted owl Territories, especially regarding outdoor operation hours in non-daylight hours. The IS/MND evaluates impacts to noise and lighting and finds impacts to be less than significant. Consistent with Section 83.07.060 (Glare and Outdoor Lighting – Mountain and Desert Region) of the County's Development Code, all exterior lighting used on the Project site would be extinguished by 11:00 p.m., close of business, or when people are no longer present in exterior area, whichever is later. Additionally, any noise associated with the Project would not have a significant impact and would comply with the County's established noise standards during operation. All impacts to aesthetics, noise, and biological resources were found to be less than significant. The comment does not provide adequate evidence that the IS/MND or its conclusions are inadequate.

R5-7 The comment includes a recommended precaution regarding California spotted owl Territories, especially regarding the operational hours of outdoor live music events. The IS/MND evaluates impacts to noise and finds them to be less than significant. The Project would provide occasional live music events on the Project site. The noise would not exceed the County's threshold from stationary noise sources or the 60 dB threshold for sensitive receptors. The comment does not provide evidence that noise related impacts would be significant, no further response is warranted.

R5-8 The comment includes a recommended precaution regarding California spotted owl Territories, especially regarding the operational hours of outdoor public address (PA) system use. The proposed PA system for announcements, music, etc., would not exceed the County's threshold (daytime and nighttime) from stationary noise sources or the 60 dB threshold for sensitive receptors. Therefore, a less than significant impact would occur in this regard. The comment does

not provide adequate evidence that the evaluation of impacts to noise or biological resources is inadequate.

R5-9 The comment includes concerns regarding rodent control methods. CEQA does not require speculative analysis of future facility maintenance methods. Any pest control activities must comply with existing federal regulations, such as the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), which requires that rodenticide products be used in accordance with the Environmental Protection Agency (EPA) regulations to prevent unreasonable adverse effects to the environment, including impacts to wildlife. Pesticide use is further regulated by the California Department of Pesticide Regulation pursuant to California Food and Agriculture Code Requirements and Title 3 of the California Code of Regulations. These regulations govern application, handling, and restrictions on pesticide use, including rodenticides. The IS/MND includes MM BIO-1 and BIO-2, which mitigate impacts to less than significant levels regarding the California spotted owl. Additionally, rodenticide was not identified within the IS/MND Hazards and Hazardous Materials section (page 109) for Impact a) and b) regarding hazardous material transport, use, disposal, or release into the environment. The Project does not propose the use of rodenticides. No revisions are warranted.

R5-10 The comment is conclusionary in nature; no further response is warranted.

2.4 Local

L1 - Arrowbear Park County Water District

Chris Dumas, General Manager

ARROWBEAR PARK COUNTY WATER DISTRICT
P.O. BOX 4045 | 2365 FIR DRIVE
ARROWBEAR LAKE, CA 92382-4045
(909) 867-2704

January 6, 2026

VIA E-MAIL AND U.S. MAIL

Elena Barragan
County of San Bernardino
Land Use Services Department, Planning Division
385 N. Arrowhead Ave 1st Floor
San Bernardino, CA 92415-0187

Re: Hume SoCal Campground Extension Comment Letter

Dear Ms. Barragan:

The Arrowbear Park County Water District ("District") is in receipt of the Notice of Availability and Notice of Intent to Adopt an Initial Study/Mitigated Negative Declaration ("MND") for the Hume SoCal Campground Extension ("Project"; State Clearinghouse Number 2025110453). The District reviewed the MND and still has serious concerns regarding potential impacts this Project may have on the District's infrastructure.

As a preliminary matter, the District was only made aware of this Project in the course of conversation with a project affiliated contact part way through the MND's public review period. Given the limited duration of the public review period, the District was only able to conduct a high-level review of the MND. In order to make an accurate determination regarding the possible impacts to the District's infrastructure, additional technical studies are required and may be conducted in conjunction with Running Springs Water District. In the meantime, the below outlines the District's initial concerns with potential Project impacts. 1

I. The District is a Responsible Agency pursuant to CEQA.

As a preliminary matter, the MND's potential impacts on the District's infrastructure would require mitigation by way of substantial expansion and modernization of the District's existing facilities and infrastructure. Any such extensive system modifications would require approval by the District's governing board. Accordingly, the District qualifies as a "responsible agency" under the California Environmental Quality Act (CEQA), which defines a responsible agency as a public agency, other than the lead agency, that has discretionary approval authority over a portion of a project. (State CEQA Guidelines, §15381.) As a responsible agency, the District was entitled to meaningful consultation by the lead agency and the project applicant during the environmental review process. (State CEQA Guidelines, §15096.) CEQA requires the lead agency to consult with responsible agencies regarding the scope and content of the environmental document, to provide 2

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them with a meaningful opportunity to comment, and to consider their expertise and concerns in evaluating the project's potential environmental impacts. (*Id.*) Here, the County and the project applicant failed to satisfy these consultation obligations by not engaging with the District beforehand.

Moving forward, we expect the District to be properly identified in the MND as a responsible agency and to be treated accordingly for purposes of CEQA compliance. Consistent with that role, we anticipate engaging in meaningful consultation with the Project applicant to ensure the District's serious technical and operational concerns regarding the Project are fully and adequately addressed. In addition, we expect to be kept informed of any material Project developments as they arise so the District may appropriately evaluate potential impacts within its jurisdiction and exercise its discretionary authority in compliance with CEQA. In the interim, and to facilitate productive discussions, we are providing below a summary of the technical bases for the District's concerns with the Project. 2 Cont

II. The IS/MND fails to properly analyze the Project's significant impacts to hydrology, water supply, utilities, and infrastructure.

CEQA Guidelines §§ 15063, 15070, and 15126.4 require that a project applicant and lead agency adequately analyze all potentially significant impacts and adopt feasible, enforceable mitigation measures supported by substantial evidence before relying on a mitigated negative declaration. This IS/MND, however, fails to adequately analyze the Project's hydrological impacts on the Agency's existing infrastructure, including whether increased demand and altered flow conditions would require system upgrades or otherwise impair the Agency's ability to operate its facilities. More specifically: 3

1. Sewer Flow Modeling and Peak Hour Conditions

The sewer analyses prepared for the Project appear to rely primarily on average daily flow (ADF) calculations and generalized peaking factors. While such methodologies are commonly used for planning-level review, they may not adequately capture short-duration peak flow conditions associated with organized camp operations. At full buildout, the Project proposes occupancy of approximately 3,000 campers and staff. Camp operations typically generate highly synchronized water use and wastewater discharge, particularly during early morning periods when occupants wake, shower, and use restroom facilities within a compressed timeframe (often one hour or less). 4

The Project documentation does not clearly demonstrate how these simultaneous-use peak events would affect:

- The Running Springs lift station conveying wastewater from the Green Valley Lake area, or

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- Available emergency storage capacity, pump cycling limits, and overflow risk during such peak conditions.

Additional clarification is warranted regarding whether the sewer modeling explicitly evaluated short-duration, simultaneous-use peak scenarios, as opposed to relying on averaged daily flows distributed over a 24-hour period. The IS/MND also does not clearly evaluate lift station and pumping system performance during power outages or emergency conditions coinciding with peak wastewater generation. 4 Cont

2. Downstream Spill Risk and Geographic Impact

Any surcharge, overflow, or spill associated with downstream lift stations serving the Project, particularly those operated by Running Springs Water District, would occur outside the Project boundary. It is noted that the Running Springs Lift Station serving the Green Valley area is in the community of Arrowbear. If wastewater from the Project contributes to a lift station failure or overflow during peak use, the resulting spill would occur in Arrowbear rather than at the Project site. 5

The Project documentation does not clearly address:

- The geographic location of potential overflow points,
- Which communities would bear environmental and public health impacts of a spill, or
- How responsibility and liability would be allocated among contributing agencies.

3. Groundwater Quality Constraints – Uranium

The water supply documentation identifies multiple on-site wells as potential sources of potable and non-potable water. However, it is understood that:

- At least two existing wells are currently limited to irrigation use for reasons not identified in the project documents. Naturally occurring groundwater quality issues are known to be common in the local mountain region, mainly uranium.
- Wells currently used for potable supply may experience increasing uranium concentrations over time when subjected to sustained higher pumping rates associated with large-scale occupancy. 6

The Water Supply Assessment does not appear to fully address:

- Long-term groundwater quality degradation risks associated with increased extraction, or
- The likelihood that currently used wells could exceed drinking water uranium standards under expanded operational demand.

4. Absence of Identified Water Treatment Facilities 7

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The Project materials do not clearly identify or commit to the construction of a water treatment system capable of removing uranium, such as ion exchange, reverse osmosis, or equivalent treatment technologies. Given that naturally occurring uranium is a known and documented groundwater condition in the local mountain region, including existing issues at Green Valley Mutual Water Company and Arrowbear Park County Water District, it is reasonable to anticipate that uranium may also become a limiting factor for sustained potable groundwater use at the Project site under expanded pumping conditions.

Without a defined treatment approach, it is unclear how the Project would:

- Maintain long-term compliance with drinking water standards, or
- Ensure that wells currently suitable for potable use would remain compliant under sustained high-demand conditions.

7 Cont

Additionally, the Project documentation does not address how uranium-bearing treatment residuals would be managed if water treatment becomes necessary. Depending on the treatment technology selected, residuals may be:

- Discharged incrementally to the wastewater collection system,
- Temporarily stored and periodically discharged, or
- Collected and hauled off-site for disposal.

The absence of this information prevents meaningful evaluation of whether uranium removed from the potable water supply could result in increased uranium loading at the Running Springs Wastewater Treatment Plant, with potential implications for:

- Treatment operations,
- Regulatory compliance, and
- Cost and liability allocation among contributing agencies.

Further clarification is warranted to disclose whether future potable water treatment would generate wastewater residuals that enter the shared wastewater system, and if so, how those residuals would be managed to avoid unintended downstream impacts.

5. Wastewater Treatment Plant Implications – Uranium Loading

It is understood that the Running Springs Wastewater Treatment Plant conducts monitoring for uranium and related constituents. Increased uranium concentrations in influent wastewater, whether originating from groundwater infiltration, potable water usage, or other pathways, could result in:

- Increased treatment complexity,
- Additional monitoring or regulatory compliance costs, and
- Potential regulatory or disposal liabilities.

8

Any increase in uranium loading attributable to the Project would not be isolated to the

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Project proponent, but would instead be borne by all entities delivering wastewater to the shared treatment facility.

The Project documentation does not appear to fully analyze:

- Whether expanded groundwater pumping could increase uranium concentrations in wastewater influent, or
- How associated costs and liabilities would be allocated among contributing agencies.

8 Cont

6. Aquifer Sustainability and Well Interference

The Water Supply Assessment does not include aquifer characterization, groundwater basin analysis, drawdown modeling, or well interference analysis sufficient to evaluate whether sustained increased groundwater extraction would affect neighboring groundwater users or nearby communities. While the assessment identifies CLAWA as a potential supplemental water source, the Project documentation does not quantify the amount of water CLAWA is capable of providing, nor does it include a binding or enforceable supply commitment. As a result, the record does not demonstrate that imported water would reliably offset Project demand under peak, dry-year, or multiple-dry-year conditions.

In the absence of a defined and reliable imported water allocation, it is reasonable to anticipate that a substantial portion of the Project's water demand would continue to be met through increased pumping of existing on-site wells. However, the documentation does not evaluate whether such sustained extraction could result in aquifer drawdown, well interference, or cumulative impacts to nearby groundwater users.

Specifically, the documentation does not evaluate:

- Long-term aquifer response to sustained higher pumping rates,
- Potential cone-of-depression effects extending beyond the Project site, or
- Cumulative impacts to surrounding wells during dry or multiple-dry-year conditions.

9

7. Downstream Watershed Considerations

The Project documentation does not clearly identify the regional watershed context for the project area or evaluate whether project-related groundwater extraction, wastewater conveyance, or treatment activities could result in downstream hydrologic or water quality effects. It is understood that the Project area lies within the Mojave River Watershed. However, the record does not indicate that potential downstream watershed impacts were analyzed, nor does it show that regional watershed agencies associated with the Mojave River system were consulted as part of the environmental review. Absent this information, it is unclear whether increased groundwater pumping, changes in wastewater flows, or treatment residual management could have cumulative

10

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or downstream effects beyond the immediate Project area. 10 Cont

Further clarification is warranted to disclose whether downstream watershed considerations were evaluated and whether coordination with appropriate regional watershed entities is necessary.

III. Conclusion

Collectively, the water and sewer documentation does not fully evaluate the peak operational stresses, downstream spill risks, groundwater quality constraints, aquifer sustainability, or shared wastewater treatment liabilities associated with the proposed expansion. Further analysis and clarification are warranted to ensure that Project-related impacts to neighboring communities and regional infrastructure are adequately disclosed and addressed. These issues must be fully and adequately resolved before the County may lawfully rely on a mitigated negative declaration for the Project. As the record currently stands, the IS/MND lacks substantial evidence to support its conclusions and fails to comply with CEQA's consultation and analytical requirements.

Moving forward, the District expects to be properly identified and engaged as a responsible agency under CEQA and to be meaningfully consulted regarding the scope, content, and resolution of these issues. The District stands ready to participate in good-faith consultation to ensure that its technical, operational, and regulatory concerns are addressed in a manner consistent with CEQA and the District's statutory obligations. 11

Sincerely,

Chris Dumas

General Manager

L1 - Responses to Arrowbear Park County Water District

Chris Dumas, General Manager

L1-1 The comment is introductory in nature. The comment provides an introduction to the purpose of the total comment. The IS/MND was initially distributed for the required 30-day review period on November 13, 2025, to December 12, 2025. This review period was extended to January 16, 2026, for a total review period of 64 days. Discussion of additional technical studies is included in the subsequent responses to this letter. No further response is required.

L1-2 The comment provides a statement about the District's relevance to CEQA and the Project. Crestline-Lake Arrowhead Water Agency (CLAWA) is the preferred water service provider with on-site wells, and Running Springs Water District (RSWD) is the preferred public wastewater service provider. Both agencies are listed as responsible agencies to the Project (refer to **Section 3, Errata**). The Project would utilize an on-site wastewater system in accordance with MM UTL-3, which would allow for connection to RSWD as a secondary solution, subject to approval by RSWD. As such, the IS/MND requires coordination with RSWD prior to connection for wastewater service and seasonal capacity. The Lead Agency will continue to consult with the utilities that may be affected. For these reasons, Arrowbear Park County Water District was not listed as a responsible agency.

L1-3 The comment is introductory in nature. The comment includes concerns about the Project's impact to hydrology, water supply, utilities, and infrastructure in relation to the Arrowbear Park County Water District. The Project proposes an on-site wastewater system, in accordance with MM UTL-3, instead of Arrowbear Park County Water District. Refer to total comment responses and Master Responses - Water and Wastewater/Sewer.

L1-4 The comment raises concerns about how sewer conditions were analyzed, noting that peak conditions should be analyzed in a more granular, peak-hour scenario instead of average daily flows. The Sewer Feasibility Study, which has been updated (**Appendix B2: Revised Sewer Feasibility Study**) was prepared in accordance with applicable County guidelines, which require wastewater generation to be calculated at average daily flows, including a 3.4 peaking factor due to camp characteristics. Flow projections were developed using the 2022 California Plumbing Code's generation of 50 gallons per capita per day. With mitigation, impacts were found to be less than significant. Wastewater infrastructure would be implemented in accordance with MM UTL-1 and MM UTL-3. Refer to Master Response – Wastewater/Sewer.

L1-5 Refer to previous response. The comment raises concerns over lift station spill risk. The IS/MND included **Appendix B2: Revised Sewer Feasibility Study**, which is intended to ensure that improvements to the wastewater system operate within capacity to avoid conditions that could result in overflow. The Project proposes the use of an on-site wastewater treatment plant, in accordance with MM UTL-3. The Project would comply with the San Bernardino County Local Agency Management Plan (LAMP), Lahontan Basin Plan, and Water Quality Control Board's on-site wastewater treatment system (OWTS) policy. Additionally, the Project would comply with the

Statewide Sewer Systems General Order in the event of a system failure. Refer to Master Response – Wastewater/Sewer.

L1-6 The comment raises concerns over Uranium concentrations in groundwater over time. The updated WSA (**Appendix B1: Revised Water Supply Assessment**) demonstrates that sufficient water is available to serve the Project via existing on-site groundwater wells through phase 3. After phase 3, the Camp will prepare an annual water supplier memorandum to identify the anticipated peak-period populations, projected demand, available on-site supply, and any requested CLAWA deliveries for the upcoming year. During drought or low-allocation years, the planned guest/staff population may be required to be reduced if verified on-site supply and confirmed CLAWA deliveries are insufficient. The WSA analyzes potential scenarios and strategies based on potential water quality outcomes and preferred connections with CLAWA. Should uranium concentrations be outside of MCL limits in all or some on-site wells, appropriate treatment may be put in place, or the Project will pursue increased CLAWA supplementation, as identified in the WSA. Specifically, MM HYD-1 requires that the Applicant conduct well drawdown tests, recovery testing, and water quality retesting before proceeding with each phase, for the wells serving that phase, and use the results to confirm the phase water supply strategy. The comment does not provide evidence that the IS/MND or its conclusions are inadequate. Refer to Master Response - Water.

L1-7 The comment includes further concerns about Uranium concentrations in groundwater. Refer to previous response.

L1-8 The comment includes further concerns about Uranium concentrations in groundwater. Refer to previous response.

L1-9 The updated WSA (**Appendix B1: Revised Water Supply Assessment**) calculates water demand in accordance with the California Code of Regulations (CCR), Title 17, Section 30710, and the 2011 County of San Bernardino Environmental Health Services Organized Camp Program, which establishes a minimum potable water supply standard of 50 gallons per capita per day (GPCPD) for organized camps. Use of a standardized demand rate is consistent with CEQA's analysis level, which evaluates whether sufficient water supply is reasonably available to serve the Project during normal, dry, and multiple dry year conditions (20-year planning horizon), rather than requiring final engineering-level design. CCR requires that organized camps maintain a dependable supply of potable water adequate to furnish a minimum of 50 gallons per capita per day (GPCPD). This standard, established by the California Department of Public Health specifically for organized camp facilities, governs the minimum potable water requirements applicable to this Project. Accordingly, a demand rate of 50 GPCPD is applied to all campers and guests across each project phase. Furthermore, the IS/MND does not rely solely on average annual demand to conclude that impacts would be less than significant. Instead, it includes mitigation requiring confirmation of water system capacity prior to incremental increases in occupancy. Specifically, MM HYD-1 requires that well drawdown tests, recovery testing, and water quality retesting be conducted before proceeding with each phase, for the wells serving that phase, and use the results to confirm

the phase water supply strategy and any required treatment. MM UTL-2 would also be implemented, which requires yearly water supply coordination between Hume SoCal and CLAWA. This approach ensures that peak conditions are addressed through agency review before service is expanded. The Project applicant has paid and delivered materials for a hydrologic study done by Albert A. Webb Associates for CLAWA, included as **Appendix M**: **Hydraulic Evaluation**.

L1-10 The comment includes a note for considerations on the downstream watershed. The IS/MND includes **Appendix G: Preliminary Hydrology Report**, which concluded that the proposed development is expected to generate negligible additional run-off downstream for storms up to the 100-year condition when compared to the existing condition. The entire site will ultimately discharge into Deep Creek.

Appendix B2: Revised Sewer Feasibility Study includes the planning documents of regional watershed agencies that were consulted with during the design of the Project, such as the San Bernardino County Local Agency Management Plan (LAMP), the Lahontan Basin Plan, and the Water Quality Control Board's (Water Board) OWTS Policy. The onsite drainage features would qualify as waters of the United States under the jurisdiction of the USACE and would qualify as "waters of the State" under the regulatory authority of the RWQCB and CDFW. Any impacts to the on-site jurisdictional areas will require a USACE Clean Water Act Section 404 Permit, RWQCB CWA Section 401 Water Quality Certification, and a CDFW Section 1602 Lake and Streambed Alteration Agreement prior to Project implementation.

The IS/MND concluded that the Project would not contribute to cumulative development impacts within the region. Refer to Master Response - Wastewater/Sewer.

L1-11 The comment is conclusionary in nature. The comment summarizes concerns and areas of interest. The total comment does not introduce evidence showing the IS/MND or its conclusions are inadequate and no changes to the IS/MND are warranted because of this.

L2 - Crestline-Lake Arrowhead Water Agency

Jennifer Spindler, General Manager

From: Jennifer Spindler - CLAWA
To: Barragan, Elena
Cc: Brian Knoll; Kris Danielson; clawa3 clawa.net
Subject: FW: PROJ-2024-00046, APNs 0328-071-04,05,07&10 0328-121-40&42
Date: Wednesday, November 19, 2025 4:14:45 PM
Attachments: image001.png
image008.png
image012.png
image013.png
image007.png
Ltr Jennifer - Hume SoCal Camp.pdf
20251119163345905.pdf

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Hello Ms. Barragan,
I just received an update on the above project and wanted to be sure that the attached concerns were still in the file. Please let us know if you have any questions or need any additional information. 1

Thank you,

Jennifer Spindler, MPA
General Manager
Crestline-Lake Arrowhead Water Agency
P.O. Box 3880 – 24116 Crest Forest Drive
Crestline, CA 92325-3880
(909) 338-1779

From: Kris Danielson <kris.danielson@webbassociates.com>
Sent: Monday, May 19, 2025 11:15 AM
To: Jennifer Spindler - CLAWA <clawa2@clawa.net>
Cc: Brian Knoll <brian.knoll@webbassociates.com>; Jon Colon <jon.colon@webbassociates.com>
Subject: RE: PROJ-2024-00046, APNs 0328-071-04,05,07&10 0328-121-40&42

Jennifer,

We have reviewed the Water Supply Assessment you received from the County for the Hume Lake project in Green Valley Lake. It appears that it is the same as what was provided to us last summer. Therefore, our letter dated July 30, 2024 is still valid (see attached).

Best Regards,

ALBERT A. WEBB ASSOCIATES

Kris Danielson, PE
Senior Engineer
T (951)320-6043 | **C** (760)636-3071
E kris.danielson@webbassociates.com
3788 McCray St | Riverside, CA | 92506

From: Jennifer Spindler - CLAWA <clawa2@clawa.net>
Sent: Thursday, May 1, 2025 9:03 AM
To: Kris Danielson <kris.danielson@webbassociates.com>
Cc: Brian Knoll <brian.knoll@webbassociates.com>
Subject: RE: PROJ-2024-00046, APNs 0328-071-04,05,07&10 0328-121-40&42

Thanks, Kris.

Jennifer Spindler, MPA
General Manager
Crestline-Lake Arrowhead Water Agency
P.O. Box 3880 – 24116 Crest Forest Drive
Crestline, CA 92325-3880
(909) 338-1779

From: Kris Danielson <kris.danielson@webbassociates.com>
Sent: Thursday, April 24, 2025 3:06 PM
To: Jennifer Spindler - CLAWA <clawa2@clawa.net>
Cc: Brian Knoll <brian.knoll@webbassociates.com>
Subject: RE: PROJ-2024-00046, APNs 0328-071-04,05,07&10 0328-121-40&42

Jennifer,

Thanks for reaching out to us about this. I have added it to our task list, but it will be sometime next week before I can finish reviewing the report and provide a response.

Best Regards,

ALBERT A. WEBB ASSOCIATES

Kris Danielson, PE
Senior Engineer
T (951)320-6043 | **C** (760)636-3071
E kris.danielson@webbassociates.com
3788 McCray St | Riverside, CA | 92506

From: Jennifer Spindler - CLAWA <clawa2@clawa.net>
Sent: Monday, April 21, 2025 1:36 PM
To: Kris Danielson <kris.danielson@webbassociates.com>
Cc: Brian Knoll <brian.knoll@webbassociates.com>
Subject: FW: PROJ-2024-00046, APNs 0328-071-04,05,07&10 0328-121-40&42

Hi Kris,
I received the forwarded email regarding the Hume Lake project in Green Valley Lake. Does this change the letter that you sent last summer? We had received a notice of their proposal from the County and I sent them our correspondence a month or so ago. Please let me know how to respond to Elena. If it would be easier for you to call her, I would really appreciate it!

Thanks so much,

Jennifer Spindler, MPA
General Manager
Crestline-Lake Arrowhead Water Agency
P.O. Box 3880 – 24116 Crest Forest Drive
Crestline, CA 92325-3880
(909) 338-1779

From: Barragan, Elena <Elena.Barragan@lus.sbcounty.gov>
Sent: Friday, April 18, 2025 1:57 PM
To: Jennifer Spindler - CLAWA <clawa2@clawa.net>
Subject: RE: PROJ-2024-00046, APNs 0328-071-04,05,07&10 0328-121-40&42

Hello Jennifer,

Thank you again for your comment on the above referenced application.

I wanted to provide you the Water Supply Assessment that was prepared for the project. We haven't circulated the initial study yet, and I thought I would send this to you so you can review.

If you would like I could also facilitate a meeting with you and the applicant, Kimley Horn, to discuss any questions you may have.

Thank you and have a great weekend.

Elena

Elena Barragan
Senior Planner
Land Use Services Department
Phone: 909-387-4422
Fax: 909-387-3223
385 North Arrowhead Avenue, First Floor
San Bernardino, CA 92415-0187

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From: Jennifer Spindler - CLAWA <clawa2@clawa.net>
Sent: Tuesday, March 25, 2025 10:11 AM
To: Barragan, Elena <Elena.Barragan@lus.sbcounty.gov>
Subject: PROJ-2024-00046, APNs 0328-071-04,05,07&10 0328-121-40&42
Importance: High

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Ms. Barragan,
On behalf of the Crestline-Lake Arrowhead Water Agency, thank you for sending the project notice regarding the above project. The Agency was previously contacted by a representative of Hume SoCal Camp regarding this proposed expansion. They were advised that the Agency's facilities are not sufficient for their projected needs without significant improvements being required. We have not received a response from them regarding the attached letter which was sent to them in August of last year. Please let me know if you need any additional information from the Agency.

Please advise if you would prefer a hard copy of this information and I will send it by USPS.

Thank you again,

Jennifer Spindler, MPA
General Manager
Crestline-Lake Arrowhead Water Agency
P.O. Box 3880 – 24116 Crest Forest Drive
Crestline, CA 92325-3880
(909) 338-1779

ALBERT A. WEBB ASSOCIATES

WO: A19870153.029

July 30, 2024

Ms. Jennifer Spindler, MPA – General Manager
CRESTLINE LAKE ARROWHEAD WATER AGENCY
P.O. Box 3880
Crestline, CA 92325-3880

RE: Hume SoCal Camp Expansion – Water Supply Review

Dear Ms. Spindler,

Pursuant to your request, Albert A. Webb Associates (WEBB) has taken a cursory look at what is needed to provide water service to the Hume SoCal Camp Expansion, based on the new site plan and Draft Water Supply Assessment provided.

BACKGROUND

The Hume SoCal Camp Expansion project is a private camp retreat in the Green Valley Lake region and includes APN's 0328-071-05, -07, and -10 as well as 0328-121-40 and -42. Proposed improvements are planned to be completed in five phases and the camp will eventually be capable of accommodating 3000 occupants. Preliminary demand estimates were based on 180 gpcpd, utilizing San Bernardino County, Special Districts Department Standards for Domestic Water Systems, 2020. It was assumed that camp irrigation demands will be met by private on-site wells. Therefore, total demands for this project are estimated to be about 375 gpm (180 gpd/capita x 3000 capita / 1440 min/day = 375 gpm). Multiple options have been provided based on a percentage of the domestic demand being supplemented by private on-site well(s). It is also assumed that fire water storage and operational storage will be provided by on-site private storage tank(s).

Existing Facilities

Currently this project site is served by a 2-inch diameter meter and backflow device with a 2-inch diameter service line. Depending on how much of the total domestic demand can be supplied by Crestline Lake Arrowhead Water Agency (CLAWA), the existing meter and backflow may need to be upsized to 4-inch diameter and the waterline to 6-inch diameter. The existing Booster Station 4 that feeds this portion of CLAWA's distribution system has a firm capacity of about 130 gpm and may need an upgrade. CLAWA's existing Green Valley Tank was not sized to accommodate the additional demands for this project so on-site private water storage will need to be relied upon. Additionally, the project may be susceptible to high system pressures based on the pressure zone this project would be served by and the proposed elevation of the project site. Therefore, a pressure reducing valve may be needed.

RECOMMENDATIONS

WEBB recommends that CLAWA request confirmation from the Developer that fire water storage and operational storage for diurnal peaks will be stored on-site with private tank(s). Additionally, a hydraulic analysis is recommended to verify how much water CLAWA can safely convey to this end of the distribution system. A deposit of $7500 is recommended for the analysis to properly evaluate the existing storage, pumping, and conveyance constraints related to the addition of the proposed project.

Should you have any questions, please feel free to contact me.

3788 McCray Street, Riverside, CA 92506 | P:951.686.1070 | F:951.788.1256 | www.webbassociates.com
J:\FORMAL PROPOSALS\Crestline Lake Arrowhead Water Agency\A19870153.029 - Hume SoCal-Adequate Service Cert\Ltr Jennifer - Hume SoCal Camp.docx

Sincerely,

Kristopher Danielson, P.E.
Senior Engineer
kris.danielson@webbassociates.com

Cc: Brian Knoll, WEBB

ALBERT A. WEBB ASSOCIATES

Page 2 of 2

L2 - Responses to Crestline-Lake Arrowhead Water Agency

Jennifer Spindler, General Manager

L2-1 The commenter references additional comments included in previous letters. The concerns within the previous letter are in regard to a hydraulic analysis being completed, and the Project applicant has delivered the deposit and all materials necessary for the analysis. The IS/MND recommends that a 300,000-gallon tank be constructed to exceed County requirements for fire flow. No further response is warranted.

L3 - Crestline-Lake Arrowhead Water Agency

Jennifer Spindler, General Manager

CRESTLINE-LAKE ARROWHEAD WATER AGENCY
A Public Agency
P.O. BOX 3880 PHONE (909) 338-1779
24116 CREST FOREST DRIVE
CRESTLINE, CALIFORNIA 92325

Directors
STEVEN D. WOOD, President
GILBERT FLORES
TELFINUES PRESZLER
BRUCE D. RISHER
DORA CONRAD

General Manager
JENNIFER A. SPINDLER

Board Secretary
KRISTA J. KETTERHAGEN

January 6, 2026

VIA E-MAIL AND U.S. MAIL

Elena Barragan
County of San Bernardino
Land Use Services Department, Planning Division
385 N. Arrowhead Ave 1st Floor
San Bernardino, CA 92415-0187

Re: Hume SoCal Campground Extension Comment Letter

Dear Ms. Barragan:

Crestline Lake Arrowhead Water Agency ("Agency") has received the Notice of Availability and Notice of Intent to Adopt an Initial Study/Mitigated Negative Declaration ("MND") for the Hume SoCal Campground Extension ("Project"; State Clearinghouse Number 2025110453). The Agency reviewed the MND and still has serious concerns regarding its proposed reliance on the Agency's water service. 1

As you are aware, this is not the first time the Agency has reached out to the San Bernardino County Planning Commission ("County") or the Project applicant's environmental consultant, Kimley-Horn & Associates ("Kimley-Horn"), to discuss this issue. On September 14, 2023, the Agency received a letter from Kimley-Horn requesting information needed to determine water supply feasibility for the Project, a copy of which is attached as Exhibit A. The Agency retained Albert A. Webb Associates ("Webb") to review this request. After conducting a cursory review of the Project proposal, Webb identified numerous concerns regarding the Project's reliance on the Agency's water service; a copy of this response letter is attached as Exhibit B. In that letter, Webb requested that Kimley-Horn pay a deposit so Webb could complete a full feasibility study to determine the Project's exact impacts on the Agency's system. On August 1, 2024, the Agency transmitted Webb's letter to Kimley-Horn. The Agency never received a response. 2

On March 24, 2025, the Agency received the Notice of Application for the Project filed with the County. That same day, the Agency emailed the County reiterating its concerns and

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January 7, 2025
Page 2

attaching the previous letter from Webb. In response, the County forwarded Kimley-Horn's Water Supply Assessment. This assessment did not alleviate any of the concerns previously raised by the Agency, and the Agency notified the County accordingly. On November 18, 2025, the Agency received the Notice of Availability and Notice of Intent ("NOA/NOI") to adopt the Project's MND. The NOA/NOI specifies the public review period for the Project's MND concludes on January 7th, 2026. After reviewing the MND, the Agency again contacted the County—now for the third time—expressing serious concerns regarding the Project's proposed reliance on the Agency's water service. 2

Given the limited duration of the public review period, the Agency was only able to conduct a high-level review of the MND. In order to make an accurate determination regarding whether the Agency can supply any water to the Project, additional technical studies are required and should be funded by the Project applicant. As the record currently stands, the Agency is not in a position to supply the Project's water demands as described in the MND. The reasons for this determination are outlined below. 3

I. CLAWA is a Responsible Agency pursuant to CEQA.

As a preliminary matter, the MND's proposed reliance on the Agency's water service would require substantial expansion and modernization of the Agency's existing facilities and infrastructure. Any such extensive system modifications would require approval by the Agency's governing board. Accordingly, the Agency qualifies as a "responsible agency" under the California Environmental Quality Act (CEQA), which defines a responsible agency as a public agency, other than the lead agency, that has discretionary approval authority over a portion of a project. (State CEQA Guidelines, §15381.) As a responsible agency, the Agency was entitled to meaningful consultation by the lead agency and the project applicant during the environmental review process. (State CEQA Guidelines, §15096.) CEQA requires the lead agency to consult with responsible agencies regarding the scope and content of the environmental document, to provide them with a meaningful opportunity to comment, and to consider their expertise and concerns in evaluating the project's potential environmental impacts. (*Id.*) Here, the County and the project applicant failed to satisfy these consultation obligations by not engaging with the Agency after the Agency expressly alerted the Project applicant to significant deficiencies in this proposed plan, particularly with respect to the Project's proposed reliance on the Agency's water service. 4

Moving forward, we expect the Agency to be properly identified in the MND as a responsible agency and to be treated accordingly for purposes of CEQA compliance. Consistent with that role, we anticipate engaging in meaningful consultation with the Project applicant to ensure the Agency's serious technical and operational concerns regarding the Project are fully and adequately addressed. In addition, we expect to be kept informed of any material Project developments as they arise so the Agency may appropriately evaluate potential impacts within its jurisdiction and exercise its discretionary authority in compliance with CEQA. In the interim, and to facilitate productive discussions, we are providing below a summary of the technical bases for the Agency's concerns with the Project.

January 7, 2025
Page 3

II. The IS/MND fails to properly analyze the Project's significant impacts to hydrology, water supply, utilities, and infrastructure.

CEQA Guidelines §§ 15063, 15070, and 15126.4 require that a project applicant and lead agency adequately analyze all potentially significant impacts and adopt feasible, enforceable mitigation measures supported by substantial evidence before relying on a mitigated negative declaration. This IS/MND, however, fails to adequately analyze the Project's hydrological impacts on the Agency's existing infrastructure, including whether increased demand and altered flow conditions would require system upgrades or otherwise impair the Agency's ability to operate its facilities. More specifically: 5

- **Unsubstantiated Water Supply Assumptions:** The IS/MND and its Water Supply Assessment (WSA) assume the Agency will provide the majority of water for the project. However, no executed agreement or technical analysis demonstrates the Agency's ability to serve the proposed demand, particularly during peak summer/dry season periods.

- **Distribution System and Infrastructure Constraints:** The Project is located near the hydraulic terminus of the Agency's distribution system where pipeline conveyance, pumping capacity and storage volumes are reduced compared to other parts of the system. This Project would likely be the single largest demand on the system, and based upon the location of the demand, it is unclear if the system can provide adequate service. A detailed study will need to be performed to verify conveyance, pumping and storage capacity to serve the Project. 6

- **Peak Demand and Seasonal Vulnerability:** The Project's water demands will likely coincide with the Agency's system-wide peak demands (summer/dry season). Adding the Project's water demands to existing demands during the system-wide peak season demands may exceed the capabilities of the Agency's conveyance system. A detailed study will need to be performed to verify conveyance and storage capacity to serve the project. 7

- **Impact on Existing Customers:** The Agency is legally obligated to prioritize service to existing customers. The proposed Project represents a significant increase in demand, which may compromise service reliability for current users, particularly during high-demand periods. A detailed study will need to be performed to determine the ability to provide services and any potential impacts to existing customers. 8

- **Fire and Operational Storage Not Addressed:** The Agency's standard practice is to evaluate new retail services on a case-by-case basis, with formal fire agency conditions and a hydraulic analysis prior to any commitment of water availability. No such evaluation has been completed for this Project. The WSA does not confirm that adequate on-site fire and operational storage will be provided, as required by standard engineering practice and Agency policy. This is a critical requirement for fire 9

January 7, 2025
Page 4

protection and diurnal peak management since the Agency does not allow wholesale customers to draw short term peak or fire flows from the Agency's system. 9

III. Conclusion

For the reasons outlined above, the Agency has identified substantial deficiencies in the IS/MND's analysis of the Project's reliance on the Agency's water service and its associated hydrological impacts. These issues must be fully and adequately resolved before the County may lawfully rely on a mitigated negative declaration for the Project. As the record currently stands, the IS/MND lacks substantial evidence to support its conclusions and fails to comply with CEQA's consultation and analytical requirements.

Moving forward, the Agency expects to be properly identified and engaged as a responsible agency under CEQA and to be meaningfully consulted regarding the scope, content, and resolution of these issues. The Agency stands ready to participate in good-faith consultation to ensure that its technical, operational, and regulatory concerns are addressed in a manner consistent with CEQA and the Agency's statutory obligations. 10

Sincerely,

Jennifer Spindler
General Manager

CC: Michael T. Riddell
Megan Kilmer
Brian Knoll

January 7, 2025
Page 5

Exhibit A

SEP 14 2023

September 11, 2023

Crestline – Lake Arrowhead Water Agency
P.O. Box 3880
24116 Crest Forest Drive
Crestline, CA 92325

RE: ***Request for Information: CLAWA Water Supply Feasibility for Hume SoCal Expansion***

Kimley-Horn is preparing a Water Supply Assessment (WSA) for the Hume Socal Camp expansion near Green Valley Lake, CA. The purpose of the WSA is to ensure the long-term viability and sustainability of water supply with the proposed increase in camp occupancy. The draft expansion plans are attached for your reference.

We understand that there is a connection to Crestline – Lake Arrowhead Water Agency (CLAWA) for supplemental domestic water in the event that the camp's on-site domestic water wells cannot satisfy demand. The objective here is to analyze CLAWA's water supply and future demand to determine the impact the camp demand will have on the system in the event that the camp's on-site domestic wells fall short of satisfying the water demand.

To help in this assessment, we'd appreciate your assistance with the following questions:

- Can you provide the latest Urban Water Management Plan (UWMP) and any other recent water resource planning documents?
- What is the current source(s) of the community's water supply, and are there plans to diversify or change this in the future?
- What policies or strategies are in place to manage water demand, especially during drought conditions? 11
- What is the current capacity of the water treatment and distribution system, and are there plans to upgrade or expand in the future? Do you have a map of service area?

The camp is planning on expanding from an occupancy of 300-people to approximately 3,000-people. Using the water usage data from the previous year as a reference, we conservatively estimated the future domestic water demand for the camp to be **60 Million-Gallons per Year**.

We appreciate your assistance and look forward to you input. Please feel free to reach out if you have any question or concerns.

Best Regards,

Sam Wuellner
Kimley-Horn | 401 B St, Suite 600, San Diego, CA 92101
Direct: 619 821 1360 | Mobile: 913 827 2761

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1

January 7, 2025
Page 6

Exhibit B

ALBERT A. WEBB ASSOCIATES

AUG 01 2024

WO: A19870153.029

July 30, 2024

Ms. Jennifer Spindler, MPA – General Manager
CRESTLINE LAKE ARROWHEAD WATER AGENCY
P.O. Box 3880
Crestline, CA 92325-3880

RE: Hume SoCal Camp Expansion – Water Supply Review

Dear Ms. Spindler,

Pursuant to your request, Albert A. Webb Associates (WEBB) has taken a cursory look at what is needed to provide water service to the Hume SoCal Camp Expansion, based on the new site plan and Draft Water Supply Assessment provided.

BACKGROUND

The Hume SoCal Camp Expansion project is a private camp retreat in the Green Valley Lake region and includes APN's 0328-071-05, -07, and -10 as well as 0328-121-40 and -42. Proposed improvements are planned to be completed in five phases and the camp will eventually be capable of accommodating 3000 occupants. Preliminary demand estimates were based on 180 gpcpd, utilizing San Bernardino County, Special Districts Department Standards for Domestic Water Systems, 2020. It was assumed that camp irrigation demands will be met by private on-site wells. Therefore, total demands for this project are estimated to be about 375 gpm (180 gpd/capita x 3000 capita / 1440 min/day = 375 gpm). Multiple options have been provided based on a percentage of the domestic demand being supplemented by private on-site well(s). It is also assumed that fire water storage and operational storage will be provided by on-site private storage tank(s). 12

Existing Facilities

Currently this project site is served by a 2-inch diameter meter and backflow device with a 2-inch diameter service line. Depending on how much of the total domestic demand can be supplied by Crestline Lake Arrowhead Water Agency (CLAWA), the existing meter and backflow may need to be upsized to 4-inch diameter and the waterline to 6-inch diameter. The existing Booster Station 4 that feeds this portion of CLAWA's distribution system has a firm capacity of about 130 gpm and may need an upgrade. CLAWA's existing Green Valley Tank was not sized to accommodate the additional demands for this project so on-site private water storage will need to be relied upon. Additionally, the project may be susceptible to high system pressures based on the pressure zone this project would be served by and the proposed elevation of the project site. Therefore, a pressure reducing valve may be needed.

RECOMMENDATIONS

WEBB recommends that CLAWA request confirmation from the Developer that fire water storage and operational storage for diurnal peaks will be stored on-site with private tank(s). Additionally, a hydraulic analysis is recommended to verify how much water CLAWA can safely convey to this end of the distribution system. A deposit of $7500 is recommended for the analysis to properly evaluate the existing storage, pumping, and conveyance constraints related to the addition of the proposed project.

Should you have any questions, please feel free to contact me.

3788 McCray Street, Riverside, CA 92506 | P:951.686.1070 | F:951.788.1256 | www.webbassociates.com
J:\FORMAL PROPOSALS\Crestline Lake Arrowhead Water Agency\A19870153.029 - Hume SoCal-Adequate Service Cert\Ltr Jennifer - Hume SoCal Camp.docx

Sincerely,

Kristopher Danielson, P.E.
Senior Engineer
kris.danielson@webbassociates.com

Cc: Brian Knoll, WEBB

12

ALBERT A. WEBB ASSOCIATES

Page 2 of 2

L3 - Responses to Crestline-Lake Arrowhead Water Agency

Jennifer Spindler, General Manager

L3-1 The comment is introductory in nature. No further response is warranted.

L3-2 The comment is informatory in nature. The comment describes multiple correspondence with both the Lead Agency and Kimley-Horn and Associates. The comment itself does not provide evidence or describe a specific concern regarding the Project's IS/MND. No further response is warranted.

L3-3 The comment is introductory in nature. No further response is warranted.

L3-4 The comment is informatory in nature. The comment provides a statement about Crestline-Lake Arrowhead Water Agency (CLAWA)'s relevance to CEQA and the Project. Following circulation of the IS/MND, CLAWA is now stated as a responsible agency under CEQA (**Section 3, Errata**).

L3-5 The comment includes concerns over water supply and reliance on CLAWA. The Project applicant and Lead Agency analyzed all potential significant impacts and proposed mitigation measures within CEQA guidelines. CEQA does not require executed utility agreements at the IS/MND stage, all CLAWA requirements must be satisfied prior to connection. The IS/MND includes MM HYD-1, which requires that well drawdown tests, recovery testing, and water quality retesting be conducted before proceeding with each phase, for the wells serving that phase, and use the results to confirm the phase water supply strategy and any required treatment. The updated WSA (**Appendix B1: Revised Water Supply Assessment**) states that the Applicant's preferred strategy moving forward is providing water via on-site groundwater wells through phase 3, with the implementation of MM HYD-1, and following phase 3, prepare an annual water supplier expectations memorandum for CLAWA, refer to Master Response - Water.

L3-6 The comment includes concerns of current infrastructure capabilities in the vicinity of the Project area. The updated WSA includes a Water Storage and Distribution System section, which describes that the Camp's storage and distribution system is served by two main storage tanks: a 212,000-gallon domestic water tank and a 50,000-gallon irrigation storage tank, both fed by domestic Wells 1, 4, and 5. Refer to the updated WSA's Table 5 – Well Supply Scenarios and Phase Coverage for specific details regarding well capacity throughout the proposed multi-phase Project. The Project Applicant has requested a technical study completed by Albert A. Webb Associates, included as **Appendix M: Hydraulic Evaluation**, and would be required to coordinate yearly with CLAWA to determine water supply availability through implementation of MM UTL-2. No further response is required.

L3-7 The comment includes concerns regarding seasonal water demand. The Estimated Water Demand for the Project section of the updated WSA provides data for estimated camp water demand by phase and cumulative water demand by phase, which indicates peak day domestic water demand is 127,700 GPD (143.0 AFY). The Camp's 3 active domestic wells (wells 1, 4, and 5) have a combined capacity of approximately 163,440 GPD, which exceeds full buildout demand under the best case

by approximately 28%. The Project Applicant has requested a technical study completed by Albert A. Webb Associates, included as **Appendix M: Hydraulic Evaluation**, and would be required to coordinate yearly with CLAWA to determine water supply availability through implementation of MM UTL-2. No further response is required.

L3-8 The comment includes concerns regarding water availability. CLAWA's Abridged Water Shortage Contingency Plan (WSCP) defines shortage triggers, response actions, and potential restrictions for retail and wholesale customers should a connection be made. Table 8 – CLAWA Water Shortage Stages, Triggers, and Actions for Retail Customers in the updated WSA details 6 shortage levels and subsequent response actions in conjunction with the WSCP. The Project Applicant has requested a technical study completed by Albert A. Webb Associates, included as **Appendix M: Hydraulic Evaluation**, and would be required to coordinate yearly with CLAWA to determine water supply availability through implementation of MM UTL-2. No further response is required.

L3-9 The comment includes concerns regarding fire-related water hydrology and storage. The updated WSA's Action #3 recommends coordination with CLAWA to identify infrastructure improvements required to establish the designated service connection, including a fire flow test to confirm available system pressure and deliverable flow rate. The Project Applicant has requested a technical study completed by Albert A. Webb Associates, included as **Appendix M: Hydraulic Evaluation**, and would be required to coordinate yearly with CLAWA to determine water supply availability through implementation of MM UTL-2. No further response is required.

L3-10 The comment is conclusionary in nature. The comment summarizes the above concerns and CLAWA's role in relation to the Project. No further response is warranted.

L3-11 The comment includes initial correspondence between CLAWA and Kimley-Horn and Associates. The comment is likely provided for reference, and therefore, no further response is warranted; refer to the above responses.

L3-12 The comment includes correspondence between CLAWA and Albert A. Webb Associates. The comment is likely provided for reference, and therefore, no further response is warranted; refer to the above responses.

L4 - Green Valley Mutual Water Company

Steve Brandt, General Manager

GREEN VALLEY MUTUAL WATER COMPANY
P.O. BOX 8300
GREEN VALLEY LAKE, CALIFORNIA 92341
TELEPHONE: (909) 867-2912
FAX: (909) 867-9603

January 5, 2026

Via E-Mail and U.S. Mail

Elena Barragan
County of San Bernardino
Land Use Services Department, Planning Division
385 N. Arrowhead Ave 1st Floor
San Bernardino, CA 92415-0187

Re: Hume SoCal Campground Extension, PROJ-2024-00046 Comment Letter

Dear Ms. Barrigan,

The Green Valley Mutual Water Company ("GVMWC") is in receipt of the Notice of Availability and Notice of Intent to Adopt and Initial Study/Mitigated Negative Declaration ("MND") for the referenced project. 1

The proposed project is within a 1-mile great circle distance of our water wells. Due to the short time frame of the public review period GVMWC could not conduct an extensive review of the MND. In addition, the MND regarding Appendix B1-Water Supply and Appendix B3- Water and Sewer Masterplan do not include any technical studies that illustrate potential issues of water supply to GVMWC shareholders. 2

Issues that need to be studied before this MND can be considered are if the increased demand of water to HUME will create a deficit of water supply to GVMWC which established domestic water rights 100 years ago. Heavy pumping of vertical wells at the Hume site could enhance water quality issues throughout the general area which include increased levels of uranium and manganese above the State Mcl allowances. In addition, heavy pumping at the HUME site could have an effect on available underground water supply that the shareholders of GVMWC have relied upon for 100 years. In the event HUME relied on water from CLAWA (State Water), during drought years the State has exercised limitations on how much water would be available to CLAWA and subsequently to the communities CLAWA serves. It would not be unreasonable to see reductions up to 90% in severe drought years and this would dramatically reduce the availability of water for domestic use across the entire region (Crestline to Green Valley Lake). Most of the water agencies in this region, both public and private rely on supplemental supply of water from CLAWA to keep up with the demands of domestic use. 3 4

GVMWC has seen an increase in water demand over the last 5 to 8 years. We suspect the increased demand stems from the increase in short term rentals ("STR") and lower housing cost in our region. We have seen an increase in transient occupancy due to STRs and an increase in fulltime occupancy because Green Valley Lake has affordable housing. This results in an increase for available water to support the ongoing growth within our residential community. Therefore, any potential negative impacts to domestic water supply to GVMWC need to be studied and presented in the MND. GVMWC request the MND submitted not be adopted until further studies are conducted and resubmitted. 5

Respectfully,

Steve Brandt
General Manager

L4 - Responses to Green Valley Mutual Water Company

Steve Brandt, General Manager

L4-1 The comment is introductory in nature. The comment includes information about Green Valley Mutual Water Company (GVMWC) and a statement about the time frame of the public review period. No further response is warranted.

L4-2 The comment includes a concern that the 1st Draft Water Supply Assessment and **Appendix B3: Water and Sewer Master Plan** do not include impacts to GVMWC. The Water Supply Assessment, which has since been updated (**Appendix B1: Revised Water Supply Assessment**), and Water and Sewer Master Plan evaluate the Project's water demand, supply sources, and feasibility based on the Project's proposed service providers and onsite wells. The Project does not propose to utilize water from or otherwise rely upon Green Valley Mutual Water Company. CEQA does not require the Lead Agency to conduct utility-specific technical studies for water systems that are not proposed to serve the Project. Potential impacts to GVMWC facilities or service are speculative and are not attributable to the Project. Therefore, no additional studies are required and no revisions to the MND are warranted.

L4-3 The comment includes a concern that increased pumping at the Project site could impair GVMWC water supply and groundwater quality. The Project does not propose to extract water from sources operated by GVMWC, nor does it interfere with GVMWC's water rights. Assertions regarding potential regional groundwater quality changes are speculative, and groundwater quality of on-site wells is separate from GVMWC. Compliance with applicable water quality standards is required prior to and during operation. Accordingly, no additional analysis is required and no revisions are warranted.

L4-4 The comment includes concerns that during drought years, CLAWA would not be able to provide adequate water to shareholders in the area. The Project does not rely exclusively on imported water and incorporates onsite groundwater supplies and conservation measures. Water allocation decisions by the State Water Project and CLAWA are governed by separate regulatory frameworks and operational decisions outside the scope of CEQA. Speculation regarding potential future regional cutbacks does not constitute substantial evidence of a Project-related impact. Therefore, no revisions are warranted.

L4-5 The comment includes a concern that additional water demand likely from short-term rentals will have unforeseen impacts. Growth related to short-term rentals and residential development is driven by independent market forces and discretionary approvals unrelated to the Project. Because the Project does not rely on GVMWC infrastructure and does not supply water to the residential community, it does not contribute to cumulative impacts on GVMWC's system. The County has appropriately analyzed cumulative water impacts, and no additional studies or recirculation of the MND are required.

L5 - Running Springs Water District

Chris Jones, General Manager

From: Chris Jones
To: Barragan, Elena
Cc: Ward Simmons
Subject: Camp Hume Project IS/MND Comment from Running Springs Water District
Date: Friday, November 21, 2025 10:03:14 PM
Attachments: Outlook-tak24mif.png
Importance: High

You don't often get email from cjones@runningspringswd.com. Learn why this is important

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Elena,

Our agency was made aware of the proposed Camp Hume Project, yesterday (November 20, 2025), in the course of conversation with a non-project affiliated contact. This is seven days after the posting was made on the County Land Use Services website. There is not enough time to adequately review and comment on the CEQA document or the potential implications of the proposed project to our operations prior to the proposed end of the comment period for the IS/MND, which is shown as 12/13/2025. We request at least 60 more days to conduct a proper review. A longer period of time will likely be necessary. Here are a few reasons for our concern: 1

1) The Camp Hume proposed project is in the RSWD sewer service area. Why was the Running Springs Water District not notified of this project NOA & NOI?

2) The existing RSWD wastewater collection, pumping and treatment systems are not adequately sized to handle the proposed expansion. For this reason, wastewater issues should be included in the 'areas of controversy' section of the Project Summary. The project owner has provided a draft feasibility study for the necessary improvements to the existing RSWD wastewater collection, pumping and treatment systems but will be required to fund the review of this feasibility study by a Running Springs Water District (RSWD) contract District Engineer. 2

3) The planning, environmental, design and construction of any required improvements to the existing RSWD wastewater collection, pumping and treatment systems will need to be fully funded by Camp Hume. 3

4) Appendix B1 - Water Supply Assessment does not load when you click on the link on the County LUS website: https://lus.sbcounty.gov/planning-home/environmental/mountain-region/. A 404 error pops up saying "Object not found," so we are not able to access to review.

5) Appendix B2 - Sewer Feasibility Study does not load when you click on the link provided on the County LUS website: https://lus.sbcounty.gov/planning-home/environmental/mountain-region/. A 404 error pops up saying "Object not found," so we are not able to access to review. 4

6) Please include RSWD on all future correspondence related to this project.

For your awareness, the NOA/NOI says the IS/MND can be access via the County's LUS website in the Desert Region. When I went to the Desert Region website via the link in the NOA/NOI it was not available. After searching further, I was able to track it down on the Mountain Areas 5

portion of the website.

I would like to talk with you as soon as possible about this project. I am available Monday after 11am and Tuesday after 8am. I look forward to coordinating with you and your team.

Thank you,
Chris

5
Cont

Chris Jones
General Manager
Running Springs Water District
P.O. Box 2206
Running Springs, CA 92382
cjones@runningspringswd.com
Office 909-403-5387
Fax 909-867-2828

L5 - Responses to Running Springs Water District

Chris Jones, General Manager

L5-1 The comment includes a request for the public review period to be extended. Public review periods for IS/MNDs are established by the Lead Agency. The Notice of Availability and Notice of Intent to adopt an IS/MND for the Hume SoCal Campground Extension public review began 11/13/2025 and closed with an extended deadline on 01/16/2026, creating a 64-day comment period. RSWD provided specific contacts of interested parties on November 25, 2025; these contacts were shared with the Lead Agency for subsequent distribution.

Further, the commenter claims that RSWD was notified of the Project on November 20, 2025. However, coordination with RSWD regarding the proposed Project began as early as March 2024. Subsequent email communications continued from that time between the applicant's environmental team and staff from RSWD. The comment does not provide evidence the review period should have been further extended. No further response is warranted.

L5-2 The comment is informatory in nature. The comment mentions logistics of feasibility studies. The review is being paid for by the Project applicant, with a study also prepared by the applicant. The comment does not warrant any changes to the IS/MND.

L5-3 The comment is informatory in nature. The comment mentions logistics of Project completion. The review is being paid for by the Project applicant, with a study also prepared by the applicant. Impact fees could be conditioned to be paid for by the applicant. The comment does not warrant any changes to the IS/MND.

L5-4 The comment notes an inability to access environmental documents online. This was brought to the Lead Agency's attention and resolved. No revisions to the IS/MND are warranted.

The Draft IS/MND Water Supply Assessment can be found here: https://lus.sbcounty.gov/wp-content/uploads/sites/48/Appendix-B1-Water-Supply-Assessment-1.pdf.

The Draft IS/MND Sewer Feasibility Study can be found here: https://lus.sbcounty.gov/wp-content/uploads/sites/48/Appendix-B2-Sewer-Feasibility-Study.pdf.

L5-5 The comment is conclusionary and informatory in nature. The comment mentions a few logistical concerns and requests future noticing related to CEQA. No further response is required.

L6 - Running Springs Water District

Chris Jones, General Manager

RUNNING SPRINGS WATER DISTRICT
A MULTI-SERVICE INDEPENDENT SPECIAL DISTRICT
31242 Hilltop Boulevard • P.O. Box 2206
Running Springs, CA 92382

January 6, 2026

VIA E-MAIL AND U.S. MAIL

Elena Barragan
County of San Bernardino
Land Use Services Department, Planning Division
385 N. Arrowhead Ave 1st Floor
San Bernardino, CA 92415-0187

Re: Hume SoCal Campground Extension Comment Letter

Dear Ms. Barragan:

The Running Springs Water District ("District") is in receipt of the Notice of Availability and Notice of Intent to Adopt an Initial Study/Mitigated Negative Declaration ("MND") for the Hume SoCal Campground Extension ("Project"; State Clearinghouse Number 2025110453). The District reviewed the MND and still has serious concerns regarding its proposed reliance on the District's wastewater service. The District also has questions and concerns about the potential impact of the Project on other aspects of our mission. 1

Given the limited duration of the public review period, the District was only able to conduct a high-level review of the MND. In order to make an accurate determination regarding whether the District can support wastewater services to the Project, additional technical studies are required and should be funded by the Project applicant. As the record currently stands, the District is not in a position to provide wastewater services to meet the forecasted Project demands as described in the MND. The reasons for this determination are outlined below.

I. The District is a Responsible District pursuant to CEQA.

As a preliminary matter, the MND's proposed reliance on the District's wastewater service would require substantial improvements and expansion of the District's existing facilities and infrastructure and would likely require new facilities. Any such extensive system modifications would require approval by the District's governing board. Accordingly, the District qualifies as a "responsible District" under the California Environmental Quality Act (CEQA), which defines a responsible agency as a public agency, other than the lead agency, that has discretionary approval authority over a portion of a project. (State CEQA Guidelines, §15381.) As a responsible agency, the District was entitled to meaningful consultation by the lead agency and the project applicant during the environmental review process. (State CEQA Guidelines, §15096.) CEQA requires the lead agency to consult with responsible agencies regarding the scope and content of the environmental document, to provide them with a meaningful opportunity to comment, and to consider their expertise and concerns in evaluating the project's potential environmental impacts. (*Id.*) Here, the County and 2

WATER (909) 867-2766 • WASTEWATER COLLECTION (909) 867-7352 • WASTEWATER TREATMENT (909) 867-3689 • FIRE (909) 867-2630

the project applicant failed to satisfy these consultation obligations by not engaging with the District after the District expressly alerted the Project applicant to significant deficiencies in this proposed plan, particularly with respect to the Project's proposed reliance on the District's wastewater services.

Moving forward, we expect the District to be properly identified in the MND as a responsible agency and to be treated accordingly for purposes of CEQA compliance. Consistent with that role, we anticipate engaging in meaningful consultation with the Project applicant to ensure the District's serious technical and operational concerns regarding the Project are fully and adequately addressed. In addition, we expect to be kept informed of any material Project developments as they arise so the District may appropriately evaluate potential impacts within its jurisdiction and exercise its discretionary authority in compliance with CEQA. In the interim, and to facilitate productive discussions, we are providing below a summary of the technical bases for the District's concerns with the Project. 2

II. The IS/MND fails to properly analyze the Project's significant impacts to the groundwater, hydrology, water supply, public services, utilities, and infrastructure.

CEQA Guidelines §§ 15063, 15070, and 15126.4 require that a project applicant and lead agency adequately analyze all potentially significant impacts and adopt feasible, enforceable mitigation measures supported by substantial evidence before relying on a mitigated negative declaration. This IS/MND, however, fails to adequately analyze the Project's impacts on the District's existing infrastructure, including whether increased demand would require system upgrades or otherwise impair the District's ability to operate its facilities or support its mission. More specifically:

Wastewater:

- The Project, as proposed, would result in the need for the construction of new and/or expanded wastewater treatment facilities to accommodate the anticipated increase in sewage treatment needs.
- The 1st Draft Sewer Feasibility Study (draft feasibility study), which is relied upon in the Utilities and Services Systems section of the IS/MND, needs to be updated to incorporate standards and norms used by the District to assess the potential for the District's sewer system to accommodate the Project. The draft feasibility study relies on a sewer generation value of 50 gallons per capita per day. The RSWD standard sewer generation value is 80 gallons per capita per day. Therefore, the sewer generation value used in the draft feasibility study underestimates the per capita contributions of the Project on the sewer system and understates potential impacts. 3
- Even with the reduced sewer generation values, the draft feasibility study acknowledges the Project exceeds the capacity of the District's sewer system infrastructure. Mitigating factors would be required to accommodate the increased demand. Therefore, the determination in the IS/MND of 'Less Than Significant' for 19(c) Utilities and Service System should be upgraded to "Potentially Significant Unless Mitigation Incorporated" or "Potentially Significant Issues" depending on the results of an updated analysis that should be initiated to more adequately represent the capabilities of the existing system and the projected demand from the Project.
- The sewer analysis relies primarily on average daily flow assumptions and generalized peaking factors, which may not adequately represent short-duration peak wastewater discharges typical of organized camp operations. At full buildout, approximately 3,000 occupants could generate highly synchronized morning peak flows within a compressed timeframe. The documentation does not clearly demonstrate whether these simultaneous-use peak conditions were evaluated with respect to the Running Springs lift station capacity, emergency storage, pump cycling, or overflow risk. It also

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remains unclear whether the modeling considered peak-hour scenarios or relied solely on flows averaged over 24 hours. Additionally, the analysis does not address lift station and pump system performance during power outages or other emergency conditions occurring during peak wastewater generation.

- The project may contribute wastewater flows to downstream lift stations within the District's sewer system. Any surcharge, overflow, or spill at these facilities would occur outside the project boundary and could directly impact downstream communities, including Arrowbear and Running Springs. However, the project documentation does not identify the specific locations where overflows could occur, which communities would experience the resulting environmental or public health impacts, or how responsibility and liability for such incidents would be allocated among agencies.
- The Project does not identify or commit to a potable water treatment system capable of removing uranium, which is documented to naturally occur in local groundwater, and therefore does not demonstrate how long-term compliance with drinking water standards would be maintained under increased pumping. The materials also do not evaluate how uranium-bearing treatment residuals would be managed (e.g., discharge to the wastewater system, temporary storage, or off-site disposal), preventing meaningful analysis of whether treatment byproducts could increase uranium loading at the District's WWTP. Because increased influent uranium could affect treatment operations, regulatory compliance, and shared cost and liability among contributing agencies, the CEQA document should fully analyze potential increases in uranium concentrations resulting from expanded groundwater pumping and disclose how any associated wastewater impacts and responsibilities would be managed. 3
- Based on the existing analysis and RSWD's knowledge of our system, we would expect that at a minimum, improvements to the wastewater interceptor pipeline, Ahwahnee pump station, Deerlick pump station, and wastewater treatment plant (WWTP) would be needed to support the increased demand from the Project. Additional new facilities may be required to accommodate the increased demand. Again, the need for upgrades, expansion, and/or new facilities would need to be supported by an updated feasibility study that incorporates input from RSWD staff and our contract District Engineer. Funding for this study, as well as, the time for the District's contract Engineer and any other reasonably required consultants would need to be born by the Project Proponent.
- All aspects of subsequent analysis and study, design, environmental documentation and permitting, construction, and monitoring and associated reporting would be required to be funded by the Project Proponent, not the District, unless otherwise coordinated and agreed to in writing by the District.

Groundwater Management

- Neither the IS/MND, nor the Appendix B1: Water Supply Assessment, nor Appendix G: Preliminary Hydrology Report evaluate potential short or long-term groundwater supply or quality impacts to the Basin and to surface flows to Deep Creek and other nearby creeks from increased extraction. Therefore, it is unclear how the determination of "Less Than Significant" for 10(b) Hydrology and Water Quality in the Environmental Analysis portion of the IS/MND was determined.
- The Water Supply Assessment lacks the aquifer characterization, groundwater basin analysis, drawdown modeling, and well-interference evaluation necessary to determine whether sustained increased groundwater extraction could adversely affect neighboring groundwater users or nearby communities. Although the assessment identifies CLAWA as a potential supplemental source, the Water Supply Assessment does not quantify CLAWA's available supply or provide a binding commitment ensuring imported water would reliably offset project demand during peak, dry-year, or 4

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multiple-dry-year conditions. In the absence of a defined and dependable imported water allocation, it is reasonable to assume that a substantial share of project demand would continue to rely on increased pumping of on-site wells. However, the documentation does not analyze potential impacts from sustained extraction, including long-term aquifer response, cone-of-depression effects extending off-site, or cumulative impacts to surrounding wells under dry or multiple-dry-year conditions.

- The IS/MND and supporting appendices do not clearly identify the Project's regional watershed context within the Mojave River Watershed, or the WWTP's discharge to the Santa Ana River Watershed, or evaluate whether groundwater extraction, wastewater conveyance, or treatment activities could result in downstream hydrologic or water quality impacts. The documents do not indicate that potential downstream effects were analyzed. 4

Running Springs Fire Department Assessment and Clarification of Emergency Procedures for the Project

The planned increase to 3,000 occupants at the Hume SoCal camp, as referenced from information on the Project, will significantly influence the camp's emergency preparedness needs, particularly regarding evacuation protocols and medical response. The following paragraphs identify factual inacurracies, outline anticipated impacts, and provide clarification on the procedures for activating the 911 emergency system for injuries and illnesses at the camp that should be factored into the analysis.

The Public Services section of the IS/MND suggests that response distances are a factor when evaluating the Project's impact to fire protection services. The IS/MND also identifies the distance from the Project site to Running Springs Fire Department (RSFD) Station 50 as 1.4 miles and to RSFD Station 51 as 1.7 miles. These distances are straight line distances and do not reflect the actual distance driven by RSFD personnel to respond to the Project site. Those distances are approximately 4.3 miles from Station 50 and approximately 5.9 miles for Station 51. Approximately 2.5 miles of this distance would occur on Highway 18 for RSFD personnel responding from Station 50 and approximately 4.1 for those responding from Station 51. The IS/MND and relevant associated analyses should be updated to reflect these distances and consider potential implications to response times from the distance that needs to be traveled and how this might affect the impact determination for the Fire Services portion of the Public Services section in Chapter 4 [15(a)(i)]. 5

Impact of Increased Occupancy on Emergency Evacuation Plans

A substantial increase in camp population will challenge existing emergency evacuation plans. The presence of approximately 2,700 additional occupants means that evacuation times may be extended, resources such as transportation and assembly areas could become strained, and communication lines may be overwhelmed. It is essential to review and update the camp's emergency plans to ensure:

- Clear identification of evacuation routes and assembly points that can accommodate the increased number of people.
- Clear and detailed shelter-in-place procedures are established for scenarios in which evacuation cannot be safely conducted. 6
- Additional transportation resources (buses, vans, etc.) are available and coordinated for mass evacuation.
- Staff are trained in crowd management and communication during emergencies.

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- Regular drills are conducted with both staff and occupants to ensure familiarity with updated procedures.
- Collaboration with local emergency services (fire, police, EMS) is maintained to ensure coordinated response efforts.
- Ensure contracts with additional entities to provide qualified buses and bus drivers familiar with the installation of chains and driving in adverse snow conditions.

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Potential Increase in Medical Aid Calls

With the proposed occupancy increase, the camp is expected to experience a rise in medical aid calls, estimated at 200 to 350 additional incidents per year. This uptick will require:

- Enhanced on-site medical staffing and resources to manage minor injuries and illnesses.
- Improved first aid training for staff and readily accessible medical supplies throughout the camp.
- Establishment of clear protocols for when to escalate medical incidents to external emergency services.
- Close coordination with local hospitals and EMS providers to prepare for increased call volume.

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Procedures for Activation of the 911 System

To ensure prompt and effective emergency medical response, the following procedures should be followed for activating the 911 system in the event of injuries or illnesses:

1. Assessment: Staff or trained personnel should quickly assess the situation to determine the severity of the injury or illness. If the condition is life-threatening or beyond the scope of on-site care, the 911 system should be activated immediately. The section on Page 22 of the Emergency plan – Water Front Emergency Plan should be used as a template for other emergencies throughout the planning process.
2. Activation: Dial 911 from the nearest phone (cell or landline). Clearly state the nature of the emergency, the exact location within the camp, and any relevant details about the patient's condition.
3. Communication: Remain on the line with the dispatcher, provide updates as necessary, and follow instructions until emergency responders arrive.
4. On-Site Support: Assign staff to guide emergency vehicles to the scene and ensure clear access. Provide first aid or CPR as needed while waiting for responders.
5. Documentation: Record the incident, response actions taken, and outcomes for post-incident review and future planning.

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Recommendations

- Conduct a comprehensive review and update of all emergency and evacuation plans to reflect increased occupancy.
- Develop clear, detailed shelter-in-place procedures for situations when evacuation is not possible.
- Increase on-site medical capacity and staff training to reduce unnecessary 911 calls for minor incidents.
- Enhance communication systems (PA systems, radios, signage) for rapid information dissemination during emergencies.

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- Establish regular coordination meetings with local emergency service providers to ensure alignment of response strategies. 8

Fire Flow, Construction Standards, and Access for Emergency Response

Fire Flow Requirements:

To ensure effective firefighting capabilities, the camp must maintain adequate fire flow—the volume of water available for fire suppression. This requires:

- Verification that water supply systems can deliver sufficient flow and pressure to meet local fire code standards for all occupied structures. The use of existing water storage systems as well as CLAWA infrastructure to mee the fire flow needs.
- Regular testing and maintenance of water mains and hydrants to ensure operational readiness.

Hydrant Access and Placement:

Hydrants must be:

- Strategically located throughout the camp to provide coverage for all buildings and high-risk areas.
- Kept clear of obstructions, with visible signage and direct access routes for emergency vehicles.
- Inspected regularly to ensure functionality and accessibility. 9

Fire Engine and Ambulance Access to Buildings:

To facilitate prompt emergency response:

- All roads and driveways leading to buildings must be wide enough and structurally capable of supporting fire engines, ambulances and other emergency vehicles.
- Turnarounds and staging areas should be provided near major structures.
- Landscaping and parking must not impede emergency vehicle movement.

Recommendations:

- Conduct a fire flow analysis and coordinate with local fire authorities to verify compliance.
- Map hydrant locations and ensure all staff are familiar with their placement.
- Schedule regular drills involving fire department and ambulance personnel to test access and response times.

The increase in occupants at Hume SoCal necessitates robust planning and clear procedures to safeguard the health and safety of staff and campers. By updating emergency plans, increasing medical readiness, clarifying 911 activation protocols, and strategic design of infrastructure the camp can effectively manage the challenges posed by higher occupancy and ensure a swift response in times of crisis.

III. Conclusion

For the reasons outlined above, the District has identified substantial deficiencies in the IS/MND's analysis of the Project's reliance on the District's wastewater service, potential impacts to local 10

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groundwater basins, and emergency response considerations. These issues must be fully and adequately resolved before the County may lawfully rely on a mitigated negative declaration for the Project. As the record currently stands, the IS/MND lacks substantial evidence to support its conclusions and fails to comply with CEQA's consultation and analytical requirements.

The assessment and recommendations provided by the Running Springs Fire Department, which is a component of the District, should also be considered to better ensure the safety of Camp visitors and the surrounding community. 10

Moving forward, the District expects to be properly identified and engaged as a responsible agency under CEQA and to be meaningfully consulted regarding the scope, content, and resolution of these issues. The District stands ready to participate in good-faith consultation to ensure that its technical, operational, and regulatory concerns are addressed in a manner consistent with CEQA and the District's statutory obligations.

Sincerely,

Chris Jones
General Manager

L6 - Responses to Running Springs Water District

Chris Jones, General Manager

L6-1 The comment is introductory in nature. The comment includes a summary of Running Springs Water District's (RSWD) relevance to the Project and the reasoning behind the comment. No further response is warranted.

L6-2 The comment includes a request to be identified as a CEQA responsible agency and be treated accordingly for purposes of CEQA compliance. The Lead Agency has added RSWD to the MND as a responsible agency.

L6-3 The comment includes multiple concerns relating to wastewater management, infrastructure, and associated potential impacts. All infrastructure would be installed in accordance with MM UTL-1 and MM UTL-3. Refer to Master Response – Wastewater/Sewer.

L6-4 The comment includes concerns that groundwater supply and quality are not properly addressed in the IS/MND and supporting documents. The Project applicant is requesting further technical study through CLAWA and will inform responsible agencies of the outcomes. Water quality and potential groundwater contaminants would be required to meet state and federal requirements.

L6-5 The comment is informatory in nature. The comment also includes a concern about the sufficiency of distance measurements to nearby fire department stations. After investigation, it was determined that straight-line distances are a less accurate measurement of the proximity of the Project to fire protection services. Therefore, the MND has included a change to route-based distances in **Section 3, Errata**. This changes the proximity distance of Station 50 from approximately 1.4 miles to 4.3 miles and of Station 51 from approximately 1.7 miles to 5.9 miles. This change represents the actual distance traveled, and therefore, the IS/MND has been adjusted accordingly. This adjustment does not change any of the conclusions of the MND; the estimated response time remains the same, and because of this, the Project remains adequately served by fire protection services. Refer to Master Response – Fire Service Capacity.

L6-6 The comment includes concerns regarding emergency evacuation plans with increased occupancy. The Project would comply with MM WF-1, which includes requirements for continually updated evacuation plans and measures. Refer to Master Response – Wildfire.

L6-7 The comment is generally speculative in nature. Although reasonable to assume a rise in medical aid calls, the estimation provided in the comment is not backed by evidence and is speculative. The comment does not provide evidence of an impact not addressed in the IS/MND.

L6-8 The comment includes recommendations for operating guidelines during medical emergencies. The Draft IS/MND was prepared with Hume SoCal's existing Emergency Evacuation Plan (**Appendix K**), which provides procedures for multiple emergencies the camp may encounter. MM WF-1 ensures that this plan will be continually updated. The medical procedures in the plan (page 17-18) closely align with the comment. No further response is warranted.

L6-9 The comment is generally informatory in nature. The comment provides statements of requirements generally related to fire and emergency response. The comment also includes recommendations related to these topics that are outside the scope of the IS/MND and CEQA. The updated WSA (**Appendix B1: Revised Water Supply Assessment**) states that The Green Valley Tank is a wholesale CLAWA facility and is not available to provide dedicated storage, emergency reserves, or fire-flow capacity to the Project. All fire flow, equalization storage, and emergency storage must be provided by on-site facilities in accordance with applicable fire code requirements and must be sized without reliance on supplemental CLAWA deliveries. Additionally, the existing potable water tank does not satisfy the County's minimum storage requirements under a peak daily demand with fire flow, to accommodate the expansion construction of a 300,000-gallon tank is recommended (refer to Draft IS/MND, page 154). Furthermore, the MND includes a Preliminary Fire Fuel Modification Plan which shows existing and proposed hydrant locations (Figure 7 – Preliminary Fire Fuel Modification Plan). Kimley-Horn prepared a truck turning analysis, included as **Appendix L – Truck Turns**, to aid in design with on-site access drives to Green Valley Lake Road. No revisions to the IS/MND are warranted.

L6-10 The comment is conclusionary in nature. The comment includes a statement of opposition to the sufficiency of the IS/MND. The total comment does not provide evidence that the IS/MND or its conclusions are inadequate (see above responses). No revisions are warranted.

2.5 Organizations/Interested Parties

O1 - Concerned Residents of Running Springs

January 6, 2026

Elena Barragan, Senior Planner
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Subject: Comments on the Initial Study/Mitigated Negative Declaration for the Hume SoCal Campground Expansion Project (PROJ-2024-00046/SCH No. 2025110453)

Dear Ms. Barragan,

The following public comments are respectfully provided regarding the November 2025 Initial Study/Mitigated Negative Declaration (IS/MND) and supporting documents for the Hume SoCal Campground Expansion Project (Project) prepared for Hume Lake Christian Camps (Applicant). Residents of the community of Running Springs have a direct and substantial interest in ensuring the Project complies with the California Environmental Quality Act (CEQA). The below comments detail multiple instances in which the IS/MND fails to adequately disclose, analyze, and mitigate potentially significant effects the Project may have on the environment. The comments also provide fair argument that the Project may have a significant effect on the environment.[1] As such, comments and recommendations refer to the preparation of a draft Environmental Impact Report (DEIR) to ensure adequate environmental review in compliance with the CEQA.[2] 1

I. AGRICULTURE AND FORESTRY RESOURCES

A. The IS/MND does not adequately disclose, analyze, or mitigate potentially significant impacts related to the loss or conversion of timberland. The IS/MND inappropriately relies solely upon compliance with local ordinances in determining that the Project "would not result in the loss of forest land or conversion of forest land to non-forest use."[3] As described in the IS/MND and supporting documents, the Project is located on forest lands that support native conifer and hardwood species. These forest lands may meet the State's definition of "timberland" pursuant to the Z'berg-nejedly Forest Practice Act of 1973.[4] The IS/MND states that the Project "is proposed to be developed on land that has been previously disturbed and developed with existing campground facilities or *within areas of the existing campground property that are currently undisturbed forest*" (emphasis added).[5] As the Project will develop currently undisturbed forest areas, it can be 2

[1] Guidelines for Implementation of the California Environmental Quality Act § 15384.
[2] Guidelines for Implementation of the California Environmental Quality Act § 15064(f) and (g).
[3] IS/MND Impact 2(d), page 58.
[4] California Public Resources Code § 4526.
[5] IS/MND Impact 14(a), page 134.

reasonably assumed the Project may result in a conversion of timberlands to uses other than the growing of timber. The DEIR should include a discussion regarding the potential significance of this conversion and identify relevant avoidance, minimization, and mitigation measures. Additionally, the Project may require a Timberland Conversion Permit pursuant to Article 9 of the Z'berg-nejedly Forest Practice Act of 1973; the Applicant should consult with the relevant authorities regarding the need for this permit. 2

II. BIOLOGICAL RESOURCES

A. The IS/MND does not adequately disclose, analyze, and mitigate potentially significant impacts to waters of the State. The IS/MND acknowledges the presence of waters of the State on the Project site and states, "Any impacts to the on-site jurisdictional areas will require a USACE Clean Water Act Section 404 Permit, RWQCB CWA Section 401 Water Quality Certification, and a CDFW Section 1602 Lake and Streambed Alteration Agreement prior to Project implementation. Acquisition of necessary permits/agreements would reduce impacts regarding jurisdictional features to a level of less than significant".[6] This represents a failure to identify, disclose, and analyze impacts, and as such is an impermissible deferral of potential mitigation under CEQA, particularly as the statement is not included in an enforceable mitigation measure and does not commit the Project to acquiring said permits/agreements. The IS/MND does not directly acknowledge that potential impacts to the waters of the State located on the Project site will occur; however, the IS/MND indicates the development of two new road crossings intersecting Drainage 7 associated with Phase 2, and a proposed activity quad within Drainage 4 associated with Phase 4.[7,8] As such, it can be reasonably assumed there is a potential for impacts. Appendix A2 Delineation of State and Federal Jurisdictional Waters (Appendix 2) identifies drainages 4 and 7 as perennial watercourses.[9] Furthermore, Drainage 7 is a direct tributary to Deep Creek, a National Wild and Scenic River and state-designated Wild Trout Stream, which occurs approximately 1400 linear ft. downstream from the Project site.[10] Any impacts to these drainages may have the potential for significant direct effects, as well as potentially significant indirect effects to Deep Creek associated with, but not limited to, changes to the timing, quantity, intensity, duration, and source of sediment and nutrient delivery. Appendix 2 states that "based on the proposed project footprint, all of the onsite jurisdictional areas will be avoided and no impacts will occur"[11] without providing substantial evidence of full avoidance, and in apparent contradiction to the Project Site Plans included in the IS/MND.[7,8,] The DEIR should disclose and 3

[6] IS/MND Impact 4(b), page 78.
[7] IS/MND Figure 6(e): Phase 4 Site Plan, page 43.
[8] IS/MND Figure 6(c): Phase 2 Site Plan, page 39.
[9] Appendix 2A: Delineation of State and Federal Jurisdictional Water, Table ES-1 Jurisdictional Areas, page ES-1.
[10] Appendix 2A: Delineation of State and Federal Jurisdictional Water, Drainage 7, page 18.
[11] Appendix 2A: Delineation of State and Federal Jurisdictional Water, Executive Summary, page ES-2.

analyze all potential direct and indirect impacts to waters of the State and include a discussion of their significance, including identification of all relevant avoidance, minimization, and mitigation measures, which may include the provision of the above referenced permits/agreements. 3

B. The IS/MND does not adequately disclose, analyze, and mitigate potentially significant impacts to southern rubber boa (*Charina umbratica*), a native snake species listed as threatened under the California Endangered Species Act (CESA). As described in the IS/MND, the periphery of the site is considered to support suitable rock outcrops with a moderate potential for southern rubber boa.[12] The IS/MND concludes that "The Project would be constructed adjacent to previously disturbed areas that do not provide as high of quality habitat for southern rubber boa as the undeveloped areas on the periphery of the Project site. The Project would be constructed adjacent to previously disturbed areas, reducing impacts to non-disturbed land which provides suitable habitat for southern rubber boa."[12] Rock outcroppings do not appear to be limited to the periphery of the site, as elsewhere the IS/MND states that "Granitic bedrock *occurs extensively in surface outcrops* and at shallow depths below the surface soils"[13] (emphasis added) and that "Outcrops are common throughout the Project area".[14] The IS/MND does not provide substantial evidence regarding the unsuitability of these outcrops to support southern rubber boa. Furthermore, as discussed previously, the Project proposes to develop "currently undisturbed forest"[5], including Phase 4 which is located in a currently undeveloped portion of the Project site northeast of Green Valley Lake Road (GVLR), in an area mapped as supporting rock outcrops. Last, MM GEO-1 requires the removal or breaking of boulders that are identified as posing a rockfall hazard "upslope of planned improvements"[15]; it is therefore reasonably assumed that this may also include currently undeveloped areas. The IS/MND does not provide substantial evidence that rock outcroppings will be avoided; rather, it provides reasonably assumed substantial evidence that permanent, direct impacts may occur within these areas. The requirement of MM BIO-1 for pre-construction surveys, which lacks an identified timeframe in which the surveys will occur, is not adequate to address these potentially significant impacts to southern rubber boa and its habitat.[16] The DEIR should include an analysis of impacts to rock outcroppings throughout the site and associated potential impacts to southern rubber boa, and a discussion of the significance of these impacts, including identification of relevant avoidance, minimization, and mitigation measures. Additionally, if the DEIR cannot substantiate avoidance, then it may be prudent for the Applicant to seek a permit 4

[12] IS/MND Impact 4(a), Southern Rubber Boa, page 76.
[13] IS/MND Impact 7(f), page 99.
[14] IS/MND 2.1 Project Background, Location, and Setting, Topography and Geologic Setting, page 5.
[15] IS/MND Section 4, Geology and Soils, Mitigation Measures, page 100.
[16] IS/MND Section 4, Biological Resources, Mitigation Measures, page 77.

for impacts to a CESA listed species; the Applicant should consult with the relevant authorities regarding permitting options. 4

III. HYDROLOGY AND WATER QUALITY

A. The IS/MND does not adequately analyze and mitigate the Project's potentially significant impacts on groundwater supplies. The Project proposes a nearly 474% increase in water usage[17]. The water demand associated with current uses is 30.2 Acre-Feet Per Year (AFY)[17], all of which is provided by existing onsite wells[18]. The Project proposes to increase groundwater pumping to a minimum of 68.2 AFY under the Project's preferred scenario of importing 75% of its domestic water from Crestline-Lake Arrowhead Water Agency (CLAWA), and up to 173.3 AFY in the event no water is imported[17,19]. This represents a *minimum* 125% increase in groundwater pumping. Appendix B1 Water Supply Assessment (WSA) prepared for the Project recommends that drawdown tests are conducted to verify the existing wells capacity and the health of the underlying aquifer to support the proposed increase in groundwater pumping. The WSA states, "These tests are essential for a technical evaluation of the groundwater wells' sustainability and operational reliability."[20] The WSA also asserts that, "This data will help determine the well's specific capacity, the groundwater recharge rate, and identify any potential long term depletion or other issues that could affect the Camp's groundwater supply."[21] Despite this, MM HYD-1 of the IS/MND impermissibly defers completion of these essential studies until after construction of Phase 2[22]. Deferring these essential studies underscores the lack of substantial evidence in the public record supporting a no significant effect determination, which is required for reliance on an MND for this Project. 5

An analysis of the potentially significant impacts on groundwater supplies associated with the Project supplying up to 100% of its water demands via existing wells should be completed prior to Project approval, and is a requirement under CEQA in establishing baseline conditions. An adequate analysis cannot be conducted until the sustainability and reliability of the existing wells and underlying aquifer have been evaluated via drawdown tests. Drawdown tests, and all other pertinent groundwater and aquifer health tests including water quality tests as recommended by the WSA[21], should be completed prior to circulation of the DEIR. The DEIR should include a discussion of the test results and associated potentially significant impacts, including identification of all relevant avoidance, minimization, and mitigation measures. These results should also be discussed in relation to potentially significant impacts to utilities and service systems.

[17] IS/MND Table 14: Summary of Project Demand, page 117.
[18] IS/MND Section 2.1 Project Background, Location, and Setting, Water Usage, page 10.
[19] Appendix B1 Water Supply Assessment, Water Supply Strategy, page 12.
[20] Appendix B1 Water Supply Assessment , Executive Summary, page 1.
[21] Appendix B1 Water Supply Assessment, Groundwater, page 9.
[22] IS/MND Hydrology and Water Quality, Mitigation Measures, page 119.

IV. POPULATION AND HOUSING

A. The IS/MND does not adequately disclose, analyze, and mitigate potentially significant impacts related to the Project's induction of unplanned growth in the area. The IS/MND states that the Project, "would not introduce new population or housing to the Project site aside from minimal temporary/seasonal housing for staff."[23] This does not adequately characterize the intensity of land use that would result from the Project. The permanent population of ZIP code 92341 (Green Valley Lake) is 458 and the permanent population of ZIP code 92382 (Running Springs and Arrowbear) is 5721, for a total permanent population of 6,179.[24] The Project's proposed 900% increase from its current capacity, from an occupancy of 300 to 3000[23], would result in a population 655% the size of Green Valley Lake, 52% the size of the combined communities of Running Springs and Arrowbear, and 48% the size of the combined total permanent population of all three communities. As described in the IS/MND, the Project would exceed the capacity of existing wastewater facilities[25] and require the use of 5% of CLAWA's annual water allocation under the preferred water supply scenario.[19] As described throughout this letter, the IS/MND does not adequately account for additional potential impacts to existing local resources, including but not limited to groundwater supplies and emergency services. These strains on local resources, individually and collectively, have the potential to prevent or hinder development of additional permanent housing in the area in the future. The DEIR should include an analysis of the Project's increase in population and use of local resources, and a discussion of the associated potentially significant impacts to, and limitation of, future permanent housing, including identification of relevant avoidance, minimization, and mitigation. In accordance with the initial study checklist utilized by the document, this analysis should focus on the Project's potential to induce unplanned growth *in the area*, rather than the County as a whole. 6

V. PUBLIC SERVICES

A. The IS/MND does not adequately disclose, analyze, and mitigate potentially significant impacts to fire protection services. The IS/MND concludes that, "Since no new housing aside from minimal seasonal/temporary housing for campground staff would be constructed as a result of this Project, and therefore no new permanent residents added to the HCAG area, the Project would not represent a potential need for expanded fire protection in the area or affect service and response times."[26] As described above, this analysis does not consider that upon full build-out (i.e., the CEQA action being considered by the IS/MND) the Project will support a population equal to 48% of the combined total population of 7

[23] IS/MND Impact 14(a), page 134.
[24] 2020 Decennial Census data, United States Census Bureau, accessed January 1, 2026.
[25] Appendix B2 Sewer Feasibility Study, Executive Summary, page 1.
[26] IS/MND Impact 14(a)(i), page 137.

permanent residents of the communities of Running Springs, Arrowbear, and Green Valley Lake. Additionally, the WSA indicates a potential ten-fold increase in permanent full-time staff from 12 to 120[27], and Appendix J Traffic Analysis (Traffic Analysis) assumes that 90% of employees will live onsite[28], resulting in an increase of 96 quasi-permanent residents. Given this, it can be reasonably assumed that the Project may require increased fire protection services to maintain service ratios, which in turn may require new fire protection facilities or modification of existing facilities, the construction of which could result in potentially significant environmental impacts.

In addition, the majority of the onsite population will consist of minors housed in high-density dormitory structures. This infrastructure design and housing density may present a more complex structure fire-fighting environment requiring additional personnel and apparatus in comparison to the existing surrounding land use which predominately consists of single family residences. Additionally, the Project-related increase in general infrastructure may require additional resources for structure defense in the event of a wildfire. Given this, it can be reasonably assumed that the Project may require increased fire protection services to maintain performance standards, which in turn may require new fire protection facilities or modification of existing facilities, the construction of which could result in potentially significant environmental impacts. 7

Furthermore, the IS/MND identifies Running Springs Fire Department (RSFD) Stations 50 and 51 as the nearest fire stations providing service to the Project and indicates that these stations are located 1.4 and 1.7 miles from the Project site, respectively.[29] The IS/MND also states that San Bernardino County "has significant resources in place for the Project site" and concludes that "the County has ensured that there is more than adequate fire protection in neighborhoods under its jurisdiction" without providing substantial supporting evidence.[29] However, the nearest non-Paid Call San Bernardino County Fire Protection District (FPD) station, Station 91 in Lake Arrowhead, is located 13 miles from the Project site.[30] The IS/MND relies upon the generalized response times from RSFD Stations 51 and 50 listed in the Hilltop Community Action Plan, does not include any response times from San Bernardino County FPD stations, and does not provide a site-specific analysis of response times. In order to facilitate meaningful review of fire protection response times, the DEIR should include an independent analysis of response times from local stations, including potential variations during peak operating periods that coincide with other peak travel periods and variations associated with access to different Project phases.

[27] Appendix B1 Water Supply Assessment, Estimated Water Demand for the Project and Table 1 Estimated Camp Expansion Water Demand, pages 5-6.
[28] Appendix J Traffic Analysis, Appendix D Summary of Project Trip Generation.
[29] IS/MND Impact 15(a)(i), page 136.
[30] Google Maps, accessed January 1, 2026.

Furthermore, as Stations 50 and 51 do not appear to support aerial resources, the analysis should rely upon the travel distance by road to the Project site from these stations, which is over twice the distance referenced in the IS/MND.[30]

Last, the Project may result in increased levels of standard day-to-day emergency and public service calls, such as medical incidents and traffic incidents, associated with Project-related increases in population, infrastructure, and traffic. The DEIR should disclose and analyze the Project's increase in local population and infrastructure and all associated potential impacts on fire protection services as described above, and include a discussion of the potentially significance of these impacts, including identification of relevant avoidance, minimization, and mitigation measures. 7

VI. TRANSPORTATION

A. The IS/MND does not adequately disclose, analyze, and mitigate potentially significant impacts related to the average daily trips and increase in vehicle miles traveled (VMT) generated by the Project. The IS/MND concludes, "Based on San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis as the Project would involve the construction of a summer camp that generates less than 110 average daily trips".[31] This average relies on an assumption of 250 employees during the summer and 40 employees during the non-summer operating periods, 10% of which are assumed to commute daily.[28] However, per the WSA, the camp may staff up to 1,000 employees during the peak summer seasonal operating period, and up to 670 employees during the peak winter seasonal operating period, each of which span a 9-week period.[27] Maintaining the other parameters of the trip generation analysis, this results in an average of 235 average trips per day during peak summer staffing and 160 average trips per day during peak winter staffing, cumulatively exceeding the 110 daily trip screening criteria for over one third of the year. Furthermore, it can be reasonably assumed that the peak seasonal operating periods are likely to coincide with peak travel periods for both tourists and residents (i.e., summer and winter K-12 school breaks), further exasperating the Project's potentially significant impacts to transportation. Last, the screening criteria related to projects that generate less than 110 daily trips is based upon an assumption that these projects are "local-serving" (i.e., serve the local community) in nature.[32,33] The Project is not "local-serving" and should not qualify as exempt based on daily trips. The primary local benefit the Project will provide are jobs, of which less than a quarter are full-time;[27] this presumed local benefit is predicated on the assumption that the Project's full-time job creation and hiring will target residents of the mountain communities, which is neither discussed or analyzed by the 8

[31] IS/MND Impact 17(b), page 144.
[32] February 2020 San Bernardino County Transit Authority Recommended Traffic Impact Analysis Guidelines, accessed January 1, 2026.
[33] July 2019 San Bernardino County Transportation Impact Study Guidelines, accessed January 1, 2026.

IS/MND. The IS/MND repeatedly asserts the Project will provide no permanent housing, and that campers will be bused in from as-of-yet undisclosed distances, remain at the Project site for the duration of their stay, and then be bused out, thus providing limited to no benefit to other local businesses; should the Project argue that employees will patron local businesses, it should be sure to include these additional off-site trips in the transportation analysis. The DEIR and revised Traffic Analysis should include a more robust VMT analysis that takes into account the above described peaks in average trips and the average distance traveled by both employees and campers, and a discussion of the potentially significant impacts associated with this increased level of VMT in accordance with CEQA Guidelines section 15064.3, subdivision (b), including identification of relevant avoidance, minimization, and mitigation measures. 8

B. The IS/MND does not adequately disclose, analyze, or mitigate the results of the Traffic Signal Warrant Analysis and associated impacts to transportation. The IS/MND states, "a Traffic Signal Warrant Analysis was conducted and determined the Project would not result in traffic generation requiring additional traffic signals in the area."[31] However, the Traffic Signal Warrant Analysis expressly concludes that the intersection of GVLR and Highway 18 will experience a "project-related effect due to the increase in delay caused by the addition of project traffic" and recommends the installation of a traffic signal to address the deficiency.[34] This serves as substantial evidence and fair argument, in the form of expert opinion, that a significant effect on transportation may occur. The DEIR should include a discussion of this potentially significant impact, an analysis of alternatives such as limiting Project-related travel to non-peak hours, and identification of relevant avoidance, minimization, and mitigation measures, including but not limited to the installation of a traffic signal. 9

C. The IS/MND does not adequately address the operations of Phase 4 and potential impacts on transportation. The proposed build-out of Phase 4 introduces development northeast of GVLR, independent of the other existing and proposed facilities southwest of Green Valley Lake Road.[7] Neither the IS/MND nor the Traffic Analysis include a discussion or analysis of potential impacts associated with the facilitation of pedestrian and/or vehicle traffic across GVLR between Phase 4 and the remainder of the Project. Furthermore, the IS/MND repeatedly fails to acknowledge the proposed intersection, and only addresses a single new intersection proposed for Phase 5.[35] The DEIR and revised Traffic Analysis should disclose the new intersection and analyze all potential associated impacts, and should explicitly state that Phase 4 will operate completely independent of the rest of the Project, or include an analysis and discussion of the potential impacts associated with pedestrian and/or vehicle 10

[34] Appendix J Traffic Analysis, Traffic Signal Warrant Analysis, Intersection Improvements and Table 7 Summary of Intersection Operation and Recommended Improvements, page 28 and 29.
[35] IS/MND Impact 17(c) and 17(d), page 145.

travel between them, including relevant avoidance, minimization, and mitigation measures as applicable. 10

D. The IS/MND does not adequately disclose, analyze, and mitigate potentially significant effects associated with the feasibility - or lack thereof - of utilizing buses for the transportation of campers, and the resulting inadequate emergency access and potential increase in hazards due to incompatible use. Neither the IS/MND nor Traffic Analysis include an analysis of the suitability, including lane widths and turning radiuses, of the existing intersections to support buses capable of transporting 50 people, as proposed for use by the Project.[28] It is the experience of the authors as local residents that the intersections are inadequate and that large vehicles routinely cross into opposing lanes in order to complete the left-hand turn from eastbound Highway 18 onto GVLR, the right-hand turn from GVLR onto westbound Highway 18, and turns exiting the existing Project site driveways along GVLR. Furthermore, the IS/MND and Traffic Analysis do not adequately account for the length of buses in comparison to the length of the existing left-hand turnpocket on eastbound Highway 18 in analyzing potential time delays caused by Project-related travel. Last, the IS/MND and Traffic Analysis do not adequately address the suitability of GVLR itself to support bus travel. Again, it is the experience of locals that buses cannot navigate GVLR - a narrow, winding, two-lane mountain road - without entering oncoming lanes.

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GVLR is the only available evacuation route available to residents and visitors of Green Valley Lake and all camps located along Green Valley Lake Road. The potential insufficiency of both the intersections and road to facilitate the safe and efficient movement of buses poses a potentially **significant** life safety threat to the residents and visitors of Green Valley Lake, emergency responders, occupants of the other camps located along GVLR, and occupants of the Project. In the event of an evacuation, buses attempting to navigate the existing intersections and GVLR while traveling both to and from the Project site have the potential to significantly hinder the flow of traffic, leading to potential entrapment, as well as limiting access for responding emergency services. The DEIR should include a thorough analysis of the suitability of the existing intersections and GVLR for bus travel and a discussion of the associated potentially significant impacts to emergency access, including identification of relevant avoidance, minimization, and mitigation measures, including but not limited to the creation of a secondary evacuation route and substantial improvements to existing intersections and GVLR. The results of this analysis should also be included in discussions regarding the potentially significant impacts related to fire protection services and wildfire.

VII. UTILITIES AND SERVICE SYSTEMS

A. The IS/MND does not adequately analyze and mitigate potentially significant impacts associated with importing water from CLAWA. Per the WSA, the existing 12

CLAWA connection has not been subject to a fire flow test to confirm its capacity to provide adequate pressure.[36] According to the WSA, "The system pressure at the connection, in conjunction with a water use agreement between the Camp and CLAWA, will dictate the flow of water that can be provided to the Camp."[36] Per the WSA, the connection was not located nor has it ever been used[36], so no substantial evidence exists within the record that it is fully functional and capable of providing adequate pressure. As the pressure at the connection has not been ascertained, the available flow of water to the Project has not been confirmed and any associated improvements necessary to provide adequate flow to the Project have not been evaluated for potentially significant environmental impacts. The fire flow test should be conducted prior to circulation of the DEIR. The DEIR should include an analysis of the results of this test and associated potential impacts, and a discussion of the significance of these impacts, including relevant avoidance, minimization, and mitigation measures. 12

B. The IS/MND does not adequately analyze and mitigate potentially significant impacts associated with off-site sewer system improvements. Per the IS/MND, "an additional off-site lift station analysis is underway to determine the lift station's capacity and potential point of connection" related to buildout of Phase 4.[37] Until the lift station's capacity is confirmed, potentially significant impacts associated with any identified required capacity increases or improvements cannot be evaluated.This analysis should be completed prior to circulation of the DEIR. The DEIR should include a discussion of the analysis and associated potentially significant impacts, including relevant avoidance, minimization, and mitigation measures.

Furthermore, the IS/MND states, "Upon completion of Phase 2, pump upgrades and storage expansion at the Deer Lick Lift Station and the Ahwahnee Lift Station would be required, as outlined in MM UTL-1 which requires implementation of additional wastewater facilities and coordination with RSWD."[38] However, Appendix B2 Sewer Feasibility Study identifies that all phases of the Project will exceed the current pumping capacity of the Deer Lick Lift Station, and that Phases 2-5 will exceed the current pumping capacity of the Awahnee lift station.[25] As such, Project-related improvements to these lift stations should occur prior to, or concurrent with, construction of Phase 1. Furthermore, the analysis of the required improvements to these lift stations and other existing RSWD sewer/wastewater facilities should be completed prior to circulation of the DEIR; the failure to include this analysis in the IS/MND and reliance on a recommendation to do so at a later date, as described in MM UTL-1, represents an impermissible deferral of mitigation under CEQA. The DEIR should include the analysis of proposed improvements and associated potential impacts, and a 13

[36] Appendix B1 Water Supply Assessment, Imported Water, page 9.
[37] IS/MND Impact 19(a), Sanitary Sewer, page 153.
[38] IS/MND Impact 19(c), page 157.

discussion of the significance of these impacts, including identification of relevant avoidance, minimization, and mitigation measures. 13

C. The State Clearinghouse (SCH) Summary Form for the Project states, "Issues raised by agencies include Crestline-Lake Arrowhead Water Agency, stating that the agencies facilities were not sufficient for their projected needs without significant improvements being required. The applicant has since worked with CLAWA and resolved the issues of concern".[39] The IS/MND does not include a discussion of the original "significant improvements" identified by CLAWA, or how this potential issue has been resolved. Furthermore, the WSA states, "The attached agreement outlines CLAWA's supply limitations and establishes a cap on the water provided to the Camp based on the scenarios outlined in the Water Supply Strategies section"[40] but fails to include the agreement, or disclose and analyze the supply limitations and cap identified by CLAWA. This raises concerns about the supply available from CLAWA, and the potential for currently unidentified improvements necessary for CLAWA to meet the Project's demand. The DEIR should include a discussion of the communications with CLAWA, the resolution of their initial concerns that has resulted in no identified improvements, and documentation from CLAWA that they have sufficient capacity to meet the Project's water demand without any improvement or expansion of existing facilities. If significant improvement or expansion of CLAWA's facilities is required, the Project scope should be expanded to include these improvements or expansions, and the DEIR should adequately disclose, analyze, discuss, avoid, minimize, and mitigate impacts related to these improvements or expansions. 14

D. The appendices of the Water and Sewer Master Plan are blank, rendering effective review impossible. At minimum, given the potentially significant impacts associated with the Project's proposed increase in sewer services, the IS/MND should be re-circulated with a complete Water and Sewer Master Plan. 15

VIII. WILDFIRE

A. The IS/MND does not adequately analyze or mitigate potentially significant impacts related to wildfire and associated evacuation needs. The Project site is located in a Very High Fire Hazard Severity Zone[41] and is served by a single narrow, winding, two-lane road that functions as the sole ingress/egress route for not only the Project but several other existing organized camps and the entirety of the town of Green Valley Lake. During peak operating periods, over two thousand minors will be present at the Project site. Given the Project's reasonably assumed and foreseeable impacts to existing evacuation strategies (see comment VI.D. above), MM WF-1 impermissibly defers approval of updated Evacuation Plans until after completion of individual construction phases. This 16

[39] Form F Summary Form for Electronic Document Submittal.
[40] Appendix B1 Water Supply Assessment, Conclusion, page 15.
[41] Office of the State Fire Marshall, Fire Hazard Severity Zone Viewer, accessed January 2026.

does not provide for adequate public disclosure on the Evacuation Plan and limits opportunities for public review and feedback, including identification of potential Project-design related deficiencies, which may necessitate Project-design changes, which may in turn result in additional potentially significant environmental impacts.

For example, the Project Site Plan as detailed in IS/MND Figures 6a-6f does not appear to show an adequate number of bus parking spaces. Table 83-15 of the County Development Code summarizes the number of parking spaces required based on land use. For organizational camps, one bus parking space is required per 20 campers. Accordingly, the Project is required to provide 128 bus parking spaces; however, IS/MND Figures 6a-6f appear to show a total of 8 dedicated bus parking spaces. The ability to stage an adequate number of buses necessary to facilitate a safe and efficient evacuation is imperative. Though not disclosed or analyzed, it is possible the Project intends to seek approval for a reduction in parking spaces and rather utilize internal roadways for bus staging and loading in the event of an evacuation. At 48-72 people per standard school bus and a maximum occupancy of 2554 campers, this would require the staging of 36-54 buses within the internal road system so as to not impair travel on GVLR. It is not clear how this will allow for the concurrent movement of emergency service vehicles, such as fire trucks, throughout the site. Furthermore, if buses are not staged onsite, it is not clear how the Project intends to charter buses to the site quickly enough - whilst residents and visitors of Green Valley Lake and surrounding camps and communities are themselves evacuating or preparing for evacuations, and emergency services are responding - to facilitate an effective evacuation that will not impede other evacuation and emergency response efforts in the process (again, see comment VI.D. above for discussion regarding evacuation related transportation impacts). 16

This is only a single example of how the Evacuation Plan may impact Project design and result in additional potentially significant effects on the environment. The Evacuation Plan should be updated and circulated with the DEIR. The Evacuation Plan should address how the Project will retain sufficient resources (i.e., staged buses) onsite, or charter buses in a timely manner, to facilitate an effective and efficient evacuation that would not result in the diversion of emergency response resources for evacuation assistance (unless additional public service needs are appropriately mitigated for under impacts to Public Services), or hinder the evacuation of neighboring camps and the town of Green Valley Lake. The Evacuation Plan should include alternatives based on fire location and associated potential road closures, and provide a shelter-in-place option capable of maintaining the safety of the camp at maximum capacity in the event GVLR is impacted by fire prior to evacuations.

B. The IS/MND does not adequately evaluate the wildfire risk the Project poses to adjacent communities, including but not limited to Running Springs, Green Valley Lake, and Arrowbear. The slopes and drainages associated with the Project site have the potential to directly align with Santa Ana winds, under which conditions an ignition could pose a potentially significant threat to the community of Running Springs and beyond, including Lake Arrowhead, as observed during the 2007 Slide Fire. The catastrophic effect on communities in downwind-alignment with Santa Ana driven fires was most recently observed in January 2025 during the Palisades and Eaton Fires. The 2018 Camp Fire serves as an example of how wind-driven wildfires in forested communities with insufficient evacuation options can lead to a mass casualty event. The DEIR should include fire modeling scenarios of an ignition originating at the Camp under various conditions, to facilitate adequate disclosure, analysis, and avoidance, minimization, and mitigation of these risks. The DEIR discussion should also include fire history, fire return interval, existing fuel types and loads, and any other conditions that would contribute to fire behavior. In addition, the DEIR should identify the proposed activities that will occur at the camp that pose an ignition risk (i.e., campfires, construction and maintenance activities involving heavy and small equipment use, etc.) and the actions that will be taken to manage these risks, including during conditions with elevated wildfire behavior potential as indicated by, but not limited to, Red Flag Warnings, Fire Weather Warnings, National Wildland Fire Preparedness Levels, Fuels and Fire Behavior Advisories, and San Bernardino National Forest Project Activity Levels, Fire Danger Levels, and wildfire-related Forest Orders. 17

C. The Fire Fuel Modification Plan (FMP) and associated Figure 7 prepared for the Project and referenced by the IS/MND[42] was not included or circulated with the IS/MND or supporting documents. In order to facilitate public disclosure and meaningful public review of the FMP and associated potential impacts, the draft FMP should be circulated with the DEIR and the DEIR should analyze and discuss - at minimum - all impacts associated with fuel breaks required by the FMP, including relevant avoidance, minimization, and mitigation measures. 18

D. MM WF-2 requires that flammable vegetation on "adjacent vacant lots" be reduced by 50% prior to construction.[43] The IS/MND does not adequately identify the location of this fuel reduction; as such, it is unclear if "adjacent lots" refers to those associated with future Project phases, or adjoining lots not associated with the Project. Under the former scenario, impacts associated with this fuel reduction occurring across the entirety of future Project phases should be accounted for in the analysis of potential impacts to biological resources and hydrology, at minimum. In the latter scenario, the scope of the Project should be expanded to include these adjoining lots. Regardless of scenario, the DEIR 19

[42] IS/MND Impact 20(a), page 163.
[43] IS/MND Impact 20(b), page 165.

should clarify the location and extent of this fuel reduction and include an analysis of the associated impacts and a discussion of the significance of the impacts, including identification of relevant avoidance, minimization, and mitigation measures. 19

IX. GENERAL/MISCELLANEOUS

A. The supporting documents do not include a copy of the current Conditional Use Permit (CUP/90-0027/M322-13) and Planned Development Permit (PUD/82-0097). Failure to include these documents meaningfully and significantly hinders the reviewers' ability to independently verify the characterization of the current land use and environmental baseline, which in turn hinders independent analysis of the proposed increase in use, or the potential significance of changes to the existing baseline conditions. CUP/90-0027/M322-13 and PUD/82-0097 should be circulated with the DEIR to assist in providing substantial evidence of the environmental baseline for the Project. 20

B. The IS/MND does not adequately convey the intensity of land use proposed by the Project. The Project is characterized as a "campground" throughout the document. This characterization is misleading and portrays a less intense land use than that proposed by the Project. Neither the Project nor the current land use meet the San Bernardino County (County) Development Code's definition of a *campground*[44]. Both the Project's proposed land use, and the current land use, are better defined as an *organized camp*[45]; however, even this definition is inadequate, as the Project proposes minimal "outdoor living". Rather, the Project proposes to house campers in high-density residential dormitories. The Project's proposed land use is more akin to that of an exclusive-use, high-occupancy resort and its impacts to the environment, character of the community, and local resources should be evaluated as such. At minimum, while not typically required of organizational camps, the County should consider levying an occupancy tax on the Project in accordance with California Revenue and Taxation Code section 7280, to defray some of the impact to, and strain on, local and County resources, particularly as the landowner is exempt from property taxes. 21

C. The IS/MND does not adequately identify the number of acres that will be impacted by the Project. Much of the IS/MND discusses the expansion of the Project from 107 to 252.1 acres. However, elsewhere the IS/MND indicates that 22

[44] San Bernardino County Development Code § 810.01.050. Definitions, C. (e) CAMP or CAMPGROUND. A site used or intended for use for temporary occupancy by campers traveling by automobiles or otherwise, which may include individual campsites, but where utility hookups for recreational vehicles are typically not provided.

[45] San Bernardino County Development Code § 810.01.050. Definitions, C. (e)(1) CAMP, ORGANIZED. A site with program and facilities established for the primary purpose of providing an outdoor group living experience with social, spiritual, educational, or recreational objectives normally for five days or more during one or more seasons of the year.

227 will be preserved as open space and new development will be limited to approximately 15 acres[46]. It is assumed the 10 acre difference between the 252 total acres, and the stated 242 combined acres of new development (15) and open space (227), represents the current developed area. Under this assumption, it would reasonably follow that only 25 of the 252 acres, or roughly 10%, of the property will be developed upon full buildout. To put it another way, 90% of the Project site would be open space. This does not appear consistent with the scale of development displayed via IS/MND Figure 6a (see screenshot below).

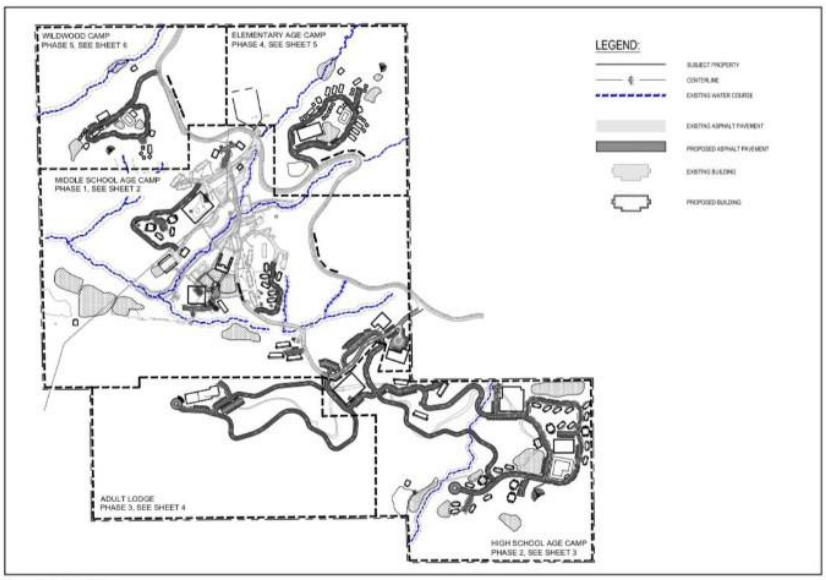

Figure 6a: Hume SoCal Campground Expansion Overall Plan Site Plan
Hume SoCal Campground Expansion Project
San Bernardino County

Not to scale Kimley»Horn

The DEIR should expressly disclose the total acreage to be impacted by the Project, including a breakdown of direct, indirect, permanent, and temporary impacts, and maps indicating where these impacts will occur, to better facilitate meaningful review and independent determinations regarding the adequacy of the Project's analysis and avoidance, minimization, and mitigation of potentially significant impacts. In concluding that an area is set aside as open space, the land should meet the County Development Codes definition of "open space"[47]

22

[46] IS/MND Project Objectives, page 24.
[47] San Bernardino County Development Code § 810.01.170. Definitions, O. (i) OPEN SPACE. Land where basic natural values have been retained. OPEN SPACE can include wilderness areas, a small park in the middle of a city, pastures, forested areas, agricultural groves, vineyards, golf courses, floodwashes, etc.

and not include small areas of interstitial space amongst development. It should further clarify that any open space associated with the Project is private open space[48], and does not contribute to public recreation opportunities. 22

The above comments represent the personal opinions and concerns of the authors as local residents. Due diligence has been exercised in limiting the analysis to factual evidence, or evidence that can be reasonably assumed from facts. These comments are the result of a cursory, non-professional review that was hindered by the comment period spanning two major holidays. The extent of the deficiencies and inadequacies identified by this review cast doubt upon the adequacy of the *entirety of the document*, including all disclosures, analyses, and mitigation measures.

Consolidated, increased levels of land use are not inherently at odds with the mountain community. One need only look at attractions such as the ski resorts and SkyPark as evidence of this. However, it must be acknowledged that these attractions differ significantly from the Project in that they are open to the public. Furthermore, the use of local resources associated with these attractions is offset in part by the meaningful economic contributions they provide to the mountain communities and the County both directly via their own tax revenue, and indirectly through the tax revenue generated by the increase in visitorship to the mountain communities, resulting in patronship of local small businesses including eateries, retail shops, and lodging establishments. Economic considerations aside, at minimum, in order to facilitate environment review commensurate with the level of intensive use proposed by the Project and associated potentially significant environmental impacts, an EIR must be prepared. 23

In closing, the Applicant is encouraged to consider what kind of neighbor they wish to be. The Applicant has been partnered with the landowner since 2020, and as such has only witnessed an explosive and unsustainable level of use in the surrounding communities that is not representative of the area's historic use pattern, and which is already declining. The stated Project objective of establishing Green Valley Lake as an "economically sound enclave of specialized outdoor recreation and campground venues"[46] fails to acknowledge that Green Valley Lake, and the surrounding communities, are people's **home**, not just tourist destinations. Green Valley Lake is already a *socially sound* community of residents, both long-term and new, that seek a rural, mountain community for very specific reasons. The Applicant is urged to take the community's opposition to this Project to heart, and consider local denizen input in redesigning a project more in harmony with the existing community. 24

The function of open space may differ, depending upon the location. It may have a protective function, as in the case of open space in flood plain areas, where it serves to protect health and safety. It can have a structural or buffer function to space and separate conflicting land uses. It may serve a recreational function, or a scenic function to provide aesthetic views of forests or mountains

[48] San Bernardino County Development Code § § 810.01.170. Definitions, O. (n) OPEN SPACE, PRIVATE. Open space directly adjoining the living areas of dwelling units, which is intended for all private enjoyment of the residents of the dwelling unit. Private open space shall in some manner be defined so that its boundaries are evident

While not required by CEQA, in the event the County chooses to move forward with the IS/MND and finds that, in light of the whole record, there is no substantial evidence the Project will have significant environmental effects, it is kindly requested that direct written responses to the above comments are provided, explaining how they fail to meet the fair argument standard. It is further requested that this response to comments also be filed with the SCH and published in the record via CEQAnet. The opportunity to provide these comments is appreciated. 24

Sincerest regards,
Concerned residents of Running Springs

O1 - Responses to Concerned Residents of Running Springs

O1-1 The comment is introductory in nature. The comment lists many concerns, the potential implications of those concerns, and makes a request for an Environmental Impact Report. The total comment does not provide adequate evidence that an Environmental Impact Report is warranted (see responses below).

O1-2 The comment includes concerns over the guidelines for the conversion of timberland and their role in the IS/MND. The Project's impacts on forestry resources were found to be less than significant. The Project site contains forest land. The majority of the Project site is classified as evergreen forest. The Project site is subject to the County's Open Space (OS) Overlay, as defined in County Development Code Section 82.19.030 Special Requirements for Natural Resources. As such, development of the Project would be subject to the unique OS Overlay development criteria (Section 82.19.040 Development Criteria within Scenic Areas), which includes limitations on timber harvesting and the removal of native vegetation, especially timber. Therefore, with compliance with applicable local regulations, the Project would not result in the loss of forest land or conversion of forest land to non-forest use, and a less than significant impact would occur. The comment does not provide adequate evidence that any impacts are not adequately addressed or are significant and would warrant additional mitigation.

O1-3 The comment includes concerns over jurisdictional drainage areas. The IS/MND identifies all jurisdictional features and acknowledges that applicable permits (USACE 404, RWQCB 401, CDFW 1602) must be obtained prior to construction. Compliance with regulatory agency permitting requirements is recognized under CEQA as adequate mitigation when impacts are fully regulated through existing federal and state programs.

Erosion Control Plans would be required as a part of the Project-specific drainage plan and would be reviewed and approved by the County. In addition, the SCAQMD and Lahontan RWQCB regulate erosion and loss of topsoil. SCAQMD Rule 403 for control of fugitive dust would reduce or eliminate the potential for soil erosion due to wind. The RWQCB State's General Construction Permit and County Public Works Department would require compliance with storm water runoff for the proposed Project, therefore reducing impacts associated with water erosion and loss of topsoil. Since the Project site is not located within the MS Phase I boundary, there are no proposed BMPs on site since storm water runoff is not required to be treated. There will be off-site drainage conveyed through the site through the various existing streams located within the site limits. The off-site runoff remains unchanged from the existing to the proposed and is not anticipated to cause any negative impacts downstream or to proposed infrastructure. No substantial evidence has been presented that impacts would remain significant after compliance with permitting requirements. No revisions are warranted.

O1-4 The comment includes concerns over the adequacy of mitigation for the southern rubber boa. The Project would be constructed adjacent to previously disturbed areas, with development clustered on approximately 20 acres that do not provide as high of quality habitat for southern rubber boa

as the undeveloped areas on the periphery of the Project site. The Project would be constructed adjacent to previously disturbed areas, reducing impacts to non-disturbed land which provides suitable habitat for southern rubber boa. To ensure the absence of southern rubber boa from site specific locations prior to grading activities, MM BIO-1 would be implemented. MM BIO-1 implements a pre-construction survey to reduce or avoid any impacts to special-status wildlife, including the southern rubber boa, before ground disturbance.

O1-5 The comment argues that groundwater use is a potentially significant impact. The IS/MND includes a Water Supply Assessment that evaluates groundwater, imported water, and phased-demand scenarios. MM HYD-1 requires verification of well capacity prior to full operational integration, consistent with CEQA's allowance for performance-based mitigation. The Project's phased implementation ensures no phase proceeds without adequate supply. The comment does not present substantial evidence that groundwater impacts would remain significant after mitigation.

O1-6 The comment claims the IS/MND underestimates population increase associated with the Project in nearby areas. Visitor populations are temporary and do not constitute population growth under CEQA. Seasonal staff housing is similarly temporary and does not induce new housing demand. The IS/MND appropriately evaluates permanent population effects and concludes none occur. No revisions are warranted.

O1-7 The comment includes a concern that the IS/MND inadequately analyzes fire staffing needs and emergency service availability. The IS/MND includes compliance with San Bernardino County Fire standards, which regulate fire, access, staffing, and emergency response capacity. CEQA relies on responsible fire authority expertise; no contrary expert evidence has been provided. The County does not have a service standard for the number of sheriff personnel per population. No revisions are warranted.

O1-8 The comment includes a concern that the IS/MND incorrectly analyzes transportation projections. The IS/MND follows County-adopted guidelines. The Lead Agency has discretion over the most appropriate methodology to evaluate a project's VMT. The Traffic Analysis was prepared in accordance with San Bernardino County Transportation Impact Study Guidelines. Land development projects that meet one or more of the three screening thresholds may be presumed less than significant on transportation and circulation. The Project would involve fewer than 110 average daily trips; therefore, the Project would be screened out based on project type. No revisions are warranted.

O1-9 The comment claims that the IS/MND fails to implement evidence from the Traffic Analysis. As mentioned in the IS/MND and **Appendix J: Traffic Analysis**, while delay increases occur, they do not meet significant impact thresholds. Signal warrant studies identify operational considerations but do not in themselves establish CEQA significance. The County may evaluate intersection improvements separately. No revisions are warranted.

O1-10 The comment includes concerns about general transportation implications following the implementation of Phase 4 of the Project. Phase-specific access and circulation must comply with the County discretionary review process and would comply with existing laws, regulations, and standards. The IS/MND evaluated overall circulation; no substantial evidence shows that Phase 4 creates a new significant impact not disclosed. No revisions are warranted.

O1-11 The comment asserts that buses cannot safely navigate intersections and local roadways. Kimley-Horn has prepared a truck turning analysis, included as **Appendix L – Truck Turns**, that analyzes a 40-foot "large school bus" turning at all three Green Valley Lake Road access points to the site in order for access to be designed accordingly during development. Additionally, the IS/MND meets criteria for less than significant impact due to an increase in hazard from a geometric design feature or incompatible use. No revisions are warranted.

O1-12 The comment includes concerns that CLAWA may not be able to meet the demand of the Project. The IS/MND acknowledges that detailed hydraulic modeling and system analysis may be required prior to final service approval. CEQA permits the use of performance-based mitigation where design-level engineering occurs at later stages. Project approval does not grant water service; all CLAWA requirements must be satisfied prior to connection. No revisions are warranted.

O1-13 The comment includes concerns that MM UTL-1 is not sufficient to mitigate potentially significant impacts. MM UTL-1, following additional coordination, reduced occupancy, and revised strategy, has been revised; refer to **Section 3.0 Errata**. Through the Revised Sewer Feasibility Study (**Appendix B2**) and the implementation of MM UTL-3, prior to the Final Development Plan (FDP) approval for Phase I, the Camp shall install an on-site wastewater system subject to County and Lahontan Regional Water Quality Control Board approval. Additionally, Mitigation Measure UTL-3 allows for sewer service buildout as recommended by the revised Sewer Feasibility Study, which concludes that the Camp will utilize, expand, and/or supplement the on-site wastewater treatment system through buildout of all phases. Furthermore, the existing RSWD system is intended to remain available as a secondary wastewater conveyance and treatment option where capacity is available, and use is approved by RSWD. As each phase advances, the required on-site treatment capacity will be confirmed based on the applicable Project flows, the selected advanced treatment system configuration, and regulatory requirements. Continued use of any portion of the RSWD system will remain subject to available District capacity and RSWD approval. Refer to Master Response – Wastewater/Sewer.

O1-14 The comment includes concerns that Crestline-Lake Arrowhead Water Agency (CLAWA) has unidentified improvements as part of the IS/MND. The Project Applicant has requested a technical study completed by Albert A. Webb Associates, included as **Appendix M: Hydraulic Evaluation**, and would be required to coordinate yearly with CLAWA to determine water supply availability through implementation of MM UTL-2. CEQA permits the use of performance-based mitigation where design-level engineering occurs at later stages. Project approval does not grant water service; all CLAWA requirements must be satisfied prior to connection. No revisions are warranted.

O1-15 The comment includes concerns about the accessibility of online documents. The Lead Agency was made aware of issues some parties had with accessing online documents. The comment period was extended to January 16, 2026. Project documents can be found here: https://lus.sbcounty.gov/planning-home/environmental/mountain-region/.

O1-16 The comment includes a concern that MM WF-1 improperly defers evacuation planning and does not address bus staging. MM WF-1 states that the evacuation plan and working guide is developed and will be strongly implemented. Those plans will be updated with the completion of each additional phase. Evacuation plans and operational documents are approved by Land Use Services. CEQA allows such plans to be finalized prior to occupancy because they do not involve environmental impacts requiring pre-approval analysis. No revisions are warranted.

O1-17 The comment makes a request for fire modeling and associated concerns. The IS/MND evaluates fire risk consistent with CEQA and incorporates required wildfire mitigation measures. No evidence has been presented that additional study is necessary. No revisions are warranted. Refer to Master Response – Wildfire.

O1-18 The comment includes a concern that the Fuel Modification Plan was not included in the circulated IS/MND. After further investigation, Figure 7: Preliminary Fire Fuel Modification Plan was found to be missing from the IS/MND during public review. Figure 7 has been added as a correction in **Section 3, Errata**. The absence of the figure itself does not change the conclusions of the IS/MND, which were based on the existing Preliminary Fire Fuel Modification Plan. No further changes are warranted.

O1-19 The comment misinterprets a mitigation measure relating to wildfire and has associated concerns. MM WF-2 does not mention “adjacent vacant lots”; it instead implements mitigation of the removal of flammable vegetation by 50 percent on “vacant lots” prior to construction. No further response is warranted.

O1-20 The comment asserts that the Project's Conditional Use Permit and Planned Development Permit need to be included to verify environmental baseline. Baseline under CEQA is established by existing environmental conditions, not permitting history. The IS/MND accurately describes onsite development and operations. No revisions are warranted.

O1-21 The commenter asserts the IS/MND mischaracterizes land use intensity and suggests occupancy tax be imposed. Land use terminology does not change the environmental impact analysis. The IS/MND evaluates building footprints, circulation, utilities, and natural resources regardless of land use. Taxation is a policy issue outside CEQA. No revisions are warranted.

O1-22 The comment requests clearer disclosure of impacted acres. The IS/MND identifies the developed footprint and open-space areas. The Project involves the expansion of the existing Hume SoCal Campground from the existing campground size of approximately 107 acres to approximately 252.1 acres – an addition of approximately 145 acres. The Project will provide up to approximately 227 acres of open space by clustering the proposed development area for the future campground

facilities within approximately 15 acres that limits impacts to sensitive habitats and identified waters of the state/ federal waters. Refer to **Section 2.1, Proposed Project** – Page 24 of the Draft IS/MND. Figure 6a is drawn not to scale and does not change the conclusions of the IS/MND. No revisions are warranted.

O1-23 The comment includes economic concerns and a request for an Environmental Impact Report. CEQA requires an EIR only when substantial evidence shows impacts may remain significant after mitigation. The IS/MND demonstrates impacts are reduced to less than significant. General opposition or speculative concerns do not constitute substantial evidence. Economic considerations are not within the scope of CEQA review. No revisions are warranted.

O1-24 The comment is conclusionary in nature and requests responses to the above comments. This document provides responses to all comments received during the IS/MND review period.

O2 - GVL Disaster Team

Kathleen Benjamin, Coordinator

FORMAL CEQA OBJECTION & PUBLIC SAFETY COMMENT

Hume Camp Expansion Green Valley Lake, CA
Proposed Increase: 250 Campers to 3,000 Campers

To:
1. San Bernardino County Land Use Services Department – Planning Division
2. San Bernardino County Fire Protection District
3. CAL FIRE – San Bernardino
San Bernardino County Office of Emergency Services

From: GVL Disaster Team,

Re: CEQA, Fire Safety, Traffic, and Land Use Incompatibility Objection

INTRODUCTION

The GVL Disaster Team submits this formal objection under the **California Environmental Quality Act (CEQA)** to the proposed expansion of Hume Camp from approximately 250 campers to 3,000 campers. 1

This proposal represents a twelvefold population increase at the end of a single-access, dead-end mountain roadway, located within a **Very High Fire Hazard Severity Zone (VHFHSZ)**. The project presents demonstrable, foreseeable, and potentially catastrophic public safety, wildfire evacuation, transportation, and land use conflicts that cannot be mitigated through standard conditions of approval. 2

1. CEQA WILDFIRE & EVACUATION IMPACTS – APPENDIX G (XVII – WILDFIRE)

Under **CEQA Guidelines, a** project results in a significant impact if it:

- Substantially impairs evacuation during a wildfire
- Exposes people to new or worsened wildfire risks
- Relies on inadequate emergency access

3

The project site meets all three of the above criteria for significant impact. Camp Hume and Green Valley Lake are served by a two-lane, winding mountain road with NO secondary emergency access route. The evacuation of:

- 3,000 campers
- Camp staff

- Tour buses
- Supply vehicles
- PLUS the residents, tourists and visitors of Green Valley Lake

is not physically achievable within accepted wildfire evacuation standards.

This constitutes a significant and unavoidable impact requiring a **FULL ENVIRONMENTAL IMPACT REPORT (EIR) per CEQA Guidelines §15064 & §15126.2**.

3 Cont

2. SAN BERNARDINO COUNTY DEVELOPMENT CODE VIOLATIONS

This proposal is inconsistent with multiple provisions of the San Bernardino County Development Code, including but not limited to:

Fire Safety & Emergency Access

- **Development Code Chapter 7** – Public Safety
- **Section 82.13 – Fire Hazard Development**
  Requires adequate emergency access, evacuation capacity, and fire-flow standards. The site significantly fails compliance due to single-point ingress/egress.
- **Subdivision & Road Standards (Title 8)**
  Require roadway capacity sufficient for project-generated emergency traffic—this mountain road does **not meet high-occupancy evacuation capacity.**

Land Use Compatibility

- Countywide Plan – Mountain Region LU Designations
- A 3,000-person institutional use is fundamentally incompatible with a low-density mountain resort community-dependent on tourism and environmental quality. The entire mountain infrastructure from community resources, roadways, scenic roads, low population density are not capable of supporting this size population.

4

3. CAL FIRE & LOCAL FIRE AUTHORITY IMPACTS

The project area lies within a State Responsibility Area (SRA) under CAL FIRE authority and also within the jurisdiction of the San Bernardino County Fire Protection District.

This expansion would:

5

- Overwhelm existing fire suppression resources.
- Create mass casualty evacuation exposure.
- Exceed emergency shelter capacity.
- Significantly delay response times due to bus congestion and gridlock.

Pursuant to:

- **California Fire Code (CFC) Section 503 – Fire Apparatus Access Roads**
- **CFC Section 404 – Fire Safety & Evacuation Planning**
- **Government Code §51182 – Fire Protection Access & Clearance**

This project cannot demonstrate compliance without major offsite infrastructure that does not currently exist.

The GVL Disaster Team, formally request that CAL FIRE and County Fire issue a written Fire Authority Consult response and evacuation modeling prior to any discretionary approval.

5 Cont

4. TRANSPORTATION IMPACTS – CEQA APPENDIX G (XVI)

The only access road is:

- Narrow
- Winding
- Seasonal
- Subject to snow, ice, fallen trees, and traffic collisions

The proposal will introduce:

- Daily commercial bus traffic
- Supply trucks
- Staff vehicles
- Visitor overflow traffic

This creates:

- Gridlock-level congestion

6

- Emergency vehicle obstruction
- Accident escalation risk
- Delayed wildfire evacuations

6 Cont

These are significant transportation hazards under CEQA and require:
-Full Traffic Impact Study
-Emergency Evacuation Modeling
-Bus Turn-Radius & Passing Capacity Analysis

5. TOURISM, ECONOMIC & COMMUNITY IMPACTS

Green Valley Lake is a tourism-dependent resort village, not a high-density institutional facility zone. A daily population spike may:

- Deter vacation renters and seasonal visitors
- Reduce business revenues
- Overwhelm parking, groceries, lodging, and public services
- Create persistent noise and congestion impacts

7

This qualifies as a significant indirect and cumulative economic impact under CEQA.

6. INFRASTRUCTURE OVERLOAD

A sudden population increase of over 2,700 additional people places unsustainable demand on:

- EMS, Sheriff, and hospital transport capacity

8

The project cannot show:

- Emergency medical scalability

7. IMPROPER PROJECT SEGMENTATION – CEQA §§15165 & 15378

Any attempt to:

- Phase this project
- Rely on older permits

9

- Avoid full environmental review

Would constitute illegal segmentation under CEQA. A 12x expansion is a fundamentally new project, not a minor modification. 9 Cont

8. WATERSHED

This scale of increase represents a significant intensification of water demand in a sensitive mountain watershed and raises serious concerns about impacts to the local groundwater basin and regional mountain water table.

The San Bernardino Mountains rely on limited groundwater recharge, primarily from seasonal snowpack and precipitation. These recharge rates are finite and increasingly stressed due to prolonged drought conditions, reduced snowpack, and climate variability. A more than twenty-fold increase in daily water usage for drinking, sanitation, food service, laundry, and fire suppression would substantially exceed historic and existing water demand levels for the site.

Lowering of the mountain water table is a foreseeable consequence of this expanded usage. Such drawdown may result in:

- Reduced well yields for neighboring communities and mutual water systems
- Increased risk of well failure during peak demand or drought years 10
- Degradation of springs, seeps, and surface waters dependent on groundwater
- Long-term impacts to forest health, wildlife habitat, and riparian ecosystems
- Increased wildfire risk due to reduced soil and vegetation moisture

Under the California Environmental Quality Act (CEQA), groundwater depletion and interference with groundwater recharge are recognized environmental impacts requiring thorough analysis. The proposed expansion appears likely to result in a substantial increase in groundwater extraction beyond existing baseline conditions and therefore warrants a detailed hydrogeologic study, including sustainable yield analysis, cumulative impact assessment, and long-term monitoring commitments.

Additionally, the reliance on a mountain water system to support an intensive, high-occupancy use raises questions regarding consistency with regional water supply planning, emergency resiliency, and the protection of existing users who depend on the same limited groundwater resources.

Until a comprehensive and transparent analysis demonstrates that groundwater extraction associated with this expansion will not result in significant or cumulative adverse impacts to the mountain water table and surrounding communities, approval of the proposed increase would be premature and inconsistent with CEQA's requirement to avoid or mitigate significant environmental harm where feasible.

FORMAL CEQA & PUBLIC SAFETY DEMANDS

The GV**L Disaster Team** formally demands:

1. **Preparation of a FULL Environmental Impact Report (EIR)**
2. **Independent Wildfire Evacuation & Egress Modeling**
3. **Formal CAL FIRE & County Fire Authority Review Letters**
4. **Comprehensive Traffic & Bus Impact Study which includes impact on the Community of Green Valley Lake.**
5. **Emergency Services Capacity Analysis**
6. **Hydrogeologic Study**
7. **Cumulative Impact Analysis with Green Valley Lake Population**
8. **Public Hearings with Full Community Notice**

11

CONCLUSION & FORMAL OPPOSITION

The proposed twelvefold increase of Hume Camp is grossly incompatible with the physical constraints, wildfire hazards, evacuation limitations, infrastructure capacity, and tourism-based economy of Green Valley Lake.

Approval of this project in its current form would represent a foreseeable and preventable mass evacuation and wildfire fatality risk, contrary to:

- **CEQA mandates**
- **California Fire Code**
- **San Bernardino County Development Code**
- **Public health and safety obligations**

Green Valley Recreation formally opposes the project and respectfully requests immediate denial as submitted, or the initiation of a full EIR with no ministerial approvals.

12

Respectfully Submitted,
The **GVL Disaster Team,** Green Valley Lake, California

Kathleen Benjamin, Coordinator, GVL Disaster Team
Date: 12/17/2025.

O2 - Responses to GVL Disaster Team

Kathleen Benjamin, Coordinator

O2-1 The comment is introductory in nature. The comment provides a general summary. No further response is warranted.

O2-2 The comment in introductory in nature. The comment briefly mentions multiple concerns and incorrectly addresses the Project's scale. The Project would increase gradually, over many decades, from 300 to a previously proposed total occupancy of approximately 3,000, which did not represent a twelvefold increase in occupancy. Following receipt of public comments and agency input, and additional coordination with the Project's proposed water supplier, the Project's maximum occupancy has been reduced to approximately 2,400 occupants, representing an eightfold increase in occupancy. The comment does not present new evidence that the IS/MND is inadequate. Refer to **Section 3, Errata**.

O2-3 The comment provides concerns related to wildfire safety especially in regards to transportation and evacuation. As discussed in the IS/MND (**Section 4, Wildfire**) MM WF – 1, the Project would continually update and comply with a comprehensive evacuation plan. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on site occupancy prior to peak hazard conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis. As evaluated in the IS/MND (**Section 4, Transportation**), the Project would not modify existing roadways, and Project related traffic would not create a significant hazard or adversely affect emergency access. Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity.

The comment also includes a request for an Environmental Impact Report (EIR). Under CEQA, the Lead Agency, San Bernardino County, determines the appropriate level of environmental review. The IS/MND evaluates all environmental topic areas required under CEQA and identifies

compliance requirements and mitigation measures that reduce all potentially significant impacts to less than significant levels. The commenter does not present substantial evidence that the IS/MND is inadequate or that any significant wildfire effect would remain unmitigated. Therefore, no revisions to the IS/MND are warranted.

O2-4 The comment includes concerns regarding potential inconsistencies with San Bernardino County Development Code. Compliance with fire-access and public-safety requirements, including those under Development Code Section 82.13 and Title 8, occurs through the County's separate permitting processes and fire-authority review. The Project will be required to meet all applicable California Fire Code and County development standards before receiving approvals. As described in the IS/MND (**Section 4, Aesthetics**), the Project is consistent with the site's HT/SD-RES zoning and Rural Living land use designation, which permits campground uses with the approval of a Conditional Use Permit (CUP). CEQA evaluates environmental impacts of land use compatibility, not economic or social compatibility unless tied to an environmental effect. The comment does not identify a new or unaddressed environmental impact under CEQA. No revisions to the IS/MND are warranted.

O2-5 The comment provides concerns related to impacts on fire authority and compliance. As analyzed in the IS/MND (**Section 4, Public Services**), the Project must comply with all applicable fire-protection requirements, including access, water supply, defensible space, and evacuation procedures. Fire-authority review and approval are mandatory as part of the County permitting process. The IS/MND concludes that compliance with applicable regulations would reduce fire-service impacts to less-than-significant levels. The comment does not provide new substantial evidence showing that the IS/MND analysis is inadequate. No revisions to the IS/MND are necessary.

O2-6 The comment includes transportation and logistics related concerns. The IS/MND (**Section 4, Transportation**) evaluates transportation safety, roadway conditions, and emergency access through a Traffic Impact Analysis consistent with CEQA criteria as well as a Truck Turning Analysis demonstrating adequate access to the Project site. The Project does not alter the regional road system. Seasonal weather conditions and roadway maintenance are performed by existing County agencies.

O2-7 The comment provides an opinion on overall community impacts. CEQA does not treat economic or social effects as significant environmental impacts unless they result in unforeseen growth effects such as through the unforeseen job or unemployment growth. The IS/MND evaluates employment and growth effects. The commenter does not identify an environmental effect not already analyzed. No revisions are necessary.

O2-8 The comment includes concerns over overload on infrastructure and emergency services. The IS/MND (**Section 4, Public Services**) evaluates potential demands on emergency services and concludes that the Project would not result in an inadequate supply of fire and police protection. Compliance with existing requirements ensures impacts remain less than significant and would

not require a new or expanded station or services. The comment presents no new environmental impact requiring revision of the IS/MND.

O2-9 The comment provides concerns over potential Project segmentation. The Project analyzed in the IS/MND includes the full scope of proposed improvements and maximum occupancy at buildout. CEQA requires review of the "whole of the action," and the IS/MND evaluates the complete Project. No segmentation has occurred, and the comment does not identify deficiencies in the IS/MND. No revisions are warranted.

O2-10 The comment brings concerns regarding groundwater sustainability and watershed issues. The Water and Sewer Master Plan (**Appendix B3**) provides detailed analysis of Projected demand and strategy to service the Project. The Water and Sewer Master Plan and Water Supply Assessment conclude through **Section 4, Hydrology and Water Quality** and **Section 4, Utilities and Service Systems**, that on-site wells provide adequate supply to meet demand, with CLAWA available as the main water source. This is based on currently available reporting from water agencies/providers. The commenter has not provided substantial evidence contradicting the Water and Sewer Master Plan and Water Supply Assessment. No revisions to the IS/MND are warranted.

O2-11 The comment includes a list of demands regarding additional documentation and studies. The IS/MND was prepared consistent with CEQA requirements and concludes that all potentially significant impacts can be reduced to less than significant levels with compliance with existing regulations. Refer to **Appendix K: Emergency Plan and Procedures, Appendix J: Traffic Analysis, Appendix F: Preliminary Geotechnical Report**, Comment Response R1, CAL FIRE, San Bernardino, as well as the cumulative analysis in the IS/MND. The comment does not provide new substantial evidence that the IS/MND is inadequate or that an EIR is required. Refer to Master Response – Request for EIR. No revisions to the IS/MND are warranted.

O2-12 The comment is conclusionary in nature. The comment provides formal opposition, voices a summary of concerns (see responses above), and incorrectly addresses the Project's scale. The IS/MND evaluates the Project's potential environmental impacts consistent with CEQA and concludes that, with continued compliance with applicable regulations, county code, state fire code, and identified mitigation, impacts would be less than significant. The Project would increase gradually, over many decades, from a total occupancy of 300 to a previously proposed occupancy of approximately 3,000 occupants, which did not represent a twelvefold increase in occupancy. Following receipt of public comments and agency input, and additional coordination with the Project's proposed water supplier, the Project's maximum occupancy has been reduced to approximately 2,400 occupants, representing an eightfold increase in occupancy. The comment does not provide substantial evidence requiring revisions to the IS/MND or preparation of an EIR. Refer to **Section 3, Errata**.

O3 - GVL Recreation, Inc. Board of Directors:

Jerry Miller, President
Bergen Moore, Vice President
Kathleen Benjamin, Secretary/Treasurer
Donna Mammone, Director
Amy Cook, Director

FORMAL CEQA OBJECTION
& PUBLIC SAFETY COMMENT

Hume Camp Expansion Green Valley Lake, CA
Proposed Increase: 250 Campers to 3,000 Campers

To:
1. San Bernardino County Land Use Services Department – Planning Division
2. San Bernardino County Fire Protection District
3. CAL FIRE – San Bernardino
4. San Bernardino County Office of Emergency Services

From:

GVL Recreation, Inc.
33180 Green Valley Lake Rd.
P.O. Box 8431
Green Valley Lake, California, 92341
gvlrecreation@gmail.com

Re: CEQA, Fire Safety, Traffic, and Land Use Incompatibility Objection

INTRODUCTION

GVL Recreation, Inc. the vendor which provides recreational services at Green Valley Lake, is submitting this formal objection under the **California Environmental Quality Act (CEQA)** to the proposed expansion of Hume Camp from approximately 250 campers to 3,000 campers. 1

This proposal represents a twelvefold population increase at the end of a single-access, dead-end mountain roadway, located within a **Very High Fire Hazard Severity Zone (VHFHSZ)**. The project presents demonstrable, foreseeable, and potentially catastrophic public safety, wildfire evacuation, transportation, and land use conflicts that cannot be mitigated through standard conditions of approval. 2

1. CEQA WILDFIRE & EVACUATION IMPACTS – APPENDIX G (XVII – WILDFIRE) 3

Under **CEQA Guidelines Appendix G, Section XVII**, a project results in a significant impact if it:

- Substantially impairs evacuation during a wildfire.
- Exposes people to new or worsened wildfire risks.
- Relies on inadequate emergency access.

The project site and Green Valley Lake are served by only one two-lane, winding mountain road with NO secondary emergency access route. The evacuation of:

- 3,000 campers
- Camp staff
- Tour buses
- Supply vehicles
- Surrounding camps
- PLUS the residents and visitors of Green Valley Lake

is not physically achievable within accepted wildfire evacuation standards.

This constitutes a significant and unavoidable impact requiring a **FULL ENVIRONMENTAL IMPACT REPORT (EIR) per CEQA Guidelines §15064 & §15126.2**.

3 Cont

2. SAN BERNARDINO COUNTY DEVELOPMENT CODE VIOLATIONS

This proposal is inconsistent with multiple provisions of the San Bernardino County Development Code, including but not limited to:

Fire Safety & Emergency Access

- **Development Code Chapter 7** – Public Safety
- **Section 82.13 – Fire Hazard Development**
  Requires adequate emergency access, evacuation capacity, and fire-flow standards. The site fails compliance due to single-point ingress/egress.
- **Subdivision & Road Standards (Title 8)**
  Require roadway capacity sufficient for project-generated emergency traffic—this mountain road does **not meet high-occupancy evacuation capacity.**

Land Use Compatibility

- Countywide Plan – Mountain Region LU Designations

4

- A 3,000-person institutional use is fundamentally incompatible with a low-density mountain resort community-dependent on tourism and environmental quality.

4 Cont

3. CAL FIRE & LOCAL FIRE AUTHORITY IMPACTS

The project area lies within a State Responsibility Area (SRA) under CAL FIRE authority and also within the jurisdiction of the San Bernardino County Fire Protection District.

This expansion would:

- Overwhelm existing fire suppression resources
- Create mass casualty evacuation exposure
- Exceed emergency shelter capacity
- Delay response times due to bus congestion and gridlock

Pursuant to:

- **California Fire Code (CFC) Section 503 – Fire Apparatus Access Roads**
- **CFC Section 404 – Fire Safety & Evacuation Planning**
- **Government Code §51182 – Fire Protection Access & Clearance**

This project cannot demonstrate compliance without major offsite infrastructure that does not currently exist.

GVL Recreation, Inc. formally requests that CAL FIRE and County Fire issue a written Fire Authority Consult response and evacuation modeling prior to any discretionary approval.

5

4. TRANSPORTATION IMPACTS – CEQA APPENDIX G (XVI)

The only access road is:

- Narrow
- Winding
- Seasonal
- Subject to snow, ice, fallen trees, and traffic collisions

The proposal will introduce:

6

- Daily commercial bus traffic
- Supply trucks
- Staff vehicles
- Visitor overflow traffic

This creates:

- Gridlock-level congestion
- Emergency vehicle obstruction
- Accident escalation risk
- Delayed wildfire evacuations

These are significant transportation hazards under CEQA and require
-**Full Traffic Impact Study**
-Emergency Evacuation Modeling
-Bus Turn-Radius & Passing Capacity Analysis

6 Cont

5. TOURISM, ECONOMIC & COMMUNITY IMPACTS

Green Valley Lake is a seasonal tourism-dependent resort village, not a high-density institutional facility zone. A daily population spike and congested roads will deter and impede customers, thereby reducing business revenues:

- Daily fishing and recreational visitors
- Employees
- Visiting family and friends again
- Vacation and STR rentals
- Fishing tournament and other weekend event customers

This qualifies as a significant indirect and cumulative economic impact under CEQA.

7

6. WATERSHED

This scale of increase represents a significant intensification of water demand in a sensitive mountain watershed and raises serious concerns about impacts to the local groundwater basin and regional mountain water table.

8

The San Bernardino Mountains rely on limited groundwater recharge, primarily from seasonal snowpack and precipitation. These recharge rates are finite and increasingly stressed due to prolonged drought conditions, reduced snowpack, and climate variability. A more than twenty-fold increase in daily water usage for drinking, sanitation, food service, laundry, and fire suppression would substantially exceed historic and existing water demand levels for the site.

Lowering of the mountain water table is a foreseeable consequence of this expanded usage. Such drawdown may result in:

- Reduced well yields for neighboring communities and mutual water systems
- Increased risk of well failure during peak demand or drought years
- Degradation of springs, seeps, and surface waters dependent on groundwater
- Long-term impacts to forest health, wildlife habitat, and riparian ecosystems
- Increased wildfire risk due to reduced soil and vegetation moisture

Under the California Environmental Quality Act (CEQA), groundwater depletion and interference with groundwater recharge are recognized environmental impacts requiring thorough analysis. The proposed expansion appears likely to result in a substantial increase in groundwater extraction beyond existing baseline conditions and therefore warrants a detailed hydrogeologic study, including sustainable yield analysis, cumulative impact assessment, and long-term monitoring commitments.

Additionally, the reliance on a mountain water system to support an intensive, high-occupancy use raises questions regarding consistency with regional water supply planning, emergency resiliency, and the protection of existing users who depend on the same limited groundwater resources.

Until a comprehensive and transparent analysis demonstrates that groundwater extraction associated with this expansion will not result in significant or cumulative adverse impacts to the mountain water table and surrounding communities, approval of the proposed increase would be premature and inconsistent with CEQA's requirement to avoid or mitigate significant environmental harm where feasible.

8 Cont

FORMAL CEQA & PUBLIC SAFETY DEMANDS

GVL Recreation, Inc. formally demands:

1. **Preparation of a FULL Environmental Impact Report (EIR)**
2. **Comprehensive Traffic & Bus Impact Study**

9

3. **Hydrogeologic Study**
4. **Cumulative Impact Analysis with Green Valley Lake Customers**
5. **Public Hearings with Full Community Notice**

9 Cont

CONCLUSION & FORMAL OPPOSITION

The proposed twelvefold increase of Hume Camp is grossly incompatible with the physical constraints, wildfire hazards, evacuation limitations, infrastructure capacity, and tourism-based economy of Green Valley Lake.

Approval of this project in its current form would represent a foreseeable and preventable mass evacuation and wildfire fatality risk, contrary to:

- **CEQA mandates**
- **California Fire Code**
- **San Bernardino County Development Code**
- **Public health and safety obligations**

Green Valley Recreation formally opposes the project and respectfully requests immediate denial as submitted, or the initiation of a full EIR with no ministerial approvals.

10

Respectfully Submitted on December 18, 2025.

GVL Recreation, Inc. Board of Directors:

Jerry Miller, President

Bergen Moore Vice President

Kathleen Benjamin, Secretary/Treasurer

Donna Mammone, Director

Amy Cook, Director

O3 - Responses to GVL Recreation, Inc. Board of Directors:

Jerry Miller, President
Bergen Moore, Vice President
Kathleen Benjamin, Secretary/Treasurer
Donna Mammone, Director
Amy Cook, Director

O3-1 The comment in introductory in nature. The comment includes a summary of the document. No further response is warranted.

O3-2 The comment in introductory in nature. The comment briefly mentions multiple concerns and incorrectly addresses the Project's scale. The Project would increase gradually, over many decades, from 300 to a previously proposed total occupancy of approximately 3,000, which did not represent a twelvefold increase in occupancy. Following receipt of public comments and agency input, and additional coordination with the Project's proposed water supplier, the Project's maximum occupancy has been reduced to approximately 2,400 occupants, representing an eightfold increase in occupancy. The comment does not present new evidence that the IS/MND is inadequate. Refer to **Section 3, Errata**.

O3-3 The comment provides concerns related to wildfire safety especially in regards to transportation and evacuation. As discussed in the IS/MND (**Section 4, Wildfire**) MM WF – 1, the Project would continually update and comply with a comprehensive evacuation plan. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on-site occupancy prior to peak hazard conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis. As evaluated in the IS/MND (**Section 4, Transportation**), the Project would not modify existing roadways, and Project-related traffic would not create a significant hazard or adversely affect emergency access. Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity.

The comment also includes a request for an Environmental Impact Report (EIR). Under CEQA, the Lead Agency, San Bernardino County determines the appropriate level of environmental review. The IS/MND evaluates all environmental topic areas required under CEQA and identifies compliance requirements and mitigation measures that reduce all potentially significant impacts to less-than-significant levels. The commenter does not present substantial evidence that the IS/MND is inadequate or that any significant wildfire effect would remain unmitigated. Therefore, no revisions to the IS/MND are warranted.

O3-4 The comment includes concerns regarding potential inconsistencies with San Bernardino County Development Code. Compliance with fire-access and public-safety requirements, including those under Development Code Section 82.13 and Title 8, occurs through the County's separate permitting processes and fire-authority review. The Project will be required to meet all applicable California Fire Code and County development standards before receiving approvals. As described in the IS/MND (**Section 4, Aesthetics**), the Project is consistent with the site's HT/SD-RES zoning and Rural Living land use designation, which permit campground uses with the approval of a Conditional Use Permit (CUP). CEQA evaluates environmental impacts of land-use compatibility, not economic or social compatibility unless tied to an environmental effect. The comment does not identify a new or unaddressed environmental impact under CEQA. No revisions to the IS/MND are warranted.

O3-5 The comment provides concerns related to impacts on fire authority and compliance. As analyzed in the IS/MND (**Section 4, Public Services**), the Project must comply with all applicable fire-protection requirements, including access, water supply, defensible space, and evacuation procedures. Fire-authority review and approval are mandatory as part of the County permitting process. The IS/MND concludes that compliance with applicable regulations would reduce fire-service impacts to less-than-significant levels. The comment does not provide new substantial evidence showing that the IS/MND analysis is inadequate. No revisions to the IS/MND are necessary.

O3-6 The comment includes transportation and logistics related concerns. The IS/MND (**Section 4, Transportation**) evaluates transportation safety, roadway conditions, and emergency access through a Traffic Impact Analysis consistent with CEQA criteria as well as a Truck Turning Analysis demonstrating adequate access to the Project site. The Project does not alter the regional road system. Seasonal weather conditions and roadway maintenance are performed by existing County agencies.

The IS/MND concludes that the Project would not create a new significant hazard, exacerbate an existing roadway hazard, nor result in inadequate emergency access in a manner requiring additional CEQA studies. Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways,

circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity. The commenter has not provided substantial evidence that the IS/MND's transportation analysis is deficient. No revisions to the IS/MND are warranted.

O3-7 The comment provides an opinion on overall community impacts. CEQA does not treat economic or social effects as significant environmental impacts unless they result in unforeseen growth effects such as through the unforeseen job or unemployment growth. The IS/MND evaluates employment and growth effects. The commenter does not identify an environmental effect that is not already analyzed. No revisions are necessary.

O3-8 The comment brings concerns regarding groundwater sustainability and watershed issues. The Water and Sewer Master Plan (**Appendix B3**) provides detailed analysis of Projected demand and strategy to service the Project. The Water and Sewer Master Plan and Water Supply Assessment conclude through **Section 4, Hydrology and Water Quality** and **Section 4, Utilities and Service Systems**, that on site wells provide adequate supply to meet demand, with CLAWA available as the main water source. This is based on currently available reporting from water agencies/providers. The commenter has not provided substantial evidence contradicting the Water and Sewer Master Plan and Water Supply Assessment. No revisions to the IS/MND are warranted.

O3-9 The comment includes a list of demands regarding additional documentation and studies. The IS/MND was prepared consistent with CEQA requirements and concludes that all potentially significant impacts can be reduced to less than significant levels with compliance with existing regulations. Refer to **Appendix K: Emergency Plan and Procedures, Appendix J: Traffic Analysis, Appendix F: Preliminary Geotechnical Report**, Comment Response R1, CAL FIRE, San Bernardino, as well as the cumulative analysis in the IS/MND. The comment does not provide new substantial evidence that the IS/MND is inadequate or that an EIR is required. Refer to Master Response – Request for EIR. No revisions to the IS/MND are warranted.

O3-10 The comment is conclusionary in nature. The comment provides formal opposition, voices a summary of concerns (see responses above), and incorrectly addresses the Project's scale. The IS/MND evaluates the Project's potential environmental impacts consistent with CEQA and concludes that, with continued compliance with applicable regulations, county code, state fire code, and identified mitigation, impacts would be less than significant. The Project would increase

gradually, over many decades, from 300 to a previously proposed total occupancy of 3,000, which did not represent a twelvefold increase in occupancy. Following receipt of public comments and agency input, and additional technical coordination with the Project's proposed water supplier, the Project's maximum occupancy has been reduced to approximately 2,400 occupants, representing an eightfold increase in occupancy. The comment does not provide substantial evidence requiring revisions to the IS/MND or preparation of an EIR. Refer to **Section 3, Errata**.

O4 - GVL Recreation, Mountain Community Alliance, GVL Disaster Team, Community Businesses, and Local Residents of Green Valley Lake, California

Pat Huckaby, Chairperson

Kathy Benjamin, Secretary/Treasurer, Project Coordinator

FORMAL CEQA OBJECTION & PUBLIC SAFETY COMMENT

Hume Camp Expansion Green Valley Lake, CA
Proposed Increase: 250 Campers to 3,000 Campers

To:
1. San Bernardino County Land Use Services Department – Planning Division
2. San Bernardino County Fire Protection District
3. CAL FIRE – San Bernardino
4. San Bernardino County Office of Emergency Services

From:
GVL Recreation, Mountain Community Alliance,(MCA), the GVL Disaster Team, Community businesses, and local residents of Green Valley Lake, California

Re: CEQA, Fire Safety, Traffic, and Land Use Incompatibility Objection

INTRODUCTION

GVL Recreation, Mountain Community Alliance,(MCA), the GVL Disaster Team, Community businesses, and local residents of Green Valley Lake submit this formal objection under the **California Environmental Quality Act (CEQA)** to the proposed expansion of Hume Camp from approximately 250 campers to 3,000 campers.

This proposal represents a twelvefold population increase at the end of a single-access, dead-end mountain roadway, located within a **Very High Fire Hazard Severity Zone (VHFHSZ)**. The project presents demonstrable, foreseeable, and potentially catastrophic public safety, wildfire evacuation, transportation, and land use conflicts that cannot be mitigated through standard conditions of approval. 1

1. CEQA WILDFIRE & EVACUATION IMPACTS – APPENDIX G (XVII – WILDFIRE)

Under **CEQA Guidelines Appendix G, Section XVII**, a project results in a significant impact if it:

- Substantially impairs evacuation during a wildfire
- Exposes people to new or worsened wildfire risks
- Relies on inadequate emergency access

The project site and Green Valley Lake are served by only one two-lane, winding mountain road with NO secondary emergency access route. The evacuation of: 2

- 3,000 campers

- Camp staff
- Tour buses
- Supply vehicles
- PLUS the residents and visitors of Green Valley Lake

is not physically achievable within accepted wildfire evacuation standards.

This constitutes a significant and unavoidable impact requiring a **FULL ENVIRONMENTAL IMPACT REPORT (EIR) per CEQA Guidelines §15064 & §15126.2**.

2

2. SAN BERNARDINO COUNTY DEVELOPMENT CODE VIOLATIONS

This proposal is inconsistent with multiple provisions of the San Bernardino County Development Code, including but not limited to:

Fire Safety & Emergency Access

- **Development Code Chapter 7** – Public Safety
- **Section 82.13 – Fire Hazard Development**
  Requires adequate emergency access, evacuation capacity, and fire-flow standards. The site fails compliance due to single-point ingress/egress.
- **Subdivision & Road Standards (Title 8)**
  Require roadway capacity sufficient for project-generated emergency traffic—this mountain road does **not meet high-occupancy evacuation capacity.**

Land Use Compatibility

- Countywide Plan – Mountain Region LU Designations
- A 3,000-person institutional use is fundamentally incompatible with a low-density mountain resort community-dependent on tourism and environmental quality.

3

3. CAL FIRE & LOCAL FIRE AUTHORITY IMPACTS

The project area lies within a State Responsibility Area (SRA) under CAL FIRE authority and also within the jurisdiction of the San Bernardino County Fire Protection District.

This expansion would:

- Overwhelm existing fire suppression resources

4

- Create mass casualty evacuation exposure
- Exceed emergency shelter capacity
- Delay response times due to bus congestion and gridlock

Pursuant to:

- **California Fire Code (CFC) Section 503 – Fire Apparatus Access Roads**
- **CFC Section 404 – Fire Safety & Evacuation Planning**
- **Government Code §51182 – Fire Protection Access & Clearance**

This project cannot demonstrate compliance without major offsite infrastructure that does not currently exist.

GVL Recreation, Mountain Community Alliance,(MCA), GVL Disaster Team, Community businesses, and local residents formally request that CAL FIRE and County Fire issue a written Fire Authority Consult response and evacuation modeling prior to any discretionary approval.

4

4. TRANSPORTATION IMPACTS – CEQA APPENDIX G (XVI)

The only access road is:

- Narrow
- Winding
- Seasonal
- Subject to snow, ice, fallen trees, and traffic collisions

The proposal will introduce:

- Daily commercial bus traffic
- Supply trucks
- Staff vehicles
- Visitor overflow traffic

This creates:

- Gridlock-level congestion

5

- Emergency vehicle obstruction
- Accident escalation risk
- Delayed wildfire evacuations

These are significant transportation hazards under CEQA and require:
-Full Traffic Impact Study
-Emergency Evacuation Modeling
-Bus Turn-Radius & Passing Capacity Analysis

5

5. TOURISM, ECONOMIC & COMMUNITY IMPACTS

Green Valley Lake is a tourism-dependent resort village, not a high-density institutional facility zone. A daily population spike may:

- Deter vacation renters and seasonal visitors
- Reduce business revenues
- Overwhelm parking, groceries, lodging, and public services
- Create persistent noise and congestion impacts

This qualifies as a significant indirect and cumulative economic impact under CEQA.

6

6. INFRASTRUCTURE OVERLOAD

A sudden population increase of over 2,700 additional people places unsustainable demand on:

- EMS, Sheriff, and hospital transport capacity

The project cannot show:

- Emergency medical scalability

7

7. IMPROPER PROJECT SEGMENTATION – CEQA §§15165 & 15378

Any attempt to:g

- Phase this project
- Rely on older permits

8

- Avoid full environmental review

8

Would constitute illegal segmentation under CEQA. A 12x expansion is a fundamentally new project, not a minor modification.

8. WATERSHED

This scale of increase represents a significant intensification of water demand in a sensitive mountain watershed and raises serious concerns about impacts to the local groundwater basin and regional mountain water table.

The San Bernardino Mountains rely on limited groundwater recharge, primarily from seasonal snowpack and precipitation. These recharge rates are finite and increasingly stressed due to prolonged drought conditions, reduced snowpack, and climate variability. A more than twenty-fold increase in daily water usage for drinking, sanitation, food service, laundry, and fire suppression would substantially exceed historic and existing water demand levels for the site.

Lowering of the mountain water table is a foreseeable consequence of this expanded usage. Such drawdown may result in:

- Reduced well yields for neighboring communities and mutual water systems
- Increased risk of well failure during peak demand or drought years
- Degradation of springs, seeps, and surface waters dependent on groundwater
- Long-term impacts to forest health, wildlife habitat, and riparian ecosystems
- Increased wildfire risk due to reduced soil and vegetation moisture

9

Under the California Environmental Quality Act (CEQA), groundwater depletion and interference with groundwater recharge are recognized environmental impacts requiring thorough analysis. The proposed expansion appears likely to result in a substantial increase in groundwater extraction beyond existing baseline conditions and therefore warrants a detailed hydrogeologic study, including sustainable yield analysis, cumulative impact assessment, and long-term monitoring commitments.

Additionally, the reliance on a mountain water system to support an intensive, high-occupancy use raises questions regarding consistency with regional water supply planning, emergency resiliency, and the protection of existing users who depend on the same limited groundwater resources.

Until a comprehensive and transparent analysis demonstrates that groundwater extraction associated with this expansion will not result in significant or cumulative adverse impacts to the mountain water table and surrounding communities, approval of

the proposed increase would be premature and inconsistent with CEQA's requirement to avoid or mitigate significant environmental harm where feasible 9

FORMAL CEQA & PUBLIC SAFETY DEMANDS

GVL Recreation, Mountain Community Alliance,(MCA), GVL Disaster Team, Community businesses, and local residents formally demand:

1. **Preparation of a FULL Environmental Impact Report (EIR)**
2. **Independent Wildfire Evacuation & Egress Modeling**
3. **Formal CAL FIRE & County Fire Authority Review Letters**
4. **Comprehensive Traffic & Bus Impact Study**
5. **Emergency Services Capacity Analysis**
6. **Hydrogeologic Study**
7. **Cumulative Impact Analysis with Green Valley Lake Population**
8. **Public Hearings with Full Community Notice**

CONCLUSION & FORMAL OPPOSITION 10

The proposed twelvefold increase of Hume Camp is grossly incompatible with the physical constraints, wildfire hazards, evacuation limitations, infrastructure capacity, and tourism-based economy of Green Valley Lake.

Approval of this project in its current form would represent a foreseeable and preventable mass evacuation and wildfire fatality risk, contrary to:

- **CEQA mandates**
- **California Fire Code**
- **San Bernardino County Development Code**
- **Public health and safety obligations**

Green Valley Recreation formally opposes the project and respectfully requests immediate denial as submitted, or the initiation of a full EIR with no ministerial approvals.

Respectfully Submitted,

GVL Recreation, Mountain Community Alliance,(MCA), GVL Disaster Team, Community businesses, and local residents Green Valley Lake, California

Pat Huckaby,

CHAIRPERSON MCA

Date: 12.17.25

Kathy Benjamin

SECRETARY/TREASURER GVL RECREATION, INC.

PROJECT COORDINATOR GVL DISASTER TEAM

Date: 12.17.25

10

O4 - Response to GVL Recreation, Mountain Community Alliance, GVL Disaster Team, Community Businesses, and Local Residents of Green Valley Lake, California

Pat Huckaby, Chairperson MCA
Kathy Benjamin, Secretary/Treasurer, Project Coordinator

O4-1 The comment in introductory in nature. The comment briefly mentions multiple concerns and addresses the Project's scale. The Project would increase gradually, over many decades, from 300 to a previously proposed total occupancy of approximately 3,000, which did not represent a twelvefold increase in occupancy. Following receipt of public comments and agency input, and additional technical coordination with the Project's proposed water supplier, the Project's maximum occupancy has been reduced to approximately 2,400 occupants, representing an eightfold increase in occupancy. The comment does not present new evidence that the IS/MND is inadequate. Refer to **Section 3, Errata**.

O4-2 The IS/MND thoroughly evaluates impacts to Wildfire and Transportation, as shown in IS/MND Sections 4.17 – Transportation, and 4.20 – Wildfire. With incorporation of mitigation, no significant and unavoidable impacts would occur. Thorough evaluation determined less than significant impacts regarding Transportation and Wildfire impacts. See Master Response – Wildfire and Master Response – Transportation/Traffic.

O4-3 As determined by the County of San Bernardino and in consistency with the Hilltop Community Action Guide, the Project is compliant with County development standards. The Project site has a Land Use Designation of Hilltop Special Development and, consistent with PROJ Record PUD/82-0097, the Project would be permitted. See IS/MND Section 4.11 – Land Use and Planning for further discussion regarding land use consistency.

O4-4 The Project would incorporate feedback from the California Department of Forestry and Fire Protection (CalFire). Additionally, the Project would abide by a comprehensive evacuation plan, see Master Response – Wildfire. Traffic associated with the Project would be less than significant, see Master Response – Transportation/Traffic. The Project is compliant with all relevant fire codes as determined by the County of San Bernardino.

O4-5 The comment includes transportation and logistics-related concerns. The IS/MND (**Section 4, Transportation**) evaluates transportation safety, roadway conditions, and emergency access through a Traffic Impact Analysis consistent with CEQA criteria as well as a Truck Turning Analysis demonstrating adequate access to the Project site. The Project does not alter the regional road system. Seasonal weather conditions and roadway maintenance are performed by existing County agencies.

The IS/MND concludes that the Project would not create a new significant hazard, exacerbate an existing roadway hazard, nor result in inadequate emergency access in a manner requiring additional CEQA studies. Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley

Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity. The commenter has not provided substantial evidence that the IS/MND's transportation analysis is deficient. No revisions to the IS/MND are warranted.

O4-6 The comment includes concerns of impacts to tourism and the community. The Project would provide services, such as food, on-site. Public services would not be significantly impacted as determined in Section 4.15 – Public Services of the IS/MND. The Project would potentially increase tourism and revenue in the community due to increased staffing and recognition of the area. As determined by Section 4.13 – Noise of the IS/MND and the Acoustical Assessment included as **Appendix I** of the IS/MND, noise impacts would be less than significant. Therefore, this comment does not identify a significant impact.

O4-7 The comment regarding impacts to emergency services has been acknowledged. Section 4.15 – Public Services of the IS/MND has determined less than significant impacts. See Master Response – Wildfire. No further response is warranted.

O4-8 As determined by State CEQA Guidelines, Section 15070, the Project has adequately evaluated environmental impacts. The Project is phased due to funding availability and is fully evaluated in the IS/MND. The Project has undergone extensive environmental review in compliance with relevant CEQA Sections. See Master Response – Request for EIR.

O4-9 This comment is in regard to groundwater withdrawal concerns. The Project would primarily use CLAWA water supply, see Master Response – Water, and would supplement with groundwater if needed. No further response is warranted.

O4-10 The comment includes a list of demands regarding additional documentation and studies. The IS/MND was prepared consistent with CEQA requirements and concludes that all potentially significant impacts can be reduced to less than significant levels with compliance with existing regulations and mitigation measures. Refer to **Appendix K: Emergency Plan and Procedures; Appendix J: Traffic Analysis; Appendix F: Preliminary Geotechnical Report**; Comment Response R1, CAL FIRE, San Bernardino, as well as the cumulative analysis in the IS/MND. The comment does

not provide new substantial evidence that the IS/MND is inadequate or that an EIR is required. Refer to Master Response – Request for EIR. No revisions to the IS/MND are warranted.

The comment provides formal opposition, voices a summary of concerns (see responses above), and addresses the Project's scale. The IS/MND evaluates the Project's potential environmental impacts consistent with CEQA and concludes that, with continued compliance with applicable regulations, county code, state fire code, and identified mitigation, impacts would be less than significant. The Project would increase gradually, over many decades, from 300 to a previously proposed total occupancy of approximately 3,000, which did not represent a twelvefold increase in occupancy. Following receipt of public comments and agency input, and additional technical coordination with the Project's proposed water supplier, the Project's maximum occupancy has been reduced to approximately 2,400 occupants, representing an eightfold increase in occupancy. The comment does not provide substantial evidence requiring revisions to the IS/MND or preparation of an EIR. Refer to **Section 3, Errata**.

O5 - Institute for Watershed Resiliency

Jennifer B. Alford, Director

Jennifer B. Alford, PhD
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January 6, 2026

SUBJECT: Comments on the Hume SoCal Campground Expansion Project/Camp Hume
Camp Hume **Project No.: PROJ-2024-00046**

TO: Elena Barragan, Senior Planner
County of San Bernardino, Planning Division,
385 N. Arrowhead Ave., San Bernardino, CA 92415-0187
Email : elena.barragan@lus.sbcounty.gov

Dear Ms. Barragan:

I am writing to formally convey several points of concern regarding the proposed **Hume SoCal Campground Expansion Project / Camp Hume (Project No. PROJ-2024-00046)**. These comments focus on potential impacts to watershed conditions, including on-site and off-site hydrology, groundwater recharge, stormwater runoff, ecosystem and riparian habitat conversion, and cumulative increases in water resource demand. 1

The environmental documentation characterizes project impacts as minimal; however, this conclusion is not supported by a sufficiently detailed or quantitative analysis. Established hydrologic science demonstrates that at a minimal land development involving grading, vegetation removal, soil compaction, and impervious surfaces typically increases runoff coefficients, reduces time of concentration, limits infiltration, and elevates peak discharge rates (NRCS, 1986; NRCS, 2004).

Hydrology & Watershed Processes

The proposed project has the potential to significantly alter surface and subsurface hydrologic processes, including runoff generation, sediment transport, groundwater recharge, and downstream channel stability. Increased impervious and compacted surfaces reduce infiltration capacity and increase overland flow, accelerating erosion and sediment delivery to receiving waters. 2

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Project development, such as the proposed site expansion, that increases impervious area and soil compaction typically reduces infiltration and decreases watershed travel time, which in turn increases runoff volume and peak discharge, and can increase erosive forces delivered to channels and infrastructure. These mechanisms are well documented in the NRCS/SCS TR-55 stormwater framework, which identifies reduced infiltration and shorter travel times as common drivers of increased runoff and peak flows (NRCS, 2004; USGS, 2019). 2

The hydrology assessment should comprehensively evaluate potential changes in hydrograph response, including increases in runoff coefficient, reduced time of concentration, higher unit discharge, and potential downstream impacts such as channel incision, bank erosion, and sedimentation. Without such analysis, the "minimal impact" conclusion is not supported by substantial evidence.

Climate Nonstationarity & Increasing Hydrologic Volatility

The analysis does not account for climate nonstationarity. Extensive research indicates California is experiencing longer dry periods punctuated by fewer but more intense precipitation events, often associated with atmospheric rivers.

The project's hydrologic review should be updated to explicitly account for climate nonstationarity—the well-established reality that historic precipitation timing and intensity are no longer reliable predictors of future conditions. The United States Geological Survey (USGS) and the National Oceanic and Atmospheric Administration (NOAA) have summarized research indicating California is experiencing greater precipitation volatility, with more intense atmospheric rivers and longer dry periods between storms, which affects both flood risk and water-supply reliability (USGS, 2017; USGS, 2022; NOAA, 2023). 3

Additional research programs focused on California indicate that extreme precipitation events are expected to intensify, which increases the need for conservative stormwater and erosion-risk design assumptions (especially for steep terrain, disturbed soils, and constrained infrastructure) (UCLA, 2026).

Given these documented trends, the hydrology analysis should not rely solely on generalized "typical" conditions. It should evaluate a range of conditions that reflect modern risk: prolonged drought periods followed by short-duration, high-intensity storm sequences (including atmospheric rivers).

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Stormwater, Flooding, & Infrastructure Risk

Given the documented trend toward more intense extreme precipitation events and the importance of atmospheric rivers in Southern California's hydrology (UCLA, 2026; USGS 2023), the analysis should include stormwater evaluation under high-intensity rainfall scenarios, including atmospheric river-driven events.

The project's stormwater approach should demonstrate—through calculations and/or regional data informed modeling—how proposed site changes affect: 4

- peak discharge (Qp) and runoff volume,
- conveyance capacity of on-site drainage and downstream culverts,
- erosion potential (shear stress / stream power indicators),
- and sediment yield from disturbed soils (construction-phase and long-term).

The TR-55 framework explicitly notes the role of infiltration limits, cover condition, and imperviousness in driving runoff response; therefore, stormwater conclusions should be supported by defensible assumptions and calculations rather than qualitative statements (NRCS, 1986; USGS, 2022).

Water Supply, Demand, & Cumulative Use

Each phase of development will create incremental and cumulative increases in water demand associated with construction, operations, staff use, and peak participant occupancy. The document does not provide a defensible estimate of annual demand or peak-period demand under realistic occupancy and operational scenarios, which is necessary to evaluate impacts to local water resources and dependent ecosystems.

These concerns are heightened because water demand typically peaks during periods when water availability is most constrained—hotter periods with elevated evapotranspiration, and seasonal low groundwater conditions. NRCS climate and water updates have documented periods of dry starts to the wet season in Southern California, including conditions involving periodic Santa Ana winds and drought stress, which can further reduce soil moisture and increase water resource vulnerability (NRCS, 2023, 2025; USGS 2023). 5

Because demand fluctuates with occupancy, it is not sufficient to provide a single "average" estimate. The analysis should evaluate upper-bound demand during peak use periods and compare that demand to water availability and sustainable recharge under drought and heat stress

conditions (NRCS, 2021). The document does not adequately quantify annual or peak-period water demand. 5

Construction-Phase Impacts & Sediment Yield

Construction-related activities including grading, excavation, vegetation clearing, and temporary access infrastructure will disturb soils and alter drainage pathways. Without a comprehensive understanding of how these disturbances affect erosion rates, sediment yield, and downstream turbidity, the project risks causing short- and long-term degradation of watershed function.

The current analysis does not sufficiently evaluate construction-phase hydrologic impacts, nor does it demonstrate that proposed mitigation measures will effectively protect downstream resources under worst-case conditions. 6

The document should include erosion and sediment control analysis that is scaled to:

- disturbed acreage,
- slope and soil erodibility,
- storm intensity expectations,
- and downstream sensitivity.

Without a construction-phase sediment and hydrology analysis that reflects extreme-event risk, the conclusion of minimal impacts is not adequately supported.

Fire Weather, Santa Ana Winds, & Post-Fire Hydrologic Risk

The environmental document should explicitly evaluate the interaction between development and fire-weather-driven watershed vulnerability, including Santa Ana wind conditions. NOAA has documented that Southern California fire events are strongly influenced by combinations of dry antecedent conditions and strong Santa Ana wind events that reduce humidity and vegetation moisture and increase spread risk. 7

Post-fire watersheds can exhibit increased runoff, erosion, and debris-flow susceptibility due to vegetation loss and soil hydrophobicity. Because these risks can increase both on-site and downstream hazards (roads, culverts, buildings, and channel stability), a complete assessment should address fire-weather exposure and post-fire hydrologic response in addition to "average year" runoff conditions (NOAA, 2020; USGS, 2018).

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Biological Resources, Riparian Corridors, & Connectivity

As proposed, the project would result in conversion and fragmentation of riparian and upland habitats that provide critical hydrologic and ecological functions, including baseflow support and habitat connectivity (USFS, 2017).

The proposed project raises concerns regarding conversion and fragmentation of habitat, including riparian corridors. Riparian areas provide essential watershed functions: bank stabilization, filtration of sediment and pollutants, shading and thermal regulation, and support for terrestrial and aquatic habitat, including endangered species. The environmental document should evaluate how alterations could affect connectivity, riparian function, and the watershed's ability to sustain perennial or near-perennial flows through baseflow and shallow groundwater exchange. 8

Deep Creek – Cultural, Ecological, & Downstream Importance

Deep Creek is within the watershed and downstream of the project site. Deep Creek serves as a critical ecological corridor and is identified as a river of high ecological significance, supporting diverse habitats and functioning as an important wildlife linkage within the San Bernardino National Forest system (National Wild and Scenic Rivers System, 2022).

Deep Creek also has formal Wild and Scenic River planning and management context through federal agencies; the USDA Forest Service has issued communications regarding the Deep Creek Comprehensive River Management Plan and management actions intended to protect watershed condition and outstandingly remarkable values (USFS, 2017). Additionally, Deep Creek converges downstream to form the Mojave River providing essential water resources to High Desert communities, many of which are characterized as disadvantaged. 9

Given Deep Creek's ecological and cultural significance (including importance to Tribal communities and downstream users), the environmental review must evaluate how changes in recharge, runoff, sediment delivery, and water demand could affect baseflows, water quality, and riparian/aquatic habitat function in both the near field and downstream receiving environments.

Inadequacy of the Hydrologic Assessment:
Request for an Extensive Environmental & Hazards Impact Assessment

The site hydrologic assessment relies primarily on regulatory checklists and generalized observations rather than quantitative, condition-based analysis. It represents a snapshot in time and does not capture hydrologic behavior during critical stress periods, including drought, extreme heat, Santa Ana wind events, and high-intensity storm conditions. 10

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A comprehensive assessment would require multi-season monitoring, groundwater level data, baseflow measurements, and storm-event analysis to accurately characterize watershed response and risk. Without such analysis, the conclusion that impacts are minimal is not supported by substantial evidence.

Given the deficiencies outlined above, the environmental review does not adequately assess the project's potential to cause adverse and potentially significant impacts to hydrology, water resources, biological systems, and downstream communities. *A more comprehensive, technically robust, and climate-informed analysis is necessary to ensure compliance with environmental review standards and to protect watershed integrity, cultural resources, and long-term water sustainability.* 10

Sincerely,

Jennifer Alford

Jennifer B. Alford, PhD

Institute for Watershed Resiliency
CALIFORNIA STATE UNIVERSITY, SAN BERNARDINO

Referenced Documents:

National Wild and Scenic Rivers System. (2022). *Wild and Scenic Rivers Act and designated rivers*. U.S. Department of the Interior.
NOAA. (2020). *Santa Ana winds and wildfire risk in Southern California*. NOAA Climate.gov.
NOAA. (2023). *Atmospheric rivers and extreme precipitation in California*. NOAA Climate.gov.
NRCS. (1986). *Urban Hydrology for Small Watersheds (TR-55)*. U.S. Department of Agriculture, Natural Resources Conservation Service.
NRCS. (2004). *National Engineering Handbook, Part 630 – Hydrology*. USDA NRCS.
NRCS. (2021). *Climate change and water resources*. USDA NRCS.
UCLA (2026). *State of the Environment & Sustainability; UCLA Center for Climate Science*
USFS. (2017). *Deep Creek Comprehensive River Management Plan*. U.S. Forest Service.
USGS. (2018). *Post-fire debris flows and hydrologic hazards in California*. U.S. Geological Survey.
USGS. (2019). *Urbanization effects on runoff, erosion, and water quality*. U.S. Geological Survey.
USGS. (2022). *Hydrologic effects of climate change in California*. U.S. Geological Survey.
USGS. (2023). *Streamflow trends and drought impacts in Southern California*. U.S. Geological Survey.

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O5 - Responses to Institute for Watershed Resiliency

Jennifer B. Alford, Director

O5-1 The comment is introductory in nature. The comment provides a summary of the total comments concerns and opinions. No further response is warranted.

O5-2 The comment includes the opinion that additional analysis needs to be done due to the development on site and its effect on hydrology. The comment includes generalized statements that can potentially apply when increased impervious area and soil compaction is present. The comment does not provide adequate evidence of these effects occurring or to be occurring on site in a way that represents a significant environmental impact that was not already addressed in the IS/MND. No further response is required.

O5-3 The comment is speculative in nature. The comment includes a request for further hydrology analysis based on generalized reasoning. The comment does not present adequate evidence that the IS/MND was incorrectly prepared within CEQA guidelines.

O5-4 The comment includes a request for further documentation within the IS/MND of stormwater evaluation based on speculative and generalized reasoning. The comment does not provide evidence of a CEQA environmental impact incorrectly or not already analyzed in the IS/MND.

O5-5 The comment includes concerns about the sufficiency of the water demand estimates and accompanying impacts. The 1st Draft Water Supply Assessment, which has been updated (**Appendix B1: Revised Water Supply Assessment**), provides water demand estimates that are in accordance with CEQA guidelines. The comment is opinionated in determining sufficiency and is not in line with CEQA guidelines.

O5-6 The comment includes concerns of additional impacts not mentioned in the IS/MND relating to construction phase effects and soil erosion. The IS/MND concludes that substantial soil erosion would be less than significant. The Project would implement the County's drainage and water quality standards. Erosion Control Plans would be required as a part of the Project-specific drainage plan and would be reviewed and approved by the County. In addition, the SCAQMD and Lahontan RWQCB regulate erosion and loss of topsoil. SCAQMD Rule 403 for control of fugitive dust would reduce or eliminate the potential for soil erosion due to wind. The RWQCB State's General Construction Permit and County Public Works Department would require compliance with storm water runoff for the proposed Project, therefore reducing impacts associated with water erosion and loss of topsoil. Since the Project site is not located within the MS Phase I boundary, there are no proposed BMPs on site since storm water runoff is not required to be treated. There will be off-site drainage conveyed through the site through the various existing streams located within the site limits. The off-site runoff remains unchanged from the existing to the proposed and is not anticipated to cause any negative impacts downstream or to proposed infrastructure. The comment does not provide evidence that the IS/MND was not prepared within CEQA guidelines.

O5-7 The comment makes a request for additional assessment, which includes “fire-weather exposure” and “post-fire hydrologic response” thresholds. The comment is opinionated and not backed by CEQA guidelines in this request. The comment does not include adequate evidence that the IS/MND was not prepared within CEQA or applicable guidelines.

O5-8 The comment includes concerns of additional impacts not mentioned in the IS/MND relating to biological resources and requests for additional evaluation. As mentioned in the IS/MND all impacts toward biological resources are less than significant (**Section 4, Biological Resources**) with mitigation present wherever necessary. This was determined in accordance with CEQA and applicable guidelines. The comment does not provide adequate evidence that further evaluation is warranted.

O5-9 The comment includes a concern that additional evaluation of the effects to Deep Creek should be required. All sections of the IS/MND were prepared in accordance with CEQA guidelines. The comment does not provide evidence that additional evaluation is warranted, and reasoning for the additional evaluation is backed by opinion.

O5-10 The comment is conclusionary in nature and includes an overall opinion of the IS/MND, summary of concerns, and a list of referenced documents. The comment does not provide evidence that the IS/MND is inadequate within applicable guidelines. No revisions are warranted.

O6 - Mountain Community Alliance

Patrick Huckaby, President

December 3, 2025

Elena Barragan
County of San Bernadino
Planning Division
385 N. Arrowhead Ave.
San Bernardino, Ca 92415-0187

Dear Ms. Barragan

The Mountain Community Alliance here in Green Valley Lake would like to express our concern over the proposed expansion of the Hume Camp (PROJ-2024-00046).

This enormous expansion from an occupancy of a few hundred to 3000 would have devastating impacts on water supplies, waste treatment capacity, and the environment in this National Forest setting. 1

But the most negative impact is on traffic and evacuation. Green Valley Lake is in a high fire danger area, and has been evacuated three times in the last five years. Green Valley Lake Rd. is a narrow two-lane road that is the only way in and out. Traffic at the intersection of this road and Highway 18 (itself a narrow 2-lane road) is often gridlocked on weekends due to the heavy traffic leaving Big Bear. In the event of an evacuation, the impact of an extra 3000 people (60 large busses?) from Hume Camp would be a disaster. Cal-Fire has already expressed concern over this single evacuation route even before this proposed project. 2

Unless Hume can construct an additional evacuation route (unlikely), we urge the County to reject this proposal. 3

Thank You,

Patrick Huckaby, President

Mountain Community Alliance
PO Box 8303
Green Valley Alke, CA 92341

A 501.c.3 Charity
IRS # 261343844
Corporation # C3067693

MOUNTAIN COMMUNITY ALLIANCE
P.O. Box 8303, Green Valley Lake, CA 92341 | www.mountaincommunityalliance.org

O6 - Responses to Mountain Community Alliance

Patrick Huckaby, President

O6-1 The concerns about the scale of the proposed expansion are acknowledged. The IS/MND analysis evaluated impacts on water supplies, wastewater treatment capacity, solid waste treatment capacity in the Utilities and Service Systems Section of the IS/MND (Section 4.19, Utilities and Service Systems) and impacts to the natural environment which were evaluated in the Biological Resources Section of the IS/MND (Section 4.4, Biological Resources) and determined to be less than significant with mitigation incorporated. Additionally, following receipt of public comments and agency input, and additional coordination with the Project's proposed water supplier, the Project's maximum occupancy for the five phases has been reduced from approximately 3,000 to 2,400 occupants. Refer to **Section 3, Errata**.

O6-2 The concerns regarding traffic impacts and evacuations are acknowledged. As analyzed in the IS/MND (Section 4.20, Wildfire), the Project site is located within a Very High Fire Hazard Severity Zone (VHFHSZ). Additionally, traffic would be generated by the Project. As determined by the Traffic Impact Analysis conducted and analyzed in the Transportation Section of the IS/MND (Section 4.17, Transportation), traffic generated as a result of Project implementation would be considered a less than significant impact. The Project would be required to adhere to MM WF – 1, which ensures a comprehensive evacuation plan is utilized and would comply with all COA provided by County Fire.

O6-3 The Traffic Impact Analysis conducted for the Project and included as **Appendix J** of the IS/MND has determined that existing road infrastructure and access would be adequate to service the expanded Project site. No further response is warranted.

O7 - Mountain Rim Fire Safe Council

Laura Dyberg, President

From: Laura Dyberg <dyberg4fsc@gmail.com>
Sent: Tuesday, January 6, 2026 8:50 PM
To: Barragan, Elena <Elena.Barragan@lus.sbcounty.gov>
Cc: Bull, Robin <Robin.Bull@bos.sbcounty.gov>; Supervisor Rowe <Supervisor.Rowe@bos.sbcounty.gov>; Chris Jones <cjones@runningspringswd.com>; Chris Dumas GM <apcwdmail@gmail.com>; Steve Farrell <stevencfarrell@gmail.com>; Hugh Bialecki <habialeckidmd@gmail.com>; Eve Sinclair <eve.sinclair@yahoo.com>
Subject: Camp Hume PROJ-2024-00046: Request for Extension of Public Comment Period

You don't often get email from dyberg4fsc@gmail.com. Learn why this is important

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Ms. Barragan,

On behalf of the Mountain Rim Fire Safe Council (MRFSC), I am formally requesting an extension of the public comment period for the Camp Hume Expansion project, currently scheduled to close on January 7, 2026.

For 28 years, MRFSC has served as a cornerstone for fire prevention and public safety in the Running Springs, Arrowbear, and Green Valley Lake communities. Our preliminary review of the project documents has identified substantial concerns regarding public safety, long-term fire suppression capabilities, and emergency preparedness & response over the proposed 20-year expansion timeline.

Given the project's scale and the presence of conflicting data within the applicant's own filings, the current timeline does not allow for a comprehensive technical review. To ensure the administrative record is complete and that the community's safety interests are fully represented, additional time is essential. 1

A thorough public comment period is not merely a formality, but a vital component of a transparent landuse process. Extending this window harms no party; rather, it protects the integrity of the project's evaluation and ensures that Land Use Services is apprised of all potential liabilities and community impacts before proceeding.

An extension will allow all stakeholders to provide the high-quality, data-driven feedback necessary for Land Use Services to make a fully informed recommendation. We look forward to your positive response regarding a new deadline.

Thank you.

Laura Dyberg
President
Mountain Rim Fire Safe Council
PO Box 2582, Running Springs, CA 92382
909-528-6975

1

MOUNTAIN RIM FireSafe COUNCIL

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CAL FIRE (California Department of Forestry & Fire Protection)

San Bernardino County Fire Protection District

Running Springs Fire

Arrowbear Lake Fire

Big Bear Fire

January 6, 2026

Ms. Elena Barragan
Senior Planner
Land Use Services Department
385 North Arrowhead Avenue, First Floor
San Bernardino, CA 92415-0187

Re: Camp Hume Expansion PROJ-2024-00046

Dear Ms. Barragan,

On behalf of the Mountain Rim Fire Safe Council (MRFSC), I am formally requesting an extension of the public comment period for the Camp Hume Expansion project, currently scheduled to close on January 7, 2026.

For 28 years, MRFSC has served as a cornerstone for fire prevention and public safety in the Running Springs, Arrowbear, and Green Valley Lake communities. Our preliminary review of the project documents has identified substantial concerns regarding public safety, long-term fire suppression capabilities, and emergency preparedness & response over the proposed 20-year expansion timeline.

Given the project's scale and the presence of conflicting data within the applicant's own filings, the current timeline does not allow for a comprehensive technical review. To ensure the administrative record is complete and that the community's safety interests are fully represented, additional time is essential.

A thorough public comment period is not merely a formality, but a vital component of a transparent land-use process. Extending this window harms no party; rather, it protects the integrity of the project's evaluation and ensures that Land Use Services is apprised of all potential liabilities and community impacts before proceeding. 1

An extension will allow all stakeholders to provide the high-quality, data-driven feedback necessary for Land Use Services to make a fully informed recommendation. We look forward to your positive response regarding a new deadline for comments.

Thank you.

Laura Dyberg

Laura Dyberg
President
909-528-6975

PO Box 2582, Running Springs, CA 92382
www.FireSafeNow.org / info@firesafenow.org

O7 - Response to Mountain Rim Fire Safe Council

Laura Dyberg, President

O7-1 Public review periods for IS/MNDs are established by the Lead Agency. The Notice of Availability and Notice of Intent to adopt an IS/MND for the Hume SoCal Campground Extension public review began 11/13/2025 and closes with an extended deadline on 1/16/2026. There is no substantial evidence that the review period should have been further extended. No further response is warranted.

O8 - Save Our Forest Association

Kevin P. Bundy, Shute, Mihaly & Weinberger LLP
Shasta Fields, Shute, Mihaly & Weinberger LLP
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Attorney
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January 7, 2026

Via E-Mail

Elena Barragan
Land Use Services Department,
Planning Division
County of San Bernardino
385 N. Arrowhead Ave 1st Floor
San Bernardino, CA 92415-0187
E-Mail: elena.barragan@lus.sbcounty.gov

Re: Hume SoCal Campground Expansion Project Draft Initial Study and Mitigated Negative Declaration (PROJ-2024-00046)

Dear Elena Barragan:

This firm represents Save Our Forest Association ("SOFA") in connection with the Hume SoCal Campground Expansion Project ("Project") and its Draft Initial Study/Mitigated Negative Declaration ("MND"). SOFA is a 501(c)(3) non-profit organization that works to preserve the quality of life in the San Bernadino mountains. SOFA is concerned that the scale and location of the proposed Project will have substantial negative effects on biological resources, such as the southern rubber boa. SOFA is also concerned about the Project's likelihood of increasing public safety risks related to wildfire and inadequate evacuation routes. The Project's MND's analyses of impacts to water supply, water quality, and wastewater services are also incomplete and unsupported. The available evidence shows that the expansion of the Camp will severely strain existing resources and have significant impacts to the region. 1

The MND for the Project fails to comply with the requirements of the California Environmental Quality Act ("CEQA"), Public Resources Code § 21000 et seq., and the CEQA Guidelines, California Code of Regulations, title 14, § 15000 et seq. ("Guidelines"). As detailed below, many of the MND's conclusions regarding the significance of the Project's environmental impacts are not supported by substantial evidence. Indeed, there is substantial evidence to support a fair argument that the Project will have significant environmental impacts. Numerous mitigation measures proposed in

Elena Barragan
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Page 2

the MND fail to meet CEQA's standards for mitigation and are not adequate to reduce the Project's impacts to a less-than-significant level. Moreover, numerous inadequacies and omissions in the MND render it insufficient as an environmental review document. The MND fails to disclose, analyze, and propose adequate mitigation for significant environmental impacts related to biological resources, hydrology, water supply and wastewater, and wildfire safety, among others. 1

I. The County May Not Approve the Project Without Preparing an Environmental Impact Report Under CEQA.

CEQA is designed to ensure that "the long-term protection of the environment shall be the guiding criterion in public decisions." *Friends of College of San Mateo Gardens v. San Mateo County Community College District* (2017) 11 Cal.App.5th 596, 604 ["*San Mateo Gardens II*"] (quoting *No Oil, Inc. v. Los Angeles* (1974) 13 Cal.3d 68, 74). Thus, the statute requires an agency evaluating a project to develop an EIR whenever "substantial evidence supports a fair argument that a proposed project 'may have a significant effect on the environment.'" *Committee for Re-Evaluation of T-Line Loop v. San Francisco Municipal Transportation Agency* (2016) 6 Cal.App.5th 1237, 1245-46 (quoting *Laurel Heights Improvement Assn. v. Regents of University of California* (1993) 6 Cal.4th 1112, 1123).

The fair argument standard establishes a "low threshold" for requiring a lead agency to prepare an EIR. *Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903, 928. Courts "owe no deference to the lead agency's determination," but rather must show "*a preference for resolving doubts in favor of environmental review*." *Id*. (italics in original). Further, where the agency fails to study an entire area of environmental impacts, deficiencies in the record "enlarge the scope of fair argument by lending a logical plausibility to a wider range of inferences." *Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 311. 2

Substantial evidence supporting a fair argument may consist of personal observations of local residents on nontechnical subjects, *Oro Fino Gold Mining Corp. v. Cty. of El Dorado* (1990) 225 Cal.App.3d 872, 882; *Protect Niles v. City of Fremont* (2018) 25 Cal.App.5th 1129, 1152, as well as expert opinion supported by facts—even if that opinion is not based on a specific analysis of the project at issue. *Pocket Protectors*, 124 Cal.App.4th at 928. In marginal cases, where it is not clear whether there is substantial evidence that a project may have a significant impact and there is a disagreement among experts over the significance of the effect on the environment, the agency "must treat the effect as significant" and prepare an EIR. CEQA Guidelines §

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15064(g); *City of Carmel-By-The-Sea v. Board of Supervisors*, (1986) 183 Cal.App.3d 229, 245.

As explained further below, ample substantial evidence supports a "fair argument" that the Project may result in significant environmental impacts that were not properly analyzed and adequately mitigated in the MND. These impacts include, but are not limited to: biological resources, hydrology, water supply and wastewater, and wildfire safety impacts, among others. Because the Project has the potential to result in significant impacts, the County is required to prepare an EIR before it may approve the Project. 2

II. The MND's Description of the Project's Baseline Environmental Setting is Incorrect and Inadequate.

The MND fails to describe the Project setting as required by CEQA and the CEQA Guidelines. An environmental document "must include a description of the physical environmental conditions in the vicinity of the project, as they exist at the time the notice of preparation is published, or if a notice of preparation is not published, at the time environmental analysis is commenced, from both a local and regional perspective." CEQA Guidelines § 15125(a). This description of the environmental setting constitutes the baseline physical conditions by which a lead agency determines the significance of an impact. *Id*. "Knowledge of the regional setting is critical to the assessment of environmental impacts." CEQA Guidelines § 15125(c). Without such an understanding, any impacts analysis or proposed mitigation becomes meaningless.

As an initial matter, the MND inaccurately characterizes the baseline conditions relevant to wildfires and fire risk by not recognizing the extreme wildfire-prone conditions that currently exist and that are intensifying as California's climatic conditions continue to turn warmer and drier. California is experiencing record-high temperatures: summers are 2.5 degrees warmer than they were several decades ago, and they are likely to get even hotter. *See* Exhibit A.[1] These high temperatures remove moisture from plants and soils, increasing fire danger and adding combustible fuel to the landscape. *Id*. "Hotter temperatures, less dependable precipitation and snowpack that melts sooner lead to drier soil and parched vegetation," according to UCLA climate scientist Daniel Swain. *See* Exhibit B. According to CalFire, the 2020 wildfire season burned over 4.2 million acres—over 4% of the State—in nearly 10,000 incidents; 33 people died; and over 10,000 structures were damaged and destroyed. *See* Exhibit C. The years 2020 and 2021 collectively brought nine of the 20 largest wildfires in California's history. *See* Exhibit D. 3

[1] A list of attached exhibits appears at the end of this letter.

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Frequent wildfires also can allow conversion of burned habitats to non-native plants that burn more easily, further increasing wildfire risk for affected areas. *See* Exhibit E at 4. This report further states that "Almost all contemporary wildfires in California, 95-97%, are caused by human sources such as power lines, car sparks and electrical equipment. Building new developments in highly fire-prone wildlands increases unintentional ignitions and places more people in danger."

Without recognizing these conditions as the baseline in fire-prone areas, the MND cannot accurately disclose or analyze the full scope or extent of the physical impacts that would result from the Project, especially as it relates to wildfire impacts. The MND's inaccurate description of the Project's environmental setting frustrates the core goals of CEQA: to provide a vehicle for intelligent public participation and to provide an adequate environmental impact analysis. See *County of Inyo v. City of Los Angeles*, (1977) 71 Cal.App.3d 185, 197. 3

III. The MND's Analyses of, and Mitigation for, the Project's Environmental Impacts are Legally Inadequate.

As explained below, the MND fails to adequately analyze the Project's numerous environmental impacts, including those affecting biological resources, hydrology, water supply and water quality, capacity for wastewater treatment, and wildfire safety impacts. In this way, the MND fails to accurately disclose the extent and severity of the Project's broad-ranging impacts, which violates CEQA's requirement that environmental review encompass all of the activity allowed by the proposed Project and all of the impacts that activity generates. The County must analyze all of the aggregated impacts of all foreseeable development under correct baseline conditions and by completing thorough assessments. Without this analysis, the environmental review will remain incomplete and the Project cannot lawfully be approved. 4

Below, we discuss several examples of impact areas with particular deficiencies and describe how the MND fails to provide the legally required analysis of Project impacts. Thus, the County must revise the environmental analysis to accurately disclose the impacts of all of the activities allowed by the Project. Moreover, in light of substantial evidence indicating that the Project's impacts will be significant, to ensure that both decision makers and the public have adequate information to consider the effects of the proposed Project, and to comply with CEQA's requirements, the County must prepare an EIR that properly describes the Project, analyzes its impacts, and considers meaningful mitigation measures that would help ameliorate those impacts.

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A. The MND Fails to Disclose and Analyze Impacts to Biological Resources and Impermissibly Defers Mitigation.

The Project will develop an area with exceptional ecological value. The site has the potential to support numerous special status species, including the southern rubber boa, a threatened species under the California Endangered Species Act ("CESA"), and the arroyo toad, a federally endangered species. MND at 75-76. According to the MND, the Project site also has a high potential to support the California spotted owl and San Bernadino flying squirrel, which are both designated as species of concern by the California Department of Fish and Wildlife ("CDFW").

The degradation of these sensitive species' habitat alone is enough to trigger the need for an EIR. An EIR is required where there is substantial evidence that a "project has the potential to … substantially reduce the habitat of a fish or wildlife species" or "substantially … restrict the range of an endangered, rare or threatened species." CEQA Guidelines § 15065. Here, the MND admits there is a "high potential" for multiple special status species to occur on the site due to the "high quality of onsite habitat." MND at 76. The Project will destroy this habitat, yet the MND found an EIR was unnecessary because impacts to biological resources would be less than significant after mitigation. *See id*. at 74-77. The MND proposes only two mitigation measures for this impact, and neither meets the requisite standards to avoid an EIR. CEQA Guidelines § 15065(b)(1) (EIR not required if mitigation measures will "avoid any significant effect" or "mitigate … to a point where clearly no significant effect on the environment would occur").[2] 5

The first mitigation measure will itself harm the species it aims to protect. MM BIO-1 proposes to conduct "a pre-construction clearance survey," where a biologist may "relocat[e] [species] from harm's way." MND at 77. This measure will be used for all sensitive species on the site, including the state-listed southern rubber boa and the federally endangered arroyo toad. *Id*. at 75. But "the capture and relocation of [an endangered species] contemplated by mitigation measures" itself may constitute a "take." *Center for Biological Diversity v. Department of Fish & Wildlife* (2015) 62 Cal.4th 204, 232-33; Fish & G. Code §§ 86 (defining "take"), 2080 (prohibiting take of state-listed species).[3] Thus, moving species from the site under MM-BIO 1 may itself negatively impact the species—and it may violate CESA with respect to state-listed species like the

[2] An EIR may also be unnecessary if the project is covered by a habitat conservation plan or natural community conservation plan. *See* CEQA Guidelines § 15065(b)(2). This Project is covered by neither. *See* MND at 79.
[3] "Take" means to "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." Fish and Game Code § 86.

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southern rubber boa. The MND fails to consider the potentially significant impacts of this proposed mitigation measure. CEQA Guidelines § 15126.4(a)(1)(d) (where mitigation measures will cause significant effects, the environmental review document must discuss the effects of the mitigation measure).

This mitigation measure is also inadequate because it improperly defers mitigation. Under MM BIO-1, a "biologist shall ensure that impacts to any special-status wildlife observed … are reduced or avoided such that impacts are less than significant (e.g., avoidance buffers, relocation from harm's way, etc.)." MND at 77. In other words, the MND's proposed mitigation is to deal with impacts as they arise during construction of the Project, without providing any further detail or standards to ensure mitigation will be implemented and effective. CEQA does not allow mitigation to be deferred in this way. *See* CEQA Guidelines § 15126.4 ("Formulation of mitigation measures shall not be deferred until some future time"); *Save Agoura Cornell Knoll v. City of Agoura Hills* (2020) 46 Cal.App.5th 665, 686-89; *Preserve Wild Santee v City of Santee* (2012) 210 Cal.App.4th 260, 280. Even where deferral is permitted, CEQA requires the articulation of specific performance standards, which are missing here. *See Sacramento Old City Ass'n v City Council* (1991) 229 Cal.App.3d 1011, 1029; CEQA Guidelines § 15126.4(a)(1)(d) ("The specific details of a mitigation measure [] may be developed after project approval … provided that the agency … adopts specific performance standards the mitigation will achieve"). MM BIO-1 is inadequate because it "simply provides a generalized list of measures to be undertaken by a … [biologist], but it does not set forth any performance standards or guidelines to ensure that these measures will be effective." *Save Agoura Cornell Knoll,* 46 Cal.App.5th at 688. In fact, the MND only lists two vague ways this measure may be carried out—avoidance buffers and relocation—and describes the rest as "etcetera." MND at 77. This is plainly insufficient, and CEQA demands more. 5

MM BIO-2 fares no better. This measure proposes a pre-activity field survey to identify active bird nests. But the outcome of that survey has no impact on the buffer size that is then implemented. *See id*. (same sized buffers used whether nests found or not). Confusingly, the mitigation measure seems to be *less* restrictive if active nests are found on the site than if they are not. *See id*. (if active nests are not found, then buffers are required for all construction, whereas buffers apply only to heavy machinery if active nests are found). Allowing *more* construction activity near active nests will not reduce impacts to sensitive bird species, and the MND fails to provide substantial evidence that this mitigation will be effective. *League to Save Lake Tahoe Mtn. Area Preservation Found. v County of Placer* (2022) 75 Cal.App.5th 63, 121 (when the efficacy of mitigation is not apparent, there must be "evidence in the record showing [it] will be effective in remedying the identified environmental problem"). In fact, there is

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substantial evidence to the contrary. Tim Krantz—a biologist with nearly 50 years of experience working with endangered species in the San Bernadino Mountains—found the pre-construction surveys to be insufficient mitigation given the "substantial expansion of the development area" and "the intensity of the proposed activities." *See* Comment submitted by Tim Krantz (Jan. 3, 2026); *see also* Comment submitted by Steve Loe (Jan. 5, 2026) (the mitigation measures fail to adequately address the loss of habitat from fuels treatment and increased trail usage).

These flaws in the mitigation measures are compounded by the fact that the MND contains multiple errors in its analysis of biological resources. For example, the MND contradicts itself on whether or not the Project is adjacent to southern rubber boa habitat. It states that the Project area does "not provide *as high of quality habitat* for southern rubber boa as [other parts] of the [P]roject site," suggesting that the Project site still may provide habitat of somewhat lesser quality. Appendix A1 at 18 (emphasis added). But in the very next sentence, the MND states that the Project area does "not provide *suitable habitat* for southern rubber boa." *Id*. Additionally, in concluding impacts to the southern rubber boa would be less than significant, the MND relies on surveys that did not find the species on the site. MND at 74. But the surveys were conducted at times of year when the species would not be present. Field surveys were conducted on July 31, 2023, and August 2, 2023, but southern rubber boa "emerge from hibernation in April and general[ly] disappear during the summer months" Appendix A1 at 1, 18. Where "surveys … [are] performed in conditions that do not maximize detection[,] [they] 'may overlook the presence or actual density of some special status [] species on the [P]roject site." *Save Agoura Cornell Knoll,* 46 Cal.App.5th 665, 692 (finding botanical surveys inadequate where conducted in the summer during an ongoing drought). Because the MND "relied on [flawed] surveys … in adopting [its] mitigation measures," there is "substantial evidence to support a fair argument that th[ose] measure[s] [are] inadequate to mitigate the potential impacts to these species." *Id*. 5

The errors and legal inadequacies in the MND's mitigation measures for biological resources demonstrate the unreliability of its significance conclusions. The Project likely will have a significant effect on the numerous sensitive species that may be present on the site, and therefore an EIR is necessary to fully analyze those impacts.

B. The MND Fails to Adequately Analyze Wildfire-related Impacts.

The Project is located in a Very High Fire Hazard Severity Zone (VHFHSZ). MND at 9, 166. The Project is situated on steep terrain that "results in faster fire spread," and its geographic setting subjects the site to one of the primary drivers of extreme wildfire behavior in Southern California—the Santa Ana Winds. *Id*. at 164. These winds 6

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were a significant factor in the 2007 Slide Fire, which burned over 12,000 acres in the community directly adjacent to the Project site. *Id*. Further, the site is surrounded by chaparral, a vegetation type in which "high intensity fires are common." *Id*. at 165. The MND actually acknowledges all of these compounding fire-hazard factors, which create a severe baseline wildfire risk at the Project site. Nevertheless, the MND concludes that "impacts related to exacerbated wildfire risk would be less than significant." *Id*.

Contrary to the MND's findings, the Project will significantly increase the fire risk at the site. The Project will develop land "within a Wildland Urban Interface (WUI) area." *Id*. Numerous studies have found that WUI expansions result in more human ignitions. *See* Exhibit F ("WUI expansions have also increased fire ignitions risks from human activities"); Exhibit G ("In WUI, there are more human ignitions compared to wildland"); Exhibit H ("growth of the [] wildland-urban interface raises wildfire risk"). Further, the Project seeks to expand capacity tenfold from 300 to nearly 3,000. MND at 167. As a result, there will be more electricity usage, more vehicles with combustion engines on site, and a substantial increase in other human-related ignition factors. *See* Exhibit I ("More people translates into a greater probability of an ignition …[and] increase[s] fire ignition risks from human activities [on] fire-prone landscapes"); MND at 105 ("The project will use buses to transport students to the camp"). Development of the Project will undeniably increase the rate of ignitions in an already fire prone area. 6

Despite these significant risks, the MND fails to even mention the potential increase in human-caused ignitions. Although the MND acknowledges that the Project site already faces severe wildfire risk, it completely ignores the additional ignition risk the Project would create. It is not enough for an environmental review document to "comprehensively analyze[] the project site's *current* wildfire risk, it [also must] expound on the anthropogenic risks that … development at the project site will introduce." *People ex rel. Bonta v. County of Lake* (2024) 105 Cal.App.5th 1222, 1235 (quotation omitted). CEQA does not permit such a glaring omission. An environmental analysis "must sufficiently discuss the project's potential adverse effect of human-caused ignitions and analyze in some detail how the project's design (or mitigation measures) alleviates such risks." *Id*. The MND's failure is particularly egregious given the massive scale of the camp expansion. Where, as here, a project will bring thousands of new visitors to an area, there must be an analysis of how the influx of people will impact the risk of wildfire ignitions. *See id*. at 1233-1235 (finding EIR inadequate because it had failed to "explain[] the extent to which bringing in over 4,000 new residents to the largely undeveloped project site increases the risk of human-caused wildfire over the existing baseline risk").

In sum, there is substantial evidence from multiple studies that the Project may have a significant impact on wildfire ignition rates due to additional visitors and

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development in the WUI. Moreover, the MND completely failed to analyze or even consider how the Project may increase ignition rates and exacerbate already severe wildfire risks to both the camp and the surrounding community. Therefore, an EIR is required to fully analyze the wildfire risk posed by the Project. *See* CEQA Guidelines § 15064(a)(1) ("If there is substantial evidence … that a project may have a significant effect on the environment, the agency shall prepare a draft EIR"). 6

C. The MND Fails to Adequately Analyze Impacts to Wildfire Safety, Emergency Access, and Evacuation and Fails to Include Adequate Mitigation Measures. The Project's Wildfire Impacts Remain Significant.

The MND asserts that the proposed project will not exacerbate wildfire risks or impair or physically interfere with any emergency response or evacuation plans, suggesting that the project will not expose people or structures to a significant risk of loss, injury or death involving wildland fires. *See* MND at 161. The MND, however, contains no evaluation of the potential congestion that is likely to be present on evacuation routes in the event of a fire when the traffic from nearby communities combines with up to 3,000 people needing to be evacuated from Hume SoCal. In order to make the claims advanced in this MND, one would expect reference to a completed evacuation analysis or wildfire risk report included as a technical appendix to the MND. However, no such evidence, support, or documentation exists. 7

The Project is thus at high risk of exacerbating safety hazards from a wildfire occurring on or near the site. As the climate changes and fire risk grows, Californians are rightfully concerned about the risk of wildfire. With the state still recovering from recent disastrous fires, decisionmakers must consider the role that increased development plays in the proliferation of wildfires, especially when that development encroaches into forested areas identified as being in Very High Fire Hazard Severity Zones on State CAL FIRE maps as well as being in the Wildland Urban Interface (WUI). CEQA requires environmental documents to analyze the risk of wildfire and the contribution of new projects to the risk of wildfire. In light of the County's history of severe fires, a thorough evaluation of fire risks associated with development in this sensitive area is essential.

The MND here fails at every juncture to provide the legally required analysis of the Project's direct, indirect, and cumulative wildfire and safety impacts. First, the MND ignores how changes to the climate will impact wildfires in the future. It then provides a legally inadequate analysis of the direct, indirect, and cumulative wildfire hazard impacts associated with operation of a campground facility that is proposed for a ten-fold expansion in a Very High Fire Hazard Severity Zone (VHFHSZ). The MND then

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attempts to rely on meager mitigation measures that do little to reduce the Project's significant fire hazard impacts. 7

1. The MND Fails to Adequately Address Future Changes in Precipitation, Temperature and Wind and Their Effects on Fire Hazards.

Wildfire season in the western region of the United States, including California, recently has lengthened from a previous average of between five and seven months to a year-round occurrence. The number of large wildfires that burn more than 1,000 acres has increased throughout the western United States. This is occurring as average annual temperature in the Western regions of the United States have risen by nearly two degrees Fahrenheit since the 1970s and the winter snow pack has declined. *See* Exhibit I. Expected changes in precipitation will result in decreased fuel moisture and increased fire risk. *See* Exhibits J, K, and L. 8

Despite these known factors, the MND fails to take them into consideration in its analysis of wildfire impacts. Instead, the MND asserts that if the Project is built to code, preserves defensible space around the buildings, and includes drought-tolerant landscaping, then the risk of fire and the resulting harm it causes will be less than significant. This simplistic approach to fire risk leaves the public and decision makers unable to fully understand the risk of this project.

2. The MND Fails to Adequately Analyze Impacts Related to Emergency Response and Evacuation.

The MND correctly admits that allowing development within designated high fire risk and remote hillside areas results in potentially significant wildfire impacts. The Project will both substantially impair an adopted emergency response plan and exacerbate wildfire risks as well as expose Project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire. *See* MND at 161. 9

The MND states that the Project would comply with the Hilltop Community Safety Element and the San Bernardino CWP Hazards Element to ensure adequate emergency services and fire protection would be provided to the Project area. The CWP Hazards Element requires that new development be located outside of environmental hazard areas, such as High or Very High FHSZs, wherever possible (Countywide Plan Policy HZ-1.2). For any lot or parcel that does not have sufficient buildable area outside of such hazard areas, the County requires adequate mitigation, including designs that allow occupants to shelter in place and to have sufficient time to evacuate during times of

extreme weather and natural disasters. *See* MND at 163. However, there is no evacuation analysis provided, so no means to assess whether sufficient time exists.

The MND claims that the Project provides adequate emergency access based on the fact that the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards. *See* MND at 145. Under typical and normal circumstances, emergency service vehicles will be able to enter the Camp safely and provide emergency services. However, the MND contains no analysis of what an evacuation scenario may be in the event the entire community – including 3,000 people from Hume SoCal – is trying to leave the area on Green Valley Lake Road at the same time during a wildland fire event. Wildland fire evacuation is challenging under any circumstances. For a site that is going to experience a 1000% increase in seasonal population, how the entirety of the Hume SoCal can safely be evacuated along with the existing mountain communities simply must be studied and modeled.

An "Evacuation Plan and Working Guide" has been developed by Hume SoCal. MND App. K. However, this Plan is for on-site emergency planning and does not address what happens once the 3,000 campers and staff at Hume SoCal leave the Project site. The Plan addresses how to get people out of the buildings and organized on-site. But no analysis was prepared to analyze whether the adjacent roadways can accommodate evacuating Camp attendees, employees and visitors, area residents, and emergency service vehicles that would all be simultaneously entering and exiting the area. 9

Nor does the Plan account for how as many as 3,000 campers will be evacuated from the site. Nowhere does the MND or any of its appendices address whether the buses used to bring campers to and from the site will be available on-site to assist in an evacuation. Indeed, the MND strongly suggests that buses will *not* be available on site. The project plans include only eight bus parking places. Using the MND's assumption that each bus will hold 50 students (*see* MND Appendix J at Appendix A, attachment A; PDF page 31), eight buses could be used to evacuate only 400 campers. The MND also assumes that 50 buses, transporting 50 students in each bus, will arrive at and depart from the site during peak summer weekends. *Id.*[4] Since the project plans include only 8 bus parking spaces, it is evident that more than 40 buses will need to travel to the site under evacuation conditions in order to evacuate campers. Further, at the December 20, 2025 community meeting hosted by San Bernardino County and Camp Hume SoCal, Camp representatives confirmed that the bus transportation for the campers is provided by

[4] The trip assumptions attached to Appendix J (at Appendix A, attachment A; PDF page 31) disclose that the 50 buses will result in 100 daily trips, suggesting that the buses will arrive, drop off campers, and leave rather than remaining on site.

outside services. Therefore, the buses will not be parked on site in the event they are needed in an emergency situation. In many evacuation scenarios, contraflow lanes are established so that all traffic is flowing out of the area. In the event of a wildfire evacuation, which can be fast-moving with constantly changing circumstances, the MND does not explain or assess how buses for Camp attendees will get to the site to evacuate the campers while all other traffic is attempting to leave the area. **The MND's emergency plans thus appear to leave upwards of 2,000 children at risk of having no transportation off the property during a summer wildfire emergency and/or exacerbating safety hazards by bringing dozens of buses into an active wildfire evacuation zone.** The MND completely ignores these obvious significant impacts to public health and safety.

Guidance prepared by the California Attorney General ("AG Guidance") recommends that an evacuation analysis be conducted for projects such as this one. "For projects located in ***high wildfire risk areas*** that present an increased risk of ignition and/or evacuation impacts, ***evacuation modeling and planning*** should be considered and developed at the time of project review and approval." Exhibit M (AG Guidance) at 10 (emphasis added). The Guidance further states that "[t]he ultimate objective is to allow for informed decision-making that minimizes the environmental and public safety hazards associated with new developments that increase the risk of ignition and impede evacuation in high wildfire prone areas." *Id*. at 10. 9

The MND must have an evacuation analysis sufficient to support a conclusion that the Camp could be safely evacuated and that Camp traffic, when added to the evacuation route roadways, would not imperil the evacuation of others. The AG Guidance notes that evacuation modeling and analysis should include the following:

- Evaluation of the capacity of roadways to accommodate project and community evacuation and simultaneous emergency access.
- Assessment of the timing for evacuation.
- Identification of alternative plans for evacuation depending upon the location and dynamics of the emergency.
- Evaluation of the project's impacts on existing evacuation plans.
- Consideration of the adequacy of emergency access, including the project's proximity to existing fire services and the capacity of existing services.

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- Traffic modeling to quantify travel times under various likely scenarios.

AG Guidance at 10.

Several recent wildfires in the San Bernardino Mountains have resulted in roadway closures and repairs. The County's 2017 Multi-Jurisdictional Hazard Mitigation Plan Update (MJHMP Update) notes that between 2010-2016, there were 13 significant wildland fires in San Bernardino County that burned a total of 86,894 acres. *See* Exhibit N (MJHMP Update) at 74. Of these 13 fires, the Blue Cut Fire, Lake Fire, and North Fire/ Pines Fire all occurred in the County's mapped Very High Fire Severity Zone. The MJHMP Update goes on to state that "[M]itigation efforts have reduced but not eliminated the threat from wildfire. The strong fall winds that are capable of creating firestorms cannot be controlled. Drought cannot be controlled. Fuels reduction programs reduce the potential spread of fire, upgraded Building Codes make structures more fire resistant, and public education prepares residents for wildfires. However, the threat of wildfire remains. The continuing goal is to reduce the threat from wildfire wherever possible." *See* Ex. N (MJHMP Update) at 76. Expanding Hume SoCal by 1000%, on a site located within a Very High Fire Hazard Severity Zone, will only increase the threat and will increase the difficulty of evacuating residents, campers, and visitors.

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The recent Line Fire started on September 5, 2024, burned over 43,000 acres, and included the evacuation of the Hume SoCal property as well as several nearby communities including Running Springs, Arrowbear, Green Valley Lake, Forest Falls, Mountain Home Village, Angelus Oaks, and Seven Oaks. More than 11,000 people in total were ordered to evacuate. The Line Fire included significant road closures (SR-18, SR-330, SR-38) and involved personnel and equipment resources from National Guard, CAL FIRE, and dozens of local fire agencies. SR-330 was closed on September 24, 2024 because of fire-related damage to crucial elements of the road infrastructure. The resulting repairs, including subsequent flooding and landslide damage, took five months to complete, and this critical access way was closed a majority of that time. *See* Exhibits O and P. Another recent San Bernardino County fire, the Lake Fire in the Silverwood Lake State Recreation Area, burned in June 2025. Here, more than 100 people were temporarily stranded after fleeing the fire, and the fire prompted road closures. A Los Angeles Times article on the fire describes how quickly the wildfire conditions shifted and that the call for evacuation happened quickly. See Exhibit Q.

Given the Project's location and the history of wildland fires in the area, the likelihood of future wildfires at, near, or in the vicinity of the project site is high. Without an evacuation analysis and proper modeling, how the area will fare in the event of an evacuation is simply unknown at this time. Two-lane Green Valley Lake Road serves as

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the sole route to evacuate the entirety of Green Valley Lake, Camp Pondo, Camp Cedar Crest, and the population of Hume SoCal. The evidence clearly demonstrates that the simultaneous evacuation of vehicles, trailers, and buses—dozens of which will apparently need to drive to the Camp under evacuation conditions, and then transport campers out of the evacuation zone—will create a significant impact that could put lives at risk. 9

3. The Proposed Mitigation Measures Will Not Reduce Wildfire Hazard Impacts to a Less Than Significant Level.

The MND contains several mitigation measures that aim to reduce wildfire impacts of the proposed project, including **MM WF-1** that requires submittal and implementation of Hume SoCal's Evacuation Plan and Working Guide, **MM WF-2** that requires a fuel modification zone, fire breaks, and underground power lines, and **MM WF-3** requiring drought-tolerant landscaping. These are all basic fire safety measures that are already mandated. The County requires that all new development in County-designated Fire Safety Overlay (FS-1) and/or CAL FIRE-designated Very High FHSZs meet the requirements of the California Fire Code and the California Building Code as amended by the County Fire Protection District, including Title 14 of the California Code of Regulations fire safety requirements for any new development within an SRA, as well as provide and maintain a Fire Protection Plan or Defensible Space/Fuel Modification Plan and other pre-planning measures in accordance with the County Code of Ordinances (Countywide Plan Policy HZ-1.13). *See* MND at 163. Countywide Plan Policy HZ-1.14 additionally requires proactive vegetation management/hazard abatement to reduce fire hazards on existing private properties, along roadsides of evacuation routes out of wildfire prone areas, and other private/public land where applicable, and requires new development to enter into a long-term maintenance agreement for vegetation management in defensible space, fuel modification, and roadside fuel reduction in the Fire Safety Overlay (FS-1) and/or Very High FHSZs. 10

CEQA does not allow agencies to assume, without underlying analysis, that simply complying with a regulatory standard is adequate to mitigate a potentially significant impact. *See*, *e.g.*, *Californians for Alternatives to Toxics v. Department of Food & Agriculture* (2005) 136 Cal.App.4th 1, 16-17 (compliance with regulation alone not a basis for finding impact less than significant); *Protect the Historic Amador Waterways v. Amador Water Agency* (2004) 116 Cal.App.4th 1099, 1108-09 (environmental effect may be significant despite compliance with such requirements).

Compliance with regulatory requirements cannot be assumed to be sufficient to mitigate wildfire impacts. For example, the Line Fire, which started September 5, 2024 and burned over 43,000 acres, was started by arson. *See* Exhibit O. This fire occurred,

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and covered significant ground, despite the fact that regulations and measures exist in San Bernardino County aimed at reducing the potential for wildfires to start. The more people that are introduced into a Very High Wildfire Hazard Severity Zone, the more likely that they will be exposed to the uncontrolled spread of wildfire. The sheer size of the Camp's proposed expansion makes it nearly impossible to assert that the Project's wildfire impacts can be mitigated so that the Project will have a less than significant impact as it relates to exacerbating wildfire risks and exposing project occupants to the uncontrolled spread of a wildfire. Just as wildfires continue to burn tens of thousands of acres of California every year despite our best efforts using many of our best tools, the Project's wildfire impacts and conditions will continue to exist despite the implementation of MM WF-1, -2, and -3. 10

D. The MND Fails to Adequately Evaluate the Project's Potential Impacts on Water Quality, Which are Significant.

The MND claims that the Project will not have significant impacts on water quality. *See* MND at 114. In fact, development of the site could degrade water quality in the vicinity of the Project in at least two distinct ways: 1) through contaminated run-off from new roadways and parking lots, and 2) through potential contamination from post-fire pollution.

Deep Creek, a designated part of the National Wild and Scenic Rivers System (https://rivers.gov/), would receive waters originating on Camp Hume. Deep Creek flows through the San Bernardino Mountains to the East Mojave River, dropping approximately 3,000 feet through boulder-strewn reached and deep pools. The river's remarkable values include its scenery, recreation, geology, fish, wildlife, cultural and botanical values. Deep Creek is considered to have outstanding botanical value because it represents some of the greatest diversity of vegetation communities of any drainage on the San Bernardino National Forest. Fourteen vegetation communities, representing the transition zones from the mountains at 6,240 feet to the desert at 3,000 feet elevation, are present within the Deep Creek Corridor. *See* Exhibit R. 11

1. The Project Will Create Contaminated Runoff from New Roadways, Driveways, and Parking Lots.

The Hume SoCal project site includes seven existing water courses, which all ultimately connect with Deep Creek. New roadways, driveways, and parking areas collect contaminants (oil, gasoline, brake pad dust, tire particles, and mechanical debris) which can blow and wash off into the on-site waterways, ultimately landing in Deep Creek with unknown and unanalyzed impacts. The MND (at page 114, Hydrology and Water Quality 12

section 10.c.III) notes whether the project will "Create or contribute runoff water which would exceed the capacity of existing or planned Stormwater drainage systems or provide substantial sources of additional runoff." The MND concludes that on site storm water runoff is not required to be treated and that this impact is less than significant. However, new roadway, driveway, and parking area surface runoff will eventually discharge into Deep Creek without on-site treatment or implementation of Best Management Practices. After storm events in urban areas, water runs off from roads, bridges, and other impervious surfaces. Often, runoff is conveyed to a sanitary sewer system where it can be treated in a wastewater plant before being released into a waterway. However, that will not be the case at Camp Hume. Untreated runoff may contain chemicals deposited on road surfaces by vehicles, including metals and polycyclic aromatic hydrocarbons (PAHs) such as petroleum products, tire dust, exhaust, and brake pad dust. *See* Exhibits S and T. This non-point source pollution can discharge to Deep Creek and imperil the waterway, which would be a significant impact. The MND's conclusion that the impact is less than significant is unfounded. 12

2. Impacts From Potential Post-Fire Water Contamination Would be Significant.

Due to the recent extent of destructive wildfires in the wildland-urban interface, several recent studies have investigated how the burning of buildings and their contents impacts the post-fire environment. Due to the toxic nature of materials burned during such events, these studies readily acknowledge the strong potential for secondary disasters, including chemical contamination of subsurface water quality. Examples from the scientific literature includes Exhibit U. The Project proposes to construct nearly 442,000 square feet of new buildings to house 2,700 additional occupants. There are currently 23,514 square feet of buildings at Hume SoCal – an eighteen-fold (1,880%) increase in square footage. This is a considerable increase in the number of structures and amount of building materials that will contaminate surface and subsurface water quality after a wildfire. 13

In either case – whether day-to-day pollution from vehicular and human sources or whether from post-fire contamination – it will be Deep Creek that will be the recipient of polluted runoff and contamination. Because both sources are likely, the Project would have significant water quality impacts because it could expose people to significant water quality risks as a result of contaminated runoff and substantially degrade both surface and groundwater quality.

E. The MND Fails to Adequately Analyze the Project's Impacts on Groundwater Supplies and Does Not Demonstrate the Availability of Agency-Supplied Water to Serve the Project.

CEQA requires that decision makers be presented "with sufficient facts to evaluate the pros and cons of supplying the amount of water that the [project] will need." *Vineyard Area Citizens for Responsible Growth, Inc. v. City of Rancho Cordova*, 40 Cal.4th 412, 430-31 (2007). This includes identifying and analyzing water supplies that "bear a likelihood of actually proving available; speculative sources and unrealistic allocations ('paper water') are insufficient bases for decision making under CEQA." *Id.* at 432.

The ultimate question under CEQA is whether the environmental document adequately addresses the reasonably foreseeable impacts of supplying water to the Project. If the uncertainties inherent in long-term land use and water planning make it impossible to confidently identify the future water sources, an environmental document may satisfy CEQA if it acknowledges the degree of uncertainty involved, discusses the reasonably foreseeable alternatives—including alternative water sources and the option of curtailing the development if sufficient water is not available for later phases—and discloses the significant foreseeable environmental effects of each alternative, as well as mitigation measures to minimize each adverse impact. *Id.* at 434. This analysis is crucial in light of the drought that gripped this State in recent years. This MND's analysis of impacts to water supply fails to meet CEQA's standards. 14

The MND includes two important questions in the Hydrology section: (1) Would the Project substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin; and (2) Would the project conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan? The Utility Services section similarly asks whether the Project will have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry and multiple dry years.

The MND asserts that the answer to all of these questions is that the impacts are less than significant, and in the case of the second question, that there is no impact. However, the MND does not substantiate these conclusions with any data or commitment from the public agency to provide water on which the Project is intending to rely.

The MND includes a Water Supply Assessment (WSA) as Appendix B1. A basic requirement of the WSA is that it must "include a discussion with regard to whether the public water system's total projected water supplies available during normal, single dry,

and multiple dry water years during a 20-year projection will meet the projected water demand associated with the proposed project, in addition to the water system's existing and planned future uses, including agricultural and manufacturing uses." *See* Appendix B1 at 2. The WSA provides data on the Project's water demand, data on existing water supply from Project on-site wells, and data on the water volume provided to communities by the Crestline-Lake Arrowhead Water Agency (CLAWA), the contractor that would provide the Project with wholesale and retail treated water from Silverwood Lake. However, the WSA does not distinguish between water the CLAWA has access to and water that CLAWA can provide to the Project. Based on the information contained within the WSA, the reader cannot discern whether CLAWA can provide the Project with water or whether Hume SoCal's on-site wells can supply the Project with water.

In fact, the WSA acknowledges as much on page 8: "Neither the Camp nor CLAWA have prepared Urban Water Management Plans (UWMP) to aid in future projection of domestic and non-domestic water demand. Therefore, the following analysis makes assumptions for the Camp's groundwater well sustainability and CLAWA allotted domestic water to the Camp." The WSA quantifies the Camp's demand on CLAWA's water supply, but the demand is not provided in the context of overall CLAWA obligations to serve other communities. Nor does the MND document any agreement from CLAWA to serve the Project. Further, neither the WSA nor the MND provide any detail on the status of the existing on-site wells and their ability to continue to serve the Camp as it experiences a ten-fold increase in inhabitants. The WSA recommends that the "[C]amp conduct well drawdown tests to determine the sustainability and reliability of its groundwater wells. The results of the tests will provide insights into the capacity of the groundwater wells and will inform the development of an effective water management strategy for the Camp." *See* Appendix B1 at 15. In other words, the analysis essential to determining whether the Project's groundwater impacts will be significant has not been conducted, but rather has been impermissibly deferred to some point in the future. 14

The MND does not provide any analysis to support the less-than significant conclusions regarding adequate groundwater recharge, whether the Project will obstruct implementation of a water quality control plan or sustainable groundwater management plan, or whether CLAWA has sufficient water supply to serve the Project in light of other obligations the agency already has. In short, sufficient water supply to serve the Project has not been demonstrated.

CLAWA itself recognizes that groundwater supply in the area is lacking. An agency history document on CLAWA's website notes that "CLAWA was formed in large part due to the remarkable foresight of several local people that realized the lack of

adequate ground water in a booming area. . . . [F]ears of inadequate local ground water were confirmed when an initial feasibility study confirmed that local well water supplies were deficient within the area." *See* Exhibit V. Hume SoCal is intending to rely on a combination of on-site wells and public water, neither of which have confirmed the ability to supply as needed. The MND has failed to accurately identify the water supply impacts of the proposed Project and fails to support a conclusion that the impacts will be less than significant. 14

F. The MND Fails to Demonstrate the Availability of Wastewater Treatment Capacity to Serve the Project and Fails to Mitigate Potentially Significant Impacts.

The MND includes a Sewer Feasibility Study as Appendix B2 and a Water and Sewer Master Plan as Appendix B3. The Water and Sewer Master Plan identifies the on-site water and sewer system design needs to be able to serve a 3,000-person camp, and determines the peak hourly sewage demand and overall estimated sewage generated by the camp at max buildout. The Sewer Feasibility Study evaluates the capacity of the existing wastewater infrastructure managed by Running Springs Water District (RSWD) to accommodate the proposed expansion of the Hume SoCal campground. The study found that the proposed expansion of Hume SoCal will strain several aspects of RSWD's existing infrastructure, including the Ahwahnee Lift Station, the Deer Lick Lift Station, and the RSWD Wastewater Treatment Plan itself. *See* Appendix B2 at 18. 15

The Sewer Feasibility Study also examined the potential of designing a septic system to serve Hume SoCal due to the limiting capacity of RSWD's infrastructure, but "a conventional septic system is not a feasible treatment method for this site due to the Basin Plan's septic prohibition zone that the facility resides in." *See* Appendix B2 at 17.

The Study concluded that designing a septic system to serve the Camp is prohibitive and the existing public infrastructure cannot accommodate an Camp expansion of the size proposed. The Sewer Feasibility Study concluded with a recommendation "that the Camp initiate preliminary design for pump upgrades and storage expansion at both lift stations, and coordinate with RSWD to evaluate near-term and long-term strategies for increasing wastewater treatment plant seasonal capacity. Concurrently, the downstream gravity sewer system should be evaluated for potential bottlenecks under future lift station conditions. These efforts should be aligned with a phased development plan that matches Camp occupancy growth with the completion of required infrastructure improvement." *See* Appendix B2 at 18.

With the information above in hand, the MND then concludes that the Project would require the construction of new wastewater infrastructure, the construction of which could cause significant environmental effects. The MND then concludes that **MM UTL-1** will mitigate the impact. *See* MND at 154. **MM UTL-1** states: "*It is recommended that the Project initiate preliminary design for pump upgrades and storage expansion at both lift stations, and coordinate with Running Springs Water District (RSWD) to evaluate near-term and long-term strategies for increasing Wastewater Treatment Facility (WWTP) seasonal capacity. Concurrently, the downstream gravity sewer system should be evaluated for potential bottlenecks under future lift station conditions. These efforts should be aligned with a phased development plan that matches Camp occupancy growth with the completion of required infrastructure improvements.*" *See* MND at 155.

CEQA Guidelines Section 15126.4(a)(1)(B) states "[F]ormulation of mitigation measures shall not be deferred until some future time. The specific details of a mitigation measure, however, may be developed after project approval when it is impractical or infeasible to include those details during the project's environmental review. Provided that the agency (1) commits itself to the mitigation, (2) adopts specific performance standards the mitigation will achieve, and (3) identifies the types of potential actions that can feasibly achieve the performance standard that will be considered, analyzed, and potentially incorporated into the mitigation measure." **MM UTL-1** meets none of these requirements, and therefore is not a reasonable, feasible, lawful, or appropriate mitigation measure. 15

Notably, the MND does not document any agreement from the RSWD to serve the Project nor to study any facility improvements to its own system. Without a commitment from RSWD to serve the Project, the Project has no documented means to treat its wastewater. Absent appropriate, reasonable, and enforceable mitigation measures that will reduce the significant environmental impacts resulting from construction of new wastewater infrastructure to serve the project, the Project's wastewater and utility services impacts remain significant and unmitigated..

G. The MND's Conclusion that the Project's Transportation Impacts Will Be Less Than Significant Lacks Evidentiary Support.

1. The Project Conflicts with the General Plan's Level of Service (LOS) Standards for Traffic Congestion. 16

In order to approve the planned development permit for the Project, the County must make several affirmative findings, including that the Project "is consistent with the

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General Plan and any applicable plan." San Bernardino Dev. Code § 85.10.050(b)(1). Policy TM-1.1 of the Countywide Plan "require[s]" County roadways "to be built to achieve" a "minimum level of service during peak commute periods" of LOS D in the Mountain Region.[5] The County's Transportation Impact Study Guidelines—on which the MND expressly relies (MND at 144)—emphasize that LOS analysis is required in transportation impact studies to ensure General Plan consistency.[6] Moreover, Policy TM-1.1 is mandatory, fundamental, and specific, and the Project cannot be found consistent with the Countywide Plan absent compliance with the policy. *See, e.g.*, *Spring Valley Lake Assn. v. City of Victorville* (2016) 248 Cal.App.4th 91; *Endangered Habitats League v. County of Orange* (2005) 131 Cal.App.4th 777; *Families Unafraid to Uphold Rural El Dorado County v. Board of Supervisors* (1998) 62 Cal.App.4th 1332.

The MND does not discuss or analyze the Project's inconsistency with the Countywide Plan's LOS requirements.[7] CEQA Guidelines section 15064.3, which focuses on vehicle miles traveled (VMT), generally governs analysis of transportation impacts under CEQA. However, CEQA preserves the County's discretion to apply traffic congestion standards, including level of service (LOS) standards, pursuant to its "general plan policies, zoning codes, conditions of approval, thresholds, or any other planning requirements pursuant to the police power or any other authority." Pub. Resources Code § 21099(b)(4). The County may also adopt thresholds of significance for assessing transportation impacts "that are more protective of the environment." *Id.*, § 21099(e). 16

The transportation study attached to the MND concluded that the intersection of SR 18 and Green Valley Lake Road would operate at LOS F under cumulative "with project" conditions in both 2027 and 2040. MND App. J at 19, 21, 24, 26. The Traffic Signal Warrant Analysis in the transportation study also concluded that an additional traffic signal at the intersection was necessary to improve conditions to LOS D. *Id.* at 28. Accordingly, without mitigation, the Project would violate mandatory standards in the Countywide Plan.

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[5] San Bernardino County, Countywide Plan, County Policy Plan at 24 (Sept. 2002) (attached as Ex. W).
[6] San Bernardino County, Transportation Impact Study Guidelines (July 9, 2019) (attached as Ex. X).
[7] *See* MND at 122-23 (discussing land use issues). The MND also erroneously refers to the "SR-38 interchange" with Green Valley Lake Road. MND at 145. There is no such "interchange." Access to the Project site is via an unsignalized *intersection* between *SR 18* and Green Valley Lake Road. *See* MND App. J at 19; Ex. Y (screenshot of intersection from Google Maps Street View).

The MND, in contrast, states that the Project's transportation impacts will be less than significant and that no mitigation is required. MND at 143-46. Specifically, the MND claims that "a Traffic Signal Warrant Analysis was conducted and determined the Project would not result in traffic generation requiring additional traffic signals in the area." *Id*. at 144. 16

At the very least, the MND's assertion that no additional traffic signals would be required directly contradicts the transportation study and is fundamentally misleading. On the other hand, if the MND's assertion that no mitigation will be required is correct, the Project will squarely conflict with the Countywide Plan by contributing to LOS F conditions at the intersection of SR 18 and Green Valley Lake Road. Finally, to the extent that the Transportation Impact Study Guidelines establish compliance with General Plan LOS standards as a "threshold" for CEQA purposes, the MND fails to disclose a significant environmental impact under CEQA as well.

2. The MND's Analysis of Vehicle Miles Traveled (VMT) Is Unsupported by the Evidence.

The MND acknowledges that the Project would generate up to 225 daily trips on Sundays during peak season, but claims there will be only 100 "average" daily trips spread across all days of the week. MND 144. The MND concludes that the Project's VMT impacts are less than significant and that no mitigation is required, citing a VMT "screening threshold" in the County Transportation Impact Study Guidelines that the MND claims applies to projects with fewer than 110 "average daily trips." *Id*.

The MND mischaracterizes the Transportation Impact Study Guidelines, which do not support the MND's conclusions for several reasons.

First, the Transportation Impact Study Guidelines state that the 110-daily trip threshold applies to "Projects which serve the local community and have the potential to reduce VMT."[8] This Project is neither. It appears the Project will primarily serve campers and their families from Orange County and elsewhere. Moreover, to the extent it will generate additional long-range trips from locations like Orange County, it will increase rather than reduce VMT relative to existing conditions. 17

Second, the 110-daily trip threshold as described in the Transportation Impact Study Guidelines does not apply to this type of project. The 110-daily trip threshold "generally corresponds" to "typical" developments such as small groups of housing units,

[8] Transportation Impact Study Guidelines, Ex. X at 18.

small offices, and small industrial and warehousing uses.[9] The Project is not similar to these types of developments, which typically generate local trips and in some circumstances can reduce VMT relative to existing levels. Again, this Project will by design generate additional, longer trips from outside the local area.

Third, the basis for the 110-daily trip threshold is a CEQA exemption that does not apply to this Project. The 110-daily trip threshold in the Transportation Impact Study Guidelines is drawn from a Technical Advisory prepared by the former Office of Planning and Research (the "Technical Advisory").[10] According to the Technical Advisory, "[a]bsent substantial evidence that a project would generate a potentially significant level of VMT . . . projects that generate or attract fewer than 110 trips per day generally may be assumed to cause a less-than-significant impact."[11] In a footnote, the Technical Advisory explains that the 110-daily trip threshold is based on a CEQA exemption "for existing facilities, including additions to existing structures of up to 10,000 square feet, so long as the project is in an area where public infrastructure is available to allow for maximum planned development and the project is not in an environmentally sensitive area."[12] This Project would not be eligible for the CEQA exemption, which was designed to accommodate minor additions to existing residential, commercial, and industrial facilities in areas already served by adequate infrastructure. 17

Fourth, the 110-daily trip threshold does not explicitly apply to a project that generates *more* than 110 daily trips simply because the project's seven-day *average* is less than 110 trips. Neither the Transportation Impact Study Guidelines nor the Technical Advisory describe the 110-daily trip threshold as a weekly average; in contrast, both documents focus entirely on "daily" trips. The MND concedes that the Project will generate more than 110 "daily" trips on peak days. Accordingly, there is substantial evidence in the record indicating that the Project's VMT impacts will exceed the screening threshold in the Transportation Impact Study Guidelines.

Finally, the MND's reliance on the *number* of daily trips under the screening threshold also ignores the *length* of trips the Project will generate. VMT is the product of the number of trips and their length; it cannot be assessed by reference to one factor alone. The MND contains no information regarding the length of Project-generated trips. Nor does the MND clearly state which churches will be sending campers from which

[9] Id., Ex. X at 19.
[10] Office of Planning and Research, Technical Advisory on Evaluating Transportation Impacts in CEQA (Dec. 2018) (attached as Ex. Z).
[11] *Id*., Ex. Z at 12.
[12] *Id*., Ex. Z at 12, fn. 19 (citing CEQA Guidelines § 15301(e)(2)).

locations. Just by way of example, campers traveling from Costa Mesa, where Calvary Temple is located, will travel 80-90 miles each way. A screening threshold that does not account for actual local conditions, such as trip length, lacks a substantial evidentiary basis. *See Cleveland National Forest Foundation v. County of San Diego* (2025) 110 Cal.App.5th 948, 965–966 & fn. 16. The MND and its accompanying transportation study completely fail to account for trip length in assessing VMT. 17

For all of these reasons, the MND's conclusion that the Project will have less-than-significant VMT impacts based on the 110-daily trip screening threshold is not supported by substantial evidence. Indeed, substantial evidence in the MND itself shows the Project's VMT impacts will be significant.

IV. Request for Notice

Pursuant to Public Resources Code section 21092.2 and any other applicable law, please provide copies of any and all future notices related to this project by email to Shasta Fields (sfields@smwlaw.com), Kristi Bascom (kbascom@smwlaw.com), and Kevin Bundy (bundy@smwlaw.com).

V. Conclusion

The MND cannot lawfully support approval of the Project. Its conclusions regarding the significance of the Project's impacts are not supported by substantial evidence. Nor do the MND's proposed mitigation measures—many of which are incomplete, inadequately described, unlawfully deferred, and unsupported—justify a finding that the Project's impacts will be less than significant. On the contrary, substantial evidence demonstrates that the Project will have significant environmental impacts. The County must prepare an EIR in compliance with CEQA before further considering this Project. 18

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Kevin P. Bundy
Shasta Fields
Kristi Bascom, AICP

SHUTE, MIHALY & WEINBERGER LLP

O8 - Response to Save Our Forest Association

Kevin P. Bundy, Shute, Mihaly & Weinberger LLP
Shasta Fields, Shute, Mihaly & Weinberger LLP
Kristi Bascom, Shute, Mihaly & Weinberger LLP

O8-1 The comment is introductory in nature. The comment introduces the main area of concern that the IS/MND does not meet CEQA guidelines and applicable standards. No further response is warranted.

O8-2 The comment includes an argument that due to "fair argument" an EIR should be prepared in place of the IS/MND. The cited cases do not alter CEQA's guidelines: an MND is appropriate where substantial evidence shows that adopted mitigation will avoid or reduce impacts to a less-than-significant level. The cited cases and total comment reasoning do not provide any evidence that the IS/MND is inadequate or that impacts would be significant (see below responses). No revisions are warranted.

O8-3 The comment includes an argument that the established baseline in the IS/MND is insufficient. The CEQA baseline identified in the IS/MND properly reflects existing environmental conditions at the time analysis commenced, including Very High Fire Hazard Severity Zone designation. The IS/MND evaluates wildfire hazards and incorporates mitigation with vegetation removal and design features (such as undergrounded powerlines) responsive to the current risk environment. The comment is generalized and does not directly connect to the IS/MND. No revisions are warranted.

O8-4 The comment is introductory in nature. The comment introduces multiple arguments for the following comments and the larger impact of those comments. No further response is warranted.

O8-5 The comment includes an argument that biological resource impact identification and mitigation is inadequate. The comment generally takes the IS/MND and its conclusions out of context. The comment argues that MM BIO-1 and BIO-2 "defer mitigation". This argument calls for speculation that special-status wildlife are present on site, which contradicts the conclusions of **Appendix A1**, and the comment does not provide evidence that these special-status wildlife are occurring or have been occurring on site. The IS/MND acknowledges potential habitat and therefore requires pre-construction surveys by a qualified biologist. This conservative approach addresses seasonal detectability and ensures impacts remain less than significant. Development will be clustered near existing developed areas, which do not provide the same quality of habitat as development areas that provide adequate evidence that the likelihood of occurrence is low. Out of an abundance of caution, MM BIO-1 and BIO-2 will be implemented, which are consistent with CEQA guidelines. No revisions are warranted.

O8-6 The comment includes an argument that the IS/MND does not sufficiently analyze potential wildfire impacts. The IS/MND discloses the site's VHFHSZ context and incorporates mitigation measures that reduce wildfire vulnerability and ignition sources present on site. The comment

takes "human-related ignition factors" out of context; all human-related ignition sources are mitigated to reduce Impacts to less than significant. Furthermore, human-related ignition sources call for speculation of human behavior and are not adequate evidence of insufficient mitigation. The MND includes a Preliminary Fire Fuel Modification Plan (**Section 3, Errata** – Figure 7) and MM WF-2 and 3, which ensure firebreaks, undergrounded powerlines, and reduced flammable and fire-resistive vegetation are implemented in the Project. With these measures, incremental ignition risk is minimized to less than significant. No revisions are warranted.

O8-7 The comment includes an argument that the IS/MND inadequately analyzes general wildfire safety. As discussed in the IS/MND (**Section 4, Wildfire**) MM WF – 1, the Project would continually update and comply with a comprehensive evacuation plan. Additionally, all COA required by the lead agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on site occupancy prior to peak hazard conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis. External roadway management during incidents is under the purview of the Fire Authority and law enforcement. CEQA does not mandate scenario-specific evacuation procedures where adopted plans and agency-enforced standards ensure adequate life-safety. Impacts remain less than significant with mitigation. No revisions are warranted.

O8-8 The comment includes an argument that adequate analysis of fire hazards are not shown in the IS/MND. The comment calls for speculation about unknown future conditions and deviates from CEQA to ensure impacts relative to environmental baseline. No revisions are warranted.

O8-9 The comment includes an argument that the IS/MND fails to sufficiently analyze emergency procedures. The IS/MND requires compliance with access/egress standards, emergency-vehicle clearances, and the Fire Authority's jurisdiction. The Evacuation Plan is an operational document updated with occupancy phases. With agency approval and required performance standards, impacts are less than significant. The final Emergency Evacuation Plan will specify transportation resources, staging, and operational contingencies with phase-specific occupancy and Fire Authority requirements. This performance-based approach is consistent with CEQA and ensures less-than-significant impacts. No revisions are warranted.

O8-10 The comment includes concerns that wildfire related mitigation measures are not sufficient to reduce impacts to less than significant levels. The comment is opinionated in its conclusions and does not provide evidence that underlying analysis is incorrect. No revisions are required.

O8-11 The comment includes concerns that unidentified impacts related to water quality are present. Any impacts to the on-site jurisdictional areas will require a USACE Clean Water Act Section 404 Permit, RWQCB CWA Section 401 Water Quality Certification, and a CDFW Section 1602 Lake and Streambed Alteration Agreement prior to Project implementation. The comment does not provide evidence that meeting these guidelines would still produce a significant environmental impact.

O8-12 The comment includes concerns that runoff will contaminate Deep Creek. This area falls under the jurisdictional areas. Any impacts to the on-site jurisdictional areas will require a USACE Clean

Water Act Section 404 Permit, RWQCB CWA Section 401 Water Quality Certification, and a CDFW Section 1602 Lake and Streambed Alteration Agreement prior to Project implementation. The comment does not provide evidence that meeting these guidelines would still produce a significant environmental impact.

O8-13 The comment includes concern over hypothetical scenarios impacting water quality. The Project's adherence to building/fire codes, hazardous-materials rules, and post-event lead agency direction avoids significant project-level water-quality effects. No revisions are warranted.

O8-14 The comment includes an argument that availability of groundwater and agency-supplied water is not demonstrated. The Project Applicant has requested a technical study completed by Albert A. Webb Associates, included as **Appendix M: Hydraulic Evaluation**, and would be required to coordinate yearly with CLAWA to determine water supply availability through implementation of MM UTL-2. The MND includes an updated WSA (**Appendix B1: Revised Water Supply Assessment**), which provides a preferred strategy of utilizing on-site wells through Phase 3. After phase 3 the Applicant would prepare an annual water supplier expectations memorandum. Refer to Master Response – Water. No further response is required.

O8-15 The comment includes multiple concerns relating to wastewater management, infrastructure, and associated potential impacts. Wastewater infrastructure would be in accordance with revised MM UTL-1 and MM UTL-3; refer to **Section 3.0, Errata**. Refer to Master Response - Wastewater/Sewer.

O8-16 The comment includes concerns that level of service standards will not be met. Under CEQA, significance is assessed by vehicle miles traveled (VMT). Intersection LOS and potential operational improvements are addressed through County Public Works processes and conditions of approval to ensure plan consistency. The IS/MND's CEQA transportation conclusion remains valid; operational measures, if required by the County, can be implemented outside CEQA. No revisions are warranted.

O8-17 The comment includes concerns the VMT analysis is insufficient. The IS/MND applies County-adopted VMT guidelines to the Project. Bused arrivals/departures and on-site programming inherently limit VMT, and average daily trip generation meets screening criteria. No additional VMT analysis is warranted.

O8-18 The comment is conclusionary in nature. The comment includes a request for ongoing circulation. The County will include provided contacts in future distributions. The comment makes a closing statement which is insufficiently backed due to the lack of applicable evidence to the total comment's arguments (see above responses). No further response is warranted.

The comment includes additional support pages as exhibits; these pages can be found in Section 4 - MND Appendices.

O9 - Save our Forest Association, Inc.

Hugh A. Bialecki, President

From: Hugh Bialecki
To: Barragan, Elena
Cc: Steve Farrell; Chris Jones, GM; Chris Dumas GM
Subject: Camp Hume PROJ-2024-00046, 32355 Green Valley Lake Road : UPDATED REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD
Date: Monday, December 22, 2025 5:00:15 PM

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Good afternoon Elena,

Thank you for your role in working with Hume SoCal and facilitating the community meeting on Saturday, December 20, 2025. Given the large turnout of GVL residents, other local mountain residents, the RSWD GM Chris Jones and the APCWD GM Chris Dumas, it is clear that there is great interest in this proposed expansion of Camp Hume as well as major concerns about the likely significant impacts that would occur. 1

The ability of individuals and other consultants to study and make meaningful comments on the IS/MND to LUS Planning is severely compromised by the current deadline for public comments on 7 January 2026.
The Save Our Forest Association requests a further extension of the deadline for public comments and to allow for a reasonable analysis of the Kimley-Horn report until 7 March 2026, in fairness to the GVL community, our larger mountain community, and the local public agencies impacted by this expansion proposal. 2

Thank you for your consideration,
Hugh A. Bialecki, DMD
Pres., Save Our Forest Association, Inc.

O9 - Response to Save our Forest Association, Inc.

Hugh A. Bialecki, President

O9-1 This comment is introductory in nature. No further response is warranted.

O9-2 This comment requests an extended comment period to allow for further review of the Project. As such, the comment period was extended to January 16th, 2026.

O10 - Save our Forest Association, Inc.

Hugh A. Bialecki, President

Barragan, Elena

From: Hugh Bialecki <habialeckidmd@gmail.com>
Sent: Thursday, November 20, 2025 8:00 AM
To: Barragan, Elena
Cc: Rowe, Dawn; Bull, Robin; Sierra Club Mtns Group Excom
Subject: Camp Hume PROJ-2024-00046, 32355 Green Valley Lake Road : REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD

Follow Up Flag: Follow up
Flag Status: Flagged

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Greetings Elena,

The Save Our Forest Association Inc., (SOFA) was made aware of the subject proposed project on 15 November 2025, two days after the posting was made on the County Land Use Services Mountain Region website. The posting is extremely troublesome as those reading the NOA and NOI are directed to the Desert Region NOT the Mountain Region. Although SOFA has been engaged with County Land Use Services for over 30 years on essentially all Mountain Region postings, we did not receive any notice from the County referring us to the posting. In calling several permanent residents of Green Valley Lake asking if they had received any notice of the proposed project, the answer was uniformly NO, no notice was received. 1

I have read the Notice of Availability (NOA) and the Notice of Intent (NOI) to Adopt an Initial Study / Mitigated Negative Declaration. The project described is a massive increase in the existing campground, DOUBLING the acreage from 107-acres to approximately 252.1-acres while increasing camp facilities from 300 campers and staff to approximately 3000 campers, staff, and facility office staff, A 10 FOLD INCREASE. When attempting to read the Draft IS/MND the report DOES NOT LOAD in spite of waiting minutes to allow viewing. An effort was made on different digital devices to view the Draft IS/MND without success. How does Land Use Services expect citizens to access, read and comment on the project when key elements are unavailable ? I would urge you to promptly review the posting of all documents to insure that they are accessible.

This acute access problem is particularly troublesome given the brief comment period listed from 13 Nov 2025 to 13 December 2025; you may realize that the Thanksgiving Holiday is exactly two weeks after the posting date and further compromises Land Use Services from receiving public comments and puts citizens at a supreme DISADVANTAGE given the extensive holiday travel that occurs during this time. For this reason, the Save Our Forest Association, Inc., is REQUESTING A 60-DAY EXTENSION of the public comment period from 13 Nov 2025 until 13 February 2025. 2

The Environmental Review and Public Comment paragraph states : "The document meets the State requirements of the California Environmental Quality Act. Interested parties can view the Initial Study/Environmental Checklist and supporting documentation online at :
https://gcc02.safelinks.protection.outlook.com/?url=https%3A%2F%2Flus.sbcounty.gov%2Fplanning-home%2Fenvironmental%2Fdesert-region%2F&data=05%7C02%7Celena.barragan%40lus.sbcounty.gov%7Cc6acc21702544ad2f3e508de284de18d%7C31399e536a9349aa8caec929f9d4a91d%7C1%7C0%7C638992512183376100%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=J

1

YhklHEUTDcccbBFs4vVRu%2FRNQnTaMwgoUhDE6hw3XQ%3D&reserved=0 and at the following offices: ……". THIS INFORMATION IS INCORRECT as the project is located in the Mountain Region, not the Desert Region (where it does not appear). Citizens and organizations wishing to make public comments are misled by this information. I had to search the County Land Use Services website to locate the Camp Hume proposed project; other citizens wishing to make comments could be less fortunate in discovering the Camp Hume posting and give up trying. 2

While it may not be required, it is extremely troubling that Hume SoCal has made absolutely no effort to reach the residents of Green Valley Lake and conduct a public meeting(s) to explain the project to their neighbors and in particular how the obvious traffic impacts of adding an additional 2700 campers/staff/facility office staff will change their lives AND THEIR SAFETY in the event of any emergency requiring evacuation since Green Valley Lake Road has only one ingress and egress. Green Valley Lake has 300 residents living at the end of the approximately three mile long road; the Camp Hume proposed expansion project is located approximately 1.5 miles from the intersection of Green Valley Lake Road and Highway 18.

Thank you for your consideration in extending the public comment period for an additional 60 days to 13 February 2025 instead of 13 Dec 2025. 3

Sincerely,

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

O10 - Responses to Save our Forest Association, Inc.

Hugh A. Bialecki, President

O10-1 Initial noticing began on November 7th, 2025. And a 1,300-foot radius was utilized for mailing. The comment regarding the NOI and NOA being directed to the desert region and not the mountain region has been corrected, and the comment period has been extended. The remainder of this comment is conclusionary in nature and no further response is warranted.

O10-2 The comment is informatory in nature. The comment provides a complaint about issues accessing the IS/MND and a request to extend the comment period. The County was made aware of an issue accessing certain documents on the San Bernardino County website. The County addressed the problem and extended the public review period. All documents for the Project can be found on the San Bernardino County Land Use Services Website[1]. The Notice of Availability and Notice of Intent to adopt an IS/MND for the Hume SoCal Campground Expansion public review began 11/13/2025 and closed with an extended deadline on 01/16/2026. The comment does not provide evidence that the review period should have been further extended. Refer to Master Response – Public Hearing/Review.

O10-3 The comment is conclusionary in nature. No further response is warranted.

[1] https://lus.sbcounty.gov/planning-home/environmental/mountain-region/

O11 - Save our Forest Association, Inc.

Hugh Bialecki, President

7 January 2025

County of San Bernardino
Land Use Services Planning Department

Att: Senior Planner Elena Barragan
Sub: Hume SoCal Campground Expansion Project Draft Initial Study and Mitigated Negative Declaration (PROJ-2024-00046)

Since 1989, the Save Our Forest Association, Inc. (SOFA), has advocated for forest stewardship that aligns with the principles of biodiversity conservation, climate change mitigation, and protection of our natural resources in the San Bernardino Mountains. SOFA has worked with the US Forest Service, the State of CA, County of San Bernardino, local regulatory agencies and the public to shape environmental actions and land use decisions in our local mountains that impact our quality of life.

It is with both the sense of opportunity and regret that the Save Our Forest Association, Inc., submits these comments regarding the subject proposed expansion project. The opportunity lies in the ability to respond to the Hume SoCal proposal and the Kelsey-Horn report; the regret being that neither Hume SoCal or Kelsey-Horn seemed to really grasp the highly significant nature of the changes they are proposing to inflict upon the San Bernardino Mountain communities, and particularly Green Valley Lake, Arrowbear and Running Springs, should this project come to fruition in the draft form. 1

The four existing camps in the vicinity, Pali Mountain, Camp Pondo, Camp Cedar Crest and Camp Hume all seem to be meeting the Christian and secular camping demand and functioning in relative harmony with the surrounding communities of Running Springs, Arrowbear and Green Valley Lake. Capacity at the four camps is approximately 300-400 campers each. The combined total permanent residents of Running Springs, Arrowbear and Green Valley Lake is approximately 6179; build out of all five phases of this proposed project would increase the residents by 48% with accompanying significant impacts to traffic, water demand, wastewater treatment, wildlife habitat, forest esthetics, wildfire ignition risk and evacuation management, and quality of life for existing mountain community residents. The majority of these impacts have not been adequately addressed in the IS/MND to meet CEQA requirements and are detailed in our comments prepared by Shute, Mihaly and Weinberger, submitted separately from this letter. 2

The recent Line Fire, burning 43978 acres, which started on 5 September 2024, exemplifies the fragility of our mountain road network and how quickly roadways can be shut down from wildfire, landslides and flooding. CA Hwy 330, the primary evacuation route for the communities of Running Springs, Arrowbear and Green Valley Lake, was closed on 9 September with evacuation of Running Springs and Arrowbear ordered on 10 Sept. Evacuation orders for Green Valley Lake followed on 11 Sept. CA Hwy 330 was not completely repaired and fully open for five months, severely restraining all transportation in and out of these mountain communities. 3

Increasing Camp Hume size from 300 to 3000 will increase wildfire ignition risk, not addressed in the IS/MND, while straining the fire fighting resources provided by the Running Springs Water District (RSWD) and the Arrowbear Park County Water District (APCWD). These impacts are further discussed in comments from both RWSD and APCWD who, unfortunately, were not contacted as "responsible Districts" required under CEQA. Per the comments submitted by RSWD GM Chris Jones, "As the record currently stands, the District is not in a position to provide wastewater services to meet the forecasted Project demands as described in the MND." and "The Project, as proposed, would result in the need for the construction of new and/or expanded wastewater treatment facilities to accomodate the anticipated increase in sewage treatment needs." There has been no mention in the IS/MND about Applicant impact fees and taking responsibility for a highly significant change to the RSWD operational infrastructure. A comprehensive Environmental Impact Report (EIR) would necessarily address these impacts and include a financial plan to consider this proposed project. Additionally, some of the sewage treatment infrastructure is located on the San Bernardino National Forest under an agreement with the US Forest Service and the RSWD; there is no mention in the IS/MND about consultation with the US Forest Service to discuss the potential impacts to our national forest with significantly greater sewage demands produced by this proposed project. 4

The CAL FIRE comments of 5 January 2026 address the need for the Applicant to be in compliance with the California Forest Practice Rules, which also has not been addressed in the IS/MND. There is no mention of a Timber Harvest Plan and Timberland Conversion Permit to be submitted to the applicable CAL FIRE Review Team Office.

The formal comments by the Save Our Forest Association, Inc., have been submitted by our firm, Shute, Mihaly & Weinberger, LLP, on 7 January, 2026. The MND's proposed mitigation measures, many of which are incomplete, inadequately described, unlawfully deterred, and unsupported, do not justify a finding that the Project's impacts will be less than significant. Our conclusion is that the County may not approve the proposed Camp Hume expansion project without preparing an Environmental Impact Report under CEQA. 5

Sincerely,

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

O11 - Responses to Save our Forest Association, Inc.

Hugh Bialecki, President

O11-1 This comment is introductory in nature. No further response is warranted.

O11-2 The comment regarding existing capacities and populations is acknowledged. Each of the mentioned topics has been adequately addressed in the IS/MND. See Master Response – Additional Documentation.

O11-3 The comment regarding transportation and evacuation concerns has been acknowledged. Transportation would primarily occur by bus to reduce traffic impacts and would occur in the opposite direction of traffic flows. Evacuation concerns are addressed within Master Response – Wildfire.

O11-4 As mentioned in the IS/MND, development impact fees would be paid to accommodate all necessary infrastructure improvements to support the Project. See Master Response – Water and Master Response – Wastewater/Sewer.

O11-5 The comment is conclusionary in nature. See Master Response – Request for EIR regarding concerns about inadequacy of the IS/MND. No further response is warranted.

O12 - Save our Forest Association, Inc.

Hugh Bialecki, President

15 January 2026

County of San Bernardino
Land Use Services Planning Department

Att: Senior Planner Elena Barragan
Sub: Hume SoCal Campground Expansion Project Draft Initial Study and Mitigated Negative Declaration (PROJ-2024-00046)

Since 1989, the Save Our Forest Association, Inc. (SOFA), has advocated for forest stewardship that aligns with the principles of biodiversity conservation, climate change mitigation, and protection of our natural resources in the San Bernardino Mountains. SOFA has worked with the US Forest Service, the State of CA, County of San Bernardino, local regulatory agencies and the public to shape environmental actions and land use decisions in our local mountains that impact our quality of life.

It is with both the sense of opportunity and regret that the Save Our Forest Association, Inc., submits these comments regarding the subject proposed expansion project. The opportunity lies in the ability to respond to the Hume SoCal proposal and the Kelsey-Horn report; the regret being that neither Hume SoCal or Kelsey-Horn seemed to really grasp the highly significant nature of the changes they are proposing to inflict upon the San Bernardino Mountain communities, and particularly Green Valley Lake, Arrowbear and Running Springs, should this project come to fruition in the draft form. 1

The four existing camps in the vicinity, Pali Mountain, Camp Pondo, Camp Cedar Crest and Camp Hume all seem to be meeting the Christian and secular camping demand and functioning in relative harmony with the surrounding communities of Running Springs, Arrowbear and Green Valley Lake. Capacity at the four camps is approximately 300-400 campers each. The combined total permanent residents of Running Springs, Arrowbear and Green Valley Lake is approximately 6179; build out of all five phases of this proposed project would increase the residents by 48% with accompanying significant impacts to traffic, water demand, wastewater treatment, wildlife habitat, forest esthetics, wildfire ignition risk and evacuation management, and quality of life for existing mountain community residents. The majority of these impacts have not been adequately addressed in the IS/MND to meet CEQA requirements and are detailed in our comments prepared by Shute, Mihaly and Weinberger, submitted separately from this letter. 2

The recent Line Fire, burning 43978 acres, which started on 5 September 2024, exemplifies the fragility of our mountain road network and how quickly roadways can be shut down from wildfire, landslides and flooding. CA Hwy 330, the primary evacuation route for the communities of Running Springs, Arrowbear and Green Valley Lake, was closed on 9 September with evacuation of Running Springs and Arrowbear ordered on 10 Sept. Evacuation orders for Green Valley Lake followed on 11 Sept. CA Hwy 330 was not completely repaired and fully open for five months, severely restraining all transportation in and out of these mountain communities. 3

Increasing Camp Hume size from 300 to 3000 will increase wildfire ignition risk, not addressed in the IS/MND, while straining the fire fighting resources provided by the Running Springs Water District (RSWD) and the Arrowbear Park County Water District (APCWD). These impacts are further discussed in comments from both RWSD and APCWD who, unfortunately, were not contacted as "responsible Districts" required under CEQA. Per the comments submitted by RSWD GM Chris Jones, "As the record currently stands, the District is not in a position to provide wastewater services to meet the forecasted Project demands as described in the MND." and "The Project, as proposed, would result in the need for the construction of new and/or expanded wastewater treatment facilities to accomodate the anticipated increase in sewage treatment needs." There has been no mention in the IS/MND about Applicant impact fees and taking responsibility for a highly significant change to the RSWD operational infrastructure. A comprehensive Environmental Impact Report (EIR) would necessarily address these impacts and include a financial plan to consider this proposed project. Additionally, some of the sewage treatment infrastructure is located on the San Bernardino National Forest under an agreement with the US Forest Service and the RSWD; there is no mention in the IS/MND about consultation with the US Forest Service to discuss the potential impacts to our national forest with significantly greater sewage demands produced by this proposed project. 4

The CAL FIRE comments of 5 January 2026 address the need for the Applicant to be in compliance with the California Forest Practice Rules, which also has not been addressed in the IS/MND. There is no mention of a Timber Harvest Plan and Timberland Conversion Permit to be submitted to the applicable CAL FIRE Review Team Office.

The formal comments by the Save Our Forest Association, Inc., have been submitted by our firm, Shute, Mihaly & Weinberger, LLP, on 7 January, 2026. The MND's proposed mitigation measures, many of which are incomplete, inadequately described, unlawfully deterred, and unsupported, do not justify a finding that the Project's impacts will be less than significant. Our conclusion is that the County may not approve the proposed Camp Hume expansion project without preparing an Environmental Impact Report under CEQA. 5

Sincerely,

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

O12 - Responses to Save our Forest Association, Inc.

Hugh Bialecki, President

O12-1 This comment is introductory in nature. No further response is warranted.

O12-2 The comment regarding existing capacities and populations is acknowledged. Each of the mentioned topics has been adequately addressed in the IS/MND. See Master Response – Additional Documentation.

O12-3 The comment regarding transportation and evacuation concerns has been acknowledged. Transportation would primarily occur by bus to reduce traffic impacts and would occur in the opposite direction of traffic flows. Evacuation concerns are addressed within Master Response – Wildfire.

O12-4 As mentioned in the IS/MND, development impact fees would be paid to accommodate all necessary infrastructure improvements to support the Project. See Master Response – Water and Master Response – Wastewater/Sewer.

O12-5 The comment is conclusionary in nature. See Master Response – Request for EIR regarding concerns about inadequacy of the IS/MND. No further response is warranted.

O13 - Sierra Club, San Bernardino Mountains Group

Steven Farrell - Chair

Bolsinger, Grant

From:	Steven Farrell <mr_sqf@yahoo.com>
Sent:	Wednesday, November 26, 2025 5:29 PM
To:	Barragan, Elena
Cc:	Cozad, Claire; Bull, Robin; Sierra Club Mtns Group Excom; Figueroa, Miguel; Bustamonte, Thomas; Gonzales, Paul; Toomey, Paul; Feliciano, Michelle; Candelaria, Rachel; Hugh Bialecki
Subject:	Re: Camp Hume PROJ-2024-00046, 32355 Green Valley Lake Road : REQUEST FOR EXTENSION OF PUBLIC COMMENT PERIOD
Follow Up Flag:	Follow up
Flag Status:	Flagged

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

On behalf of the Sierra Club San Bernardino Mountains Group, I thank you for this additional time and effort for public outreach. We have many concerns about the project, but look forward to the additional time to learn and review about its scope and impacts to our local environment.

I also had encountered the download problem of the Water Supply Assessment and Sewer Feasibility Study, so am relieved they have been corrected.

As it happens, I subscribe to the County's Environmental notices for the Mountain Region, and since you are now expressing there is a difference in terms of notification expectations, I hope to learn more about why I was not notified of this project posting. 1

In the meantime, please do enjoy your Thanksgiving holiday!

Regards,

Steven Farrell
Chair, San Bernardino Mountains Group of the Sierra Club

O13 - Response to Sierra Club, San Bernardino Mountains Group

Steven Farrell - Chair

O13-1 The comment includes general correspondence with the Lead Agency, no further response is warranted.

O14 - Sierra Club, San Bernardino Mountains Group – San Gorgonio Chapter

Steven Farrell – Chair

SIERRA CLUB
SAN GORGONIO

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mountainsgroup@sangorgonio.sierraclub.org
www.sangorgonio.sierraclub.org/mountains

Comments on the Hume SoCal Campground Expansion Project / Camp Hume
Camp Hume Project No.: PROJ-2024-00046

TO: Elena Barragan, Senior Planner
County of San Bernardino, Planning Division
385 N. Arrowhead Ave.
San Bernardino, CA 92415-0187
Email: elena.barragan@lus.sbcounty.gov

On behalf of the Sierra Club San Gorgonio Chapter, San Bernardino Mountains Group, we submit this letter to express concern regarding the proposed expansion of the Hume SoCal Camp. Our concerns focus primarily on biological resources and the integrity of forested habitat at and surrounding the Project site, including impacts to special-status species such as the southern rubber boa. We are also concerned that the scale and location of this Project will intensify wildfire risk and evacuation hazards, and that analyses related to water supply, water quality, stormwater management, and wastewater services appear incomplete and unsupported. The available evidence indicates that a ten-fold expansion of seasonal occupancy would severely strain existing natural and infrastructural systems and create significant environmental impacts in a region already facing compounding pressures from drought, forest stress, erosion, and high wildfire hazard conditions.

Sierra Club Mission and Goals 1

The Sierra Club's mission is to explore, enjoy, and protect the wild places of the earth; to practice and promote responsible use of the earth's ecosystems and resources; and to educate and enlist humanity to protect and restore the quality of the natural and human environment. The San Bernardino Mountains Group works locally to conserve biodiversity, protect intact forest and watershed systems, and promote land stewardship that sustains wildlife, clean water, and resilient ecosystems—especially in mountain environments where small changes in land use can have outsized ecological consequences. The proposed Project would convert and intensify use of biologically valuable forested lands at a scale that risks fragmenting habitat, degrading sensitive microhabitats, increasing disturbance to wildlife, and placing additional stress on limited and vulnerable mountain water, stormwater, and wastewater systems. Importantly, it would do so in a setting where long-term ecological resilience is already compromised by drought, tree mortality, erosion, and wildfire.

Biological Resource Concerns

1) Loss and degradation of high-quality forest habitat
The Project site and surrounding lands include forested habitat that provides cover, moisture retention, woody debris, downed logs, rock features, and other structural components essential to wildlife. Large-scale expansion—through new buildings, roads, utilities, grading, lighting, noise, and year-over-year human presence—would convert intact habitat into a developed footprint and create a broader "disturbance zone," reducing ecological function well beyond the limits of direct grading.

In mountain forests, ecological integrity depends not only on acreage left undeveloped, but on habitat connectivity, undisturbed refugia, microclimatic stability (shade, moisture, temperature buffering), and intact geomorphology. Increased development intensity alters wind exposure, runoff patterns, soil stability, and moisture retention, which in turn degrades habitat quality over a larger area than construction limits alone suggest.

2) Impacts to special-status species, including the southern rubber boa
We are particularly concerned about impacts to the southern rubber boa and other sensitive wildlife that rely on stable, cool, and moist microhabitats found in forested systems. Species that spend much of their lives under logs, rocks, and leaf litter are especially vulnerable to:

- Vegetation removal and soil disturbance that eliminate cover objects and compact soils.
- Increased edge effects (heat, wind, drying) that reduce habitat suitability.
- Increased human presence leading to incidental harm, displacement, or mortality (including vehicle strikes and maintenance activities);
- Habitat fragmentation that limits movement and recolonization of suitable areas.

Scientific research and published literature clearly demonstrate that chronic noise and artificial nighttime lighting significantly alter wildlife behavior, movement patterns, predator-prey dynamics, and habitat use—particularly for cryptic, slow-moving, or disturbance-sensitive species. These impacts are not speculative; they are well documented and must be treated as a foreseeable consequence of high-intensity development adjacent to forest habitat.
We are also concerned that conclusions of "low likelihood" or "absence" based on limited surveys are unreliable for cryptic species whose detectability varies widely by season, weather, and survey timing. A precautionary approach is warranted when habitat features make presence plausible and when impacts involve habitat loss that cannot be quickly or effectively restored.

3) Indirect impacts from intensity of use, noise, and lighting
Even where some habitat remains ungraded, high-intensity use near sensitive habitat can produce significant indirect impacts, including:

- Nighttime lighting that disrupts wildlife movement and circadian behavior.
- Chronic noise that alters habitat suitability and species distribution.
- Increased trash and food attractants that modify predator dynamics.
- Proliferation of informal trails and unauthorized access into surrounding habitat.
- Ongoing maintenance and fuel-management activities that expand vegetation clearing over time.

2

The proposed increase from hundreds of occupants to thousands during peak periods represents a fundamental shift in land-use intensity—functionally transforming the site from a relatively low-impact facility into a high-density, urban-scale use embedded within forest habitat. 2

County General Plan Consistency: Buffer Zones and Resource Protection

The San Bernardino County General Plan explicitly recognizes the importance of buffer zones in protecting sensitive natural resources from incompatible development. The Plan defines a buffer zone as: "An area of land separating two distinct land uses that acts to soften or mitigate the effects of one land use on the other." (General Plan, p. XI-4)
Relevant General Plan policies include, but are not limited to:

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

Given the Project's proximity to forest habitat and sensitive biological resources, the absence of clearly defined, mapped, and enforceable buffer zones—particularly to address noise, lighting, human activity, and vegetation clearing—is inconsistent with these County policies. 3

Accuracy and Adequacy of Project Plans

To accurately evaluate impacts to biological resources, watershed functions, and geomorphology, all land alteration types and work limits must be clearly and accurately depicted on Project plans at appropriate scales. This includes grading, vegetation removal, utilities, drainage improvements, access routes, staging areas, and ongoing maintenance zones. Such plans must be prepared and certified by qualified professional entities. Without precise and professionally prepared plans, it is not possible to reliably assess impacts, enforce mitigation, or ensure compliance with County standards intended to protect natural resources. 4

Storm Damage, Erosion, and Watershed Protection

The County General Plan also includes development standards aimed at preventing storm damage and protecting natural systems from erosion, sedimentation, and hydrologic alteration. These standards are particularly relevant in steep, forested mountain environments. Applicable policies include:

- Goal S-4 – The County will minimize damage due to wind and water erosion where possible.
- CI 13.2 – Promote the implementation of low-impact design to minimize changes in hydrology and pollutant loading; protect slopes and channels; preserve riparian corridors and buffer zones; establish reasonable limits on vegetation clearing; and require structural and non-structural BMPs to mitigate increases in runoff and pollutant loads. 5

Expanded impervious surfaces, altered drainage patterns, vegetation removal, and soil disturbance increase the risk of erosion, sediment transport, and downstream habitat degradation—risks that are further amplified following wildfire events. These impacts directly affect biological resources and must be fully evaluated and mitigated. 5

Conservation Easements for Undeveloped Hume Lands

Given the ecological value of the broader property, conservation easements should be required for all portions of Hume-owned land not proposed for development. Permanently protecting remaining forested acreage would:

- Secure habitat connectivity and reduce incremental development pressure.
- Protect watersheds, riparian functions, and forest carbon storage. 6
- Maintain undisturbed refugia during wildfire and drought.
- Provide durable, enforceable conservation benefits that partially offset development impacts.

Any conservation strategy must be legally binding, clearly mapped, and accompanied by defined management objectives. Without permanent protection, the Project risks initiating cumulative habitat loss across the property.

Lack of Meaningful Mitigation Given Existing Forest Degradation

Biological concerns are compounded by the apparent lack of meaningful mitigation addressing existing forest degradation on Hume-owned lands. Where habitat conditions are already compromised, additional development pressure can push ecosystems beyond recovery thresholds.

Project materials do not adequately address:

- Restoration of degraded forest areas. 7
- Long-term avoidance of fragmentation and edge effects.
- Replacement of lost habitat functions such as cover, moisture retention, and downed wood structure.
- Measurable performance standards and long-term monitoring.

Mitigation must be specific, enforceable, and commensurate with the scale of impacts—particularly in sensitive mountain forest settings.

Related Resource Concerns That Intensify Biological Impacts

<u>Wildfire risk and evacuation constraints</u>

The Project's scale and location raise substantial wildfire and evacuation concerns. Increased occupancy and activity elevate ignition risk and complicated evacuation in a landscape with limited road capacity. Post-fire erosion and debris flows would further degrade habitat and water quality. 8

Water supply, water quality, and wastewater capacity
Expanded demand on water and wastewater systems poses ecological risks, particularly during drought and post-fire conditions. Infrastructure expansion and emergency responses can create additional habitat disturbance if not fully evaluated and constrained. 9

Requested Actions

To protect biological resources and align land-use decisions with long-term stewardship of the San Bernardino Mountains, we respectfully request that the County:

- Require a substantially more robust biological resources analysis addressing scale, intensity, indirect impacts, and special-status species.
- Require enforceable avoidance and minimization measures, including adequate buffer zones for noise, lighting, and human activity. 10
- Require meaningful mitigation that addresses both Project impacts and existing forest degradation, with measurable success criteria.
- Require permanent conservation easements on all Hume-owned lands not proposed for development.
- Ensure complete and realistic analyses of water supply, stormwater, water quality, and wastewater capacity under peak-demand conditions.

Conclusion

The San Bernardino Mountains Group is committed to protecting the biological integrity of the San Bernardino Mountains. As currently proposed, the Hume SoCal Camp expansion appears likely to cause substantial and lasting harm to forest habitat, sensitive species, and watershed systems, and is inconsistent with County General Plan policies requiring buffer zones, erosion prevention, and resource protection. We urge the County to require a substantially improved analysis, enforceable mitigation, and permanent conservation commitments ***before*** considering approval of this Project.

11

Thank you for the opportunity to provide these comments. Please include this letter in the administrative record for the Project.

Sincerely,

Steven Farrell - Chair
San Bernardino Mountains Group - San Gorgonio Chapter
Sierra Club

O14 - Responses to Sierra Club, San Bernardino Mountains Group – San Gorgonio Chapter

Steven Farrell - Chair

O14-1 The comment is introductory in nature. The comment includes an introduction to concerns. No further response is warranted.

O14-2 The comment is generally informatory in nature but also includes concerns regarding habitat loss, Southern Rubber Boa mitigation, and indirect impacts. The Project would have less than significant impacts regarding conversion of forest land to non-forest use. As mentioned in the IS/MND (**Section 4, Agriculture and Forestry Resources**), the Project site is subject to the to the County's Open Space (OS) Overlay, as defined in County Development Code Section 82.19.030 Special Requirements for Natural Resources. As such, development of the Project would be subject to the unique OS Overlay development criteria (Section 82.19.040 Development Criteria within Scenic Areas), which includes limitations on timber harvesting and the removal of native vegetation, especially timber. All potential Project impacts to habitat modifications would be less than significant in consideration of compliance with existing laws, ordinances, regulations and standards, and implementation of proposed mitigation measures. As with the Project, all cumulative development in the area would undergo environmental and design review on a Project-by-Project basis pursuant to CEQA, in order to evaluate potential impacts to biological resources and avoid or reduce any impacts. Noise and lighting operations for the Project would follow regulations outlined by the County.

Regarding the southern rubber boa, the Project would be constructed adjacent to previously disturbed areas, with development clustered on approximately 20 acres that do not provide as high of quality habitat for southern rubber boa as the undeveloped areas on the periphery of the Project site. To ensure the absence of southern rubber boa from site specific locations prior to grading activities, MM BIO-1 would be implemented. MM BIO-1 requires a pre-construction survey to reduce or avoid any impacts to special-status wildlife, including the southern rubber boa, before ground disturbance.

To address indirect impacts, CEQA evaluates impacts that are individually limited, but cumulatively considerable. Potential impacts have been thoroughly evaluated in accordance with CEQA and applicable guidelines and have been deemed to be neither individually significant nor cumulatively considerable in terms of any adverse effects upon the region, the local community, or its inhabitants.

Additionally, the Project site is subject to the to the County's Open Space (OS) Overlay, as defined in County Development Code Section 82.19.030 Special Requirements for Natural Resources. As such, development of the Project would be subject to the unique OS Overlay development criteria (Section 82.19.040 Development Criteria within Scenic Areas), which includes limitations on timber harvesting and the removal of native vegetation, especially timber.

Stationary noise sources of the Project would result in an incremental increase in non-transportation noise sources in the Project vicinity. However, operational noise caused by the Project would be less than significant in accordance with applicable guidelines. The noise would not exceed the County's threshold from stationary noise sources or the 60 dB threshold for sensitive receptors. The Project would comply with the County Light Trespass Ordinance, which was adopted in December 2021. The ordinance requires light fixtures to be designed with shielding to contain lighting spillage within 0.1 footcandle for the Mountain Region. Consistent with Section 83.07.060 (Glare and Outdoor Lighting – Mountain and Desert Region) of the County's Development Code, all exterior lighting used on the Project site would be fully shielded, with trespass minimized by direction lighting, fixture location, and height. Automated control systems, such as motion sensors and times would be implemented. The comment does not provide evidence that the IS/MND or its conclusions are inaccurate. Refer to Master Response – Noise.

The comment does not provide evidence that the IS/MND or its conclusions are inadequate.

O14-3 The comment includes concerns regarding buffer zones not being implemented. Figure 7 – Preliminary Fire Fuel Modification Plan shows space between developed and natural resource areas, vegetative thinning for fire break purposes, and access points. Furthermore, pre-construction clearance surveys would be conducted, and if special-status wildlife were present on site, a buffer zone could be used to avoid impacts. Because operational noise and lighting were both determined to be less than significant in the IS/MND through compliance with the County regulations the absence of buffer zones in not inconsistent with County resource protection policies. Refer to Master Response – Biological Resources/Wildlife.

O14-4 The comment is informatory in nature. The comment does not make any statement or connection to the Project itself. The MND includes Figure 7 – Preliminary Fire Fuel Modification Plan, which shows space between developed and natural resource areas as well as vegetative thinning for fire break purposes. The IS/MND **Appendix B2: Revised Sewer Feasibility Study** and **Appendix G: Preliminary Hydrology Report** contain appropriate plans developed by professional consultants, which illustrate grading in **Appendix G** (Appendix C – Reference Plans), drainage in **Appendix G** (Appendix E – Proposed Drainage Map and Calculations), and utilities in **Appendix B2** (Appendix A – Conveyance As-Builts), which are adequate for this level of Project review. No further response is warranted.

O14-5 The comment argues that the Project did not fully analyze how the expansion of impervious surfaces, vegetation removal, and soil disturbance would impact soil erosion, sediment transport, or downstream habitat degradation. The IS/MND concluded impacts on hydrology would be less than significant. The Project would obtain a National Pollutant Discharge Elimination System (NPDES) permit and implement a Stormwater Pollution Prevention Plan (SWPPP). The Project is not located within an MS4 boundary and is not legally required to implement operational BMP's. No further response is warranted.

O14-6 The comment includes concerns of future uses for undeveloped Hume property. The IS/MND is prepared in accordance with applicable guidelines for the development being proposed. The comment includes an opinion that proposes to require conservation easements. There are no local or state legal policies that require the Lead Agency to implement conservation easements. The comment does not provide evidence of CEQA guidelines that are not met for the development being proposed.

O14-7 The comment includes an opinion that proposed mitigation measures are not adequate. The IS/MND was prepared in accordance with applicable guidelines, and all mitigation measures relating to "forest degradation" are sufficient to reduce any potentially significant impacts to less than significant. The Project would be constructed adjacent to previously disturbed areas that do not provide high-quality habitat for sensitive wildlife species. **Appendix A1: Biological Resources Assessment** illustrates that no special-status biological resources were observed onsite (Appendix C – Potentially Occurring Special-Status Biological Resources). Based on the proposed project footprint, all of the onsite jurisdictional areas will be avoided. Project activities are not expected to significantly impact the capacity of Deep Creek to support wildlife movement. The Project site is not located within an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state Habitat Conservation Plan. Therefore, impacts to any local, regional, or state habitat conservation plans are not expected to occur from development of the proposed project and no additional mitigation is required. The comment does not provide evidence that specific CEQA guidelines are not being met with the associated mitigation measures.

O14-8 The comment includes concerns generally regarding transportation and emergency evacuation on local roads near the Project. The comment does not provide evidence that the IS/MND was inadequately prepared or that a revision is warranted. Impacts related to wildfire and transportation would be less than significant per CEQA guidelines. Refer to Master Responses – Transportation/Traffic, Wildfire and Biological Resources/Wildlife. No further response is warranted.

O14-9 The comment is informatory in nature. The comment does not make any statement or connection to the Project itself. The expanded demand was evaluated in the updated WSA (**Appendix B1: Revised Water Supply Assessment**) and the updated Sewer Feasibility Study (**Appendix B2: Revised Sewer Feasibility Study**). CLAWA's Abridged Water Shortage Contingency Plan (WSCP) defines shortage triggers, response actions, and potential restrictions for retail and wholesale customers should a connection be made. Table 8 – CLAWA Water Shortage Stages, Triggers, and Actions for Retail Customers in the updated WSA details 6 shortage levels and subsequent response actions in conjunction with the WSCP. Proposed infrastructure expansion is fully evaluated in the IS/MND through Sections Hydrology and Water Quality and Utilities and Service Systems. No further response is warranted.

O14-10 The comment makes multiple requests generally about biological resources, water and wastewater management, impact mitigation, and standards. All of the requests are accounted for

in the technical reports prepared for the IS/MND and therefore do not require revisions to the IS/MND. Refer to the above responses.

O14-11 The comment is conclusionary in nature. No further response is warranted.

O15 - Western Christian Schools

Kathy Scheenstra, Director of Community & Student Life
Brandon Doolittle, Principal, Western Christian High School
John Attwood, Head of Schools

From: Kathy Scheenstra
To: Barragan, Elena
Subject: So. Cal Hume Expansion
Date: Tuesday, January 6, 2026 4:11:31 PM
Attachments: image001.png
Hume Lake Letter of Recommendation.pdf
Attwood Hume Letter 1-26.pdf

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hello Elena,

I hope this email finds you well. I am reaching out to you on behalf of Western Christian. We have attached letters of support from our Superintendent and our Principal for the expansion of Hume Christian camps.

We have had a long-standing relationship with Hume both in Central California and in Southern California. The camp has been invaluable to our students and remains the number 1 greatest memory of their school experience for them. With the expansion of the Southern California camp, we would be able to take our high school (600 students) to a local camp instead of spending $120,000 on transportation taking them to Central California. 1

We appreciate the opportunity to share with you and thank you in advance for taking our thoughts into consideration.

Should you need anything further, please reach out anytime.

All the best,

WESTERN
CHRISTIAN SCHOOLS

Kathy Scheenstra
Director of Community & Student Life

kscheenstra@westernchristian.org
(909) 291-4717
www.westernchristian.org
100 W. Ninth Street Upland, CA 91786
Preschool thru 12th Grade/District Office

1

WESTERN CHRISTIAN SCHOOLS
A Legacy of Excellence Since 1920

January 5, 2026

To Whom It May Concern,

I am writing to express my strong support for the proposed long-term expansion of Hume SoCal and its continued development as a camp and ministry resource serving schools throughout Southern California.

I have been with our school for approximately twenty-five years, and for the past fifteen years we have partnered with Hume Lake for our student retreats. Prior to attending Hume, our school participated in several Southern California–based retreat programs. However, as our school has grown and our retreat structure has become more intentional and comprehensive, there are currently no Southern California retreats capable of serving us with the level of professionalism, organization, responsiveness, and responsible management that Hume has consistently provided.

Each year at graduation, when students are asked to reflect on the most formative moments of their high school experience, the Hume Lake retreat is consistently identified as the most impactful. This sustained influence speaks directly to the quality of Hume's programming, leadership, and care for students.

At the same time, traveling to Central California presents a significant time, transportation, and financial burden for Southern California schools. Despite these challenges, our school and many others in the region have continued to make considerable sacrifices to attend Hume Lake because no comparable alternative exists locally. As word of the impact of Hume has spread, additional schools have followed suit, even with the inconvenience of distance, because of the life-changing value of the experience. 1

For these reasons, we highly anticipate the proposed expansion of Hume SoCal, with the hope that Southern California may one day be home to a premier camp facility that is operated with excellence and able to accommodate larger schools while maintaining the high standards Hume is known for.

Based on our long-standing relationship with Hume and our direct experience with its leadership and operations, I am confident that Hume SoCal is well equipped to expand responsibly. I respectfully encourage approval of their expansion plans.

Thank you for your time and consideration.

Sincerely,

Brandon Doolittle
Principal
Western Christian High School

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www.westernchristian.org

WESTERN CHRISTIAN SCHOOLS
A Legacy of Excellence Since 1920

To Whom It May Concern,

I write on behalf of Western Christian High School in support of the proposed long-term expansion of Hume SoCal. As a faith-based educational institution, our school is deeply committed to developing students who demonstrate strong character, spiritual maturity, leadership capacity, and a sense of responsibility toward others. Experiences that meaningfully contribute to these outcomes are not supplemental to our mission; they are essential.

For more than a decade, Hume Lake has played a significant role in helping our school advance these aims. Their retreat programming aligns closely with our educational philosophy by providing students with structured opportunities for reflection, community building, and personal growth in an environment that is both well managed and purpose driven. The impact of these experiences extends well beyond the retreat itself and is evident in student engagement, spiritual formation, and the shared culture of our campus.

As our school has grown and our vision for student formation has become more intentional, the limitations of existing Southern California retreat options have become increasingly clear. Few, if any, facilities in the region are equipped to serve larger schools at scale while maintaining high standards of safety, organization, and program quality. Hume's approach to leadership, planning, and student care distinguishes them in this regard. 1

The expansion of Hume SoCal represents an important opportunity to meet a real and growing need among schools throughout Southern California. A well-run, purpose-built camp facility would allow schools like ours to pursue meaningful student outcomes without the substantial logistical and financial challenges associated with long-distance travel. More importantly, it would strengthen the capacity of schools to deliver formative experiences that align with their mission, vision, and values.

Based on our long-standing relationship with Hume and our confidence in their leadership and operational integrity, I believe Hume SoCal is well positioned to expand responsibly and serve as a trusted partner to schools for years to come. I respectfully support approval of their expansion plans and appreciate your careful consideration of this proposal.

Sincerely,

John Attwood
Head of Schools
Western Christian Schools

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O15 - Western Christian Schools

Kathy Scheenstra, Director of Community & Student Life
Brandon Doolittle, Principal, Western Christian High School
John Attwood, Head of Schools

O15-1 The comment(s) includes general support for the Project. The commenter's support for the Project has been acknowledged. No further response is warranted.

2.6 General Public

G1 - Albert Espinoza

From: ALBERT ESPINOZA
To: Barragan, Elena
Subject: Hume expansion
Date: Tuesday, January 6, 2026 5:01:21 AM

[You don't often get email from amespinoza@mac.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Good Morning Elena,

My name is Albert and my family own a cabin in GVL and we think the Hume expansion is too massive to be supported buy the single lane road that is existing. There doesn't seem any way to increase the size of that road and for sure would be impossible to service the area if or when a fire happens again. We're also concerned about the wildlife impact to the area. 1

Please don't allow Hume to expand.

Thank you

Albert Espinoza 2

G1 - Responses to Albert Espinoza

G1-1 The comment includes emergency access concerns especially regarding increased occupancy. As discussed in the IS/MND (**Section 4, Wildfire**), MM WF – 1, the Project would continually update and comply with a comprehensive evacuation plan. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on-site occupancy prior to peak hazard conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis. Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity.

G1-2 The comment includes general concerns about wildlife impact. As mentioned in the IS/MND (**Section 4, Biological Resources**), MMs BIO-1 and -2 require pre-construction clearance surveys and compliance with the Migratory Bird Treaty Act and California Fish and Game Code, which would be implemented to reduce any impact to less than significant levels. Refer to Master Response – Biological Resources/Wildlife.

G2 - Alex Davis

From: Alex Davis
To: Barragan, Elena
Subject: Comment re Hume Camp Expansion
Date: Tuesday, January 6, 2026 4:55:35 PM

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Ms. Barragan,

I am writing to express my objection to the proposed Hume Camp expansion off Green Valley Lake Road. I join in the concerns previously submitted by other folks, and in particular I am concerned about the increased infrastructure demand and wildfire risks. 1

I also wonder about the impact on endangered species, such as the American bald eagle and other protected raptors both nearby and within sound distances of heavy construction activity. I also do not believe that there has been adequate environmental or endangered species studies done. 2

Thank you,

Alex Davis

G2 - Responses to Alex Davis

G2-1 The comment includes concerns generally regarding infrastructure and wildfire. The comment does not provide evidence that the IS/MND was inadequately prepared or that a revision is warranted. Impacts related to wildfire would be less than significant per CEQA guidelines. Refer to Master Responses – Wildfire. As mentioned in the IS/MND all impacts would be mitigated to less than significant levels.

G2-2 The comment has concerns about wildlife in the area and the adequacy of the wildlife studies done. All impacts (**Section 4, Biological Resources**) would be reduced to less than significant levels with MMs BIO-1 and -2, which implement, for certain species, protection measures during preconstruction. All environmental studies were conducted within CEQA guidelines; the comment does not provide evidence that the IS/MND or its appendices were inadequately prepared.

G3 - Alexis Dickson

From: Alexis Dickson
To: Barragan, Elena
Subject: In regard to the GVL Hume project
Date: Monday, January 5, 2026 2:55:13 PM

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1/5/2026

Elena Barragan

County of San Bernardino Planning Division

385 N. Arrowhead Ave. First Floor

San Bernardino, CA 92415-0187

Dear Ms. Barragan,

I am excited to share my enthusiastic support for the proposed expansion of Hume Camp (PROJ-2024-00046). This project represents an incredible opportunity to strengthen our community, promote sustainable growth, and create lasting benefits for Green Valley Lake.

The Hume Camp master plan reflects thoughtful planning that balances the needs of guests with the preservation of our beautiful natural environment. Its commitment to sustainable practices and environmentally conscious design aligns perfectly with our county's vision for responsible development. By incorporating green spaces and protecting local wildlife habitats, this project ensures that our treasured landscapes remain vibrant for generations to come.

As a resident of Green Valley Lake, I deeply value the project's emphasis on maintaining open spaces and enhancing the natural beauty of our area. This approach fosters a sense of stewardship and pride within our community, encouraging us all to protect and appreciate the resources that make our home so special.

1

Beyond environmental benefits, Hume's mission to invest in youth is truly inspiring. Through programs that build leadership, teamwork, and character, Hume equips young people with the skills and values they need to thrive. Supporting this expansion means supporting the next generation of leaders who will shape a brighter future for all of us.

Additionally, the economic impact of this project cannot be overstated. By creating jobs and attracting visitors, the expansion will energize local businesses and spark new opportunities for growth. This positive ripple effect will strengthen our mountain community and contribute to its long-term vitality.

I encourage you to consider the many benefits this project brings—not only for today but for the future of Green Valley Lake and San Bernardino County. Thank you for your time and dedication to our community. I hope you will join us in supporting this vision for a sustainable, thriving, and connected future.

Sincerely,

Alexis Dickson

Resident, Green Valley Lake

1
Cont

G3 - Response to Alexis Dickson

G3-1 The comment includes general support for the Project. The commenter's support for the Project has been acknowledged. No further response is warranted.

G4 - Amanda Lopez

From: Amanda Lopez
To: Barragan, Elena
Subject: Hume SoCal Project
Date: Tuesday, December 16, 2025 8:25:46 AM

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Hello Elena, I'm Amanda Lopez a resident of Green Valley Lake. I know a lot of people are voicing their concerns about the Hume SoCal Project. So I wanted to voice my support about how I think GVL would benefit from this project. It'll create jobs and business for the small business that are currently open and possibly create more. I don't think it'll ruin the small town vibes but help create more of a community. 1
Thank you for taking the time to read this.
Amanda Lopez

G4 - Response to Amanda Lopez

G4-1 The comment includes general support for the Project. The commenter's support for the Project has been acknowledged. No further response is warranted.

G5 - Amanda Lopez

From: Amanda Lopez
To: Barragan, Elena
Subject: Hume SoCal
Date: Friday, January 2, 2026 8:13:00 AM

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January 2, 2026

Elena Barragan
County of San Bernardino Planning Division
385 Arrowhead Ave. First Floor
San Bernardino,Ca 92415-0187

Dear Ms. Barragan,
My name is Amanda Lopez; I want to express my strong support for the purposed expansion of the Hume Camp (PROJ-2024-00046). I believe it will help our mountain community by bringing more jobs and opportunities. The Hume Camp master plan envisions a well-integrated camp that prioritizes not only the needs of its guests but also the preservation of our natural environment. By focusing on sustainable practices, this development aligns with our county's goals. The incorporation of green spaces and environmentally conscious design will protect open spaces in our community while protecting our local wildlife habitats. By Hume maintaining this land it ensures open untouched land that will be here for generations to come, so people and wildlife can experience it. A big part of Hume is working with youth by providing programs that will help shape them for a better life now and in the future. By engaging young people in enriching activities, mentorship, team building, and outdoor education, Hume plays a pivotal role in developing confident, responsible, and community-minded individuals. This is helping equip better leaders with skills, values, and a better vision to address challenges to come. To do this it requires an investment in our youth. Furthermore, this project is poised to bringing jobs and creating new businesses and encouraging innovation. I plead with you to consider the long-term benefits that the Hume Camp plan brings to the mountain community. The thoughtful planning and vision behind this project will contribute significantly to our county's growth and sustainability, while also nurturing the next generation of citizen leaders. 1

Thank you for your attention to this matter. I hope you will support this project and help pave the way
for a brighter, more sustainable future for the Green Valley Lake community.

Sincerely,
Amanda Lopez
Resident of Green Valley Lake

G5 - Response to Amanda Lopez

G5-1 The comment includes general support for the Project. The commenter's support for the Project has been acknowledged. No further response is warranted.

G6 - Amy Cook

From: amy cook
To: Barragan, Elena
Cc: Board Meeting Comments; Supervisor Cook; Supervisor Armendarez; Supervisor Hagman; Supervisor Baca; Supervisor Rowe; assemblymember.lackey@assembly.ca.gov; senator.ochoa-bogh@senate.ca.gov
Subject: San Bernardino County: Hume SoCal Campground Extension: PROJ-2024-00046
Date: Tuesday, December 30, 2025 7:26:10 PM

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Elena, County and State Representative and Senator,

I am writing in strong opposition to the Hume So Cal Campground extension. I am one of about 300 full time residents of Green Valley Lake. **We are a small town with one road in and out,** this expansion threatens our lives if there were a fire and we had to evacuate (as the proposed camp expansion from 300 to 3000 campers would cause extreme bus gridlock). 1

We are in a similar situation as the tragedy in Paradise. In 2007 the Slide fire burnt 10% of our town (100 of 1,000 properties). Just last year we had to evacuate for 11 days due to the Line Fire; thankfully we had enough notice to get out safely.

Additionally, there are major concerns about lowering water tables and we do not have the sewage system which could handle 3,000 additional showers, toilets, etc. 2

Please do not approve this expansion. Please demand an Environmental Impact Report from Hume. 3

Respectfully,
Amy Cook

G6 - Responses to Amy Cook

G6-1 The comment includes emergency access concerns during wildfire. As discussed in the IS/MND (**Section 4, Wildfire**) MM WF – 1, the Project would continually update and comply with a comprehensive evacuation plan. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on-site occupancy prior to peak hazard conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis. Additionally, following receipt of public comments and agency input, and additional technical coordination with the proposed water supplier, the Project's maximum occupancy for the five phases has been reduced from approximately 3,000 to approximately 2,400 occupants. This refinement lowers the Project's future on site population and associated impacts, including wildfire-related considerations, compared to the scenario evaluated in the Draft IS/MND. Refer to **Section 3, Errata**.

Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity.

G6-2 The comment brings concerns regarding groundwater sustainability and sewer issues. The Water and Sewer Master Plan (**Appendix B3**) provides detailed analysis of Projected demand and strategy to service the Project. The Water and Sewer Master Plan and Water Supply Assessment conclude through **Section 4, Hydrology and Water Quality** that on-site wells provide adequate supply to meet domestic demand, with CLAWA available as the main water source. This is based on currently available reporting from water agencies/providers. The WSA evaluates groundwater production capacity, historical pumping data, and projected demand under full buildout conditions. The analysis incorporates conservative assumptions for peak occupancy and seasonal demand.

All Project wastewater facilities would be constructed and operated in accordance with the applicable guidelines and regulations of CLAWA, RSWD, the County, and the IS/MND mitigation measures. The commenter has not provided substantial evidence contradicting the Water and

Sewer Master Plan (**Appendix B3**), the Revised Water Supply Assessment (**Appendix B1**), or the Revised Sewer Feasibility Study (**Appendix B2**).

Any agreements or infrastructure improvements would be in accordance with MM UTL-1 and MM UTL-3. Refer to Master Response – Wastewater/Sewer.

G6-3 The comment is conclusionary in nature. The comment provides an opinion of opposition and includes a request for an Environmental Impact Report. The comment does not include substantial evidence demonstrating that the IS/MND is inadequate or that the preparation of an EIR is required. No further response is warranted.

G7 - Andrea Pereira

From: Andrea Pereira
To: Supervisor Armendarez; supervisor.cook@bos.sbounty.gov; Board Meeting Comments; Barragan, Elena; Supervisor Hagman; Supervisor Baca; Supervisor Rowe; assemblymember.lackey@assembly.ca.gov; senator.ochoa-bough@senate.ca.gov
Subject: Camp Hume Proposed Expansion Questions
Date: Monday, January 5, 2026 9:48:26 PM

You don't often get email from andrea.pereira111@gmail.com. Learn why this is important

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Good Evening,

My name is Andrea Pereira and I have lived full time in Green Valley Lake with my husband and 2 children for just over 5 years now. I'm writing because I have some concerns and questions regarding the proposed expansion at Camp Hume which is located on Green Valley Lake Road.

I want to thank you in advance for reading through my comments and concerns; and for taking the thoughts and expertise of the general public into consideration regarding their proposal.

I was present at the community forum that Camp Hume hosted mid-December and listened to their presentation and the comments from the community. 1

I have a few general questions regarding county codes and will then get into the specific questions I have for the expansion proposal specifically.

Right off, I will say that I only read through the traffic study and the evacuation/emergency preparedness plan. I saw there were several other studies linked online, however I chose to focus my energy on the two I read and leave the other studies for other community members who had personal experience with those areas.

General Concerns

- What are the specific county requirements regarding population and entrances/exits to neighborhoods?
  - GVL is populated by roughly 300 full time residents, in addition to the tourists and vacationers. Specifically, I'm curious if there are requirements regarding how many ways in and out of an area are needed based on population. 2
- Would Running Springs be required to develop more roads if there were only one way in and out based on their current population?

Specific Concerns and Questions

- During the presentation the Hume representative mentioned wanting to serve the local community. 3
  - Can you please elaborate on how they plan to do this as specifics were not mentioned.
  - When a community member asked about allowing local underprivileged kids to

attend the camp, we were told there are camp scholarships to apply for. 3 Cont

- The representative eventually answered when prompted (several times) that the camp would only be at capacity during 7-8 weeks in the summer, which is prime fire season.
    - When pressed about this, he would not elaborate on how many campers would be in attendance the remainder of the year.
    - I specifically asked how it would be financially feasible for the camp to operate if only at capacity for less than 2 months out of the year. The answer was general and basically said there are outdoor education and winter camps in the off-season. However there was no answer as to how many campers we could reasonably expect.
    - I followed up asking what the breakeven point is for the expansion and how many campers are needed annually to make it feasible. The representative answered that he did not have the answer to that question.
    - I find this hard to believe as there's no reasonable way this proposal would have gotten this far without those calculations. It's basic business 101 to do a feasibility study before a business plan. If the breakeven point is not achievable, the proposal dies there and no further resources are used to keep exploring. 4
- As a follow up to the above question about breakeven, if the camp is only at capacity 7-8 weeks in the summer, how will that affect the jobs this expansion creates?
    - Will these jobs be seasonal? And if so, how does that help local workers in the long term?
- The presentation listed economic growth.
    - Can you please expound on that? What economic growth can be expected? WIll the contractors hired for the expansion be local from the mountain communities? Will the vendors needed to supply the camp once the expansion phases are complete be local vendors? Will the camp staff and campers have the opportunity to spend money at the local businesses in Green Valley Lake, Arrowbear or Running SPrings?
- The presentation listed "wildfire improvements".
    - Can you please detail those out? The representatives didn't explain what the wildfire improvements would be.
- The representative noted that they operate a camp of similar size in Northern CA and it has been fine regarding evacuations and impact on the surrounding communities.
    - Has anyone at the county looked up the location of the existing Hume camp? I did and the local "town" is listed at an appx population of 100 people. My guess is these folks are largely connected to the camp itself as either staff or family of staff. The reason I believe that is because there appears to be no additional towns anywhere near the camp off the highways the camp is between.
    - This is important to note because if indeed there are no other towns nearby, then there are little to no concerns with a camp evacuation during an emergency causing the roads to be impassable by other residents. In Green Valley Lake, if there is an evacuation order the increased capacity will likely cause heavy traffic on the singular road into and out of town. If the camp were on a secluded road away for other residents, then there would be little to no impact to other communities. 5
    - In addition, the representative mentioned they have their own fire and emergency personnel at the northern CA location, however would not move to do that at this location.
- The presentation noted that a wildfire would "potentially have an impact" on transportation. 6

Please elaborate on this. I'm curious how evacuating even 1000 campers during a wildfire would only "potentially" impact local traffic. The traffic study noted that campers would be 50 to a bus, so with those calculations that would be 20 busses to evacuate 1000 campers. Those busses would be on the roads when residents are being either warned or ordered to evacuate and thus would be on the roads during a time when the roads are already congested. How can the county and Hume ensure that these drivers will be safe and courteous during such a stressful time? 6 Cont

- The presentation noted water and sewer as being adequate, however there were little details beyond that.
  - Is water and sewer adequate as the infrastructure currently stands?
  - What infrastructure additions and improvements need to be made to accommodate the increase in campers?
  - If water runs low during drought seasons, what local district will be requested to supply water to fill the gap, and has that local district agreed to be the backup supplier? 7
  - The water study apparently didn't take into consideration the impact on existing communities and residents. I know this because the representative from the company that did the studies said himself that they only looked at the camp and potential increase, and that they did not look at the impact on surrounding areas.
- A local GVL resident has been posting on the local facebook pages that the camps here and Hume in general pay fees to the Running Springs Water District.
  - I'm curious how this relates to safe evacuation procedures, maintenance of the water table, has minimal impact on traffic conditions, or protects the local wildlife. Is there something I missed as to how the fees to the water district mitigate the potential negative impact locally? 8
- The traffic study that Hume had done specifically states under the evacuation order section that they will wait until the threat to life is 1-2 hours away.
  - I asked him how the camp could ensure a safe and smooth evacuation procedure for both the campers and the locals if they intend to wait that long. He was unable to answer me.
  - The plan also noted that the church groups attending the camps are responsible for their transportation. How will this work? Will the groups have the option of keeping the buses on the property in case of emergency so there's no lag time waiting for the buses to have to evacuate the campers?
  - What if it takes longer than desired to secure buses on short notice to evacuate the campers?
  - The study was not specific on the plan to evacuate the campers smoothly and that is concerning. Is there a possibility of calling parents to come get their kids? If so, that would be a mess having so many scared parents who are not familiar with the roads coming up the hill during an emergency. 9
  - The residents are owed a reasonable evacuation plan. Obviously not everything can be predicted in an emergency, however proper planning can alleviate many potential dangerous outcomes. If Hwy 38 is closed (as it is much of the year), then the buses will have to go down the 330 and 18 through Crestline, which will potentially cause congestion for locals who are also evacuating.
- As you know, there is only one way in and out of GVL, and I can't imagine there's a realistic possibility of building another one. Even if another entrance was developed, if it connected to hwy 18 near Arrowbear, that wouldn't help the traffic congestion through Running Springs and down the 330 anyway.

The traffic study noted that at capacity, there would be 50 buses in and out every Saturday and Sunday with 50 campers each. That's 100 trips daily, and it's not as if those trips would be evenly split between all 24 hours in a day. They'd likely be in blocks somewhere between 9am-5pm, clogging up the one road even more. It's rough getting in and out at the 18/GVL intersection as it is currently with all the tourist traffic to and from Big Bear. If that increase is eventually approved, the residents of GVL will basically have to either hunker down at home all weekend, or hunker down elsewhere just to avoid being stuck for hours at a time. What about the people that have work or school? Is it reasonable to ask them to leave 1-2 hours early every weekend day just to go 10-ish miles to another location on the mountain, or to do business down the hill? That's not even considering the bus traffic during the week that was also noted in the traffic study. 9 Cont

- The single lane road was a concern when looking at homes and we ultimately decided that the amount of traffic was negligible and generally wouldn't interfere with needing to leave in a timely manner. This expansion could have a very real negative impact on that.

- I'm also concerned about the buses during the winter.
  - I have rarely seen a bus using tire chains, even when required. The bus drivers are from down the hill and don't seem well versed in driving techniques. Within the last month there was a bus traveling down the 330 that rode their brakes so much the brakes caught fire, then the bus tipped to its side. It's a miracle nobody was killed.
  - Personally, I have been almost crushed against a large rock-face on GVL road as a bus was leaving and I was coming home. The bus was in my lane as we were both coming around the corner in opposite directions and I pulled my car as far to the right as I could while the bus just got closer, to the point where I was only an inch from being pushed into the rock face. The driver didn't slow down, or attempt to check and see if I was actually hit or not. 10
  - The buses regularly get stuck in the snow and block the roads.
  - Is it possible to have a requirement built into the bus contracts for every time there is an incident including a stuck bus or accidents due to no chains that the driver and company would both be charged a hefty fine? I don't believe these companies will take the safety and chain control seriously because it's not something they deal with regularly and they're not inconvenienced when there is an incident. Chains are required for a reason. How can we ensure the bus companies will follow the requirements in order to keep everyone as safe as possible?

I realize that was long and apologize if anything was unclear. There were a lot of thoughts and concerns floating around in my head and I did my best to get them out cleanly.

In general, I'm not necessarily opposed to the expansion. The desired level of the increase concerns me of course, but if the camp has a well designed plan in place to mitigate as much risk as possible, then I really don't see an issue. At the end of the day, I need to know that my family will be safe in the event of a fire and evacuation, and that the quality of life we bought into when we purchased our home here will be relatively the same. 11

oI urge you to require Hume to do a full Environmental Impact Report and look closely at all the potential impacts this expansion will have. If they can complete that report and show the impact will be negligible, then they will have my blessing to move forward. I believe it is

prudent for the county of San Bernardino to require Hume to really look at all the ways this could be both good and bad for the local area. If the county fails to require the full report, It is my belief that the county will be complicit in the event of an emergency.

Thank you again for your time and attention to this important matter. Your dedication to our community is very much appreciated. 11 Cont

Blessings,

Andrea Pereira
541-829-3974

G7 - Responses to Andrea Pereira

G7-1 The comment is introductory in nature. The comment provides a general introduction, and background for the following comment. No further response is warranted.

G7-2 The comment includes questions regarding access to regional areas. The IS/MND evaluates emergency access, requires compliance with County Fire Department standards, and includes mitigation measure WF-1. MM WF-1 ensures that a continually updated evacuation plan and working guide is implemented by Hume SoCal, and is to be based on CAL FIRE's "Ready, Set, Go!" model. The Plan would be reviewed by Land Use Services for review and approval, upon completion of construction activities for each Phase. The mitigation measure also ensures Hume SoCal will work with local fire agencies and hold annual safety and evacuation preparedness meetings. Existing roadway conditions and emergency access requirements were considered in the analysis and found to have a less than significant impact with mitigation. No revisions to the IS/MND are warranted.

Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity.

G7-3 The comment includes questions about the benefits to the local community. CEQA does not require analysis of social or programmatic benefits. The IS/MND addresses environmental impacts only. No revisions are warranted.

G7-4 The comment includes questions regarding economic feasibility of the Project. CEQA does not require evaluation of financial feasibility or business planning. The IS/MND addresses environmental impacts only. No revisions are warranted.

G7-5 The comment asks for specifics on wildfire improvements and comparison to similar projects. The IS/MND includes mitigation measures requiring compliance with construction measures, defensible space, and preparation of an Emergency Evacuation Plan. These measures constitute

wildfire risk reduction. Additionally, the MND includes a Preliminary Fire Fuel Modification Plan (Figure 7 – Preliminary Fire Fuel Modification Plan), which shows the locations of proposed fire hydrants and fire fuel modification zones surrounding existing and proposed development. Comparisons to other locations do not alter CEQA conclusions. No revisions are warranted.

G7-6 The comment provides concerns related to wildfire safety especially in regards to transportation and evacuation. As discussed in the IS/MND (**Section 4, Wildfire**), MM WF – 1, the Project would continually update and comply with a comprehensive evacuation plan. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on site occupancy prior to peak hazard conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis. As evaluated in the IS/MND (**Section 4, Transportation**), the Project would not modify existing roadways, and Project related traffic would not create a significant hazard or adversely affect emergency access.

Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity.

G7-7 The comment brings concerns regarding groundwater sustainability and sewer issues. The Water and Sewer Master Plan (**Appendix B3**) provides detailed analysis of projected demand and strategy to service the Project. The Water and Sewer Master Plan and Water Supply Assessment conclude through **Section 4, Hydrology and Water Quality** that on-site wells provide adequate supply to meet domestic demand, with CLAWA available as the main water source. This is based on currently available reporting from water agencies/providers. The WSA evaluates groundwater production capacity, historical pumping data, and Projected demand under full buildout conditions. The analysis incorporates conservative assumptions for peak occupancy and seasonal demand.

All Project wastewater facilities would be constructed and operated in accordance with the applicable guidelines and regulations of CLAWA, RSWD, the County, and the IS/MND mitigation measures. The commenter has not provided substantial evidence contradicting the Water and Sewer Master Plan (**Appendix B3**), the Revised Water Supply Assessment (**Appendix B1**), or the Revised Sewer Feasibility Study (**Appendix B2**).

Any agreements or infrastructure improvements would be in accordance with MM UTL-1 and MM UTL-3. Refer to Master Response – Wastewater/Sewer.

G7-8 The comment includes questions about utility fees with Running Springs Water District (RSWD). The Project proposes to utilize an on-site Wastewater Treatment Plant, subject to applicable approval. RSWD is an alternative service provider identified for the Project. The Project will pay fees to RSWD for sewer service, if applicable. Sewer service does not directly mitigate fire evacuation, traffic conditions, groundwater impacts, or biological resources. Those factors are addressed in the IS/MND and found to have less than significant impacts, with mitigation incorporated to avoid negative local impacts. Refer to Master Response – Wastewater/Sewer.

G7-9 The comment includes concerns regarding additional traffic and emergency evacuation. The Traffic Impact Analysis (**Appendix J**) concludes the Project would add approximately 100 daily Project trips, peaking to approximately 225 on Sundays, of additional traffic, and is not enough to have significant impacts or trigger signal warrants; therefore, no significant congestion impact is anticipated, and no signal is warranted. Seasonal weather/road conditions are addressed by existing County Road maintenance operations; CEQA does not impose contractual fines on bus operators. The Project does not modify roadway geometry and would not result in inadequate emergency access.

Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity.

G7-10 The comment includes concerns regarding buses on local roads and winter conditions such as regulations of bus driver behavior. CEQA addresses environmental impacts and does not regulate contractual terms or enforcement of traffic safety laws. The IS/MND requires compliance with transportation regulations and impacts were found to be less than significant. No revisions are warranted.

G7-11 The comment is conclusionary in nature. The comment includes closing remarks and a request for an Environmental Impact Report. Under CEQA, the Lead Agency (San Bernardino County) determines the appropriate document. The IS/MND demonstrates that potentially significant impacts are reduced to less than significant with mitigation, and the comment does not present substantial evidence requiring an EIR. Therefore, no EIR is warranted based on the IS/MND's conclusions and mitigation measures.

G8 - Angelique Womack

From: Angelique Womack
To: Barragan, Elena
Subject: Hume Camp Expansion in SB Mountains
Date: Sunday, January 4, 2026 11:30:03 AM

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Ms Barragan,

I am writing to express my extreme disapproval of the proposed expansion of Hume Camp in the San Bernardino Mountains. To expand the camp by 10 fold is irresponsible, ludicrous, and greedy. 1

In case you don't know, Hume Camp lies in between Highway 18 and Green Valley Lake. Highway 18 is, in this area, a two lane highway that's already overburdened on holidays and snow days as it is one of the main ways to get to Big Bear. Green Valley Lake Road is the only way in and out of Green Valley Lake. When there's an evacuation, and there often is, it is the only way to get out. If there's a major fire do you really think adding another 3000 people to the evacuation on a two-lane winding road is going to do anything but put people in harm's way? It's really the height of irresponsibility to even consider this proposal in regard to citizens of Green Valley Lake, the attendees at all the camps on that road and the firefighters and police who will be tasked with protecting the people. Can you even imagine how many buses it would take to evacuate 3000 plus camp attendees? More often than not, the bus drivers have little or no experience driving mountain roads. It's a nightmare scenario waiting to happen. Remember what happened in Paradise? The tragedy of Paradise was inadequate evacuation routes. We only have one. 2

I have read the reports on the Land Use Services web site but I noticed that these reports were prepared "for" Hume. Has the County done their own reports? 3

The "Emergency Plan and Procedures" (Appendix K) submitted by Hume as part of the proposal only explains their internal plans and does not address the impact of evacuating 3,000 plus people on Green Valley Lake Road at the same time as evacuating the town of Green Valley Lake as well as the populations of the other camps in that road. 4

There is no upside to this proposed expansion except to the Hume Corporation. They will increase their possible income 10 fold, but as they are a nonprofit it will add little if anything to the coffers of San Bernardino County or the State of California but it will cost the County and the State plenty. Instead it will add burdens to our first responders and our infrastructure and utilities, make living in Green Valley Lake more dangerous, and it will disrupt the way of life we moved here to live. 5

Thank you for your attention to this matter,
Angelique Womack
PO Box 8171
Green Valley Lake CA 92341
(909) 965-6476

womackbookkeeping@gmail.com

G8 - Responses to Angelique Womack

G8-1 The comment is introductory in nature. The comment includes a statement of disapproval of the Project. No further response is warranted.

G8-2 The comment provides concerns related to local transportation, especially in regard to wildfire and evacuation. As discussed in the IS/MND (**Section 4, Wildfire**), MM WF – 1, the Project would continually update and comply with a comprehensive evacuation plan. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on site occupancy prior to peak hazard conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis. As evaluated in the IS/MND (**Section 4, Transportation**), the Project would not modify existing roadways, and Project related traffic would not create a significant hazard or adversely affect emergency access. The Project relies on existing County-maintained roadways that are managed under established snow-removal, storm-response, and road-maintenance programs. Additionally, following receipt of public comments and agency input, and additional technical coordination with the proposed water supplier, the Project's maximum occupancy for the five phases has been reduced from approximately 3,000 to approximately 2,400 occupants. This refinement lowers the Project's future on site population and associated impacts, including wildfire-related considerations, compared to the scenario evaluated in the Draft IS/MND. Therefore, transportation and wildfire impacts remain less than significant. Refer to **Section 3, Errata**.

Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity.

G8-3 The comment includes a question about reports funded by the Lead Agency. The reports were prepared in accordance with CEQA. Under CEQA, the Lead Agency (San Bernardino County) must exercise independent judgment and analysis over environmental documents, regardless of who funds consultant work. Lead agencies are responsible for preparing, circulating, and adopting an

IS/MND, and for ensuring the final document reflects their independent judgment. CEQA guidance also clarifies that payment by an applicant does not undermine independent review so long as the consultant is under contract to, and directed by, the Lead Agency. No change to the IS/MND is required.

G8-4 The comment includes concerns about the impact of evacuating additional occupants in the regional area. Roadway performance is addressed in the **Appendix J: Traffic Impact Analysis**, which studies existing street systems, peak operations, and emergency access. The Project introduces less than 110 average daily trips. Therefore, transportation impacts are less than significant and within San Bernardino County guidelines.

G8-5 The comment is conclusionary in nature. The comment states an opinion about the Project overall. The comment does not present substantial evidence that the IS/MND is inadequate, no further response is warranted.

G9 - Ann K. Zald

From: Ann Zald
To: Barragan, Elena
Subject: Proposed HUME Expansion
Date: Sunday, January 4, 2026 1:04:01 PM

[You don't often get email from annzald@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Hello Ms. Barragan,

I am writing to express my concerns about the reckless proposal to expand Hume. There are grave concerns about infrastructure and safety that cannot be ignored. 1

There is only one paved way in and out of Green Valley Lake. Thus we have an inadequate road to support evacuations for all who live on along the road where Hume is located and the residents of Green Valley Lake. In the event of a wildfire, we could see catastrophic destruction and even more concerning, loss of life. Do we really want to see the loss of life that was seen in Paradise, California come to the San Bernardino mountains? I think not, and this proposal recklessly disregards that very real potential. 2

It is wonderful to see residents and visitors enjoy our local mountains, but the location of Hume doesn't serve to support additional visitors in a manner that is safe for those visitors or current residents. Thus, it would be completely irresponsible to allow the level of development proposed along Green Valley Lake Road. 3

Sincerely,
Ann K. Zald
310-365-4925
33322 Falling Leaf Dr
Green Valley Lake CA 92341

G9 - Responses to Ann K. Zald

G9-1 The comment is introductory in nature. The comment states an opinion about the Project. No further response is warranted.

G9-2 The comment provides concerns related to local transportation, especially in regard to wildfire and evacuation. As discussed in the IS/MND (**Section 4, Wildfire**) MM WF – 1, the Project would continually update and comply with a comprehensive evacuation plan. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on site occupancy prior to peak hazard conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis. As evaluated in the IS/MND (**Section 4, Transportation**), the Project would not modify existing roadways, and Project related traffic would not create a significant hazard or adversely affect emergency access and average daily trips would not exceed 110. Therefore, consistent with San Bernardino County guidelines, impacts related to transportation and wildfire would be less than significant with mitigation incorporated.

Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity.

G9-3 The comment is conclusionary in nature. The comment provides closing remarks and overall opinions of the Project. The comment does not provide evidence that the IS/MND is inadequate, no further response is warranted.

G10 - Avery Wilhite-Medina

From: avery wilhite
To: Barragan, Elena
Subject: Hume Project (PROJ-2024-00046)
Date: Friday, January 2, 2026 10:57:38 AM

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Dear Ms. Barragan,

I'm writing as a former employee for Hume Lake Christian Camps – SoCal, and 25 year member of the mountain community to share my personal support for the proposed expansion project (PROJ-2024-00046). Hume has been part of this mountain community for many years, and they care deeply about stewarding both the land and the relationships that make this area so special.
Their hope with this master plan is to thoughtfully grow in a way that honors the natural beauty of Green Valley Lake while allowing them to continue serving youth and families well. Protecting open space, caring for the environment, and being mindful of wildlife are priorities for Hume, and they shape how they plan and operate every part of the site.
At the heart of Hume's mission is investing in young people. Through their programs, students and young adults are given space to grow in character, leadership, and a desire to serve others. The proposed improvements help to continue this work safely and sustainably, ensuring that future generations can have the same meaningful experiences so many have had here before. 1
Hume also recognizes the importance of being a positive presence in the local community. Their ongoing operations create jobs and bring visitors who support nearby businesses, helping contribute to the vitality of the mountain area. Hume wants to be good neighbors and long-term partners who care about the health and future of this community.
Thank you for the time and care you give to reviewing projects like this. I truly appreciate your consideration and support as we seek to move forward in a way that benefits both Hume SoCal and the greater Green Valley Lake community.

Sincerely,
Avery Wilhite-Medina
Hume Employee 2020-2025
Green Valley Lake Resident

G10 - Response to Avery Wilhite-Medina

G10-1 The comment includes general support for the Project. The commenter's support for the Project has been acknowledged. No further response is warranted.

G11 - Barbara Basham

From: Barbara Basham
To: Barragan, Elena
Cc: Barbara Basham; Barbara Basham
Subject: Hume SoCal Campground Extension (Project No. PROJ-2024-00046)
Date: Monday, January 12, 2026 9:24:32 AM

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San Bernardino County Land Use Services Department

Planning Division

Attention: Elena Barragan

Re: Hume SoCal Campground Extension (Project No. PROJ-2024-00046)

Good morning,

I am a property owner in the Green Valley Lake community submitting these comments regarding the Initial Study / Mitigated Negative Declaration (IS/MND) prepared for the proposed Hume SoCal Campground Extension.

The proposed project represents an extraordinary intensification of land use in a constrained mountain environment, increasing the developed area to approximately 252 acres and expanding occupancy from roughly 300 individuals to approximately 3,000 campers and staff. This tenfold increase in population constitutes a significant change in land use intensity with potentially significant environmental impacts. 1

Based on the project's scale, location, and operational intensity, the use of an IS/MND is legally inadequate under the California Environmental Quality Act (CEQA). Substantial evidence supports a fair argument that the project may result in significant impacts requiring preparation of a full Environmental Impact Report (EIR).

Areas of concern include, but are not limited to:

• Long-term water supply reliability in a water-constrained mountain community

• Wildfire evacuation feasibility, emergency access, and public safety

• Traffic impacts and roadway capacity on Green Valley Lake Road during peak arrival and departure periods

• Impacts to biological resources, wildlife movement, forest health, and watershed stability

• Cumulative impacts and improper segmentation associated with phased development

Green Valley Lake is a high fire-risk area with limited ingress and egress, constrained infrastructure, and sensitive environmental resources. A development of this magnitude introduces risks that cannot be mitigated to less-than-significant levels through project conditions alone.

Additionally, the project description references implementation over five phases. CEQA requires that the entire project be evaluated as a whole. Phased approval without a comprehensive EIR constitutes improper piecemealing and obscures the full scope of environmental impacts. 1

For these reasons, I respectfully request that San Bernardino County require preparation of a full Environmental Impact Report prior to any consideration of project approval.

Sincerely, Barbara

Barbara Basham – 33230 Wild Rose Dr – Green Valley Lake, CA92341

Cell – 512-426-9196

Please confirm delivery

G11 - Responses to Barbara Basham

G11-1 The comment includes a concern that due to "fair argument" an EIR should be prepared in place of the IS/MND. The areas of concern do not alter CEQA's guidelines: an MND is appropriate where substantial evidence shows that adopted mitigation will avoid or reduce impacts to a less-than-significant level. Under CEQA, an EIR is required only where there is substantial evidence that the Project may cause a significant environmental effect after application of mitigation.

Following receipt of public comments and agency input and additional coordination with the Project's proposed water supplier, the maximum occupancy has been reduced from approximately 3,000 to 2,400 occupants. This reduction lowers impacts compared to the worst-case scenario analyzed in the IS/MND.

The MND includes an updated WSA (**Appendix B1: Revised Water Supply Assessment**) that provides a strategy moving forward to have on-site groundwater wells serve the Project through phase 3. After phase 3, the Applicant would prepare an annual water supplier expectations memorandum. The updated WSA also analyzes normal, dry, and multiple dry years with a 20-year planning horizon. Refer to Master Response – Water.

Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus, the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b), and impacts would be considered less than significant. Emergency evacuation was analyzed in the IS/MND (**Section 4, Wildfire**) and finds impacts to be less than significant with MM WF-1, which ensures a comprehensive evacuation plan is utilized and would comply with all COA provided by fire jurisdictions. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on-site occupancy prior to peak hazards conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis. Refer to Master Response – Transportation/Traffic, Emergency Evacuation.

The Project would impact natural areas with the implementation of the Project; however, a large portion of the Project site would remain in its natural condition. Additionally, the Biological Resources Assessment, which is further described in the Biological Resources Section of the IS/MND, has determined that less than significant impacts would occur with implementation of mitigation measures (MM) BIO – 1 and -2 which require pre-construction clearance surveys and compliance with the Migratory Bird Treaty Act and California Fish and Game Code. Refer to Master Response – Biological Resources/Wildlife.

The entirety of proposed future expansions for the Hume SoCal Campground have been analyzed in the IS/MND. No segmentation of analysis for the Project has occurred. The IS/MND provides substantial evidence that the adopted mitigation measures will reduce all potentially significant

impacts to less than significant levels. Accordingly, preparation of an EIR is not warranted, and no revisions to the IS/MND are warranted.

G12 - Beverly Bernice Voelkelt

Ms. Elena Barragan, Senior Planner
County of San Bernardino
Land Use Services Department, Planning Division
385 N. Arrowhead Avenue, 1st Floor
San Bernardino, CA 92415-0187
elena.barragan@lus.sbcounty.gov

January 14, 2026

Comments on the Initial Study/Mitigated Negative Declaration for the Hume SoCal Campground Expansion Project (PROJ-2024-00046/SCH No. 2025110453)

Dear Ms. Barragan,

The following public comment is respectfully provided regarding the November 2025 Initial Study/Mitigated Negative Declaration (IS/MND) and supporting documents for the Hume SoCal Campground Expansion Project (Project) prepared for Hume Lake Christian Camps (Applicant). 1

As someone with 15 years of experience in wildfire risk mitigation, I would like to address the potential risks of wildfire on said project. I worked for the Arrowhead Communities Fire Safe Council, where I developed the acclaimed Area Risk Mitigation program that proved successful during the 2008 Grass Valley Fire. I also worked for the Mountain Area Safety Task Force (MAST) and for Cal Fire as a wildfire code inspector.

The Hume SoCal Campground Expansion is in a High Fire Hazard Severity Zone, as defined by Cal Fire. What makes the location especially vulnerable is its position on a steep slope with a southern aspect. This southern aspect accelerates the drying of vegetation because it faces the sun already early in the morning.

What compounds the risk for this location is that access is limited to one road. That is all traffic going to and from the location must use this road. The road itself is narrow. This poses real challenges for large vehicles like fire engines and buses. 2

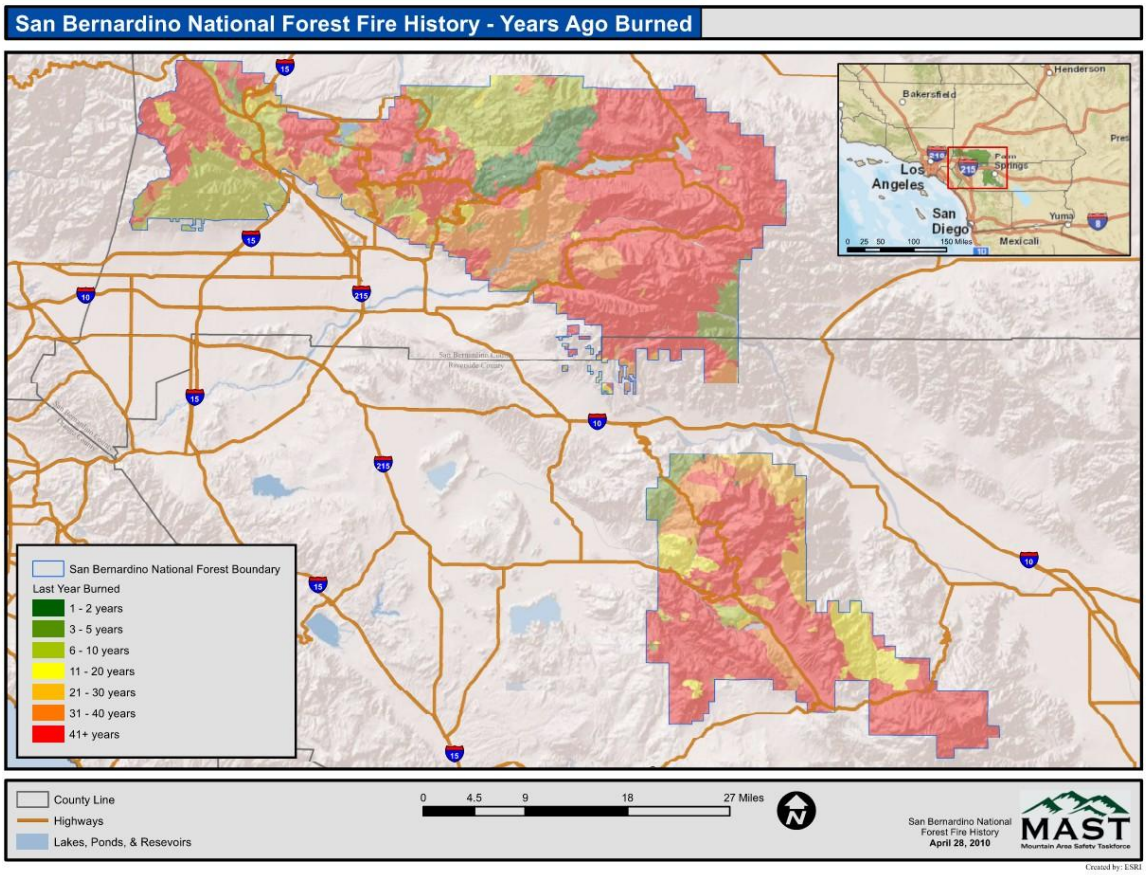
We know from historical observations that the Front Country, the southern slope of the San Bernardino Mountains, is especially vulnerable to wildfire ignition. Almost all the large fires that resulted in significant property losses and fatalities originated on this south side. Please also see

the attached pdf-Map from April 2010 by MAST. Since the time the map was created, several additional large wildfires occurred.

It is my recommendation that the campground expansion needs to take wildfire into account and, at least, provide a detailed plan to mitigate the significant risk of wildfire impact. That plan should be evaluated by wildfire risk assessment experts for viability and its chances of being successfully implemented. 2

Sincerely,

Beverly Bernice Voelkelt


San Bernardino National Forest Fire History - Years Ago Burned
San Bernardino National Forest Boundary
Last Year Burned
1 - 2 years
3 - 5 years
6 - 10 years
11 - 20 years
21 - 30 years
31 - 40 years
41+ years
County Line
Highways
Lakes, Ponds, & Resevoirs
0 4.5 9 18 27 Miles
San Bernardino National Forest Fire History
April 28, 2010
MAST
Mountain Area Safety Taskforce
Created by: ESRI
Bakersfield
Henderson
Los Angeles
San Diego
Palm Springs
Yuma
Mexicali

G12 - Responses to Beverly Bernice Voelkelt

G12-1 The comment is introductory in nature. No further response is warranted.

G12-2 The comment includes an inquiry related to wildfire mitigation. As mentioned in the IS/MND and accompanying documents, all impacts related to wildfire would be less than significant. Refer to Master Response – Wildfire. No further response is warranted.

G13 - Bob Mull

From: Robert Mull
To: Barragan, Elena
Subject: Hume SoCal Expansion Advocacy
Date: Friday, January 16, 2026 10:21:08 AM

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Good morning Elena

My name is Bob Mull and I am writing as an advocate for the expansion of Hume SoCal (HSC).

I have been associated with Christian Camping for most of my life, starting with attendance in adult ministry conferences in the early 1980's at Forest Home and then in the 90's at Calvary Chapel Christian Camp in Green Valley Lake. Furthermore we attended camps in Big Bear and Thousand Pines with our children in the 90's and early 2000's. Our advocacy and commitment to the camping experience culminated when we moved to the campus of Hume Lake Christian Camp's (HLCC) in the Sequoia National Forest in August 2001 to volunteer in the Christian camping experience. We learned a long time ago the value and important benefits of youth/ families and churches being exposed to and experiencing mountain camping and a distraction free environment. The positive values and benefits are borne out the successes and long history of the many camping opportunities found across the San Bernardino mountain range and beyond. 1

HLCC has been a premier camp, hosting well over one million camping youth and adults since 1946 - 80 years of camping experience. I joined HLCC as a full time employee upon retiring from the fire department in 2014 and stepped down as Site Director of Hume SoCal in August 2024. We still call Hume Lake our home. In addition to my association with HLCC, I am a retired firefighter. Starting my career with the Crest Forest Fire District in Crestline Ca. in 1976, and finished with the Los County Fire Department in 2014. I am a founding member of the Hume Lake Volunteer Fire Department (2002) retiring in 2024. Finally, I am a Rim of the World High School graduate (1977), and continue to have fond memories of my early life experiences living in the San Bernardino mountains.

My advocacy for this expansion is based on several criteria:

First, the HLCC's is a well established, industry leading camp, respected by many industry leaders, providing a high quality - faith based camping experience - in education, life skills, and leadership development, community engagement, safe and wholesome outdoor recreation, team building and developing healthy interpersonal relationships within church youth groups and youth pastors. Our generational relationships with churches from California, Arizona, Oregon, Washington, Nevada, and Montana along with newer developing relationships enhance lifelong friendship, untold lifelong memories and family/ community cohesion and is a testament to our passion for camping ministry. 2

Second, HSC is perfectly situated on a well established, albeit underdeveloped, existing campus in an area of many additional successful camps. Being established minimizes the negative impact on the local community of Green Valley Lake and with the expansion provides enhance employment opportunities throughout the community. Challenges to this ambitious expansion is minimized by the phasing of the project, and the many years to address concerns as each phase takes shape.

Finally, HLCC has a passion for reaching youth and adults for Christ through the camping experience. We have long ago forged deep rooted relationships with families, and local churches, including several in the Green Valley Lake/ Lake Arrowhead area. We desire to continue to impact the local community in positive ways.

Thank you for your time,

Blessings Bob

Fire Chief Retired and current President of the Board of the Hume Lake Fire and Rescue Department.
Battalion Chief Retired - Los Angeles County Fire Department

2

G13 - Responses to Bob Mull

G13-1 This comment is introductory in nature. No further response is warranted.

G13-2 CEQA does not treat economic or social effects as significant environmental impacts unless they result in an environmental impact. The IS/MND evaluates environmental effects. No new environmental effects are presented that were not addressed in the IS/MND. No revisions are necessary.

G14 - Brad and Karen Theriault

From: Karen Theriault
To: Barragan, Elena
Subject: No to Hume project
Date: Wednesday, January 7, 2026 4:02:03 PM

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To Elena Barragan,
I guess this is the last day to submit our protest. We're 35 year residents of Green Valley Lake. There's one 2 lane, slow, curvy road going in and out. Our house burned down because of the forest fire in 2007, "The Slide Fire," which mainly was because the fire personnel were called off fighting the fire because of their safety- one road in and one road out. They didn't want the firefighters to be trapped. So, when we evacuated, there were a lot of people leaving town in a escape-mode caravan., frantic because our town was burning. I can't imagine if there's another fire and evacuations, how that traffic would be with all of the population from Hume's proposed housing. It would be dangerous and perhaps deadly. 1

The issue of our water supply, waste treatment, noise, lighting, increased traffic on Green Valley Lake Road, the biological impacts on wildlife and vegetation all makes it clear that this is a REALLY BAD IDEA. 2

In conclusion, we strongly oppose this proposal and hope it fails.

Sincerely,

Brad and Karen Theriault, long time residents.

G14 - Responses to Brad and Karen Theriault

G14-1 The comment includes concerns generally regarding transportation and emergency evacuation on local roads near the Project. The comment does not provide evidence that the IS/MND was inadequately prepared or that a revision is warranted. Impacts related to wildfire and transportation would be less than significant per CEQA guidelines. Refer to Master Responses – Transportation/Traffic, Wildfire.

G14-2 The comment includes a summary of all impacts addressed in the IS/MND and makes a conclusion about these impacts. As mentioned in the IS/MND all impacts with mitigation would be less than significant, refer to Master Responses in Section 2.2 of this document. The comment does not provide evidence of the conclusion mentioned and therefore no changes to the IS/MND are warranted.

G15 - Brenna Cunningham

From: Brenna C
To: Barragan, Elena
Subject: Opposition to Camp Hume Expansion in SB
Date: Thursday, December 11, 2025 8:54:37 AM

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To the San Bernardino County Planning Commission,

Thank you for the opportunity to provide public comment regarding the proposed expansion of Camp Hume to accommodate up to 3,000 people including campers and staff. I am a new resident of Green Valley Lake.

I am writing to express serious concerns about the safety implications of this expansion and the impact it will have on our community.

1

This is not a small increase in visitor numbers. Tripling the camp population changes the safety profile of the entire region. Green Valley Lake is located at the end of a single access road. That same road is the only way into and out of Camp Hume. In the event of a wildfire or similar emergency, every person in Green Valley Lake and every person at the camp would be forced onto the same narrow mountain road with no alternate exit.

Safety Concerns

One Road In and One Road Out

Evacuation from Green Valley Lake follows a single route down Green Valley Lake Road. This is a steep, winding two-lane mountain road with tight turns and very limited space for emergency vehicles. Under normal circumstances it is already a challenge during winter storms or weekend visitor traffic. Even one car accident on Highway 330 or Highway 18 — or routine construction — can cause hours of delays. That kind of congestion happens today with normal traffic. During an evacuation, it would be catastrophic.

2

Bus and Large Vehicle Risks During an Emergency

Another reality we cannot overlook is how dangerous these mountain roads can be for buses and large vehicles.

In early November 2025, a bus carrying people home from a church event in the San Bernardino Mountains overturned on Highway 330 near Running Springs. At least 20 people were hospitalized and around two dozen were treated for injuries after the vehicle tipped over on a winding stretch of road. Passengers had to escape through a roof hatch while first responders worked to care for them, and traffic was blocked for hours.

3

This isn't a distant, unrelated incident. It happened on the same kind of narrow, winding mountain road that every camper and resident in our area would be forced to use during an evacuation. If a bus alone can block the road for hours, imagine the chaos if you have thousands of additional people and dozens of buses trying to evacuate at once beside residents and emergency responders. 3 Cont

A rollover or traffic incident during a wildfire evacuation could completely stop all movement, prevent ambulances from reaching the injured, and turn a dangerous situation into a tragedy.

Recent Road Failure Demonstrates Real Risk

On September 18, 2025, heavy storms caused mudslides and debris flows in the San Bernardino Mountains. This resulted in a complete failure of Highway 38. The road was washed out in multiple places, shutting down access between Angelus Oaks and Big Bear. Communities were cut off from each other and normal travel was impossible. This happened during a typical storm event and underscores how easily our mountain roads can become impassable. 4

Historical Wildfires Near Green Valley Lake

Our region has a history of fast-moving fires that required full evacuation:

• In 2007, the Slide Fire burned directly around Green Valley Lake, forcing entire neighborhoods to evacuate urgently.

• In 1999, a major wildfire pushed residents to leave their homes as winds shifted and flames approached.

• In 2020, the El Dorado Fire burned terrain similar to ours, leaving behind unstable slopes that continue to create erosion and debris flow risk. 5

These are not hypothetical threats. They are events that shaped how residents here understand evacuation — it must happen fast, and any delay can cost lives.

Emergency Evacuation With 3,000 Additional People

Based on past fires and road closures, there is often only a small window to evacuate. Trying to move thousands of additional people, including children, onto a single mountain road while residents are doing the same will slow evacuation, block first responders, and increase panic. There is no way to safely manage that volume of people without additional roads or controlled infrastructure that simply do not exist.

The proposed expansion does not only place full-time residents at risk. It places the campers themselves in danger. Families trust that youth at camps are safe. With only one route out of these mountains and documented examples of vehicles overturning on narrow roads during routine travel, that trust cannot be guaranteed.

Impact on Community Character 6

Green Valley Lake is a small, peaceful, family-oriented mountain town. We know our

neighbors, we look out for one another, and we enjoy a level of safety and quiet that is increasingly rare. Residents chose this community because it is not a high-traffic resort center like Big Bear or Lake Arrowhead. Increasing Camp Hume's population to 3,000 will overwhelm the area, strain local services, and permanently change the nature of our community. 6 Cont

Request to the Commission

I support outdoor camps and understand that Camp Hume plays an important role for many families. But any expansion must respect the physical limitations of this mountain and the safety of everyone who lives and visits here. I respectfully ask the Commission to:

• Require a full evacuation study that models real fire behavior, real bottlenecks, and real road conditions

• Consider the recent Highway 38 failure as evidence of road vulnerability

• Limit camp occupancy to a number that can be safely evacuated 7

• Require secondary access or staged evacuation planning before any capacity increase is approved

• Consider the long-term impact on the unique community of Green Valley Lake and public safety

Until a plan exists that truly guarantees safe evacuation for both residents and campers, I urge the Commission to deny the proposed expansion.

Thank you for your attention to these concerns and for valuing the safety of our mountain communities.

Sincerely,

Brenna Cunningham

Resident, Green Valley Lake

G15 - Responses to Brenna Cunningham

G15-1 The comment is introductory in nature. The comment includes concerns about overall safety implications and impact. No further response is warranted.

G15-2 The comment includes emergency access concerns. As discussed in the IS/MND (**Section 4, Wildfire**) MM WF – 1, the Project would continually update and comply with a comprehensive evacuation plan. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on-site occupancy prior to peak hazard conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis.

Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity.

G15-3 The comment includes concerns regarding bus and large vehicle risks. As evaluated in the IS/MND (**Section 4, Transportation**), the Project does not alter regional highways or roadway alignments. Compliance with fire-authority requirements, including roadway width, grade, turning radius, and emergency vehicle access remains mandatory during permitting. No CEQA thresholds were found to have significant impacts that could not be mitigated and therefore no additional response is warranted.

G15-4 The comment provides concerns over storm and weather related roadway logistics. As discussed in the IS/MND (Sections 4, Transportation; 4, Wildfire; and 4, Geology/Soils), roadway reliability, weather exposure, debris potential, and access during emergencies were evaluated consistent with applicable CEQA significance criteria. The Project does not modify regional road infrastructure and relies on existing County-maintained roadways that are managed under established snow-removal, storm-response, and road-maintenance programs. The comment does not present new evidence that the IS/MND is inadequate and therefore no additional response is warranted.

G15-5 The comment provides information on historical wildfires in the surrounding area. The comment does not provide additional evidence that the IS/MND emergency preparedness is inadequate. Refer to Response G15-2.

G15-6 The comment includes concerns regarding community character. CEQA addresses environmental impacts as described in CEQA Guidelines Appendix G rather than community-identity changes unless they result in or stem from an environmental effect. The IS/MND evaluates environmental topics—including transportation, noise, wildfire risk, public services, land use, and aesthetics—and concludes that impacts would be less than significant with existing regulatory compliance and mitigation where applicable.

The comment does not provide new information showing that a significant environmental effect was overlooked. No changes to the IS/MND are warranted.

G15-7 The comment includes recommendations and opposition to the Project. The IS/MND evaluates fire risk, evacuation considerations, roadway conditions, and emergency access consistent with CEQA requirements. The Project is subject to extensive fire-authority review, FS-1 overlay requirements, California Fire Code standards, and the Project's documented early-evacuation procedures, which reduce on-site population during high-risk conditions.

Determinations regarding Project approval, occupancy limits, and the level of CEQA documentation required are the responsibility of the Lead Agency. The IS/MND concludes that, with compliance with applicable codes and standard conditions, impacts would be less than significant. The comment does not provide substantial evidence requiring revisions to the IS/MND. No further response is warranted.

G16 - Brenna Cunningham

From: Brenna C
To: Barragan, Elena
Subject: Re: PROJ-2024-00046, Circulation Extension to 01/16/2026
Date: Wednesday, January 7, 2026 7:32:38 PM
Attachments: image001.png

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Thank you for the information.

I would still like to stress my strong opposition to the expansion of Hume camp.

Expanding the camp without first addressing road capacity, emergency access, and evacuation infrastructure places the surrounding communities at unnecessary and unacceptable risk. 1

Concerned Resident,
Brenna Cunningham

On Wed, Jan 7, 2026 at 5:32 PM Barragan, Elena <Elena.Barragan@lus.sbcounty.gov> wrote:

> Attached to this email is the official Notice of Availability/ Notice of Intent to Adopt an Initial Study/ Mitigated Negative Declaration
>
> The comment period on the IS/MND begins November 13, 2025, and closes on **January 16, 2026**.
>
> Please submit comments to Elena.Barragan@lus.sbcounty.gov or to
>
> Elena Barragan
>
> San Bernardino County
>
> Land Use Services Department, Planning Division
>
> 385 N. Arrowhead Ave, 1st Floor
>
> San Bernardino, CA 92415

Elena Barragan

Senior Planner
Land Use Services Department

Phone Number: 909-387-4422
Fax: 909-387-4422
385 N. Arrowhead Ave., 1st Floor

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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G16 - Response to Brenna Cunningham

G16-1 The comment includes multiple general concerns in relation to the Project. As mentioned in the IS/MND, all environmental impacts would be less than significant with mitigation incorporated. Refer to Master Responses – Transportation/Traffic, Wildfire, and Fire Service Capacity.

G17 - Brett Jensen

From: Brett Jensen
To: Barragan, Elena
Subject: Hume Camp Application Request
Date: Monday, January 5, 2026 11:49:05 AM
Attachments: Hume Camp Application Request.docx

You don't often get email from jettbrensen@hotmail.com. Learn why this is important

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Good morning,

Attached is a letter regarding the Hume Camp application. Would you please read this request at your convenience? Thank you for taking time on this matter and should you have any further questions, please do not hesitate to ask.

Brett Jensen
Email: jettbrensen@hotmail.com

1

January 5, 2026

Elena Barragan

County of San Bernardino Planning Division

385 N. Arrowhead Ave. First Floor

San Bernardino, Ca 92415-0187

Dear Ms. Barragan,

As an elder of my church and public high school teacher deeply invested in the well-being of our county, I am writing to express my enthusiastic support for the Hume Camp master plan application. (PROJ 2024-00046) This project presents a unique opportunity to enrich our community, promote sustainable development, and nurture our youth and invest in the next generation of leaders.

The Hume master plan envisions a harmonious community that not only addresses the needs of its residents but also safeguards our precious natural environment. By prioritizing sustainable practices, this development aligns beautifully with our shared values of stewardship and respect for creation. The incorporation of open spaces and green areas will not only enhance the beauty of our surroundings but also provide vital habitats for local wildlife, ensuring that our mountains remain connected to the natural world. This commitment to maintaining open areas fosters a spirit of stewardship among our congregation and the broader community, encouraging everyone to appreciate and protect the gifts of nature that God has entrusted to us. 1 Cont

I currently serve as an elder and youth leader at my church, Chino Valley Community Church, and had the privilege of attending Hume Lake as a camper, volunteer, and leader. Hume is transformational for so many youths and is a huge bright spot in their lives. At my church, I have had the privilege of taking hundreds of high school and college students to Hume and witnessed the long-term impact made in their lives.

Additionally, I am in my sixteenth year working as a local high school teacher at Colony High School. As a teacher, I see the value and importance of youth camps where these young adults can process through a very critical time in their life with meaningful support and connections. This investment in our youth is not merely an investment in the present, but a foundation upon which we can build a brighter future.

I urge you to consider the profound benefits that the Hume project will bring to our community. The thoughtful planning and vision behind this project will contribute significantly to our

county's growth and sustainability while nurturing the next generation of leaders who will guide us in the years to come.

Thank you for your attention to this important matter. I hope you will lend your support to the Hume master plan and help pave the way for a more hopeful and sustainable future for our community. 1 Cont

Blessings,

Brett Jensen

Elder at Chino Valley Community Church

Math Teacher at Colony High School

G17 - Response to Brett Jensen

G17-1 The comment includes general support for the Project. The commenter's support for the Project has been acknowledged. No further response is warranted.

G18 - Briana Lynn

From: Rev. Briana Lynn
To: Barragan, Elena
Subject: Formal Request for Environmental Impact Report: PROJ-2024-00046, Human SoCal Campground Extension
Date: Tuesday, December 30, 2025 9:52:13 AM

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Elena Barragan,

I am writing on behalf of concerned citizens of Green Valley Lake to formally and adamantly request that the County require a full Environmental Impact Report (EIR) prior to the approval of any additional construction related to the project listed below.

Project Location: 32355 Green Valley Lake Road, Green Valley Lake, CA 92341
Project No.: PROJ-2024-00046
Project Title: Human SoCal Campground Extension

We assert that this project poses significant, unmitigated risks to our community, infrastructure, and natural environment. Approving any expansion without a comprehensive EIR would be irresponsible and contrary to the county's duty to protect public welfare and safety.

Our specific and grave concerns are as follows: 1

1. Traffic and Infrastructure: The existing operations already generate unsustainable traffic congestion, with an estimated 500+ individuals per weekend during summer months, exceeding permitted capacities. This creates a persistent backlog on our single access road. Any expansion will exacerbate this to a critical degree, necessitating immediate and costly interventions such as a traffic signal at the Highway 18/Green Valley Lake Road intersection —a burden unfairly placed on our small community. 2

2. Fire Evacuation and Public Safety: Summer weekend events coincide precisely with peak fire season. Green Valley Lake is a community of fewer than 300 full-time residents with only one road in and out. Current evacuation planning is already precarious. Adding hundreds or thousands of additional temporary occupants creates an unacceptable public safety hazard, guaranteeing that any emergency evacuation scenario will become severely compromised, potentially with catastrophic consequences. 3

3. Water Resource Depletion: Our local aquifer and water table are already under demonstrable stress serving the existing population. The addition of even 100 more beds, as proposed, would accelerate depletion at a catastrophic rate, threatening the water security of every resident and the ecological health of the area for decades to come. 4

4. Discriminatory Policy and Emergency Shelter: As an evangelical Christian camp, the project applicant has publicly stated its intention to house only those who subscribe to its specific religious dogma. This discriminatory policy means that in a county-declared 5

emergency, this facility would categorically not be available as a general refuge for all residents in need, nullifying any potential community benefit and raising serious ethical and practical concerns. 5 Cont

A thorough Environmental Impact Report will objectively quantify these critical issues and reveal additional impacts. We demand that San Bernardino County uphold its fiduciary and environmental responsibilities.

Therefore, we formally and insistently request that you:
1. Require a full Environmental Impact Report for PROJ-2024-00046 before any permitting or construction proceeds.
2. Seriously consider denying any project expansion until the fundamental issues of water security, road safety, and fire evacuation capacity are permanently and effectively resolved. 6

The future of Green Valley Lake, the safety of its residents, and the preservation of its fragile environment depend on prudent action now. We expect your immediate acknowledgment of this request and a commitment to a full and transparent review process.

We await your prompt response.

Sincerely,
Re. Briana Lynn
One of the MANY Concerned Citizens of Green Valley Lake

–

liberation-ms.com

G18 - Responses to Briana Lynn

G18-1 The comment is introductory in nature. The comment provides an introduction and request for an Environmental Impact Report. CEQA does not require preparation of an EIR when an IS/MND demonstrates that impacts can be mitigated below significance thresholds. The IS/MND concludes that, with implementation of identified mitigation measures, the Project would not result in significant environmental effects. Therefore, preparation of an EIR is not warranted.

G18-2 The comment includes concerns regarding current and future traffic congestion. The IS/MND includes a Traffic Impact Analysis (**Appendix J**). The analysis evaluates existing and future traffic conditions, including peak summer operations, and concludes that the Project's contribution toward potential future transportation impacts in the County is not cumulatively considerable. The IS/MND determines that traffic impacts would be less than significant, and the Traffic Signal Warrant Analysis concluded the Project would not require additional traffic signals in the area. No revisions are warranted.

G18-3 The comment includes concerns regarding potential evacuation hazards with additional occupants. The IS/MND evaluates wildfire hazards (Section 4) and includes MMs WF 1-3 requiring compliance with development standards, preparation of an Emergency Evacuation Plan, and fire-resistive plants. The Project site is within a Very High Fire Hazard Severity Zone; therefore, strict adherence to fire safety regulations is mandatory. With implementation of these measures, wildfire and evacuation impacts would be less than significant. No revisions are warranted.

G18-4 The IS/MND includes a Water Supply Assessment (1st Draft Water Supply Assessment), which has been updated (**Appendix B1: Revised Water Supply Assessment**), prepared in compliance with CEQA. The assessment demonstrates that sufficient water in on-site groundwater wells in available to serve the Project through phase 3. After phase 3, the Applicant would prepare an annual water supplier expectations memorandum for CLAWA. The Project will comply with **Section 4, Hydrology and Water Quality** MM HYD-1 to conduct well drawdown tests, recovery testing, and water quality retesting before proceeding with each phase, for the wells serving that phase, and use the results to confirm the phase water supply strategy and any required treatment. The IS/MND concludes that water-supply impacts would be less than significant. Refer to Master Response – Water.

G18-5 The comment provides concerns related to the Project's status during a county-declared emergency in regard to religion. CEQA focuses on environmental impacts and does not regulate social or policy matters such as religious affiliation or emergency shelter eligibility. These concerns fall outside the scope of CEQA review. No revisions to the IS/MND are warranted.

G18-6 The comment is conclusionary in nature. The comment summarizes concerns and requests an Environmental Impact Report. The IS/MND concludes that with mitigation measures implemented, impacts would be reduced to less than significant levels (refer to responses above). The comment does not include substantial evidence demonstrating that the IS/MND is inadequate or that the preparation of an EIR is required. No further response is warranted.

G19 - Bruce Phillips

From: Bruce Phillips
To: Barragan, Elena
Subject: Comments on the Hume SoCal Campground Expansion PROJ-2024-00046
Date: Monday, January 5, 2026 3:57:53 PM

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Ms. Barragan,

I have owned a home at 721 Tulip in Green Valley Lake since 2001. I am writing to oppose the expansion.

As a Christian camp, Hume SoCal s exempt from property taxes and the cost of additional demands for utilities will be borne by all other residents of Green Valley Lake.

The first amendment exempts churches from taxation. It also protects citizens from having to support churches to which they do not belong. As their website proclaims (https://hume.org/socal/), Hume SoCal is a global ministry. I am not part of that ministry and I strongly object to being forced to support it financially by sharing in the cost of public services, utilities, and additional road maintenance. 1

Moreover, the HumeSoCal expansion will increase the risk of wildfires, use of the sewer systems, electrical use, increased noise and traffic, and affect endangered species of wildlife. 2

Please deny their request for expansion. It is not fair to the homeowners who pay to support the infrastructure of the quiet mountain life to have to support this Christian Church which I'm sure has a lot more money than the average homeowner in the area. 3

Thank you,

Professor Bruce A. Phillips
University Fellow
Center for Religion and Civic Culture
University of Southern California

G19 - Responses to Bruce Phillips

G19-1 The comment provides an introduction, statement of opposition, and concerns over Project taxation. CEQA focuses on environmental effects, not on taxation, funding allocations, or an organization's religious status. Economic or social concerns are not environmental impacts under CEQA unless they would cause an environmental effect. The IS/MND therefore evaluates environmental topics and identifies mitigation where necessary. No changes to the IS/MND are warranted.

G19-2 The comment includes an opinion of negative effects potential occurring with the Project. All areas of potential risk (wildfire, hydrology and water quality, utilities and service systems, noise, transportation, and biological resources) were evaluated in accordance with CEQA guidelines and, with mitigation incorporated, were found to have less than significant impacts. No revisions to the IS/MND are warranted.

G19-3 The comment is conclusionary in nature. The comment provides multiple opinions relating to the Project and its potential effects. None of the potential effects mentioned are within CEQA thresholds and therefore no further response is warranted.

G20 - Carlo Luzzi

From: Carlo Luzzi
To: Barragan, Elena; Bull, Robin
Subject: Hume Camp Expansion project plan (PROJ-2024-00046) Citizen Comments
Date: Wednesday, January 7, 2026 7:32:30 AM

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hello Elena Barragan and Robin Bull,
I am submitting public comments to the "Hume Camp Expansion Project Plan (PROJ-2024-00046).
I am a citizen and property owner living in Green Valley Lake.
I am concerned and currently against the Hume Camp Expansion project. Please do not vote and request some sort of EIR for the expansion. Here are a few of my comments:

1. Increasing 10 fold from 300 to 3,000 is very concerning which some sort of EIR or study needs to be done to determine what impacts. 1
2. Traffic impacts are a concern. Highway 330 and 18 is currently overcrowded. Highway 330 needs to be expanded with two lanes in each direction before any further increases in adding addition population. Not just for this project but any expansion to Running Springs, Arrowbear, Green Valley, Big Bear, Fawnskin, etc....
3. Traffic exiting Green Valley Lake Junction to Highway 18 is already overcrowded. Additional population will only make it worse. 2
4. Evacuation during a fire or earthquake or some sort of disaster is a concern. The emergency exists during an evacuation is a concern and issue. The existing population will overcrowd the existing roadway/highway network including highway 330 and 18.
5. The existing infrastructure to handle additional population is another concern. This includes, water, sewer, storm drain, trash, electricity, etc... We already have a water issue which everyone living in Green Valley Lake pay high prices. 3
6. Environmental concerns to wildlife related to animals and forests. We have an increase in deer and bears. Managing the forests is also a concern. Another reason for an EIR. 4
7. Green Valley Lake residents are also concerned with increases in population will overcrowd the lake. Outside residents already overcrowded the Green Valley Lake for fishing. The existing crowds around the lake make the residents uneasy and wanting to avoid walking around the lake or go fishing. 5
8. The existing Christian camps have already built many structures which is another concern.

These are only a few concerns that warrant a study of the impacts and against the

project.
Let me know if you have any questions.
Thank you,
Carlo Luzzi, Green Valley Lake Property Owner.

5
Cont

G20 - Responses to Carlo Luzzi

G20-1 The comment is introductory in nature. The comment establishes general opposition to the Project and makes a request for an Environmental Impact Report. Potential impacts were analyzed for the Project, and all were found to be less than significant with mitigation incorporated and thus a Mitigated Negative Declaration was prepared over an Environmental Impact Report.

G20-2 The comment includes concerns generally regarding transportation and emergency evacuation on local roads near the Project. The comment does not provide evidence that the IS/MND was inadequately prepared or that a revision is warranted. Impacts related to wildfire and transportation would be less than significant per CEQA guidelines. Refer to Master Responses – Transportation/Traffic, Wildfire.

G20-3 The comment includes concerns about increased use of infrastructure and infrastructure pricing. As mentioned in the IS/MND all impacts relating to infrastructure were found to be less than significant with mitigation. CEQA only evaluates environmental impacts, impacts like pricing are outside the scope of CEQA review.

G20-4 The comment includes an opinion about the effects on wildlife with certain species mentioned. As discussed in the IS/MND **Section 4, Biological Resources**, impacts on wildlife would be less than significant with MMs BIO-1 and -2 which implement, for certain species, protection measures during preconstruction. The Biological Resources Assessment (**Appendix A1**) found that all wildlife impacts could be mitigated to less than significant levels. Refer to Master Response – Request for EIR.

G20-5 The comment includes concerns mostly tied to community character and makes a request for a study of the potential impacts of the Project. CEQA only evaluates environmental impacts, impacts like community character fall outside the scope of CEQA review. The IS/MND studies all potential environmental impacts and by incorporating mitigation where necessary reduces any environmental impacts to less than significant levels.

G21 - Caroline Lee

From: Caroline Lee
To: Barragan, Elena
Subject: No to Hume Expansion
Date: Sunday, January 4, 2026 3:15:27 PM

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Elena,

As homeowners in Green Valley Lake, we are opposed to the expansion of Hume camp. There is only ONE road out of Green Valley Lake, and this would significantly impact our commute and pose a safety hazard to the mountain with the influx of thousands of campers and buses. We hope you will take into account homeowners in the area and consider what is safe and just for the larger community instead of considering what is profitable for a few. 1

Thank you,
Caroline

Sent from my iPhone

G21 - Response to Caroline Lee

G21-1 The comment provides general opinions about the Project and lists a concern related to transportation safety. As discussed in **Section 4, Transportation** of the IS/MND the Project would not generate an average peak trip count of 110 daily trips. Under San Bernardino County guidelines, transportation impacts would be less than significant without mitigation required. The comment does not provide evidence the IS/MND is inadequate and no further response is required.

G22 - Catherine Beckman

From: Catherine Beckman
To: Barragan, Elena
Subject: Stop Hume SoCal Camp expansion in Green Valley Lake
Date: Friday, January 2, 2026 2:53:49 PM

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Please stop the expansion. Our forests are already in trouble! The expansion will not benefit our mountain communities. The issues are numerous and not limited to the following: 1

- Water infrastructure will be impacted 2
- Fire risk/wildfire risks increase 3
- Sewer infrastructure is not adequate 4
- Overhead electrical causes fire risk. 5
- Road expansion would be needed due to increased traffic 6
- Air quality would be reduced due to increased number of buses 7
- Impact on endangered wildlife species including … the Bald Eagle, Nesting birds, Coopers Hawk, California Spotted Owl… 8
- The impact that years of construction will have on the community cannot be understated 9

This expansion of Hume SoCal Campground will serve Hume Camp ONLY not the general public who will foot the bill for impact the expansion will have on infrastructure.

Leave our forests alone 10

Catherine Beckman
Resident of Arrowbear Lake

Sent from my iPhone

G22 - Responses to Catherine Beckman

G22-1 The comment is introductory in nature. The comment includes a request and multiple opinions related to the Project. No further response is warranted.

G22-2 The comment includes a statement about water infrastructure. The IS/MND is adequate in regard to water infrastructure because all impacts and specifically those in **Section 4, Utilities and Service Systems,** and **Section 4, Hydrology and Water Quality,** are less than significant. No further response is required.

G22-3 The comment provides a statement about wildfire risks regarding the Project. The IS/MND evaluates wildfire hazards (Section 4) and includes MMs WF 1-3 requiring compliance with development standards, preparation of an Emergency Evacuation Plan, and fire-resistive plants. The Project site is within a Very High Fire Hazard Severity Zone; therefore, strict adherence to fire safety regulations is mandatory. With implementation of these measures, wildfire impacts would be less than significant. No revisions are warranted.

G22-4 The comment includes a statement about sewer infrastructure and it potentially not being adequate to accommodate the Project. Refer to Master Response – Wastewater/Sewer.

G22-5 The comment includes a statement about overhead electrical causing fire risk. The IS/MND will, under **Section 4, Wildfire**, implement MM WF-2, which ensures all new power lines shall be undergrounded.

G22-6 The comment includes a statement about road expansion. The IS/MND **Section 4, Transportation** is adequate with all impacts less than significant with the Project including new, paved-asphalt internal roads. No further response is required.

G22-7 The comment includes an opinion about the result of additional buses on air quality. As discussed in the IS/MND, **Section 4, Air Quality**, all impacts would be less than significant with MM AQ-1 implementation. MM AQ-1 ensures that prior to issuance of grading permits, Hume SoCal will prepare and submit documentation to the County that demonstrates all off-road diesel-powered construction equipment greater than 50 horsepower meets California Air Resources Board Tier 4 Final off-road emissions standards and ensures the ability to supply and regulate such equipment.

G22-8 The comment includes an opinion about the effects on wildlife with certain species mentioned. As discussed in the IS/MND **Section 4, Biological Resources**, impacts on wildlife would be less than significant with MMs BIO-1 and-2 which implement, for certain species, protection measures during preconstruction. Refer to Master Response Biological Resources/Wildlife.

G22-9 The comment provides a general opinion of the Project's effect on the community. CEQA focuses on environmental effects. Community concerns are not environmental impacts under CEQA unless they would cause an environmental effect. The IS/MND therefore evaluates environmental topics and identifies mitigation where necessary. All potential effects under CEQA are found to be less than significant. No changes to the IS/MND are warranted.

G22-10 The comment provides a general opinion of the Project's effect on regional economics. CEQA focuses on environmental effects. Economic concerns are not environmental impacts under CEQA unless they would cause an unplanned change to employment or housing growth in the area. The IS/MND therefore evaluates environmental topics and identifies mitigation where necessary. All potential effects under CEQA are found to be less than significant. No changes to the IS/MND are warranted.

G23 - Chad Castor

From: Chad Castor
To: Barragan, Elena
Subject: Support for Hume SoCal Expansion Project (PROJ-2024-00046)
Date: Friday, January 2, 2026 7:43:51 AM
Attachments: cee58cd7-a558-45fd-8938-d4ad9d9c4b59.png

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Ms. Barragan,

I'm writing as the Site Director for Hume Lake Christian Camps – SoCal to share my personal support for our proposed expansion project (PROJ-2024-00046). Hume has been part of this mountain community for many years, and we care deeply about stewarding both the land and the relationships that make this area so special.

Our hope with this master plan is to thoughtfully grow in a way that honors the natural beauty of Green Valley Lake while allowing us to continue serving youth and families well. Protecting open space, caring for the environment, and being mindful of wildlife are priorities for us, and they shape how we plan and operate every part of our site.

At the heart of Hume's mission is investing in young people. Through our programs, students and young adults are given space to grow in character, leadership, and a desire to serve others. The proposed improvements help us continue this work safely and sustainably, ensuring that future generations can have the same meaningful experiences so many have had here before. 1

We also recognize the importance of being a positive presence in the local community. Our ongoing operations create jobs and bring visitors who support nearby businesses, helping contribute to the vitality of the mountain area. We want to be good neighbors and long-term partners who care about the health and future of this community.

Thank you for the time and care you give to reviewing projects like this. I truly appreciate your consideration and support as we seek to move forward in a way that benefits both Hume SoCal and the greater Green Valley Lake community.

Sincerely,

Chad Castor
Site Director, Hume SoCal
Green Valley Lake Resident

Chad Castor
Site Director | SoCal
(559) 305-7690 | hume.org

G23 - Response to Chad Castor

G23-1 The comment includes general support for the Project. The commenter's support for the Project has been acknowledged. No further response is warranted.

G24 - Chris Tanton

From: Chris T
To: Barragan, Elena
Subject: Camp Hume Expansion Proposal
Date: Wednesday, January 7, 2026 10:59:58 AM

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I am a resident of Running Springs California and am against this project until a full environmental impact report is completed and filed. We have limited resources in our mountain communities and need to protect the wildlife and residents. 1

Thank you,

Chris Tanton

G24 - Responses to Chris Tanton

G24-1 Under CEQA, the Lead Agency, San Bernardino County, determines the appropriate level of environmental review. The IS/MND evaluates all environmental topic areas required under CEQA and identifies compliance requirements and mitigation measures that reduce all potentially significant impacts to less than significant levels. There is not substantial evidence presented that the IS/MND is inadequate or that any significant unavoidable impacts would remain unmitigated. Therefore, no revisions to the IS/MND are warranted and an Environmental Impact Report (EIR) is not required.

G25 - Christina Sogi

From: Christina Sedita
To: Barragan, Elena
Subject: Hume Camp Expansion Project - Concern and Opposition
Date: Tuesday, January 6, 2026 12:38:01 PM

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hello Ms. Barragan,

I am writing to you today to express by concern and opposition to the proposed expansion of the Hume Camp Complex. My family has owned a cabin in Green Valley Lake for over 40 years. One of the draws for us and many others, is that Green Valley Lake offers a quiet and calm environment that can be enjoyed by families and individuals alike. The proposed expansion of the Hume site from 300 guests to 3000 guests would result in a massive increase in those visiting the lake and adjacent community therefore disrupting the current environment and capacity the town can accommodate. 1

The additional people using the lake would result in increased maintenance costs to provide trash cleanup and other costs related to this increased use. The transportation of 3000 people into and out of this area using the existing narrow 2-lane road will have an adverse effect on the traffic level now existing in the area and pose an increase hazard in the winter months. This is not to mention the additional air pollution that these transport vehicles would release into the environment. Additionally, the increased water usage from such a massive increase in population, could likely result in water shortage issues facing the community and possible increases in water and possibly sewer fees for existing residents. This proposed expansion would be to the detriment to the community of Green Valley Lake and at the minimum, a detail and thorough Environmental Impact Study and inclusive participative survey of all residents and property owners in Green Valley Lake need to be completed before anyone should even consider this proposal. 2 3 4 5

Best Regards,

Christina Sogi

G25 - Responses to Christina Sogi

G25-1 The comment is introductory in nature. The comment shares opinions over the future of the nearby community. CEQA evaluates environmental impacts only, unless other issues, such as community character or economics, are tied to an environmental effect. The comment does not identify a new or unaddressed environmental impact under CEQA. No revisions to the IS/MND are warranted.

G25-2 The comment includes concerns about additional traffic on local roads. Refer to Master Response – Transportation/Traffic.

G25-3 The comment includes concerns over potential air pollution as a result of the Project. As discussed in the IS/MND, **Section 4, Air Quality**, all impacts would be less than significant with MM AQ-1 implementation. MM AQ-1 ensures that prior to issuance of grading permits, Hume SoCal will prepare and submit documentation to the County that demonstrates all off-road diesel-powered construction equipment greater than 50 horsepower meets California Air Resources Board Tier 4 Final off-road emissions standards and ensures the ability to supply and regulate such equipment.

G25-4 The comment includes concerns regarding water usage and increased associated fees. Refer to Master Response – Water; water supply impacts would be less than significant.

CEQA evaluates environmental impacts only, unless other issues, such as economics, are tied to an environmental effect. The comment does not identify a new or unaddressed environmental impact under CEQA or that potentially increased fees would directly cause an unaddressed environmental impact. No revisions to the IS/MND are warranted.

G25-5 The comment is conclusionary in nature. The comment summarizes a general opinion toward the Project and makes a request for further environmental documentation. Refer to Master Response – Request for EIR.

G26 - Cindy Lawrence

From: Cindy Lawrence
To: Barragan, Elena
Subject: In support of Hume So Cal - San Bernardino Mountains
Date: Wednesday, January 14, 2026 1:57:34 PM

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Today, I am writing to express my support for the Hume So Cal planned Camp Development.

There are two main reasons for my support: 1

First, the expansion and development of the camp will bring numerous benefits to our communities in the San Bernardino mountains.

These benefits include increased tax revenue, which can be used to improve schools, preserve natural areas, and support established businesses. 2

Second, the developed camp will provide year-round employment and career opportunities for residents of the mountains.

This will help stabilize our surrounding communities' economies and well-being, offering more than just seasonal jobs. 3

In conclusion, the Hume So Cal has presented a serious and well-thought-out proposal to become a working alliance and partner with our natural forests and the communities surrounding Green Valley Lake.

Their enhanced development will be welcoming to many, and Hume will offer a fresh and enriched approach to our overall mountain economy.

Visitors to our mountains may find a solid assurance due to Hume So Cal's successful development plans. 4

Imagine a weekend visitor becoming a yearly vacationer and confidently investing in our community.

They may become our friends, neighbors, or even the owners of properties or start-up businesses.

This is what we want to attract in our mountain communities—progress and growth.

Thank you for considering my support for the Hume So Cal Camp Development.

Sincerely,
Cindy Lawrence

Sent from my iPhone

G26 - Responses to Cindy Lawrence

G26-1 This comment is introductory in nature. No further response is warranted.

G26-2 This comment acknowledges benefits the Project would have for the community. No further response is warranted.

G26-3 The economic benefits of the Project have been acknowledged. No further response is warranted.

G26-4 The perceived benefits of the Project have been acknowledged. This comment is conclusionary in nature. No further response is warranted.

G27 - Craig Steele

From: craig steele
To: Barragan, Elena
Subject: Hume SoCal Campground Expansion Project - PROJ-2024-00046
Date: Monday, December 22, 2025 2:54:18 PM

You don't often get email from craig.steele@gmail.com. Learn why this is important

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Hello,

I am writing in regard to the Hume SoCal Campground expansion project.

As a CA licensed architect and general contractor, and year-round resident of Green Valley Lake, I am concerned that this project is not conducting a full environmental impact report in alignment with CEQA and CA public resources code.

The scale of this proposed project represents a significant increase in use and environmental impacts in an under-resourced area. The scale and impact of this project do not align with a mitigated negative declaration. 1

Please reconsider this decision. If the project will truly not have any significant impacts, the EIR will demonstrate this, and the surrounding community will have their concerns assuaged.

Thank you for your time.

Regards,
Craig Steele, AIA

G27 - Response to Craig Steele

G27-1 The comment provides concerns over the appropriate level of environmental review and provides a request for an Environmental Impact Report. Refer to Master Response – Request for EIR.

G28 - Dan and Lauryl Schumacher

From: LAURYL SCHUMACHER
To: Barragan, Elena
Subject: HUME CAMP EXPANSION PROJECT
Date: Wednesday, January 7, 2026 10:37:06 PM

[You don't often get email from schucrew@aol.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Dear Elena Barragan,

We strongly object to the Hume Camp Expansion Project!

At the very least, we feel that a full environmental impact report should be completed before this project is allowed to go forward.

We are homeowners in Green Valley Lake, and we feel that this project is "over building" in our Beautiful and peaceful community. 1

Sincerely,

Dan and Lauryl Schumacher
Juniper Lane, GVL

Sent from my iPhone

G28 - Response to Dan and Lauryl Schumacher

G28-1 The comment includes a statement of opposition, a request for an Environmental Impact Report, and a comment outside the scope of CEQA. Refer to Master Response – Request for EIR.

G29 - Daniel and Kathy Cortez

From: Daniel Cortez
To: Barragan, Elena
Subject: Hume Expansion
Date: Wednesday, January 7, 2026 12:51:47 PM

You don't often get email from hvanode@gmail.com. Learn why this is important

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hello Elena and County, 1

Writing to protest the Hume expansion. The land, water supply and highway safety cannot support such an expansion. Also, the land is home to the endangered fly squirrel, plus many deer and various animals currently graze throughout the year in this area, which of course provides the main food source for mountain lions. Bald eagles also nest in this area. 2
The Highway is narrow two lane paved road which provides the only entry and exit to Green Valley lake, which would be a problem in emergency conditions. 3
Historically, during fires the water supply can run very low requiring water to be drawn from nearby lakes so having more structures will strain the water supply even further.
Currently three camps exist on Green Valley Lake road including Hume. If expansion is approved, what is to stop the others from also expanding as the Hume Project green lights other camps to also expand, including other nearby camps? 4

Please consider blocking the Hume expansion.
Sincerely,

Daniel and Kathy Cortez of Green Valley Lake.

G29 - Responses to Daniel and Kathy Cortez

G29-1 This comment is introductory in nature. The concerns about the scale of the proposed expansion are noted. Responses to each topic are described in detail below.

G29-2 Natural areas would be impacted by implementation of the Project; however, a large portion of the Project site would remain in its natural condition. Additionally, the Biological Resources Assessment which is further described in the Biological Resources Section of the IS/MND has determined that less than significant impacts would occur with implementation of MMs BIO – 1 and -2 which require pre-construction clearance surveys and compliance with the Migratory Bird Treaty Act and California Fish and Game Code.

G29-3 As discussed in the IS/MND (**Section 4, Wildfire**) MM WF – 1, the Project would continually update and comply with a comprehensive evacuation plan. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on-site occupancy prior to peak hazard conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis.

G29-4 The comment includes concerns related to water supply and demand. The IS/MND includes a Water Supply Assessment (1st Draft Water Supply Assessment), which has been updated (**Appendix B1: Revised Water Supply Assessment**), prepared in accordance with CEQA and state water-supply requirements. The WSA evaluates groundwater production capacity, historical pumping data, and projected demand under full buildout conditions. The analysis incorporates conservative assumptions for peak occupancy and seasonal demand. The WSA identifies that adequate water is available to serve the Project through phase 3 via on-site groundwater wells. After phase 3, the Applicant will prepare an annual water supplier expectations memorandum.

The IS/MND concludes that water-supply impacts would be less than significant with compliance with applicable standards and MMs HYD-1 . With MM HYD-1, the Applicant shall conduct well drawdown tests, recovery testing, and water quality retesting before proceeding with each phase, for the wells serving that phase, and use the results to confirm the phase water supply strategy. Refer to Master Response – Water.

G30 - Danielle Shapira and Matt

From: Danielle Shapira
To: Barragan, Elena
Subject: Hume Planning Commission
Date: Monday, January 5, 2026 2:50:41 PM

You don't often get email from daniellealanashapira@gmail.com. Learn why this is important

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hi,

We are residents of Green Valley Lake. We heard about the Hume expansion and have great concerns over what it will do to our community, resources, and evacuation plans. We beg you to please consider the local residents here who have loved this land and community for so long. 1

Best,
Danielle and Matt

--
Danielle Shapira | danielleshapira.com | 585.770.3353

G30 - Response to Danielle Shapira and Matt

G30-1 The comment provides general concerns over the Project. All environmental impacts such as resources (Sections 4, Biological Resources, Hydrology and Water Quality) and evacuation (Sections 4, Transportation, Wildfire) with mitigation measures will be reduced to less than significant impacts. CEQA does not focus on impacts such as community character unless such effects are caused by an environmental change. The comment does not provide evidence that the IS/MND is inadequate or that changes are warranted.

G31 - Dan Kohne

From: Kohne
To: Barragan, Elena
Subject: PROJ-2024-00046
Date: Saturday, January 17, 2026 9:01:53 AM

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I am concerned that the ten-fold increase in occupancy of this project has not been evaluated for its impact on water use and sewage treatment affecting the very small community of Green Valley Lake. 1

Thank you for your attention to the particulars of this matter.

Sincerely,

Dan Kohne
property owner

G31 - Responses to Dan Kohne

G31-1 The concerns regarding the expansion of the camp are noted. See Master Response – Water and Master Response – Wastewater/Sewer.

G32 - D'Anne Goatcher

From: D"Anne Goatcher
To: Barragan, Elena
Subject: Hume Expansion Project
Date: Monday, January 5, 2026 9:17:14 PM

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Good Evening, Ms. Barragan,

My name is D'Anne Goatcher. I live at
32951 Juniper Lane in Green Valley Lake. I am against the multi-phase expansion requested by Hume Christian Camp.

I am vehemently opposed for the following reason-
Adding thousands of people and dozens of busses for evacuation in the event of an emergency could wreak havoc for the residents of Green Valley Lake if there is a fire. There is only one paved two-lane road between Green Valley and Highway 330. If we were to need to evacuate with an additional 2500-plus people, it seems a dangerous and catastrophic issue. 1

Thank you for your consideration to this important matter.

D'Anne Goatcher
(951)733-0788

Sent from the all new AOL app for iOS

G32 - Response to D'Anne Goatcher

The comment includes a statement of opposition, a concern over evacuation, and conclusion. The IS/MND (**Section 4, Transportation**) evaluates transportation safety, roadway conditions, and emergency access through a Traffic Impact Analysis consistent with CEQA criteria.

As discussed in the IS/MND (**Section 4, Wildfire**) MM WF – 1, the Project would continually update and comply with a comprehensive evacuation plan. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on site occupancy prior to peak hazard conditions.

Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity.

G33 - Dave and Lori Clapper

From: David Clapper
To: Barragan, Elena
Cc: Supervisor Rowe; Supervisor Baca; Supervisor Hagman; Supervisor Armendarez; Supervisor Cook
Subject: Hume SoCal Campground Extension/Project number: PROJ-2024-00046
Date: Monday, January 5, 2026 10:42:55 PM

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

To all recipients,
We are sending this letter to object to the proposed five-phase expansion of Hume SoCal Campground Extension. We feel that there are many issues that Hume's Mitigated Negative Declaration failed to address in relation to the community of Green Valley Lake which is less than two miles beyond the camp. None of the tax paying property owners were ever notified of the plans by Hume or by the County of San Bernardino Land Use Services Department, Planning Division. Fortunately, a community member found out about the proposal and organized a Town Hall meeting on December 14th so we were able to present a united front at the Hume Expansion Meeting on December 20th. Then we find out that the comment period on the IS/MND began on 11/13/25 and was closing 1/7/2026. No notification, busy time for property owners with three holidays during this time period, possibly no comments sent in because of a missed deadline, a well known camp wanting to expand--Big Red Flag! 1

Some of the issues of concern are water in the community of Green Valley Lake, sewer system service provided by the Running Springs Water District Waste Water Treatment Plant, road repair and maintenance for Green Valley Lake Road and HIghways 18/330 with the dramatic increase in traffic, impact on the wildlife surrounding the expansion area, the increase in traffic on Green Valley Lake Road with personal vehicles, work trucks, delivery trucks, and buses, and most concerning, the egress for Green Valley Lake Road during an emergency. With these concerns, we would like to strongly recommend an EIR before this proposal goes any further. 2

We would like to address the egress that does not seem to be a concern for Hume Camp. Green Valley Lake has about 1050 properties and is located at the dead-end of Green Valley Lake Road which is a four mile long, narrow, winding 2-lane road. There are currently three camps on this road, Pondo with 350 campers maximum, Cedar Crest with 600 campers maximum, and Hume with 365 maximum that wants to expand to 3000 over the 5 phase extension plan. Green Valley Lake has approximately 300 full time residents with up to 1000 on summer and holiday weekends. Full-time residents, full-time renters, STR guests and property owners in Green Valley Lake share this single paved access road with the 3 camps buses, personal vehicles, supply trucks, etc. Green Valley Lake Road is the only paved access road to highway 18/330 and at this time only has a stop sign. The highway is frequently congested with traffic from the Big Bear area or closed due to storms, rock slides, accidents, and emergencies.

A quick look at the problems on the 18/330 during this holiday/rainfall period shows the impact this has on the mountain communities. When this traffic backs up and blocks the Green Valley Lake Road cutoff, we must rely on the grace of impatient drivers wanting to get home from their weekend and are now sitting in completely stopped traffic. Now add in the population of Hume expanded to 3000 on buses and in private vehicles in an emergency evacuation, as well as the other two camps buses and private vehicles and behind all of them the people evacuating from Green Valley Lake, and you have a recipe for disaster. The representative for Hume said that if there was an emergency the camp would cancel sessions, but when asked about this scenario if campers were present, we were told to send our questions to the representative for Kimley-Horn. There didn't seem to be a concern for the other camps or for the community residents. 3

Considering the history of this area, the isolated nature of the community of Green Valley Lake, and the extreme vulnerability of the singular access road, it would be short-sighted and reckless to increase the

population pressure on this road without adding another avenue of egress.

Our cabin address is 33458 Weeping Willow Drive in Green Valley Lake, California. The property for this cabin was purchased in the 1940's by Lori's grandparents and the cabin was built in 1964. Our family is very fortunate to have been enjoying Green Valley Lake for 5 generations! 3 Cont

Dave and Lori Clapper
3113 Fairgreen Lane
Palmdale, California 93551

G33 - Responses to Dave and Lori Clapper

G33-1 The comment expresses general opposition to the Project and alleges insufficient public notice during the Draft IS/MND review period. CEQA does not require individual mailed notice to all property owners community-wide unless a local code or separate hearing process so requires. The minimum public review period for a proposed MND is 30 days when the document is submitted to the State Clearinghouse. For this Project, the County's IS/MND public review period was extended beyond CEQA minimums: the IS/MND was circulated from November 13, 2025, through January 16, 2026 (64 days), which exceeds the 30-day requirement.

G33-2 The comment mentions multiple concerns and because of these concerns requests and Environmental Impact Report. As mentioned in the IS/MND, all potential impacts with mitigation are reduced to less than significant levels. Refer to Master Comment – Request for EIR.

G33-3 The comment provides opinions, concerns, and statements about transportation on local public roads during an emergency. All transportation impacts are less than significant, refer to Master Response – Transportation/Traffic.

G34 - Dave Gumpertz

From: David Gumpertz
To: Barragan, Elena
Subject: Oppose Hume Camp expansion
Date: Monday, January 5, 2026 10:11:44 PM

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Ms Barragan
My name is Dave Gumpertz and I am a 35 year resident of Running Springs
I echo the concerns of the mountain communities alliance.
We're a small under funded community with limited resources and infrastructure. 1

I'm also concerned about the Water/electricity use. Even though they have some of their own wells, they can draw from the water table and from the water district, possibly impacting the residence. Also there will be a big increase in electrical demand that could cause issues for residents. 2

I have safety concerns for fire and snow. I don't see a good way to effectively remove 3000 campers in the event of a wildfire or snowstorm or other natural disaster in addition to the current residents. 3

Traffic congestion and safety. Weekend and holiday traffic are already a huge burden on the 330 and 18 up to GVL. This would literally be 10x the everything in an area that doesn't have the capacity for this. 4

Thank you for your time
Dave Gumpertz

G34 - Responses to Dave Gumpertz

G34-1 The comment is introductory in nature. The comment provides an introduction and lists an introduction to concerns. No further response is warranted.

G34-2 The comment lists concerns about groundwater sustainability and increased electricity usage. All impacts related to groundwater would be less than significant, refer to Master Response – Water. It is expected that construction energy consumption associated with the Project would not be inefficient, wasteful, or unnecessary. The Project would not substantially affect existing energy or fuel supplies, or resources and new capacity would not be required. Additionally, the Project would also be required to adhere to the provisions of CALGreen, which establishes planning and design standards for energy efficiency (in excess of the California Energy Code requirements). **Section 4, Energy**, concludes that all impacts would be less than significant.

G34-3 The comment lists concerns related to emergency evacuation with additional occupants while accommodating existing residents in the nearby areas. All impacts related to Wildfire and Transportation (Section 4) would be less than significant per CEQA guidelines refer to Master Responses – Wildfire, Transportation/Traffic.

G34-4 The comment lists concerns related to transportation with additional vehicles. As mentioned in the IS/MND, Section 4 Transportation, impacts would be less than significant. Refer to Master Response – Transportation/Traffic.

G35 - Dave Rainey

From: Dave Rainey
To: Barragan, Elena
Subject: Hume Lake expansion project # PROJECT-2024-00046
Date: Monday, December 15, 2025 11:10:52 AM

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Ms. Barragan

My name is Dave Rainey and I live in Green Valley Lake, Ca. I am writing to you to register my concerns regarding the Hume Lake expansion project. It is my understanding that they want to expand from a capacity of around 350 to around 3,000. While I am not opposed to a business trying to grow I have serious concerns about this magnitude of growth. I am extremely concerned about congestion on the roads (estimates of 50 busses per day, several days per week) and in particular Green Valley Lake road which is the only way in and out of my community. We have been evacuated 3 times in the last 5 years and we survived the Slide Fire. The volume of people who will need to access that road during an emergency evacuation will create a very dangerous situation. I am also concerned about the added stress on our water and sanitation systems. An Environmental Impact Assessment must be completed at the very least. Please do everything possible to ensure that the impacts to the mountain and our small community are taken into account. I believe the scale of this project will have a long term negative impact on all of us who live and love to visit our community.

1 2 3 4

Thank you

Dave Rainey, Green Valley Lake
Sent from my iPhone

G35 - Responses to Dave Rainey

G35-1 The comment is introductory in nature. The comment provides an introduction and summary of the Project. No further response is warranted.

G35-2 The comment includes transportation and emergency evacuation related concerns. The IS/MND (**Section 4, Transportation**) evaluates transportation safety, roadway conditions, and emergency access through a Traffic Impact Analysis consistent with CEQA criteria.

As discussed in the IS/MND (**Section 4, Wildfire**) MM WF – 1, the Project would continually update and comply with a comprehensive evacuation plan. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on-site occupancy prior to peak hazard conditions. No further response is warranted.

Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity.

G35-3 The comment provides concerns regarding water supply and wastewater. As documented in the Water Supply Assessment (**Section 4, Hydrology and Water Quality** and 1st Draft Water Supply Assessment), which has been updated (**Appendix B1: Revised Water Supply Assessment**), existing on-site wells can provide adequate capacity to meet the Project's projected water demand through phase 3. The updated WSA identifies a preferred strategy with CLAWA following phase 3, in which the Applicant would prepare an annual water supplier expectations memorandum. Refer to Master Response – Water. The IS/MND (**Section 4, Utilities and Service Systems**) concludes that Project-related water demand would result in a less than significant impact.

Regarding wastewater, the IS/MND (**Section 4, Utilities and Service Systems** and **Appendix B2: Revised Sewer Feasibility Study**) evaluates wastewater generation and treatment options. Refer to Master Response – Wastewater/Sewer.

G35-4 The comment provides a request for further environmental impact study. Under CEQA, the Lead Agency determines the appropriate environmental document. The IS/MND provides a comprehensive evaluation of potential environmental impacts associated with the Project and identifies compliance measures and mitigation ensuring that all potentially significant impacts would be reduced to less-than-significant levels. Comments expressing general concerns about long-term community effects do not, on their own, constitute substantial evidence of a significant environmental impact beyond those analyzed in the IS/MND. No revisions to the IS/MND are warranted.

G36 - David A. Burt

From: David A. Burt
To: Barragan, Elena
Cc: David A. Burt
Subject: Hume Camp Expansion - Green Valley Lake
Date: Monday, January 5, 2026 1:57:43 PM

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Elena -

It was a pleasure meeting you on December 20th at the Hume Camp Presentation. 1

As a 17 year property owner in Green Valley Lake, I have numerous concerns regarding the potential expansion of the local Hume Camp Ground.

From the lack of communication of the proposed expansion, to the impacts to the water table, sewer systems, and most importantly emergency access to GVL residents in the event of an evacuation due to wild fires or earthquakes.

I request the following be ordered and made public before any approvals are granted -

1. Preparation of a FULL Environmental Report
2. Independent Wildfire Evacuation & Egress Modeling
3. Formal Cal Fire & County Fire Authority Review Letters
4. Comprehensive Traffic & Bus Impact Study
5. Emergency Services Capacity Analysis
6. Cumulative Impact Analysis with Green Valley Lake Population
7. Public Hearings with Full Community Notice 2

I am not against expansion, but it needs to be done in a transparent, thoughtful manner considering all impacted by this project, including a town beyond the 1200 foot notification requirement space that shares the same 2 lane road and sewer systems.

Respectfully,

David A. Burt
503 & 505 Oak Lane
Green Valley Lake, CA 92341

G36 - Responses to David A. Burt

G36-1 The comment is introductory in nature. The comment includes an introduction to the commenter and following concerns. No further response is warranted.

G36-2 The comment lists multiple concerns and requests for additional studies. As mentioned in the IS/MND all potential environmental impacts would be less than significant with applicable mitigation, refer to Master Responses – Transportation/Traffic, Wildfire, Water, Utilities. The IS/MND was prepared within CEQA guidelines and includes cumulative discussions for each environmental topic. Under CEQA, the Lead Agency determines the appropriate level of environmental review. An emergency management plan has been drafted by the Project applicant. CalFire has provided a response to the Project and is included in this document as Response R1. Public hearings will remain a part of Project procedure prior to Project approval. The comment has not provided evidence demonstrating the IS/MND or its conclusions are inadequate. No further response is required.

G37 - David A. Burt

From: David A. Burt <dburt100@gmail.com>
Sent: Monday, January 5, 2026 3:03 PM
To: Burnett, Candyce <Candyce.Burnett@kimley-horn.com>
Cc: David A. Burt <dburt100@gmail.com>
Subject: Hume Camp Expansion - Green Valley Lake

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Candyce –

It was a pleasure meeting you on December 20th at the Hume Camp Presentation.

As a 17 year property owner in Green Valley Lake, I have numerous concerns regarding the potential expansion of the local Hume Camp Ground. 1

From the lack of communication of the proposed expansion, to the impacts to the water table, sewer systems, and most importantly emergency access to GVL residents in the event of an evacuation due to wild fires or earthquakes.

I request the following be ordered and made public before any approvals are granted –

1. Preparation of a FULL Environmental Report
2. Independent Wildfire Evacuation & Egress Modeling
3. Formal Cal Fire & County Fire Authority Review Letters
4. Comprehensive Traffic & Bus Impact Study
5. Emergency Services Capacity Analysis
6. Cumulative Impact Analysis with Green Valley Lake Population
7. Public Hearings with Full Community Notice

2

I am not against expansion, but it needs to be done in a transparent, thoughtful manner considering all impacted by this project, including a town beyond the 1200 foot notification requirement space that shares the same 2 lane road and sewer systems.

Respectfully,

David A. Burt
503 & 505 Oak Lane
Green Valley Lake, CA 92341

G37 - Responses to David A. Burt

G37-1 The comment is introductory in nature. The comment includes an introduction to the commenter and following concerns. No further response is warranted.

G37-2 The comment lists multiple concerns and requests for additional studies. As mentioned in the IS/MND all potential environmental impacts would be less than significant with applicable mitigation, refer to Master Responses – Transportation/Traffic, Wildfire, Water, Utilities. The IS/MND was prepared within CEQA guidelines and includes cumulative discussions for each environmental topic. Under CEQA, the Lead Agency determines the appropriate level of environmental review. An emergency management plan has been drafted by the Project applicant. CalFire has provided a response to the Project and is included in this document as Response R1. Public hearings will remain a part of Project procedure prior to Project approval. The comment has not provided evidence demonstrating the IS/MND or its conclusions are inadequate. No further response is required.

G38 - Dennis Foster

Barragan, Elena

From: dennis foster <fosterdennis@charter.net>
Sent: Wednesday, November 19, 2025 8:36 AM
To: Barragan, Elena
Subject: Project number PROJ-2024-00046

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As a full time resident of Green Valley Lake in the San Bernardino mountains of Southern California, I am strongly opposed to the planned land use by Hume for a huge facility to accommodate as many as 3000 people. Green Valley Lake is a small town of about 300 residents, many of whom are retired senior citizens. With just a 2 lane road in & out of our town, bringing in thousands of people adjacent to this road would create huge traffic jams & delays especially during mandatory wildfire evacuations, which unfortunately are frequent. Traffic would be totally blocked off & potentially cause loss of lives. I also worry about the envirnmental impact on our wildlife. 1

Thank you,
Dennis Foster

1

G38 - Response to Dennis Foster

G38-1 The comment includes concerns regarding emergency evacuation with respect to transportation and wildlife impact. As concluded in the IS/MND all impacts would be less than significant due to low average daily trips and VMT. Refer to Master Responses – Transportation/Traffic, Wildfire. All impacts to wildlife (**Section 4, Biological Resources**) were found to be less than significant with mitigation incorporated.

G39 - Dino Luzzi/Anne Luzzi

Good Morning Ms. Barragan,

I am writing to share my concerns regarding the proposed expansion of the Hume Camp Complex.

The Luzzi families have been in the Green Valley Lake community for the last 65 years, my direct family owns two cabins and have for 65 years. Like many others, we chose Green Valley Lake because of its quiet, peaceful atmosphere that allows families and individuals to enjoy the area without excessive congestion or disruption. 1

The proposed increase in capacity from 300 guests to 3,000 guests would bring a dramatic and overwhelming rise in traffic and activity to the lake and surrounding community. This level of expansion would significantly change the character of Green Valley Lake and place a heavy burden on local resources. Increased trash, wear on facilities, and the need for additional maintenance services would be unavoidable. 2

In addition, transporting thousands of visitors in and out of the area using the existing narrow two-lane road raises serious concerns about traffic congestion and public safety, especially during winter months. The added vehicle traffic would also increase air pollution in an area that residents value for its clean mountain environment. The traffic on Highway 330 going to Big Bear and the Ski Resorts is already congested and sometimes at a standstill. When you add buses loaded with visitors it will take us hours to arrive to our cabins. Unacceptable! 3

The expected increase in water usage is another major concern. A population surge of this size could strain the community's water supply and potentially result in higher water and sewer costs for current residents. 4

For these reasons, I believe this proposed expansion would be harmful to the Green Valley Lake community. At the very least, a comprehensive Environmental Impact Study should be completed, along with a meaningful opportunity for all residents and property owners in Green Valley Lake to provide input, before this proposal moves forward. 5

Thank you for your time and consideration.

Respectfully,

Dino Luzzi

G39 - Responses to Dino Luzzi/Anne Luzzi

G39-1 This comment is introductory in nature. The concerns about the scale of the proposed expansion are noted. No further response is warranted.

G39-2 The concerns about the scale of the proposed expansion are acknowledged. The IS/MND analysis evaluated impacts on water supplies, wastewater treatment capacity, solid waste treatment capacity in the Utilities and Service Systems Section of the IS/MND (Section 4.19, Utilities and Service Systems).

G39-3 The Transportation Section of the IS/MND prepared a Traffic Analysis that is included as **Appendix J** of the IS/MND and determined that traffic conditions, existing road infrastructure and access would be adequate to service the expanded Project site. As evaluated in the IS/MND (**Section 4, Transportation**), the Project would not modify existing roadways, and Project-related traffic would not create a significant hazard or adversely affect emergency access.

Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity.

G39-4 The comment provides concerns regarding water supply and wastewater. As documented in the Water Supply Assessment (**Section 4, Hydrology and Water Quality** and 1st Draft Water Supply Assessment), which has been updated (**Appendix B1: Revised Water Supply Assessment**), existing on-site wells can provide adequate capacity to meet the Project's projected water demand through phase 3. The updated WSA identifies a preferred strategy with CLAWA following phase 3, in which the Applicant would prepare an annual water supplier expectations memorandum. Refer to Master Response – Water. The IS/MND (**Section 4, Utilities and Service Systems**) concludes that Project-related water demand would result in a less than significant impact.

G39-5 Under CEQA, the Lead Agency, San Bernardino County, determines the appropriate level of environmental review. The IS/MND evaluates all environmental topic areas required under CEQA and identifies compliance requirements and mitigation measures that reduce all potentially

significant impacts to less than significant levels. There is not substantial evidence presented that the IS/MND is inadequate or that any significant unavoidable impacts would remain unmitigated. Therefore, no revisions to the IS/MND are warranted and an Environmental Impact Report (EIR) is not required.

G40 - Elias and Nadia Barhoum

From: Nadia Barhoum
To: Barragan, Elena; Board Meeting Comments; Supervisor Cook; Supervisor Armendarez; Supervisor Hagman; Supervisor Baca; Supervisor Rowe
Cc: Elias
Subject: PROJ-2024-00046 - SoCal Hume Expansion Projects
Date: Monday, January 5, 2026 3:53:16 PM

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Dear Members of the Planning Committee and County Supervisors,

We are writing to formally oppose the proposed expansion (PROJ-2024-00046) of the SoCal Hume camp to 3,000 campers in our high fire danger mountain community. The extreme wildfire risk, combined with a single exit route, presents an unacceptable safety hazard for campers, staff, community residents, and first responders.

Recent events highlight how unpredictable and uncontrollable wildfires can be. The devastating Los Angeles and Altadena wildfires and the New Year's fire in Switzerland demonstrate that even well-prepared regions can be rapidly overwhelmed, leaving little time for safe evacuation. These examples make clear that emergency planning **cannot rely on best-case assumptions**.

State law also recognizes the danger of communities with limited egress. Assembly Bill 2911 (Friedman, 2018) requires the identification of subdivisions in State Responsibility Areas and Very High Fire Hazard Severity Zones that lack a secondary escape route and are at high fire risk. According to CAL FIRE's 2024 assessment, **our community meets these criteria and is officially recommended to add a secondary egress. Expanding occupancy while an acknowledged evacuation deficiency remains unresolved directly contradicts the intent of this law.** 1

Approving a project of this scale under these conditions would amount to a "let's see what happens" approach to public safety. When thousands of lives are involved, this is not a risk that should be accepted. Until multiple safe evacuation routes and adequate infrastructure are in place, this expansion should not move forward.

We urge you to prioritize public safety and deny the proposed expansion. Thank you for all your hard work and have a healthy and safe 2026!

Sincerely,
Elias and Nadia Barhoum
32997 Maple Lane
Green Valley Lake, CA

G40 - Response to Elias and Nadia Barhoum

G40-1 The comment emphasizes concern over transportation with respect to wildfire and emergency evacuation. The analysis conducted for the IS/MND was primarily based on "worst case scenarios" of Project implementation, namely the presence of 3,000 occupants at the camp at once, which would not occur normally. Furthermore, following receipt of public comments and agency input, and additional technical coordination with the Project's proposed water supplier, the Project's maximum occupancy has been reduced to approximately 2,400 occupants. This refinement reduces the Project's maximum on-site population and associated impacts to traffic and wildfire relative to the worst-case scenario evaluated in the circulated IS/MND. Refer to **Section 3, Errata**. Additionally, the Project does not propose a subdivision of parcels within the Project area. Impacts related to wildfire and transportation would be less than significant per CEQA guidelines. Refer to Master Responses – Transportation/Traffic, Wildfire. The comment does not provide evidence that the IS/MND was inadequately prepared or that a revision is warranted.

G41 - Emilie Reagan

From: Emilie Reagan
To: Barragan, Elena; Bull, Robin
Subject: Comment on Hume SoCal proposed expansion
Date: Wednesday, January 7, 2026 4:55:43 PM

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Dear Ms. Barragen and Ms. Bull,

I am writing to comment on the proposed expansion of the Hume SoCal campground in Green Valley Lake, California. Thank you for the opportunity to provide input on this matter. 1

After reviewing the proposal, I have serious concerns about both public safety and environmental impacts.

From an emergency evacuation perspective, recent fire, flood, and snow events have demonstrated how limited and fragile existing egress routes are. Evacuating hundreds or thousands of campers by bus would significantly increase risk to Green Valley Lake residents, campers, and others traveling off the mountain. No alternate evacuation routes are proposed, nor do they appear feasible. On safety grounds alone, this expansion does not seem viable. 2

The environmental impacts are also substantial. A large increase in campers and staff raises 3
unresolved concerns regarding water usage and strain on the local water table, impacts on 4
wildlife, wastewater and solid waste management, air pollution from increased traffic and 5
campfires, and increased noise and light pollution affecting both wildlife and nearby residents. These issues have not been adequately addressed in the proposed plans.

Given the scale of the proposed expansion and the risks involved, I respectfully request that this proposal be denied. At a minimum, I request a full Environmental Impact Assessment Report (EIAR) before any further consideration of the proposed plans for Hume SoCal expansion. 6

Thank you for your time and consideration.

Sincerely,

Emilie Reagan

G41 - Responses to Emilie Reagan

G41-1 This comment is introductory in nature. The concerns about the proposed scale of the expansion are noted. Responses to each topic are described in detail below

G41-2 As discussed in the IS/MND (**Section 4, Wildfire**) MM WF – 1, the Project would continually update and comply with a comprehensive evacuation plan. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on-site occupancy prior to peak hazard conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis.

G41-3 As analyzed in the IS/MND (**Section 4, Wildfire**) through **Appendix K: Emergency Plan and Procedures**, the Project site is located within a Very High Fire Hazard Severity Zone (VHFHSZ). The Project would be required to adhere to MM Wildfire – 1, which ensures a comprehensive evacuation plan is utilized and would comply with all COA provided by fire jurisdictions. The Project's Emergency Plan includes early evacuation protocols, which reduce on-site occupancy prior to peak hazards conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis. Wildfire impacts would be further reduced to less than significant with the implementation of MMs WF-2 and -3 which requires compliance with existing and proposed development standards such as undergrounded power lines. The measures also reduce risk through requiring fire-resistive plants.

G41-4 The comment provides concerns regarding water supply and wastewater. As documented in the Water Supply Assessment (**Section 4, Hydrology and Water Quality** and 1st Draft Water Supply Assessment), which has been updated (**Appendix B1: Revised Water Supply Assessment**), existing on-site wells can provide adequate capacity to meet the Project's projected water demand through phase 3. The updated WSA identifies a preferred strategy with CLAWA following phase 3, in which the Applicant would prepare an annual water supplier expectations memorandum. Refer to Master Response – Water. The IS/MND (**Section 4, Utilities and Service Systems**) concludes that Project-related water demand would result in a less than significant impact.

G41-5 The concerns about the proposed expansion are acknowledged. The Project is consistent with the existing HT/SD-RES zoning and Rural Living land use designation, which permits campground uses subject to County review. The Project phasing would occur over many decades, gradually increasing capacity. As determined by the IS/MND, no significant and unavoidable impacts would occur which would assist in maintaining the existing character of the surrounding area.

G41-6 Under CEQA, the Lead Agency, San Bernardino County, determines the appropriate level of environmental review. The IS/MND evaluates all environmental topic areas required under CEQA and identifies compliance requirements and mitigation measures that reduce all potentially significant impacts to less than significant levels. There is not substantial evidence presented that the IS/MND is inadequate or that any significant unavoidable impacts would remain unmitigated. Therefore, no revisions to the IS/MND are warranted and an Environmental Impact Report (EIR) is not required.

G42 - Eric Hooker

From: Eric H
To: Barragan, Elena
Subject: HUME CAMP Project in Green Valley Lake
Date: Wednesday, December 24, 2025 8:03:38 AM

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To Whom It May Concern,

I own property located at 32986 Spruce Dr in Green Valley Lake and submit this letter as formal public comment regarding the Hume SoCal Campground Expansion Project and the County's Initial Study/Mitigated Negative Declaration (IS/MND) released in November 2025. After reviewing the IS/MND, I am concerned that the County's reliance on a Mitigated Negative Declaration does not provide an adequate level of environmental review for a project of this magnitude. In my view, the scope and intensity of the proposed development necessitate preparation of a full Environmental Impact Report (EIR) prior to any approval or further advancement of the project.

As proposed, the project would more than double the size of the existing campground—from approximately 107 acres to roughly 252 acres—and would increase occupancy from about 300 individuals to as many as 3,000 at full buildout. This represents an extraordinary escalation in land use intensity on a predominantly forested, mountainous site bordered by San Bernardino National Forest lands. A tenfold increase in population and activity alone presents serious questions under the California Environmental Quality Act (CEQA) regarding whether the full range of potential environmental impacts has been sufficiently identified and evaluated. 1

The IS/MND identifies potentially significant impacts in multiple environmental categories, including biological resources, hydrology and water quality, wildfire hazards, public utilities and services, transportation, and tribal cultural resources, and proposes mitigation measures intended to reduce these impacts to less-than-significant levels. However, CEQA requires preparation of an EIR whenever substantial evidence supports a fair argument that a project may have a significant environmental effect (Public Resources Code § 21082.2). Given the project's location within a Very High Fire Hazard Severity Zone, limited evacuation capacity, dependence on both community water systems and on-site groundwater—particularly during dry and multi-dry years—and the need for substantial wastewater and infrastructure upgrades, there is ample evidence that significant environmental impacts may occur and warrant a more detailed analysis. 2

Additionally, the project area contains tributaries that ultimately connect to Deep Creek, a resource valued for both its ecological importance and recreational use. The surrounding landscape also functions as wildlife habitat and movement corridors and includes areas of tribal cultural sensitivity. While mitigation measures are proposed, only an EIR can adequately address cumulative impacts, growth-inducing effects, long-term operational risks, and a reasonable range of project alternatives. This includes consideration of lower-intensity or phased development options that could meaningfully reduce environmental harm. These analyses are fundamental components of an EIR and cannot be fully or effectively addressed through an IS/MND.

Requiring an EIR would also promote a more thorough and transparent public review process, ensuring that decision-makers and community members are fully informed of the environmental consequences and trade-offs associated with such a substantial expansion before irreversible decisions are made. Moving forward without an EIR risks eroding public trust in the CEQA process and may expose the County to unnecessary legal and environmental risk.

For these reasons, I respectfully urge San Bernardino County to withdraw the proposed Mitigated Negative Declaration and require preparation of a full Environmental Impact Report for the Hume SoCal Campground Expansion Project before any approvals are granted. 3

Thank you for your time and for your attention to responsible and lawful environmental review. If there is a more appropriate contact for submission of these comments, please advise me accordingly. I would also appreciate information on how to be added to any notification or mailing list to receive future updates regarding this project.

Sincerely,

Eric Hooker

562 355-9961

32986 Spruce Dr

Green Valley Lake, Ca 92341

G42 - Responses to Eric Hooker

G42-1 The concerns regarding the adequacy of the environmental document are acknowledged. The Project site acreage and capacity would be increased; however, project sizes do not automatically necessitate the preparation of an EIR under CEQA Guidelines. Additionally, the IS/MND addresses all environmental impacts included in Appendix G of CEQA Guidelines. Impacts that would be evaluated in an EIR are analyzed in the IS/MND and multiple technical studies were conducted to supplement analysis and impact determinations. No significant and unavoidable impacts were anticipated in association with Project implementation, with mitigation incorporated. As such, an Environmental Impact Report would not be warranted.

G42-2 The concerns regarding fire hazard severity, evacuation, and water system impacts are acknowledged. As analyzed in the IS/MND (Section 4.20, Wildfire), the Project site is located within a Very High Fire Hazard Severity Zone (VHFHSZ). The Project would be required to adhere to MM Wildfire – 1, which ensures a comprehensive evacuation plan is utilized and would comply with all COA provided by fire jurisdictions. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on-site occupancy prior to peak hazards conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis. The IS/MND (**Section 4, Public Services**) evaluates fire protection needs and concludes that the Project would not represent a potential need for expanded fire protection in the area or affect service and response times. Refer to Master Response – Fire Service Capacity.

The IS/MND, consistent with CEQA analyzes water supply and wastewater management (**Section 4, Utilities and Service Systems** and **Section 4, Hydrology and Water Quality**) through Appendix B3, Water and Sewer Master Plan, and the 1st Draft Water Supply Assessment, which has been updated (**Appendix B1: Revised Water Supply Assessment**), existing on-site wells can provide adequate capacity to meet the Project's projected water demand through phase 3. The updated WSA identifies a preferred strategy with CLAWA following phase 3, in which the Applicant would prepare an annual water supplier expectations memorandum. Refer to Master Response – Water. The IS/MND (**Section 4, Utilities and Service Systems**) concludes that Project-related water demand would result in a less than significant impact.

The IS/MND concludes that water-supply impacts and wastewater management would be less than significant with compliance with applicable standards and MMs HYD-1, UTL-1, and UTL-3. With MM HYD-1, the Applicant shall conduct well drawdown tests, recovery testing, and water quality retesting before proceeding with each phase, for the wells serving that phase, and use the results to confirm the phase water supply strategy. MM UTL-1 requires that prior to approval of each phase, the Project applicant shall evaluate the available treatment and disposal capacity of the approved on-site wastewater treatment plant (WWTP) to confirm adequate treatment capacity, disposal capacity, operational performance, regulatory compliance, and any improvements necessary to accommodate the proposed occupancy increase. MM UTL-3 requires that prior to the Final Development Plan (FDP) approval for Phase I, the Camp shall install an on-

site wastewater system subject to County and Regional Water Board approval. Additionally, Mitigation Measure UTL-3 allows for sewer service buildout as recommended by the revised Sewer Feasibility Study, which concludes that the Camp will utilize, expand, and/or supplement the on-site wastewater treatment system through buildout of all phases. Furthermore, the existing RSWD system is intended to remain available as a secondary wastewater conveyance and treatment option where capacity is available, and use is approved by RSWD. As each phase advances, the required on-site treatment capacity will be confirmed based on the applicable Project flows, the selected advanced treatment system configuration, and regulatory requirements. Continued use of any portion of the RSWD system will remain subject to available District capacity and RSWD approval. These efforts should be aligned with a phased development plan that matches Camp occupancy growth with the completion of required infrastructure improvements. Refer to Master Response - Wastewater/Sewer.

G42-3 The IS/MND evaluates all impacts listed in CEQA Guidelines Appendix G, similar to an EIR. No further environmental analysis was found to be warranted. Natural areas would be unsubstantially impacted by implementation of the Project; however, a large portion of the Project site would remain in its natural condition. Additionally, the Biological Resources Assessment, which is further described in the Biological Resources section of the IS/MND, has determined that less than significant impacts would occur with implementation of MMs BIO–1 and BIO-2, which require pre-construction clearance surveys and compliance with the Migratory Bird Treaty Act and California Fish and Game Code. The remainder of this comment is conclusionary in nature. No further response is warranted.

G43 - Eric Toth

From: Greetings
To: Barragan, Elena; Bull, Robin
Subject: Shame on HUME! Project Plan (PROJ-2024-00046)
Date: Thursday, January 1, 2026 5:18:33 PM

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I am absolutely appalled to learn that our "Neighbor" Hume Christian Camp seeks to expand their occupancy from 300 **to 3000 a 10x increase in size!!!!** Any increase in capacity is disrespectful to the mountain, and the community that they reside alongside, Green Valley Lake (**with a population of only about 300 itself!!!)** ... ANY increase, let alone a despicable 10x increase shows such **utter disregard for the Mountain, for their neighbors and for our limited resources, our mountain & wildlife, and basic public safety.**

I am both shocked and horrified that such an egregious development would even be proposed, much less considered San Bernardino county.

I hope out of respect for GVL residents, the natural beauty of our precious mountain and rapidly disappearing wilderness, already struggling against congestion, and all that that brings with it, **you will swiftly deny this proposal.**

I hope you will honor our communities strong opposition to ANY explanation of the camps along the GVL road who take much more from our wilderness and community than they give back already.

I am horrified that they would even consider such an affront to the Mountain communities, but it must stop at the County.

DO NOT ALLOW THIS TO PROCEED !!!!!

Thank you!
Eric Toth / Mountain Resident & Home Owner. 1

Project Reference:

The Hume Christian Camp, 32355 Green Valley Lake Rd, has submitted a project plan (PROJ-2024-00046) to the County Land Use Services (LUS) to expand their occupancy from 300 to 3000. This will have significant impact on Green Valley Lake in terms of our evacuation route down GVL Rd, the capacity of our sewer treatment in Running Springs, and our well water supply, and the traffic at the Hwy. 18 junction, just to name a few. The Public Comment Period goes to 1/7/26. To submit your comments on the project you can send a letter to Elena Barragan, County of San Bernardino, Land Use Services-Planning Division, 385 N. Arrowhead Ave. First Floor, San Bernardino, CA 92415-0187, or 2

G43 - Responses to Eric Toth

G43-1 Concerns regarding the scale of the Project are acknowledged. The IS/MND has evaluated various impacts pertaining to the expansion of the facility. Refer to Master Response Biological Resources/Wildlife. No further response is warranted.

G43-2 The comment makes claims about significant effects on sewer and water capacity, and roadway congestion. Refer to Master Responses Transportation/Traffic, Water, and Wastewater/Sewer. No further response is warranted.

G44 - Erika Sheldon

From: Erika Sheldon
To: Barragan, Elena
Subject: Please help us in Green Valley Lake
Date: Monday, January 5, 2026 6:26:23 PM

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Dear Ms. Barragan,

My name is Erika Sheldon, and I have lived in Green Valley Lake with my wife, Jessie Birschbach (a Paid Call Firefighter for our small and special town) and our ten-year-old son for nearly ten years. We chose to make our home here because of the community, the environment, and the sense of safety that this small mountain town provides. 1

I am writing with deep concern regarding San Bernardino County's consideration of Hume SoCal's proposal to expand from approximately 300 campers to 3,000.

I know you've likely received extensive correspondence from other Green Valley Lake residents outlining the strain such an expansion would place on our infrastructure. Even with potential future improvements, an increase of this magnitude would irreversibly change the character and sustainability of our town. Our water system is already designed in a way that gradually depletes the underground water table; a tenfold increase in seasonal population would only accelerate that decline and contribute to long-term environmental damage. From a practical standpoint, it's difficult to understand how this scale of expansion could be sustained responsibly over time. 2

While I write as a resident and parent, I also feel compelled to raise serious public safety concerns based on my wife's role as a paid-call firefighter in Green Valley Lake. Evacuation during a wildfire or any other emergency situation is already a significant challenge due to limited access roads. Introducing thousands of additional campers and staff would severely complicate evacuation efforts in an emergency. In such a scenario, residents and first responders would inevitably be delayed, and any resulting injuries or loss of life would be the responsibility of both the operator and the County. 3

Additionally, many emergency calls already originate from Hume (whose tax dollars do not contribute financially in equal measure even slightly) and the other camps in the area. A dramatic expansion would further stretch our small fire station, diverting our extremely limited resources away from protecting permanent residents and increasing risk for everyone involved.

I urge you to take these concerns—particularly those related to safety, water sustainability, and emergency response—into serious consideration as this proposal is reviewed. I would welcome the opportunity to discuss any of this further if that would be helpful. 4

Thank you for your time and consideration.

Sincerely,

Erika Sheldon

SAFEWORD

Erika Sheldon | 310-902-0428
www.safewordcreative.com

4

G44 - Responses to Erika Sheldon

G44-1 This comment is introductory in nature and expresses concern for the capacity expansion.

G44-2 The comment regarding water concerns is acknowledged. The Project intends to use municipal water provided by the Crestline-Lake Arrowhead Water Agency and groundwater wells. The IS/MND, consistent with CEQA analyzes water supply and wastewater management (**Section 4, Utilities and Service Systems** and **Section 4, Hydrology and Water Quality**) through **Appendix B3: Water and Sewer Master Plan**, and the 1st Draft Water Supply Assessment, which has been updated (**Appendix B1: Revised Water Supply Assessment**), existing on-site wells can provide adequate capacity to meet the Project's projected water demand through phase 3. The updated WSA identifies a preferred strategy with CLAWA following phase 3, in which the Applicant would prepare an annual water supplier expectations memorandum. Refer to Master Response – Water. The IS/MND **(Section 4, Utilities and Service Systems)** concludes that Project-related water demand would result in a less than significant impact.

The IS/MND concludes that water-supply impacts and wastewater management would be less than significant with compliance with applicable standards and MMs HYD-1, UTL-1, and UTL-3. With MM HYD-1, the Applicant shall conduct well drawdown tests, recovery testing, and water quality retesting before proceeding with each phase, for the wells serving that phase, and use the results to confirm the phase water supply strategy. MM UTL-1 requires that prior to approval of each phase, the Project applicant shall evaluate the available treatment and disposal capacity of the approved on-site wastewater treatment plant (WWTP) to confirm adequate treatment capacity, disposal capacity, operational performance, regulatory compliance, and any improvements necessary to accommodate the proposed occupancy increase. MM UTL-3 requires that prior to the Final Development Plan (FDP) approval for Phase I, the Camp shall install an on-site wastewater system subject to County and Regional Water Board approval. Additionally, Mitigation Measure UTL-3 allows for sewer service buildout as recommended by the revised Sewer Feasibility Study, which concludes that the Camp will utilize, expand, and/or supplement the on-site wastewater treatment system through buildout of all phases. Furthermore, the existing RSWD system is intended to remain available as a secondary wastewater conveyance and treatment option where capacity is available, and use is approved by RSWD. As each phase advances, the required on-site treatment capacity will be confirmed based on the applicable Project flows, the selected advanced treatment system configuration, and regulatory requirements. Continued use of any portion of the RSWD system will remain subject to available District capacity and RSWD approval. These efforts should be aligned with a phased development plan that matches Camp occupancy growth with the completion of required infrastructure improvements. Refer to Master Response - Wastewater/Sewer.

G44-3 The comment about public safety and evacuation concerns is acknowledged. As discussed in the IS/MND (**Section 4, Wildfire**) MM WF – 1, the Project would continually update and comply with a comprehensive evacuation plan. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which

reduce on-site occupancy prior to peak hazard conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis.

G44-4 The Project would pay development impact fees to assist with public service impacts. The IS/MND (**Section 4, Public Services**) evaluates fire protection needs and concludes that the Project would not represent a potential need for expanded fire protection in the area or affect service and response times. Refer to Master Response – Fire Service Capacity.

G45 - Ernie Poulin

From: Ernie Poulin
To: Barragan, Elena
Subject: Hume Expansion proposal
Date: Tuesday, January 13, 2026 7:28:10 AM

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Hello Ms. Barragan,

As a full-time resident of Green Valley Lake and owner of three residences, all occupied by family, my wife and I have a great stake in our little town.

With as much as I understand about expansion of the Southland and the exploration of the national forest by the young, it pains me to, currently, be in opposition to the existing set of plans for the expansion of the Hume Camp. It is quite clear that the plans, as written, are very remiss in their ability to predict and plan for the expansion they require, while maintaining the safety and free flow of residents and mountain visitors. 1

Regardless of the great teachings that may be from the words of holy men or a deity, to allow neighbors to suffer while allowing any for or not-for-profit organization, including churches, to continue to stomp over the rights of the beliefs and choices of those around them. In this case, it is more an over burdening of this area with more traffic and population than the area can handle at one time. 2

Green Valley Lake and even Running Springs are not Lake Arrowhead or Big Bear. And the thought that this would create any additional necessary or even reasonable jobs for the locals, is not realistic either. We are mostly retirees in Green Valley Lake and those who come up to enjoy the peace and quiet at one of the very last communities left, at the very highest elevation on this mountain, wish for some peace and quiet, the ability to flush our toilets, run clean water, and it is already clear how many bus and truck accidents have been occurring on highways 330 and 18, which cannot be remedied by any plan yet indicated in the Hume plans. 3

Recommendations? 4

1. Hume paying the running springs water district for great improvements to its sewer system.
2. Hume planning and paying for a tram system to bring their campers up the hill from

a bus parking area at the bottom.

3. There are so many more to make this a rational plan that would have to be engineered, far further than already done.

Thank you,

Ernest Poulin
33680 Green Valley Lake Rd
PO Box 8212
Green Valley Lake, CA 92341-8212

818-590-3007 cell

G45 - Responses to Ernie Poulin

G45-1 This comment is introductory in nature. No further response is warranted.

G45-2 The concerns about overexpansion are acknowledged. See Master Response – Transportation/Traffic.

G45-3 Traffic and noise impacts would not be significant, as determined by the IS/MND. The Project would not operate at full capacity at all times and would minimize traffic impacts through strategic planning. See Master Response – Noise.

G45-4 The recommendations have been noted. Development impact fees would be paid to support all necessary infrastructure improvements to support the camp. Additionally, the vast majority of transportation trips would be conducted via bus. No further response is warranted.

G46 - Eugene and Lori Medina

From: Lori Medina
To: Barragan, Elena
Subject: Hume Camp Expansion
Date: Tuesday, January 6, 2026 9:23:54 AM

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Dear Ms. Barragan,

I hope this message finds you well. I am writing to share my sincere support for the proposed expansion of Hume Camp (PROJ-2024-00046). I truly believe this project offers a meaningful opportunity to strengthen our community while thoughtfully balancing growth, sustainability, and environmental care.

The Hume Camp master plan reflects a considerate and well-rounded vision—one that honors both the experience of its guests and the protection of our natural surroundings. Its emphasis on sustainable practices aligns closely with our county's values, and the inclusion of green spaces and environmentally mindful design demonstrates a genuine commitment to preserving open space and supporting local wildlife.

The camp's proximity to Green Valley Lake is especially meaningful. By carefully maintaining and enhancing this area, the project helps ensure that these natural landscapes remain accessible and protected for future generations. This approach not only safeguards biodiversity and ecological balance but also encourages a shared sense of responsibility and appreciation for our environment within the community.

Equally important is Hume Camp's longstanding dedication to working with youth. Through programs that emphasize mentorship, teamwork, outdoor education, and personal growth, Hume plays an important role in helping young people develop confidence, responsibility, and a sense of community. Investing in opportunities like these is an investment in our future leaders and in the long-term well-being of our community. 1

In addition, the proposed expansion has the potential to positively impact our local economy by creating jobs and supporting nearby businesses. Increased activity from visitors and residents alike could provide a much-needed boost to our mountain community and help foster continued economic vitality.

I respectfully encourage you to consider the long-term benefits this thoughtfully planned project may bring. The vision behind the Hume Camp master plan reflects care for our environment, our economy, and our future generations.

Thank you very much for your time and consideration. I sincerely hope you will lend your support to this project and help move our community toward a positive and sustainable future for Green Valley Lake.

Warm regards,
Eugene and Lori Medina

32994 Spruce Dr.

Green Valley Lake, Ca 92341-8401 1

Sent from my iPhone

G46 - Response to Eugene and Lori Medina

G46-1 This comment offers comprehensive support for the Project and is acknowledged. No further response is warranted.

G47 - Eun Ah Kim

From: Eun Ah Kim
To: Barragan, Elena
Subject: PROJ-2024-00046
Date: Friday, January 16, 2026 8:03:08 PM

> You don't often get email from kimeunah1205@gmail.com. Learn why this is important

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I am a full time resident/homeowner in Green Valley Lake. I have been out of town due to a medical emergency for my son and just picked up my mail from the post office box and read in the Mountain Lifestyle newspaper the Hume Camp Expansion Meets Resistance from Locals. 1

I am very concerned and would like to know when the next planning commission meeting will be taking place so that I can attend. 1

I agree this expansion will have adverse effects on the local residents, water, sewer, safety, and mountain resources. 2

I am requesting a formal environmental impact report to address these important issues before the County can approve the camp's tenfold expansion. 3

I apologize that I am submitting my concerns after the 1/7/26 deadline, but I was out of town due to a medical emergency. 4

Warmly,
Eun Ah Kim

G47 - Responses to Eun Ah Kim

G47-1 This comment is introductory in nature. No further response is warranted.

G47-2 Impacts to the community and regarding water, wastewater, safety, and resources have been evaluated in the IS/MND. See Master Responses – Biological Resources/Wildlife; Water; and Wastewater/Sewer.

G47-3 The IS/MND has adequately evaluated the Project. See Master Response – Request for EIR.

G47-4 This comment is conclusionary in nature. No further response is warranted.

G48 - Eve Sinclair

From: eve sinclair
To: Barragan, Elena
Cc: Rowe, Dawn; Bull, Robin; Supervisor Rowe; senator.ochoabogh@senate.ca.gov; assemblymember.lackey@assembly.ca.gov
Subject: Camp Hume, Project 2024-00046, 32355 Green Valley Lake Road - Public Comment
Date: Wednesday, December 10, 2025 9:38:57 PM

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Good evening! Below, please find my public comment regarding the Camp Hume requested expansion by another 3000 people:

- Green Valley Lake has about 1050 properties and is located at the dead-end of Green Valley Lake Rd, a four-mile-long narrow, winding 2-lane road. In addition to GVL residents, there are three camps (including Hume) located along this road, currently totaling up to about another 1300 campers that will need to use that road in case of evacuation. 1
- GVL is currently working to become a Firewise community, and during our community evaluation with Cal Fire, one of our biggest challenges noted is that we only have one road out (only one means of egress) in the event of evacuating during a wildfire.
- According to California Fire Code, section 503.1.2, secondary access may be required if the singular egress is vulnerable to vehicle congestion, terrain issues, or climate conditions - GVL road experiences all three of these conditions, and so should require secondary egress.
- Assembly Bill (AB) 2911 (Friedman, 2018), which added Section 4290.5 to the Public Resources Code, requires the Board of Forestry and Fire Protection (Board), in consultation with the State Fire Marshal and local jurisdictions, to identify existing subdivisions with over 30 homes in State Responsibility Areas or Very High Fire Hazard Severity Zones that are at high fire risk and lack a secondary escape route. The Board, State Fire Marshal, and local government are also tasked with developing recommendations to enhance the fire safety of these subdivisions. The Subdivision Review Program is led by the Board of Forestry and Fire Protection, involving consultation with CAL FIRE's Office of the State Fire Marshal. According to the Cal Fire assessment of GVL in 2024, we are both a State Responsibility Area and also located in a Very High Fire Severity zone. This report officially recommends to add a secondary egress for the community of GVL: https://services1.arcgis.com/jUJYIo9tSA7EHvfZ/arcgis/rest/services/Subdivisions_Public_VIEW_v2/FeatureServer/0/2521/attachments/2050
- During the Slide Fire (2007), GVL lost nearly 100 homes and businesses in the wildfire; fire crews had to surrender and withdraw from fire fighting at 10p on 10/22/2007 due to fears of becoming trapped due to single egress road; fire then burned unchecked, except for citizens that remained behind with hoses, risking life and limb. 2
- In addition to wildfire and evacuation needs, the community of Green Valley Lake was cut off for weeks from neighboring towns and the 18 highway during Snowmageddon. Community members ran out of necessities and supplies, which had to be dropped off by helicopters until the road could eventually be cleared.
- As we saw in Paradise during the 2018 Camp Fire, there was effectively **only one primary evacuation route**, the four-lane road known as Skyway, which led to severe traffic gridlock. This lack of sufficient exit routes was a major issue during the fire, contributing to the chaos and trapping many residents in traffic as the firestorm ripped through the town. City officials have since worked to improve the situation by adopting new protocols for converting roads into one-way evacuation routes and paving an additional forest road north of Paradise to serve as another escape path.
- Considering the history of this area, the isolated nature of this community, and the extreme vulnerability of our singular access road, it would be short-sighted and reckless to increase the population pressure on this road by another 3000 people without adding another avenue of egress. One fallen tree could trap thousands of residents and camp attendees in a senseless tragedy.

Please do not approve the expansion of the Hume camp without requiring the installation of a secondary egress route. We depend on you to think through the worst-case scenarios that could endanger the lives of the people that live and recreate along Green Valley Lake Road.

- best,
Eve Sinclair
GVL Resident

G48 - Responses to Eve Sinclair

G48-1 The comment is introductory in nature. The comment provides general information about Green Valley Lake. No further response is warranted.

G48-2 The comment includes emergency access concerns. As discussed in the IS/MND (**Section 4, Wildfire**) MM WF – 1, the Project would continually update and comply with a comprehensive evacuation plan. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on-site occupancy prior to peak hazard conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis. As evaluated in the IS/MND (**Section 4, Transportation**), the Project would not modify existing roadways, and Project-related traffic would not create a significant hazard or adversely affect emergency access.

Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity.

G49 - Gabriel Cristales

From: Gabriel Cristales
To: Barragan, Elena
Subject: I am a resident of the mountain community and have been following the discussions around Hume's proposed expansion with great interest. As someone who lives locally and understands both the challenges and potential of this area, I believe this expansio... 1
Date: Tuesday, January 6, 2026 6:50:45 PM

You don't often get email from gabrielcristales3@gmail.com. Learn why this is important

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G49 - Responses to Gabriel Cristales

G49-1 The comment was submitted as an incomplete statement within the subject line of an email and was truncated upon receipt. The full context of the comment is unavailable, and no specific concern regarding the Project can be identified. Accordingly, no substantive response is possible, and no changes to the IS/MND are warranted.

G50 - Gina Galbo

From: Gina G
To: Barragan, Elena
Subject: HUME expansion. Why it"s a bad idea.
Date: Thursday, December 11, 2025 8:08:37 PM

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Elena

I moved to Green Valley because it is a small, quiet community. If I wanted a busy, high-density neighborhood, I could have chosen Big Bear or Lake Arrowhead. Proposing to increase Hume to 3,000 occupants— even 1,000— is unreasonable. Managing that many people, along with the buses and traffic required to move campers on and off the mountain, is already challenging under normal conditions. 1

During holidays or snowfall, Green Valley Lake Road, Highway 18, and 330 are already congested and chaotic. In the event of a fire, earthquake, or any other natural disaster, the risks multiply. This isn't just dangerous for visitors—it's dangerous for those of us who live here. With only one road out, we have a single, fragile evacuation route_that is Green Valley Lake road. Approving a project that would dramatically increase population density in such a vulnerable area is irresponsible. 2

And to suggest that the project will be expanded gradually over the next 30 to 50 years makes no sense. Many of us—whether part-time or full-time residents—cherish this place as a peaceful mountain retreat, something to pass down from generation to generation. I want my granddaughter to be safe here, especially, in times of disaster. 3

Let's be reasonable: this expansion is a for-profit move. Homeowners did not buy property here to profit, but to enjoy living in a peaceful, quiet, and safe environment. Supporting growth on this scale goes against everything this community stands for. Anyone strongly pushing for the Hume expansion appears to have something to gain from it. 4

Lives are at stake.

Sincerely,

Gina Galbo

594 Bolsa Chica Ave

Green Valley Lake, CA 92341

--
Gina Galbo
Twenty First Century Design Group
1311 N Whitnall Hwy
Burbank CA 91505
818 845-0159 ofc
www.gotographics.com
www.twitter.com/gotographics

G50 - Responses to Gina Galbo

G50-1 The comment includes concerns over the scale of the Project. The Project is consistent with the existing HT/SD-RES zoning and Rural Living land use designation, which permits campground uses subject to County review. The comment does not identify a new environmental impact requiring revisions to the IS/MND.

G50-2 The comment provides concerns regarding emergency access on local and regional roadways. The emergency access concerns are acknowledged. As discussed in the IS/MND (**Section 4, Wildfire**) MM WF – 1, the Project would continually update and comply with a comprehensive evacuation plan. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on-site occupancy prior to peak hazard conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis. As evaluated in the IS/MND (**Section 4, Transportation**), the Project would not modify existing roadways, and Project-related traffic would not create a significant hazard or adversely affect emergency access. Seasonal weather conditions and snow removal are addressed by existing County road maintenance operations.

Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity.

G50-3 The comment is conclusionary in nature. The comment provides an opinion of Project timeline and impact. Refer to responses above. No further response is warranted.

G50-4 The comment is conclusionary in nature. The comment provides an opinion of community development in the area, economics of the Project, and community character concerns. No further response is warranted.

G51 - Gloria McNamara

From: Gloria Mcnamara
To: Barragan, Elena
Subject: PROJ-2024-00046
Date: Wednesday, January 14, 2026 6:29:36 PM

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Hello Elena,
I am a property owner in Green Valley Lake, CA and have understand that this project is a plan to expand the Hume camp occupancy from 300 to 3000. This is very concerning as the area roads and infrastructure is not built to handle that many people in the area.

One of the concerns is the one way in, one way out road that we all must travel to get to and from Green Valley Lake. This road, would become a safety disaster if that many people tried to flee a wild fire or other emergency.

Local residents care for the area and drive cautiously on the narrow windy road. We have issues when people who are unfamiliar with this road drive excessive speeds with little concern for the safety of others. The drastic increase in occupancy rates at Hume will cause many more traffic incidents to occur in the area and emergency support response is already lengthy due to the distance and remote nature of the area. Safety is the biggest concern with this project.

Thank you for your consideration of the residents concerns to this expansion.

Gloria McNamara
Green Valley Lake property owner

1

G51 - Responses to Gloria McNamara

G51-1 The concerns regarding the expansion of the camp are acknowledged. Traffic impacts have been evaluated in the IS/MND. See Master Response – Transportation/Traffic.

G52 - Grace Lopez

From: grace lopez
To: Barragan, Elena
Subject: Hume socal
Date: Monday, December 15, 2025 3:26:55 PM

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Elena Barragan

I am writing this to hopefully voice my opinion on the proposal of Hume Christian camp. I know most people here in Green Valley Lake do not like the proposed idea. I do not share their views. This town has prevented many people from opportunities to better the community. I just wanted to state that I am for their proposal. I know The concerns are valid. When it comes to water and to sewage but I believe they have that worked out in their proposal, people are blinded and don't read the facts and the details. Thank you very much for your attention. Grace Lopez resident of Green Valley Lake

1

2

1 Cont

G52 - Responses to Grace Lopez

G52-1 Support for the Project is acknowledged. No further response is warranted.

G52-2 The comment includes concerns over water and sewage. The IS/MND, consistent with CEQA, analyzes water supply and wastewater management (**Section 4, Utilities and Service Systems** and **Section 4, Hydrology and Water Quality**) through **Appendix B3: Water and Sewer Master Plan** and the 1st Draft Water Supply Assessment, which has been updated (**Appendix B1: Revised Water Supply Assessment**), existing on-site wells can provide adequate capacity to meet the Project's projected water demand through phase 3. The updated WSA identifies a preferred strategy with CLAWA following phase 3, in which the Applicant would prepare an annual water supplier expectations memorandum. Refer to Master Response – Water. The IS/MND (**Section 4, Utilities and Service Systems**) concludes that Project-related water demand would result in a less than significant impact.

The IS/MND concludes that water-supply impacts and wastewater management would be less than significant with compliance with applicable standards and MMs HYD-1, UTL-1, and UTL-3. With MM HYD-1, the Applicant shall conduct well drawdown tests, recovery testing, and water quality retesting before proceeding with each phase, for the wells serving that phase, and use the results to confirm the phase water supply strategy. MM UTL-1 requires that prior to approval of each phase, the Project applicant shall evaluate the available treatment and disposal capacity of the approved on-site wastewater treatment plant (WWTP) to confirm adequate treatment capacity, disposal capacity, operational performance, regulatory compliance, and any improvements necessary to accommodate the proposed occupancy increase. MM UTL-3 requires that prior to the Final Development Plan (FDP) approval for Phase I, the Camp shall install an on-site wastewater system subject to County and Regional Water Board approval. Additionally, Mitigation Measure UTL-3 allows for sewer service buildout as recommended by the revised Sewer Feasibility Study, which concludes that the Camp will utilize, expand, and/or supplement the on-site wastewater treatment system through buildout of all phases. Furthermore, the existing RSWD system is intended to remain available as a secondary wastewater conveyance and treatment option where capacity is available, and use is approved by RSWD. As each phase advances, the required on-site treatment capacity will be confirmed based on the applicable Project flows, the selected advanced treatment system configuration, and regulatory requirements. Continued use of any portion of the RSWD system will remain subject to available District capacity and RSWD approval. These efforts should be aligned with a phased development plan that matches Camp occupancy growth with the completion of required infrastructure improvements. Refer to Master Response - Wastewater/Sewer.

G53 - Grace Lopez

January 1, 2026

Elena Barragan

County of San Bernadino Planning Division

385 N.Arrowhead Ave. First Floor

San Bernardino,Ca 92415-0187

Dear Ms. Barragan,

I am writing to express my strong support for purposed expansion of the Hume Camp (PROJ-2024-00046). This project represents a vital opportunity for our community to enhance its infrastructure,promote sustainable development, and foster economic growth.

The Hume Camp master plan envisions a well-integrated camp that prioritizes not only the needs of its guests but also the preservation of our natural environment. By focusing on sustainable practices, this development aligns with our county's goals. Theincorporation of g reen spaces and environmentally conscious design will protect open spaces in our commun ity while protecting our local wildlife habitats. 1

The project's proximity to Green Valley Lake is a valuable aspect that contributes to the preservation of open space in our community. By maintaining and enhancing this natur al area,we can ensure that future generations have access to untouched landscapes that promote biodiversity and ecological balance. This commitment to preserving open space not only enriches our environment but also fosters a sense of stewardship among com munity members,encouraging them to appreciate and protect our natural resources.

A critical aspect of Hume mission is its commitment to working with youth, providing prog rams that help shape future leaders. By engaging young people in enriching activities,ment orship,team building, and outdoor education, Hume plays a pivotal role in developing confi dent,responsible, and community-mninded individuals. Equipping our future leaders with the skills,values, and vision to address tomorrow's challenges is essential, and this requires an investment in our youth.

Moreover,the project is poised to stimulate our local economy by creating jobs and attracti ng new businesses. The anticipated influx of both residents and visitors will have a positiv e ripple effect on our local economy, supporting existing businesses and encouraging new entrepreneurial ventures. This economic boost is essential for the renewal of our mountain community. 2

I urge you to consider the long-term benefits that the Hume Camp master plan brings to our community. The thoughtful planning and vision behind this project will contribute significantly

to our county's growth and sustainability, while also nurturing the next generation of citize n leaders.

Thank you for your attention to this matter. I hope you will support this project and help pave the way for a brighter, more sustainable future for the Green Valley Lake community.

2

Sincerely,

Grace M.Lopez

Resident Green Valley Lake

G53 - Responses to Grace Lopez

G53-1 This comment is introductory in nature and offers support for the Project. No further response is warranted.

G53-2 This comment highlights perceived benefits of the Project and is conclusionary in nature. No further response is warranted.

G54 - Grace Monsma

From: Grace Monsma
To: Barragan, Elena
Subject: The Hume Christian Camp PROJ-2024-00046
Date: Sunday, January 4, 2026 11:30:04 PM

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To Elena Barragan
Regarding County Land Use Services- Hume Christian Camp PROJ-2024-00046

Ms. Barragan,

I am very concerned about the expansion project proposed by the Hume Christian Camp on Green Valley Lake Road. My husband and I own a home in Green Valley Lake, California, and we hear that the proposed expansion would take the Hume Camp occupancy from 300 to 3000. We have a number of concerns. 1

Our town relies on well water, and we are concerned about the effect of so many more people using the mountain water, and also the stress on the capacity of the Running Springs sewer treatment. 2

The town of Green Valley Lake is at the end of a very small 3 mile road, and one of our major concerns is our ability to quickly evacuate in the event of an emergency. We are very much like Paradise, California, in that we have only one way out if there is a wildfire. We have had fire emergencies in our recent history, so this is a valid concern. We see the large increase of people from the Hume Camp needing to evacuate the area, along with Green Valley Lake residents, as a real safety concern.

We fear that Hume might receive permission to proceed with their expansion without seriously looking at the effect on the environment and our small town at the end of the road. At the very least, we feel that a full Environmental Impact Report should be completed before the project is allowed to proceed. 3

Thank you for taking our concerns seriously. We are anxious about this expansion, especially because we were not asked early on about this matter. We are the people who live here!

Grace Monsma

Sent from my iPad

G54 - Responses to Grace Monsma

G54-1 Concerns regarding the expansion of the camp are acknowledged. This comment is introductory in nature. No further response is warranted.

G54-2 The IS/MND has evaluated impacts on water and sewer systems and determined impacts to be less than significant. See Master Response – Water.

G54-3 The concerns regarding evacuation and ability to evacuate in case of emergency are acknowledged. The IS/MND has evaluated evacuation abilities and would require incorporation of a comprehensive evacuation plan to ensure less than significant impacts on the community. See Master Response – Wildfire. The IS/MND adequately addresses environmental review as determined by the County of San Bernardino who is the Lead Agency of the Project. The remainder of this comment is conclusionary in nature; therefore, no further response is warranted.

G55 - Guy and Susan Bredesen

From: Susan Bredesen
To: Barragan, Elena
Subject: Hume Camp / Green Valley Lake
Date: Wednesday, January 7, 2026 3:50:56 PM

[You don't often get email from sue.m.bredesen@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Elena,
My family and I have been part of the GVL community for over 40 years and owned property for the last 15 years. To read about the excessive Hume expansion is quite disturbing for many reasons especially the lack of planning in the case of an emergency evacuation. Has Cal Trans and CHP been consulted on their thoughts and the impact of that much traffic added to the 330, 1
Hwy 18 and Green Valley Lake Road?
In addition, I don't believe the infrastructure can handle such a huge impact on our natural and all necessary resources. We vehemently oppose the project.
and hope that going forward the community of GVL and Running Springs will be formally informed of any future decisions and developments of this project. 2

Kind regards,
Guy and Susan Bredesen

G55 - Responses to Guy and Susan Bredesen

G55-1 The Transportation section of the IS/MND prepared a Traffic Analysis that is included as **Appendix J** of the IS/MND and determined that traffic conditions, existing road infrastructure and access would be adequate to service the expanded Project site. As evaluated in the IS/MND (**Section 4, Transportation**), the Project would not modify existing roadways, and Project-related traffic would not create a significant hazard or adversely affect emergency access. Seasonal weather conditions and snow removal are addressed by existing County road maintenance operations.

Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity.

G55-2 The concerns about the scale of the proposed expansion are acknowledged. The IS/MND analysis evaluated impacts on water supplies, wastewater treatment capacity, and solid waste treatment capacity in the Utilities and Service Systems Section of the IS/MND (**Section 4, Utilities and Service Systems**).

G56 - Jadwiga Hescox

From: Jadwiga Hescox
To: Barragan, Elena
Subject: Fwd: Hume Camp Expansion Comment Period
Date: Monday, January 5, 2026 10:47:09 AM

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Jadwiga (Yad-vee-ga) Jagiello Hescox, PhD, MA
Community Psychology
Health Psychology

Administrator
APA Division 27, Society for Community Research and Action
www.scra27.org
jadwigahescox@scra27.org

Recent Publications:
Harnessing sociocultural and sociodemographic factors to promote gratitude in diverse youth. *Flourishing in Contexts and Cultures: Sociocultural Perspectives on Promoting Youth Well-Being,* 14th Edition. Information Age Publishing. (Hescox, Bono, & Palacios, 2023).
https://www.amazon.com/Flourishing-Contexts-Cultures-Sociocultural-Perspectives/dp/B0CC7KMWNX
Additional Publications:
International Journal of Wellbeing Article of the Year 2020
Stress and wellbeing in urban college students in the U.S. during the COVID-19 pandemic: Can grit and gratitude help? (Bono, Reil, & Hescox, 2020)
https://www.internationaljournalofwellbeing.org/index.php/ijow/article/view/1331/931

1

---------- Forwarded message ---------
From: **Jadwiga Hescox** <jadwigahescox@gmail.com>
Date: Mon, Jan 5, 2026 at 10:44 AM
Subject: Hume Camp Expansion Comment Period
To: <ElenaBarragan@lus.sbcounty.gov>
Cc: Jeffrey Hescox <jhescox@ucdavis.edu>

To Whom it May Concern,

I am vehemently opposed to the expansion of Hume camp. My husband and I own a home on Piedras Grandes in Green Valley Lake and pay a premium in property taxes, water maintenance, tree maintenance, and property insurance. Hume Camp should do the same. I do not want my maintenance fees to go up to support the additional

strain their expansion will do to the area's infrastructure. I am not a follower of the global christian ministry and do not want to subsidize their activities. Their expansion will increase the risk of wildfires, use of the sewer systems, electrical use, increased noise and traffic, and affect endangered species of wildlife. There is no way to safely evacuate a 3000 person camp during a wildfire without endangering the evacuation of local residents. Please deny their request for expansion. Thank you. 1 Cont

2

Dr. Jadwiga Hescox

Jadwiga (Yad-vee-ga) Jagiello Hescox, PhD, MA
Community Psychology
Health Psychology

Administrator
APA Division 27, Society for Community Research and Action
www.scra27.org
jadwigahescox@scra27.org

Recent Publications:
Harnessing sociocultural and sociodemographic factors to promote gratitude in diverse youth. *Flourishing in Contexts and Cultures: Sociocultural Perspectives on Promoting Youth Well-Being,* 14th Edition. Information Age Publishing. (Hescox, Bono, & Palacios, 2023).
https://www.amazon.com/Flourishing-Contexts-Cultures-Sociocultural-Perspectives/dp/B0CC7KMWNX
Additional Publications:
International Journal of Wellbeing Article of the Year 2020
Stress and wellbeing in urban college students in the U.S. during the COVID-19 pandemic: Can grit and gratitude help? (Bono, Reil, & Hescox, 2020)
https://www.internationaljournalofwellbeing.org/index.php/ijow/article/view/1331/931

G56 - Responses to Jadwiga Hescox

G56-1 The comment mentions concerns tied to general fees and finances. Like other developments in the County, the Project would be eligible to pay applicable development impact fees to County services, including school districts. The comment does not identify a new or unaddressed environmental impact under CEQA. No revisions to the IS/MND are warranted.

G56-2 The comment lists multiple concerns followed by a request for denial. The IS/MND evaluated potential impacts to utility infrastructure, roadways, wildfire risk, electricity usage, and noise in accordance with State CEQA Guidelines. Each impact area was found to be less than significant per CEQA guidelines. Refer to Master Responses Transportation/Traffic, Wildfire, Water, Noise, Wastewater/Sewer, and Energy. The comment does not provide additional evidence that the IS/MND is inadequate. No revisions are warranted.

G57 - James Higgins

01/06/2026

Elena Barragan
County of San Bernardino Planning Division
385 N. Arrowhead Ave. First Floor
San Bernardino, Ca 92415-0187

Dear Ms. Barragan,

I'm a Southern California local – born in the L.A. area, raised in San Diego, and currently live in the Inland Empire. I've also started and led many networks of youth workers from many church denominations, have worked with public and private schools, and non-profits as well. I have also taken thousands of students, parents, and other volunteers to over 100 summer camps, winter camps, conferences, trainings, and retreats that have utilized not only Hume's facilities, but other camps in the area as well. In addition to this, I benefitted from camp experiences as a student by attending them, and my children were able to grow up benefitting from these as well. With this background and experience, and as a voting resident of San Bernardino County, I want to express my full support for the Hume Camp master plan application. (PROJ 2024-00046).

This project will be beneficial not only for many religious institutions who cannot provide camp experiences on their own, but will also benefit our community at large. I believe that investing in the next generation is a priority, as I have invested the majority of my career in this area. While there are many beautiful individually owned properties, and other developments for wealthy individuals to vacation, ski/snowboard, or boat, there are very few opportunities for children growing up to experiencing life-shaping camps and retreats with other students and caring adults in a safe environment. I benefitted from camping ministry personally; being raised by a single mother who was a first-generation immigrant and needed government assistance to get by. She did not having the resources or ability to provide an experience like this for me, but camping ministries in Southern California did. They got me out of a run-down apartment into the beautiful outdoors, provided opportunities for friendship and support, and gave me an appreciation for our local Southern California environment. Hume SoCal will help provide this to many other children like me, impacting a diverse population of students from all over Southern California and beyond. 1

My experience with Hume in the past (and by bringing students to Hume SoCal from its inception), is positive. They manage resources well, provide financial assistance to

students who cannot afford it, and recruit safe and capable adults to supervise. Their staff is top notch, and their volunteer base allows them to have consistent, sustainable management of their facilities (such as fire abatement and other facility maintenance). As a certified Water Tender Fire Support driver I also see value in Hume SoCal's ability to maintain their facilities for safety, and as a potential resource for fire support like they do at Hume Lake.

This history of Hume's responsible environmental management give me overwhelming confidence that their master plan will take the needs of its residents into high consideration and safeguards our beautiful Southern California environment. They prioritize sustainability, have a deep conviction of being good stewards of our environment. The long-term value of open spaces and green areas will not only highlight the beauty of our surroundings, but also provide sustainable habitats for local wildlife. Providing a place for people to escape from the city to experience this in person will also help to ensure the long-term appreciation of this area. In addition to this, voting measures that protect these areas and provide support for them in the future will be more visible to those who vote within this county. It's hard to think of a better way to protect and sustain them in the long term. 1

In your planning and discussions, please consider the long-term benefits that the Hume project will bring to the community, and to those who will experience it as campers. The thoughtful planning and vision will positively shape our county's growth and sustainability. Not only so, but it is also an investment into a diverse population of the next generation of leaders who will guide us in the years to come.

Thank you for your time and consideration. Please consider giving the Hume Master Plan your support to provide an incredible resource for our youth, and a sustainable development that will expose many to the incredible resources in nature that we have around us.

Sincerely,

James "Jimmy" Higgins
Family Care Pastor
Hillside Community Church

G57 - Responses to James Higgins

G57-1 The comment includes general support for the Project. The commenter's support for the Project has been acknowledged. No further response is warranted.

G58 - Jan Jones

From: Jan Jones
To: Barragan, Elena
Subject: Hume near Green Valley Lake
Date: Friday, January 2, 2026 3:05:00 PM

[You don't often get email from jjones@socal.rr.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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I am contacting you to share my concerns about the Hume expansion off Green Valley Lake road. There are many reasons why this is unsafe. My greatest concern is the safety problem if a fire evacuation is called. The one and only road into Green Valley Lake could not safely handle the traffic the Hume expansion would create. For the safety of GVL residents and the camps along the road, the Hume expansion should be denied. Thank you for the time you've taken to read my message and understanding the hazard this situation would create. I am a homeowner in GVL. 1

Jan Jones
Sent from my iPhone

G58 - Response to Jan Jones

G58-1 This comment is primarily concerned with evacuation impacts and traffic impacts. The Project would include the implementation of a comprehensive evacuation plan. Additionally, the Project would schedule arrivals and departures methodically to avoid peak traffic periods currently experienced by the community. The IS/MND concluded, in part because of these components, that Project implementation would have a less than significant impact to traffic. See Master Response – Wildfire and Master Response – Transportation/Traffic.

G59 - Jean Konnoff

From: jean konnoff
To: Barragan, Elena
Cc: Board Meeting Comments; Supervisor Cook; Supervisor Armendarez; Supervisor Hagman; Supervisor Hagman; supervisor.baca@sbcounty.gov; Supervisor Rowe; assemblymember.lackey@assembly.ca.gov; senstor.ochoa-bogh@senate.ca.gov
Subject: Hume Camp Expansion - Green Valley Lake
Date: Wednesday, January 7, 2026 4:44:46 PM

You don't often get email from meanjeanoh@yahoo.com. Learn why this is important

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To Whom It May Concern,

I have owned property in Green Valley Lake for 22 years. I have numerous concerns regarding the potential expansion of the local Hume Camp Ground.

From the lack of communication of the proposed expansion, to the impacts to the water table, sewer systems, and most importantly emergency access to GVL residents in the event of an evacuation due to wild fires or earthquakes.

I request the following be ordered and made public before any approvals are granted -

1. Preparation of a FULL Environmental Report
2. Independent Wildfire Evacuation & Egress Modeling
3. Formal Cal Fire & County Fire Authority Review Letters
4. Comprehensive Traffic & Bus Impact Study
5. Emergency Services Capacity Analysis
6. Cumulative Impact Analysis with Green Valley Lake Population
7. Public Hearings with Full Community Notice

I am against expansion given the manner it has been broached with the residents of GVL. It has not been transparent nor thoughtful considering all impacted by this project, including a town beyond the 1200 foot notification requirement space that shares the same 2 lane road and sewer systems. Our infrastructure cannot support an expansion of this magnitude. We would have very limited ability to evacuate in an emergency given there is only one road in/out; we would be trapped behind dozens of busses also trying to evacuste.

Respectfully,

Jean Konnoff
33536 Weeping Willow Dr.
And 735 Dahlia Dr.
PO Box 8316

1
2
3

Green Valley Lake, CA 92341

3

G59 - Responses to Jean Konnoff

G59-1 This comment is introductory in nature. No further response is warranted.

G59-2 The comment lists multiple concerns and requests for additional studies. As mentioned in the IS/MND all potential environmental impacts would be less than significant with applicable mitigation, refer to Master Responses – Transportation/Traffic, Wildfire, Water, Utilities. The IS/MND was prepared within CEQA guidelines, including cumulative discussions for each environmental topic. Under CEQA, the Lead Agency determines the appropriate level of environmental review. An emergency management plan has been drafted by the Project applicant. CalFire has provided a response to the Project and is included in this document as Response R1. Public hearings will remain a part of Project procedure prior to a Project decision. The comment has not provided evidence demonstrating the IS/MND or its conclusions are inadequate. No further response is required.

G59-3 As analyzed in the IS/MND (**Section 4, Wildfire**) through **Appendix K: Emergency Plan and Procedures**, the Project site is located within a Very High Fire Hazard Severity Zone (VHFHSZ). The Project would be required to adhere to MM WF – 1, which ensures a comprehensive evacuation plan is utilized and would comply with all COA provided by fire jurisdictions.

The Project's Emergency Plan includes early evacuation protocols, which reduce on-site occupancy prior to peak hazards conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis.

Wildfire impacts would be further reduced to less than significant with the implementation of MM WF-2 and 3 which requires compliance with existing and proposed development standards such as undergrounded power lines. The measures also reduce risk through requiring fire-resistive plants.

G60 - Jeff Stanners

From: Jeff Stanners
To: Barragan, Elena
Subject: Hume Camp GVL
Date: Friday, January 2, 2026 10:01:25 PM

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hello,

I would like to voice my opposition to the Hume Camp expansion. As a homeowner in Arrowbear (32778 Encina Dr.), this feels as if it'd be a drain on resources as well as a traffic issue. I'm not opposed to the camp or even a small expansion. But an expansion to anything close to 3000 seems crazy, especially if there was an emergency and evacuation was needed. This would be especially worrisome for the GVL residents as well as for the Hume Camp itself. Please do not approve an expansion of this size. 1

Jeff Stanners

G60 - Responses to Jeff Stanners

G60-1 This comment is concerned about the scale of the expansion, not the expansion itself, and the impacts the large expansion would have on the community. An analysis has been conducted to evaluate impacts on Public Services, Utilities and Service Systems, and Transportation. Please see Master Response – Transportation/Traffic, Master Response – Wastewater/ Sewer, Master Response – Energy, and Master Response – Wildfire.

G61 - Jennie Seidewand

From: Jennie Seidewand
To: Barragan, Elena
Cc: Bull, Robin
Subject: Hume SoCal Campground Extension (Project No: PROJ-2024-00046)
Date: Wednesday, January 7, 2026 8:51:00 PM

You don't often get email from jennieann@gmail.com. Learn why this is important

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Ms. Barragan and the Land Use Services Department of San Bernardino County,

I'm writing to express my deep concern about the proposed Hume SoCal Campground Extension (Project No: PROJ-2024-00046) under consideration which would expand the Hume SoCal Campgrounds from its current 300 person capacity to a 3000 person capacity.

My husband and I own our home in Running Springs, but my concern for this project stems from my professional experience. I am a former Director of Operations for a multi-million-dollar camp on the East Coast where I served over 1,600 high-school aged campers each summer. I have extensive experience in planning and coordinating crisis response in camp operations for over 13 years. I am a huge supporter of camps and expanding camp access, however, the location of Hume SoCal makes this expansion far too risky. 1

The documentation for the Hume SoCal Campground expansion downplays how critical the location is regarding this decision. Hume SoCal is located about halfway up Green Valley Lake Road, which is a winding two-lane road that dead ends at the Green Valley Lake community. Heading in one, single direction down Green Valley Lake Road is the **only** exit road for both the Hume SoCal Campground and all of the Green Valley Lake community members. There are additional forest roads nearby, but those are only passable by high-clearance, 4-wheel drive vehicles with drivers comfortable in off-road environments. Having hiked those forest roads, there is no way a standard car (much less a bus) would be able to use any of the forest routes out. Green Valley Lake Road, in only one direction, will be the only safe exit for the entire community of Green Valley Lake and Hume SoCal in the event of an evacuation. 2

The single point of evacuation egress alone is of concern for emergency preparedness, and expanding camp operations in this location poses significant risk

to both the campers and Green Valley Lake community.

The documentation on the Land Use Services website deeply undersells how much *more* difficult it is to move campers than a resident or even a school. Community members predominantly have their own transportation nearby, and schools have nearby buses as well as a system in place for rapidly organizing and loading students that everyone in the community is regularly practicing. But most campers will not have immediate access to any form of transportation. Hume SoCal campers usually don't have their own vehicles on the mountain during their stay. While occasionally there are churches with their own transportation on site while at camp, Hume SoCal doesn't require it, and it would be highly irregular to ask a camp to do so. There's not enough parking up there anyways to keep the requisite buses onsite at this scale.

Transportation will need to be arranged at scale in the moment of evacuation, and the single egress will need to remain open to two-way traffic to accommodate the arrival of buses for these campers. For 3,000 campers and the corresponding staff, you would need roughly 65 full-sized tour buses or 74 standard-sized school buses to move just the people.

2

Even in good conditions, it is no small feat to get buses on short notice. Regardless of what a bus company tells you or how much money a camp might be willing to pay to expedite things, getting a bus is not quick. Even in or near large cities where my camp was operating (such as New York City, Boston, and Washington DC), it takes time for the company to contact drivers, get drivers to their buses, and then get the buses to the kids. Our bus yards were often just 10-20 minutes away, and still, it would usually take 4+ hours on a good day for a bus to reach the students in the event of a breakdown or emergency. And that's just one bus – when we needed more buses, it was a far more significant and timely ordeal. Bus companies don't keep 60+ drivers and buses on call 24/7. Hume SoCal is significantly further away from major bus depots than any camp location I've worked with, and the mountain roads are much more difficult for many drivers.

Vehicles to evacuate these campers will need to come up the mountain roads from down the hill before being able to take students to safety. Traffic flow in an emergency is extremely important, and needing to maintain two-way traffic up to Hume SoCal for this many buses will severely limit the options emergency services have in an evacuation to make a single egress workable. This can have disastrous consequences, as was seen with the Paradise Fire up north several years ago (where that community had four-lane single egress instead of just the two-lane egress Green Valley Lake has).

I share these bus logistics because in the event of an emergency, realistically, it will fall to the County and Emergency Services to evacuate these campers. It is simply not possible for a camp director to pull off an evacuation of this scale in this location on the timeline needed for a true emergency. It's not about intent or effort. It's the proposed scale. 3,000 children combined with the location and the difficulty of dealing with one exit route? In a true emergency, the camp simply will not have the resources to get the number of buses they'll need to move 3,000 campers off the mountain fast enough. The camp director will end up needing to rely on emergency services, and they will end up needing the County to supply buses and coordinate the evacuation for these minors through emergency services. This, in turn, will take critical personnel away from firefighting and other emergency services and will have cascading effects for both fire suppression and public safety. 2 3

Truthfully, for most camps, an evacuation plan will likely never be needed. Camps must have one, but they're unlikely to use most of their emergency procedures outside of training exercises. Evacuations are exceptionally uncommon. But that's not true on the Rim and in the Rim Communities where Hume SoCal is located. A camp here must be prepared to actually operate an effective, efficient, mostly self-sustained evacuation on short notice due to the extreme wildfire risk of the area. 4

When my husband and I purchased our home in Running Springs, I had to learn a lot about wildfire behavior in these mountains. Historically, San Bernardino experiences a severe wildfire at the scale of the Old Fire or Line Fire roughly every 20 years. But fires like this are expected to become far more common as the Southwest trends towards hotter and drier conditions. Fueled by Santa Ana winds, our fires already move incredibly fast and can quickly engulf the entirety of 100-foot trees. Fire behavior is simply erratic and extreme here, and it must be considered a reality.

San Bernardino County Fire has a great, short YouTube video called Every 20 Years: Wildland Fires in San Bernardino Country. You can view the video here and I highly recommend it: https://www.youtube.com/watch?v=FwVGeD_tlRc The video gives an overview of how and why the San Bernardino mountains burn so regularly and why these fires are so difficult to contain when the conditions are right. This video (published before Line Fire in 2024) gives an overview of how the 2003 Old Fire grew deadly so quickly and it explains how erratic, difficult, and extreme the fire conditions can be in these mountains, and why it's everyone's responsibility to be prepared for fires of this size and scope. 5

As you know, in 2024, the whole area was evacuated for Line Fire, and some zones went straight to an Evacuation Order without earlier warning stages. Slide Fire

passed near the Hume SoCal area in 2007, but that area will unfortunately be due to burn again soon. The area immediately surrounding Hume SoCal is littered with dead oaks from the bark beetle infestations that killed oaks along the Rim. I hike this area regularly, and truthfully, I often think of that valley between Running Springs and the backside of Hume SoCal as a tinderbox – there is so much dead wood waiting to burn, and Hume SoCal sits on the ridge directly overlooking that powder-keg of dead oaks.

The fire danger in these mountains must be taken seriously, and Hume SoCal's Emergency Plan and Procedures (which I read) are woefully inadequate if they expand. It's not about having a better plan either – there are factors in the landscape, climate, and road infrastructure that cannot be overcome without significant overhauls to the entire system. As a former Director of Operations who has prepared for and overseen many life or death camp scenarios, there is no way to build an adequate evacuation plan for 3,000 campers in this location. There's no shelter-in-place plan for a heavily-forested area like Hume that can withstand the types of fires we have in these mountains. There is no way to evacuate 3,000 campers safely in a reasonable amount of time on camp resources alone. There's simply no way to expand to 3,000 campers in this location safely. 5

This planned expansion is grossly negligent in the event of an actual emergency, and the Hume SoCal emergency plans rely on significant time, extensive resources, and extreme luck that the single road in and out of this community does not become impassable. It is not a question of IF a fire comes through the area, it's a question of WHEN. With one road in and out for Hume SoCal and the Green Valley Lake community, expanding the Hume SoCal Campground is irresponsible both for camp operations and the surrounding communities. There is no safe way to expand Hume SoCal in its current location, and any camp director that tells you otherwise is either ignorant or dismissive about the wildfire risk in these mountains. 6

Lives will be lost at some point if the Hume SoCal Campground expansion plan is allowed to move forward – whether that cost is paid in 10 years or 50 years, it will be paid. And those lives lost will likely be the lives of children.

After disasters like the drowning of 27 girls and counselors at Camp Mystic last summer, we cannot allow camps to operate (much less expand) without true consideration for whether the campers can realistically be evacuated in emergency circumstances. These campers — these children — are depending on the County to make the right decision here. The Hume SoCal Campground should not be allowed to move forward with any expansion in this location.

If you have any questions that I can answer from the perspective of a Director of Operations for camps, please feel free to contact me at my personal email: jennieann@gmail.com. Thank you for your time. 6

Sincerely,
Jennie Seidewand

G61 - Responses to Jennie Seidewand

G61-1 This comment is introductory in nature. No further response is warranted.

G61-2 A Traffic Analysis is included as **Appendix J** of the IS/MND and determined that traffic conditions, existing road infrastructure and access would be adequate to service the expanded Project site. As evaluated in the IS/MND (**Section 4, Transportation**), the Project would not modify existing roadways, and Project-related traffic would not create a significant hazard or adversely affect emergency access. Seasonal weather conditions and snow removal are addressed by existing County road maintenance operations.

Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity.

G61-3 The IS/MND (**Section 4, Public Services**) evaluates fire protection needs and concludes that the Project would not represent a potential need for expanded fire protection in the area or affect service and response times. Refer to Master Response – Fire Service Capacity.

G61-4 As analyzed in the IS/MND (**Section 4, Wildfire**) and included in **Appendix K: Emergency Plan and Procedures**, the Project site is located within a Very High Fire Hazard Severity Zone (VHFHSZ). The Project would be required to adhere to MM WF – 1, which ensures a comprehensive evacuation plan is utilized and would comply with all COA provided by the County and fire jurisdictions. The Project's Emergency Plan includes early evacuation protocols, which reduce on-site occupancy prior to peak hazards conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis. Wildfire impacts would be further reduced to less than significant with the implementation of MM WF-2 and 3 which requires compliance with existing and proposed development standards such as undergrounded power lines. The measures also reduce risk through requiring fire-resistive plants.

G61-5 Refer to response above regarding Wildfire.

G61-6 Refer to response above regarding Evacuation.

G62 - Jeremiah Brenner

January 7, 2026

Elena Barragan, Senior Planner
Land Use Services Department
County of San Bernardino
385 North Arrowhead Ave
San Bernardino, CA 92415

Dear Ms. Barragan:

Thank you for the opportunity to comment. I have been a resident of the San Bernardino Mountains for many years and I am very concerned regarding the proposed project, expansion of the existing Hume SoCal Campground. Overall, I am concerned that the level of CEQA analysis is inadequate and many of the determinations made in the IS/MND are unsubstantiated and not based on fact. I recommend the County of San Bernardino, as CEQA lead agency reject the IS/MND and require the project proponent to complete a full Environmental Impact Report to assess and disclose project impacts and provide detailed specific and enforceable avoidance and minimization measures with compensatory mitigation strategies for impacts. 1

The Project involves the expansion of campground uses for the existing Hume SoCal campground to accommodate up to 2,854 total occupants. The campground and recreational structures and uses will occur over a 251-acre area of the Green Valley Lake community. Development of the Project site would be completed in five phases. 2

I have several concerns regarding the adequacy of the IS/MND's analysis of project impacts regarding wildlife and plants within the Biological Resources section of the IS/MND.

The Biological Resources Section refers to the Appendix A1:Biological Resources Assessment which indicates that ELMT biologists Jacob H. Lloyd Davies, Rachael A. Lyons, and Megan E. Peukert evaluated the conditions of the plant communities found within the boundaries of the project site on March 22, April 18, and June 30, 2023. The document does not identify which staff were included within the impact evaluation to the wildlife potentially present within the project site. Additionally, the document does not give any details regarding the education, knowledge, and experience of the three biologists. The San Bernardino Mountains have a complex composition of plants and wildlife, and expertise is needed to evaluate sensitive plant species habitat suitability. I have organized my comments into associated sections of the IS/MND with appropriate headers. 3

Natural Corridos and Linkages

I have concerns regarding the adequacy of the projects evaluation on natural corridors and linkages. The Biological Resources Report identifies that field staff identified any natural corridors and linkages that may support the movement of wildlife through the area. Section4.5 Wildlife Corridors and Linkages states,

> "Although partially constrained by existing roadway and buildings, the natural habitats on and surrounding the project site allow for local wildlife to move from the project site into the undeveloped areas surrounding the project site in search of food, shelter, or nesting habitat. However, the project site does not function as a major wildlife movement corridor or linkage. As such, implementation of the proposed project is not expected to have a significant impact to wildlife movement opportunities or prevent local wildlife movement through the area since there is ample habitat adjacent to the project site to support wildlife movement opportunities."

I am very concerned with the IS/MND conclusion regarding impacts to Wildlife Corridors and Linkages and find that this determination is unsupported and provides no evidence or substantiation that the conclusion is backed with scientific literature. I am concerned that the conclusion that the "the natural habitats on and surrounding the project site allow for local wildlife to move from the project site into the undeveloped areas surrounding the project site in search of food, shelter, or nesting habitat. In reviewing Figure 6a Hume SoCal Campground Expansion Overall Plan Site Plan it appears that the proposed project expansion is extends in both directions on one side of Green Valley Lake Road and expands to the opposite side of Green Valley Lake Road. This rational that wildlife can move into undeveloped areas surrounding the project site is avoiding the actual impact analysis for this section. According to the South Coast Missing Linkages Project, the San Gabriel and San Bernardino Linkage is one of 15 landscape linkages identified as irreplaceable and immediately threatened. The San Bernardino Mountains provide wildlife movement linkages to the Mojave Desert to the north, the San Jacinto Mountains to the South and the San Gabriel Mountains to the west. The project site is within an important corridor of wildlife movement and should not be disregarded. Campgrounds can impact wildlife movement in a variety of ways including habitat disruption, trash pollution, water pollution, light pollution, noise pollution, all resulting in behavior changes, leading to stress, altered foraging and displacement to wildlife. The document fails to address any of these impacts. The determination that impacts to wildlife movement, corridors and linkages is unsupported. The document should have a detailed analysis of wildlife movement through the project area and surrounding habitat to demonstrate that impacts to wildlife movement will not be hindered and if there are impacts they be identified and mitigated to a less than 3

significant level, if possible. If the impacts are not able to be reduced to a less than significant level then an EIR is a more appropriate CEQA document for the project. 3

Native Plants

The Biological Resources Report identified approximately 20 species of plant observed over the 251-acre project site. The San Bernardino Mountains are estimated to have several hundred to over a thousand of individual plant species and the IS/MND seems to be wildly inadequate in evaluating the potential for rare and sensitive plants, if the biologists were only able to identify 20 species during their surveys.

The IS/MND makes the conclusion that

> "No special-status plant species were observed during the field investigation. Based on habitat requirements for the identified special-status species, known species distributions, and the quality and availability of habitats present, it was determined that the Project site has to the potential to support the following species:
>
> - Coville's dwarf abronia (Abronia nana var. covillei; CNPS 4.2)
> - Palmer's mariposa lily (Caolochortus (sic) palmeri var. palmeri; CNPS 1B.2)
> - San Bernardino Mountains owl's clover (Castilleja lasiorhyncha; CNPS 1B.2))
> - Parish's alumroot (Heuchera parishii; CNPS 1B.3)
> - Lemon lily (Lilium parryi; CNPS 1B.2)
> - Silky lupine (Lupinus elatus; CNPS 4.3)
> - Parish's yampah (Perideridia parishii ssp. parishii; CNPS 2B.2)
> - Laguna Mountains jewelflower (Strepthanthus bernardinus; CNPS 4.3)
> - Southern jewelflower (Streptanthus campestris; CNPS 1B.3)
>
> None of the aforementioned special-status plant species are federally or state listed as endangered or threatened. They are designated with CNPS Rare Plant Ranks 4.2, 4.3, 2B.2, 1B.2, and 1B.3. As such, if any of the aforementioned special-status plant species were observed onsite, their small, isolated populations would not contribute meaningfully to the conservation of their relative species. No focused surveys are recommended."

4

The IS/MND does not include any other appendices, such as a protocol focused botanical survey that would support these determinations. The California Department of Fish and Wildlife has a protocol for surveying for plants (2018 Protocol for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities). Botanical field surveys should be floristic in nature, meaning that every plant taxon that occurs in the project area is identified to the taxonomic level necessary to determine rarity and listing status. The botanist(s) should be experienced in conducting floristic botanical

field surveys, knowledgeable of plant taxonomy and plant community ecology and classification, familiar with the plants of the area, including special status and locally significant plants, and familiar with the appropriate state and federal statutes related to plants and plant collecting. The botanical field surveys should be conducted at the appropriate time of year when plants will both be evident and identifiable and, in a manner, maximizes the likelihood of locating special status plants and sensitive natural communities that may be present.

Plants considered to be "rare, threatened or endangered in California" includes plants tracked by the CNDDB and the California Native Plant Society (CNPS) as California Rare Plant Rank (CRPR) 1 or 2. Plants that may warrant consideration on the basis of declining trends, recent taxonomic information, or other factors. This may include plants tracked by the CNDDB and CNPS as CRPR 3 or 4 6 . All of the plants constituting California Rare Plant Rank 1A, IB and 2A meet the definitions of the California Endangered Species Act of the California Fish and Game Code, and are eligible for state listing. Impacts must be analyzed during preparation of CEQA environmental documents, as they meet the definition of Rare or Endangered under CEQA Guidelines §15125 (c) and/or §15380. 4

Because the IS/MND fails to include substantial evidence supporting the determination that no special status plant species exist within the project boundaries, the impact analysis is inadequate. The document fails to determine whether the impacts would be mitigated and cannot, without further information from the project proponent concur that impact would in fact be mitigated to less than significant levels. I recommend the County include supporting documentation needed to reach the IS/MND's conclusion with mitigation measures that detail specific and enforceable compensatory mitigation strategies for impacts to special status plant species. I am concerned that the IS/MND is an inadequate level of CEQA for this project, and an EIR needs to be completed to assess the projects impacts.

Wildlife

I am very concerned regarding the impact analysis of Section 4.7.2 Special Status Wildlife.

California Spotted Owl

In particular the California Spotted Owl section states,

> "The project site supports high quality habitat and generally primarily consists of undisturbed forested areas along with areas which have undergone varying levels of disturbance in association with campground development and recreational areas. The canopy varies in density, but there are many areas with closed canopy which is favorable for cover for the species. Additionally, there are many trees that are both tall and mature enough to provide nesting cavities and perching opportunities for this species. Therefore, it was determined that there is a high potential for California 5

spotted owl to occur onsite. The proposed project will be installed adjacent to previously disturbed areas that do not provide as high of quality habitat for spotted owl as the undeveloped areas on the periphery of the project site. Prior to implementation of each phase of the project, a clearance survey should be conducted to ensure spotted owl remain absent from the project site."

I am concerned that the conclusion that the "proposed project will be installed adjacent to previously disturbed areas and do not provide as high of quality habitat for spotted owl as the undeveloped areas on the periphery of the project site" is untrue and misleading. Exhibit 5 Vegetation demonstrates that the majority of the project footprint is identified as Mixed Conifer Forest, Willow Riparian Woodland shows that the majority of the project footprint is undisturbed and vegetated with native vegetation. Additionally, in reviewing Figure 6a Hume SoCal Campground Expansion Overall Plan Site Plan it appears that the proposed project expansion is not actually "adjacent" but extends in both directions on one side of Green Valley Lake Road and expands to the opposite side of Green Valley Lake Road. The projects expansion impacts are actually quite extensive when reviewing Figure 6a. This rational for impacts are less than significant is not supported and misleading to the public. The IS/MND should provide details regarding the suitability of the habitat, where there is high, moderate and low-quality foraging and nesting habitat and results of protocol surveys. The IS/MND should use this information to disclose specific impacts to the specie and provide an evaluation of impact with substantial evidence of why, if the lead agency believes the impacts are less than significant, or if not mitigation to reduce the impacts. California spotted owl is a candidate for listing under the Federal Endangered Species Act and USFWS has stated, "After a review of the best available scientific and commercial information, we find that listing the Coastal-Southern California DPS as endangered is warranted, and that listing the Sierra Nevada DPS as threatened is warranted." 5

Additionally, Tempel et. al. in 2022 published a study that looked at California spotted owls in the San Bernardino Mountains and found that California spotted owls at their southern range boundary are vulnerable to extirpation. The IS/MND proposed mitigation of clearance surveys is wholly inadequate. The project should conduct protocol surveys for California spotted owl throughout the project footprint and associated buffers, accounting for light pollution due to the expansion and increased noise pollution due to the campground expansion into native vegetation and disclose actual project impacts and include mitigation measures that detail specific and enforceable compensatory mitigation strategies for impacts to California spotted owl. The IS/MND should also identify permanent compensatory mitigation for habitat loss to this sensitive species.

Southern Rubber Boa 6

The Biological Resources Report in the IS/MND indicates

> "The periphery of the project site supports rock outcrops suitable for hibernacula and other debris for shelter. Therefore, it was determined that the undisturbed areas on the project site has a moderate potential to support southern rubber boa. The proposed project will be installed adjacent to previously disturbed areas that do not provide as high of quality habitat for southern rubber boa as the undeveloped areas on the periphery of the project site. The proposed project will be installed adjacent to previously disturbed areas that do not provide suitable habitat for southern rubber boa."

Southern rubber boa is a California endangered species. Southern rubber boa is largely subterranean, meaning they spend most of their time beneath the surface of soil in rocky outcrops, rock pile, decaying trees, woody debris, leaf litter, loose and soft soils and in moist areas including streams, seeps and springs. They spend limited periods of time at or near the surface, and detection during a biological survey is unlikely unless the survey methods are carefully designed with this snake's specialized life-history traits in mind. Naturally occurring surface site structures seldom lend themselves to easy searching. In such cases, deployment of artificial coverings, nocturnal surveys during the summer months, and other specialized search methods must be deployed in order to have a good chance of detecting this snake. Southern rubber boas can be missed in a given area for many years before they are found to be present, even by experts. 6

The IS/MND and Biological Resources Report do not give details regarding the expertise of the ELMT biologist that could support the evaluation of southern rubber boa habitat or the determination that SRB is not found within the project site. Additionally, as identified above in the California spotted owl discussion, but consistent with the evaluation of impacts to southern rubber boa, Exhibit 5 Vegetation demonstrates that the majority of the project footprint is identified as Mixed Conifer Forest and Willow Riparian Woodland shows that the majority of the project footprint is undisturbed and vegetated with native vegetation. Additionally, in reviewing Figure 6a Hume SoCal Campground Expansion Overall Plan Site Plan it appears that the proposed project expansion is not actually "adjacent" but extends in both directions on one side of Green Valley Lake Road and expands to the opposite side of Green Valley Lake Road. In reality, the expansion of the campground is actually not adjacent to already disturbed habitat but encroaches into natural habitats and appears to have suitable southern rubber boa habitat throughout the expansion area and even within the existing campground. The rational that the expansion is adjacent to disturbed areas and therefor the project impacts are less than significant is not supported with actual survey data or habitat details and is misleading to the public. The IS/MND should disclose

the actual project impact to this California state listed species and provide avoidance and minimization measures that can protect the species. The IS/MND should provide substantial evidence why if the lead agency believes the impacts are less than significant, or if not mitigation to reduce those impacts. The permanent loss of habitat can not be "mitigated to less than significant" by stating that even though there is a moderate potential to occur, there is no significant impact because the project is adjacent to disturbed habitat. The document does not discuss the amount and quality of the southern rubber boa habitat or results of surveys by southern rubber boa experts.

As a longtime resident, I am aware that the project area contains extensive rock outcrops in the forest understory and is likely to have a significant population of southern rubber boa. The IS/MND fails to provide effective, feasible and enforceable minimization and mitigation measures to address impacts to southern rubber boa. As I indicated above, southern rubber boa are largely subterranean, and are secretive during the limited periods when present at or near the surface, detection during a biological survey is unlikely unless the survey methods are carefully designed with this snake's specialized life-history traits in mind. Additionally, as I also indicated the conclusion that impacts are less than significant because the impacts are adjacent to disturbed habitat is inaccurate. I recommend that the Project obtain an expert on southern rubber boa to analyze the projects habitat, establish a survey protocol in coordination with the California Department of Fish and Wildlife and perhaps United States Geological Survey and disclose project impacts accurately. 6

The IS/MND should include permanent conservation of southern rubber boa habitat to mitigate the loss of important habitat including rock outcrops, surface rocks, woody debris, forest leaf litter and moist areas like seeps, springs and streams, in actuality the majority of the project site. Due to the sensitive nature of southern rubber boa, the County should require the mitigation to be at a 3:1 mitigation ratio and also require the project to obtain an incidental take permit from the California Department of Fish and Wildlife.

San Bernardino Flying Squirrel

The IS/MND states,

> "The project site consists primarily of heavily forested, undisturbed areas with a dense canopy with larger, older trees which provide suitable nesting, denning, and gliding habitat for flying squirrel. Additionally, the understory in these areas in composed of adequate woody debris which provides suitable habitat for moss and truffle for flying squirrel to forage. Due to the high quality of onsite habitat and the occurrence of San Bernardino flying squirrel in nearby areas, it was determined that the project site has a high potential to support San Bernardino flying squirrel. The 7

proposed project will be installed adjacent to previously disturbed areas that do not provide as high of quality habitat for San Bernardino flying squirrel as the undeveloped areas on the periphery of the project site. Prior to implementation of each phase of the project, a clearance survey should be conducted to ensure San Bernardino flying squirrel remain absent from the project site."

The San Bernardino flying squirrel (*Glaucomys oregonensis californicus*) is a rare, nocturnal subspecies of northern flying squirrel in Southern California's high-elevation conifer forests, known for gliding on furry skin flaps between trees. It relies on mature forests with big trees, snags, and logs for its truffle diet and nesting, but faces threats from climate change, habitat loss due to development, pollution, and wildfire, leading to potential extirpation in the San Jacinto Mountains and concern for its limited remaining population in the San Bernardino Mountains. Clearance surveys are an ineffective avoidance and minimization measure and does not mitigate the project's impact to less than significant. CEQA requires that mitigation measures be effective, feasible, and enforceable to minimize a project's significant environmental impacts. The use of clearance surveys to reduce project impacts is ridiculous for San Bernardino flying squirrel. What can a biologist on the ground, at night do to move squirrels that are able to soar high above their heads? The idea that clearance surveys will be effective at minimizing impacts is inadequate. The County should have focused surveys completed by a San Bernardino flying squirrel expert to assess the value of habitat and occupation and disclose those impacts to the public with effective mitigation that likely will be conservation of occupied habitat at an appropriate ratio necessary for a sensitive species of special concern. 7

Crotch Bumble Bee

Crotch Bumble Bee is currently a candidate for listing under the California endangered species act. The IS/MND and Biological Resources Assessment mentions Crotch Bumble bee once in Appendix C the Potentially Occurring Special-Status Biological Resources table and concludes that the species is Presumed Absent, because "there is no suitable habitat present within the project site." It appears that the biologist may not have reviewed all of the literature available since there are Crotch Bumble bee occurrences throughout the San Bernardino Mountains. I recommend including INaturalist as part of the literature search since the number of Crotch Bumble bee occurrence from 2024 in Green Valley Lake. It is surprising that the IS/MND disregards a species candidate for listing without any substantiation. I recommend that the County include this species with thorough impact analysis with supporting protocol survey results. Again I want to express my concern regarding the adequacy of the IS/MND and request that the County as lead agency consider 8

whether an EIR may be a more appropriate level of CEQA for a project with this level of unassessed impacts. 8

Water and Sewer analysis

I am also very concerned regarding Appendix B2, the Sewer Feasability Study. It is important to note that the document slipsheet for this section (page 347) has misspelled Feasibility. The feasibility study identifies the sewer generation will flow through the Ahwahnee Lift Station, Deer Lick Lift Station and ultimately the Running Springs Water District's Wastewater Treatment Plan. The Feasibility Study concludes that the Running Springs Water District Wastewater Treatment Plant is already exceeding it threshold and with the camp expansion would exceed the summer capacity for several months. I am aware that the Running Springs Water District Wastewater Treatment Plant needs many upgrades and if the County as lead agency approves this project, the project mitigation should include upgrades to the Wastewater Treatment Plant to a level that is needed to operate the camp. The current population of the local area is less than 10,000 and the camp is proposing to bring in a third of that number. The County should not pass the upgrade cost that is required to support this for-profit camp to the tax payers.

The IS/MND Mitigation Measure MMUTL-1 indicates the Project will "coordinate with Running Springs Water District to evaluate near-term and long-term strategies for increasing Wastewater Treatment Facility season capacity." I believe this mitigation measure is inadequate based on the level of impact proposed on the Wastewater Treatment Facility and necessary upgrades needed for the camp expansion should be paid for by the camp and not the tax payers. 9

The Feasibility Study suggest an alternative treatment via on-site septic that was deemed infeasible since the zone is governed by the Lahontan Basin Plan. I agree that this should be considered infeasible and not an option. Malfunctioning septic systems are known source to water pollution, contaminating groundwater and surface water systems. As this area is the headwaters to both the Santa Ana River watershed and the Mojave River watershed we should ensure that the most up to date technology is used to protect these valuable water sources.

The Feasibility Study includes as builts from 1974 and 1969 to show the extent of the existing sewer system for the camp. It is my opinion that if the expansion of this camp is approved, the County should also require a complete overhaul of the sewer system and not rely on over 5 decades old infrastructure. Groundwater and surface water pollution from outdated and dilapidated infrastructure is a huge concern for both the mountain community and lower elevation water districts that rely on water from higher elevations.

I am concerned with the documents evaluation of water needs. The IS/MND states, "Previous correspondence with CLAWA indicated a lack of system capacity to fully provide the Camp with adequate water supply, therefore, this scenario is assumed to be the maximum reliance on CLAWA's supply." The IS/MND continues "The Project would be required to implement similar conservation efforts during dry year scenarios to mitigate the impact on groundwater and CLAWA's imported water demand. As such, Project implementation would not exceed CLAWA water supply sources in combination with groundwater sources." The use and dependency of groundwater sources takes valuable water from adjacent streams in which fish and wildlife and most importantly mountain communities rely . To make the determination that the combination of maxing CLAWA's supply of water and supplementing with groundwater is a misuse and waste of important water supplies on the mountain. This evaluation and determination that impacts are less than significant is concerning and should be evaluated in an EIR setting and not an IS/MND. 9

Wildfire risk

As a longtime, San Bernardino Mountain resident, I am very concerned regarding the potential for wildfire. Page 163 of the IS/MND indicates Figure 7: Preliminary Fire Fuel Modification Plan, however when searching the document for this Figure and plan I was unable to find it. I am very concerned regarding fuel modification. In many cases, fuel modification can just result in a border of flashy fuels that spread wildfire into adjacent undisturbed habitats. I am surprised that this document was not included and recommend that the IS/MND is recirculated or upgraded to an EIR to address impacts to fuel modification. Because this figure/document was not included I have questions regarding the impact analysis of the fuel modification. Was the area identified within the fuel modification included within the impact calculation for biological resources habitats? Page 163, states "The Fuel Modification Plan designates Zones A, B, and C, which represent buffer zones around each structure extending to the property line. Zone A extends from the outer edge of the structure or appendage to 20 feet. Zone B extends 80 feet from the edge of Zone A, and Zone C extends up to 200 feet from the edge of Zone B. Each buffer zone includes landscaping, fuel load, and irrigation design considerations that would reduce the severity and progress of wildfire within the Project site." Did the impact analysis account for impacts 300 feet from the campground? How will the fuel modification area be maintained? These disturbed areas are often invaded by non-native grasses and forbs which are a much more flammable fuel and fire travels much quicker. Maintenance of fuel modification areas are important to disclose as they can have significant impacts to biological resources within the fuel modification area as well as the adjacent areas. The impact analysis in the Biological Resources section indicate that project development would not encroach upon the riparian areas therefore impacts to riparian habitat will be 10

less than significant, however how does this analysis account for impacts from the Fuel Modification Plan. Riparian habitats occur within areas that may be required to have a fuel modification. The IS/MND is inconsistent with this evaluation and should be clear where impacts will occur to these sensitive habitats. 10

I am aware that the majority of our road infrastructure is a two-lane highway. I am concerned that 60 bus trips per week will put a huge strain on our roads and could significantly limit the evacuation ability for mountain residents. I recall during the Line Fire sitting in a long line of traffic trying to evacuate my home with all other mountain residents. Having a significant number of buses trying to also evacuate a massive camp is a huge concern and does not appear to be evaluated in the IS/MND. 11

One final comment is in regard to the local fire department. The IS/MND indicates that the Running Springs Fire Department which covers a 52-square mile area and would be responding to incidents within the campground. The Running Springs Fire Department services the community of Running Springs, Arrowbear Lake and Green Valley Lake. The number of residents is approximately 7000 (5000 in Running Springs, 1,400 in Arrowbear Lake and 300 in Green Valley Lake). Additionally, there is a volunteer Fire Department in Green Valley Lake ran by local volunteers. The proposed campground expansion will increase the number of people potentially needing emergency services exponentially. The local fire departments do not have the capacity to respond to the additional needs from the campground, particularly a campground set within a forested environment. The project should be financially responsible for the increased demand and requirement for operation of a new or upgraded fire station with paid fire fighters. The Green Valley Lake volunteer fire department could be an excellent option if the camp were required to pay for the upgrade in order to operate within the area. I recommend the camp be financially responsible for providing fire and emergency services for its expansion and not take this valuable resource from the small local community that relies on it. 12

Thank you for the opportunity to comment. I am very concerned regarding the adequacy of the impact analysis in the IS/MND and recommend that the County, as CEQA lead agency reevaluate the level of CEQA and release an EIR to address all project impacts thoroughly. 13

Sincerely,

Jeremiah Brenner

G62 - Responses to Jeremiah Brenner

G62-1 Under CEQA, the Lead Agency determines the appropriate level of environmental review. The IS/MND evaluates all environmental topic areas required under CEQA and identifies compliance requirements and mitigation measures that reduce all potentially significant impacts to less than significant levels. There is not substantial evidence presented that the IS/MND is inadequate or that any significant unavoidable impacts would remain unmitigated. Therefore an Environmental Impact Report (EIR) is not required.

G62-2 The comment describes the Project and does not raise concerns addressing the adequacy of the IS/MND. No further response is warranted.

G62-3 Natural areas would be impacted by implementation of the Project; however, a large portion of the Project site would remain in its natural condition. Additionally, the Biological Resources Assessment which is further described in the Biological Resources Section of the IS/MND has determined that less than significant impacts would occur with implementation of MMs BIO – 1 and -2 which require pre-construction clearance surveys and compliance with the Migratory Bird Treaty Act and California Fish and Game Code.

G62-4 The comment includes a concern that special-status plant species were not adequately analyzed. The IS/MND conducted a biological resources assessment (**Appendix A1**) and did not find any special-status plants to be present on site. Given the lack of presence of special-status plants on site, it would not represent a significant or unavoidable impact. No focused surveys are recommended, and the comment does not provide evidence that the IS/MND was prepared inadequately.

G62-5 The comment draws conclusions regarding potential impacts to California spotted owl. The comment references figure 6a which was drawn not to scale and therefore can only be used for general reference. The IS/MND recognizes the potential for California spotted owl to occur and includes MMs BIO-1 and BIO-2. The Project would be constructed adjacent to previously disturbed areas that do not provide as high-quality habitat for California spotted owl as the undeveloped areas. Prior to implementation of each phase of the Project, a pre-construction clearance surveys for special-status wildlife and pre-activity field survey for nesting birds would be conducted to ensure California spotted owl have not inhabited the Project site. If California spotted owl presence is documented, MM BIO-2 identifies buffers to be implemented to protect nesting birds, including the California spotted owl. The comment does not provide evidence that impacts would be significant or that further mitigation is necessary. The comment does not provide evidence that impacts would be significant or that further mitigation is necessary. No revisions are warranted.

G62-6 The comment includes concerns about the sufficiency of the identification and mitigation of impacts to the southern rubber boa. The Project would be constructed adjacent to previously disturbed areas, with development clustered on approximately 20 acres that do not provide as high of quality habitat for southern rubber boa as the undeveloped areas on the periphery of the Project site. The Project would be constructed adjacent to previously disturbed areas, reducing

impacts to non-disturbed land which provides suitable habitat for southern rubber boa. To ensure the absence of southern rubber boa from site specific locations prior to grading activities, MM BIO-1 would be implemented. MM BIO-1 implements a pre-construction clearance survey to reduce or avoid any impacts to special-status wildlife, including the southern rubber boa, before ground disturbance. The comment does not provide evidence that impacts would be significant or that further mitigation is necessary. No revisions are warranted.

G62-7 The comment includes concerns about the sufficiency of the identification and mitigation of impacts to the San Bernardino flying squirrel. The Project would be constructed adjacent to previously disturbed areas, with development clustered on approximately 20 acres that do not provide as high of quality habitat for San Bernardino flying squirrel as the undeveloped areas on the periphery of the Project site. The Project would be constructed adjacent to previously disturbed areas, reducing impacts to non-disturbed land which provides suitable habitat for San Bernardino flying squirrel. To ensure the absence of San Bernardino flying squirrel from site specific locations prior to grading activities, MM BIO-1 would be implemented. MM BIO-1 implements a pre-construction clearance survey to reduce or avoid any impacts to special-status wildlife, including the San Bernardino flying squirrel, before ground disturbance. The survey would be conducted by a qualified biologist. The comment does not provide evidence that impacts would be significant or that further mitigation is necessary. No revisions are warranted.

G62-8 The comment includes concerns about the sufficiency of the identification and mitigation of impacts to the Crotch's bumble bee. The comment does not provide adequate evidence of Crotch's bumble bee occurring or having potential to occur on or near the site, and therefore, no revisions are warranted. Note that MM BIO-1 would be implemented to ensure a pre-construction clearance survey for special-status wildlife, including the bee, is conducted. No revisions are warranted.

G62-9 The comment provides concerns regarding water supply and wastewater. The IS/MND, consistent with CEQA analyzes water supply and wastewater management (**Section 4, Utilities and Service Systems** and **Section 4, Hydrology and Water Quality**) through **Appendix B3: Water and Sewer Master Plan**, and the 1st Draft Water Supply Assessment, which has been updated (**Appendix B1: Revised Water Supply Assessment**), existing on-site wells can provide adequate capacity to meet the Project's projected water demand through phase 3. The updated WSA identifies a preferred strategy with CLAWA following phase 3, in which the Applicant would prepare an annual water supplier expectations memorandum. Refer to Master Response – Water. The IS/MND (**Section 4, Utilities and Service Systems**) concludes that Project-related water demand would result in a less than significant impact.

The IS/MND concludes that water-supply impacts and wastewater management would be less than significant with compliance with applicable standards and MMs HYD-1, UTL-1, and UTL-3. With MM HYD-1, the Applicant shall conduct well drawdown tests, recovery testing, and water quality retesting before proceeding with each phase, for the wells serving that phase, and use the

results to confirm the phase water supply strategy. MM UTL-1 requires that prior to approval of each phase, the Project applicant shall evaluate the available treatment and disposal capacity of the approved on-site wastewater treatment plant (WWTP) to confirm adequate treatment capacity, disposal capacity, operational performance, regulatory compliance, and any improvements necessary to accommodate the proposed occupancy increase. MM UTL-3 requires that prior to the Final Development Plan (FDP) approval for Phase I, the Camp shall install an on-site wastewater system subject to County and Regional Water Board approval. Additionally, Mitigation Measure UTL-3 allows for sewer service buildout as recommended by the revised Sewer Feasibility Study, which concludes that the Camp will utilize, expand, and/or supplement the on-site wastewater treatment system through buildout of all phases. Furthermore, the existing RSWD system is intended to remain available as a secondary wastewater conveyance and treatment option where capacity is available, and use is approved by RSWD. As each phase advances, the required on-site treatment capacity will be confirmed based on the applicable Project flows, the selected advanced treatment system configuration, and regulatory requirements. Continued use of any portion of the RSWD system will remain subject to available District capacity and RSWD approval. These efforts should be aligned with a phased development plan that matches Camp occupancy growth with the completion of required infrastructure improvements. Refer to Master Response - Wastewater/Sewer.

G62-10 As analyzed in the IS/MND (**Section 4, Wildfire**) through **Appendix K: Emergency Plan and Procedures**, the Project site is located within a Very High Fire Hazard Severity Zone (VHFHSZ). The Project would be required to adhere to MM WF – 1, which ensures a comprehensive evacuation plan is utilized and would comply with all COA provided by fire jurisdictions. The Project's Emergency Plan includes early evacuation protocols, which reduce on-site occupancy prior to peak hazards conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis.

Wildfire impacts would be further reduced to less than significant with the implementation of MMs WF-2 and -3 which requires compliance with existing and proposed development standards such as undergrounded power lines. The measures also reduce risk through requiring fire-resistive plants.

G62-11 The Transportation Section of the IS/MND prepared a Traffic Analysis that is included as **Appendix J** of the IS/MND and determined that traffic conditions, existing road infrastructure and access would be adequate to service the expanded Project site. As evaluated in the IS/MND (**Section 4, Transportation**), the Project would not modify existing roadways, and Project-related traffic would not create a significant hazard or adversely affect emergency access. Seasonal weather conditions and snow removal are addressed by existing County road maintenance operations.

Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within

the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity.

G62-12 The IS/MND (**Section 4, Public Services**) evaluates fire protection needs and concludes that the Project would not represent a potential need for expanded fire protection in the area or affect service and response times. Refer to Master Response – Fire Service Capacity.

G62-13 Under CEQA, the Lead Agency, San Bernardino County, determines the appropriate level of environmental review. The IS/MND evaluates all environmental topic areas required under CEQA and identifies compliance requirements and mitigation measures that reduce all potentially significant impacts to less than significant levels. There is not substantial evidence presented that the IS/MND is inadequate or that any significant unavoidable impacts would remain unmitigated. Therefore an Environmental Impact Report (EIR) is not required.

G63 - Jerry and Kathleen Benjamin

FORMAL OBJECTION & SAFETY COMMENT

Hume Camp Expansion Green Valley Lake, CA
Proposed Increase: 250 Campers to 3,000 Campers

To: San Bernardino County Land Use Services Department – Planning Division

From: Jerry and Kathleen Benjamin, Homeowners, Green Valley Lake, California

Re: Expansion Camp Hume to 3000 campers

The proposed expansion of Hume Camp from approximately 250 campers to 3,000 campers will have significant negative impact on the Residents of Green Valley Lake.

This proposed twelvefold population increase at the end of a single-access, dead-end mountain roadway, located within a **Very High Fire Hazard Severity Zone (VHFHSZ)**. The project presents demonstrable, foreseeable, and potentially catastrophic public safety, wildfire evacuation, transportation, and land use conflicts. 1

1. WILDFIRE & EVACUATION IMPACTS – This project Substantially impairs evacuation during a wildfire

- Exposes people to new or worsened wildfire risks
- Relies on inadequate emergency access

The project site and Green Valley Lake are served by only one two-lane, winding mountain road with NO secondary emergency access route. The evacuation of:

- 3,000 campers 2
- Camp staff
- Tour buses
- Supply vehicles
- PLUS the residents and visitors of Green Valley Lake

is not physically achievable within accepted wildfire evacuation standards.

This constitutes a significant and unavoidable impact requiring a **FULL ENVIRONMENTAL IMPACT REPORT (EIR) per CEQA Guidelines §15064 & §15126.2**. 2 Cont

2. SAN BERNARDINO COUNTY DEVELOPMENT CODE VIOLATIONS

This proposal is inconsistent with multiple provisions of the San Bernardino County Development Code, including but not limited to **Fire Safety & Emergency Access**

Land Use Compatibility 3

- Countywide Plan – Mountain Region LU Designations
- A 3,000-person institutional use is fundamentally incompatible with a low-density mountain resort community-dependent on tourism and environmental quality.

3. CAL FIRE & LOCAL FIRE AUTHORITY IMPACTS

This expansion would:

- Overwhelm existing fire suppression resources
- Create mass casualty evacuation exposure
- Exceed emergency shelter capacity
- Delay response times due to bus congestion and gridlock

Pursuant to: 4

- **California Fire Code (CFC) Section 503 – Fire Apparatus Access Roads**
- **CFC Section 404 – Fire Safety & Evacuation Planning**
- **Government Code §51182 – Fire Protection Access & Clearance**

This project cannot demonstrate compliance without major offsite infrastructure that does not currently exist.

As homeowners in GVL, we are extremely concerned for the community of GVL, the campers within Hume and campers in the other two existing camps within a 1-2 mile radius. As we have had to evacuate for wildfire, the roads become congested very quickly. There is no alternate route out.

4. TRANSPORTATION IMPACTS – The only access road is: 5

- Narrow
- Winding
- Seasonal
- Subject to frequent snow, ice, fallen trees, and traffic collisions

The proposal will introduce:

- Daily commercial bus traffic
- Supply trucks
- Staff vehicles
- Visitor overflow traffic

This creates significant hazards.

- Gridlock-level congestion
- Emergency vehicle obstruction
- Accident escalation risk
- Delayed wildfire evacuations

5 Cont

5. TOURISM, ECONOMIC & COMMUNITY IMPACTS

Green Valley Lake is a tourism-dependent resort village, not a high-density institutional facility zone. A daily population spike may:

- Deter vacation renters and seasonal visitors
- Reduce business revenues
- Overwhelm parking, groceries, lodging, and public services
- Create persistent noise and congestion impacts. Currently, we can clearly hear the loudspeaker at our home. We have overlooked the occasional inconvenience and tolerated the noise pollution, but with this significant increase in population, the sound would definitely be increased.

We formally request an acoustic study.

6

7. CONCLUSION & FORMAL OPPOSITION

7

The proposed twelvefold increase of Hume Camp is grossly incompatible with the physical constraints, wildfire hazards, evacuation limitations, infrastructure capacity, and tourism-based economy and daily living in Green Valley Lake.

Approval of this project in its current form would represent a foreseeable and preventable mass evacuation and wildfire fatality risk, contrary to:

- **CEQA mandates**
- **California Fire Code**
- **San Bernardino County Development Code**
- **Public health and safety obligations**

As homeowners, we formally opposes the project and respectfully requests immediate denial as submitted, or the initiation of a full EIR with no ministerial approvals.

7 Cont

Respectfully Submitted,

Jerry and Kathleen Benjamin, **local residents** Green Valley Lake, California

G63 - Responses to Jerry and Kathleen Benjamin

G63-1 The comment includes introductory statements. The comment does not provide substantial evidence of the conflicts mentioned. No further response is warranted.

G63-2 The comment includes emergency access concerns. As discussed in the IS/MND (**Section 4, Wildfire**) MM WF – 1, the Project would continually update and comply with a comprehensive evacuation plan. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on-site occupancy prior to peak hazard conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis.

Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity.

Regarding the commenters' request for preparation of an EIR, determinations regarding the appropriate CEQA document are made by the Lead Agency. The IS/MND provides substantial evidence that, with compliance with applicable codes and standards, wildfire and emergency access impacts would be less than significant. The comment does not provide evidence demonstrating the IS/MND is inadequate.

G63-3 The comment includes concerns over potential violations of San Bernardino County Code. As addressed in the IS/MND, the Project is consistent with the HT/SD-RES zoning and Rural Living land use designation, which allow campground uses subject to County review. The comment does not provide evidence demonstrating that an environmental impact has been inadequately analyzed. No IS/MND changes are warranted.

G63-4 The comment includes concerns regarding fire service capacity. The IS/MND (**Section 4, Public Services**) evaluates fire protection needs and concludes that the Project would not represent a potential need for expanded fire protection in the area or affect service and response times. Refer to Master Response – Fire Service Capacity.

G63-5 The comment includes concerns regarding traffic and roadway safety. As evaluated in the IS/MND (**Section 4, Transportation**), the Project would not modify existing roadways, and Project-related traffic would not create a significant hazard or adversely affect emergency access. Seasonal weather conditions and snow removal are addressed by existing County road maintenance operations. No substantial evidence has been presented demonstrating inadequacy of the IS/MND's conclusions.

Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity.

G63-6 The comment provides concerns regarding the overall community impacts. CEQA focuses on environmental impacts rather than social or economic effects unless such effects are caused by an environmental impact. The IS/MND evaluates potentially affected issue areas—including transportation, noise, wildfire, public services, and aesthetics—and concludes impacts would be less than significant with mitigation on specific thresholds.

Noise impacts were evaluated in the IS/MND (**Section 4, Noise**), which found that operational noise levels associated with the Project would comply with applicable County noise standards and would result in less-than-significant impacts. An acoustical assessment is provided as **Appendix I** to the IS/MND. Based on this analysis, additional acoustic studies are not required.

The comment does not identify a new or unaddressed environmental impact. No further response is warranted.

G63-7 The comment is conclusionary in nature. The comment provides an opinion of formal opposition and summarizes the comment (see responses above). The comment does not provide substantial evidence of conflicts mentioned. The comment does not include substantial evidence demonstrating that the IS/MND is inadequate or that the preparation of an EIR is required. No further response is warranted.

G64 - Jessie Birschbach

From: Jessie Birschbach
To: Barragan, Elena
Subject: GVL in Grave Danger
Date: Friday, January 2, 2026 3:14:37 PM

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Letter concerning PROJ-2024-00046:

Dear Elena Barragan,

My name is Jessie Birschbach and I have lived in Green Valley Lake (GVL) with my wife and ten-year-old son for almost ten years now. I love this little mountain town. So much so I became one of its paid-call firefighters roughly three years ago. So far I've helped to save one life and put out two fires. 1

I am reaching out with the utmost concern that the county of San Bernardino is actually considering the alarming request for Hume SoCal to expand from 300 to 3000 campers.

I'm sure you've already received emails, letters, and calls from other GVL residents detailing how our inadequate infrastructure, both current and even future (improved)— would not only result in the slow dismemberment of the town of GVL, but the expedited environmental decline of the area. As it is our water system is set up to deplete our underground water table over time. Should the catastrophic expansion actually be approved, it would not be long lived: I'm surprised Hume and its investors are blind to this ROI… 2

But as a PCF my biggest most immediate concern is GVL's ability to evacuate during a fire. Behind thousands of campers and employees, we'd be the last to leave and the those lost would be the responsibility of both the business and the county. Not to mention that many of the calls we go on are at Hume and the other two camps. More campers would only stretch our little station even further, taking us away from protecting our residents. 3

I am begging you to consider the above and happy to discuss any of it in more detail.

Thank you for your time and consideration.

Jessie Birschbach

G64 - Responses to Jessie Birschbach

G64-1 The comment is introductory in nature. No further response is warranted.

G64-2 The concerns about the scale of the proposed expansion are acknowledged. The IS/MND analysis evaluated impacts on water supplies, wastewater treatment capacity, and solid waste treatment capacity in the Utilities and Service Systems Section of the IS/MND (Section 4.19, Utilities and Service Systems).

G64-3 As discussed in the IS/MND (**Section 4, Wildfire**) MM WF – 1, the Project would continually update and comply with a comprehensive evacuation plan. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on-site occupancy prior to peak hazard conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis.

G65 - Jillian Gomez

From: Jillian Gomez
To: Barragan, Elena; Bull, Robin; Board Meeting Comments
Subject: PROJ-2024-00046 - Hume SoCal Campground Extension - Opinion
Date: Sunday, December 21, 2025 4:46:02 PM

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Hello,

My name is Jillian Gomez and my family owns a cabin in Green Valley Lake. I heard about the HUME extension plan and it sounds incredibly reckless to move forward with such a project. Not only is it an outright announcement that Green Valley Lake and its current residents are not as important as potential new business, it's incredibly UNSAFE for these potential young campers. 1

There is one small winding road in and out of this town. HUME is part way in. With the recent fires, every few months I worry that my parents will not be able to make it down the mountain with the one small road and the state of the 330 (as well as the influx of reckless driving on that highway). Now they will be stuck behind buses and cars trying to evacuate thousands of campers? Please explain how this is right.

The mountain was not built (literally) for this many people.

At the VERY least, a FULL AND COMPLETE ENVIRONMENTAL IMPACT REPORT needs to be done. 2

Save yourself the future lawsuits and guilt of lives lost and do not move forward with this plan.

Jillian Gomez

Sent from my iPhone

G65 - Responses to Jillian Gomez

G65-1 The comment is introductory in nature. No further response is warranted.

G65-2 As discussed in the IS/MND (**Section 4, Wildfire**) MM WF – 1, the Project would continually update and comply with a comprehensive evacuation plan. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on-site occupancy prior to peak hazard conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis.

G66 - Jim Stone

From: James Stone
To: Barragan, Elena
Subject: Hume SoCal Campground Extension Project
Date: Tuesday, January 6, 2026 7:45:33 AM

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Dear Ms. Barragan:

I am writing to express my concerns and opposition to the proposed Hume SoCal Campground Extension (Project # PROJ-2024-00046).

As a full time resident of the San Bernardino Mountains, I am a frequent and enthusiastic user of the beautiful habitats that make our region so special. I am an avid hiker and a life-long birder. In fact, I serve as a volunteer bird walk leader at Heaps Peak Arboretum and recently wrote a field guide to the birds for them. I also volunteer for the Southern California Mountains Foundation as a fire lookout. 1

As you might imagine, I feel very connected to these mountains. That's why the expansion of the Hume Campground is so concerning to me. I fear this project will irreversibly change our mountains, and not in a positive way.

The planned project will double the size of the existing facility and boost the number of annual participants from 300 to 3,000, an increase of 1,000 percent.

The additional vehicular traffic generated by this project will cause more congestion on Highway 18 which is already overburdened with cars, trucks, and buses from tourists, residents, and commercial vehicles. This will also lead to more air pollution and lower air quality. 2

Finally, the expansion of the Hume Campground will destroy nearly 150 acres of alpine habitat that many species of birds, mammals, reptiles, invertebrates, and plants call home.

Please do not approve this project.

Sincerely, 3

Jim Stone
Lake Arrowhead, CA

Sent from my iPhone

G66 - Responses to Jim Stone

G66-1 The comment is introductory in nature. No further response is warranted.

G66-2 The Transportation Section of the IS/MND prepared a Traffic Analysis that is included as **Appendix J** of the IS/MND and determined that traffic conditions, existing road infrastructure and access would be adequate to service the expanded Project site. As determined by the Traffic Impact Analysis conducted and analyzed in the Transportation Section of the IS/MND (**Section 4, Transportation**), traffic generated because of Project implementation would not exceed 110 average daily trips and per San Bernardino County guidelines would be considered a less than significant impact. As evaluated in the IS/MND (**Section 4, Transportation**), the Project would not modify existing roadways, and Project-related traffic would not create a significant hazard or adversely affect emergency access.

G66-3 Natural areas would be impacted by implementation of the Project; however, a large portion of the Project site would remain in its natural condition. Additionally, the Biological Resources Assessment, which is further described in the Biological Resources Section of the IS/MND, has determined that less than significant impacts would occur with implementation of MMs BIO – 1 and -2 which require pre-construction clearance surveys and compliance with the Migratory Bird Treaty Act and California Fish and Game Code.

G67 - Jodi Walters

From: jodi walters
To: Barragan, Elena
Subject: Hume
Date: Friday, January 2, 2026 6:51:56 PM

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This is insane to allow the expansion of Hume camp.

Safety in case of fire should be the major concern. It would be a crisis if for an

reason we needed to get out fast.

Why do all of our mountains have to change all because money. This is stupid and I hope the entire town of GVL will fight this

J Walters.

Sent from my iPad

1

From: jodi walters
To: Barragan, Elena
Subject: Re: Hume
Date: Monday, January 5, 2026 7:00:54 PM

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Your response to my comments is very disappointing. No mention of the safety for us living in GVL. Getting out on the one small road in case of fire or disaster is not safe now and will be less safe with the huge increase in the Hume camp increase.

When I read between the lines it is all more money for SB county and no thought for safety of residents.

Silly me. I thought residents of the county of SB were more important than money.

Nancy Walters

Sent from my iPad

1

G67 - Responses to Jodi Walters

G67-1 As discussed in the IS/MND (**Section 4, Wildfire**) MM WF – 1, the Project would continually update and comply with a comprehensive evacuation plan. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on-site occupancy prior to peak hazard conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis.

G67-2 As analyzed in the IS/MND (**Section 4, Wildfire**), the Project site is located within a Very High Fire Hazard Severity Zone (VHFHSZ). The Project would be required to adhere to MM WF – 1, which ensures a comprehensive evacuation plan is utilized and would comply with all COA provided by fire jurisdictions. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan includes early evacuation protocols, which reduce on-site occupancy prior to peak hazards conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis.

G68 - John A. Giarelli

From: john
To: Barragan, Elena
Subject: Hume Camp Proposed Expansion
Date: Friday, January 2, 2026 10:09:13 AM

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Dear Ms. Barragan,
As a resident of Green Valley Lake, California, I would like to register my opposition to the Hume Camp proposed expansion. 1
Thank you,
John A. Giarelli

G68 - Response to John A. Giarelli

G68-1 The comment is introductory in nature. The comment includes opinions about the Project and does not introduce new or substantial concerns about the adequacy of the IS/MND. No further response is warranted.

G69 - Joseph Parcells

January 5, 2026

Elena Barragan
County of San Bernardino Planning Division
385 N. Arrowhead Ave. First Floor
San Bernardino, CA 92415-0187

Dear Ms. Barragan,

My name is Joseph Parcells, and I am a lifelong resident of Green Valley Lake. I am writing to share my strong support for the proposed expansion of the Hume Camp (PROJ-2024-00046), which I believe is an important opportunity for our small mountain community.

Having grown up here, I care deeply about both the character of Green Valley Lake and the long-term health of our local environment. The Hume Camp master plan, with its emphasis on thoughtful design and sustainable practices, reflects the kind of careful planning that can support growth while still respecting our natural surroundings. The inclusion of open space, green areas, and environmentally conscious design elements will help protect wildlife habitat and the forested landscape that makes this place so special.

The project's location near Green Valley Lake also allows for preservation and enhancement of the natural areas around the lake that residents like me have enjoyed our entire lives. Protecting these spaces ensures that future generations will be able to experience the same clean air, open views, and outdoor recreation that have defined life here for decades. This kind of stewardship encourages our community to stay engaged in caring for the land and waters that surround us. 1

Another reason I support this project is Hume's focus on working with youth. The programs they provide—mentorship, outdoor education, team building, and leadership development—offer young people a positive, healthy environment that can shape them into responsible and community-minded adults. Investing in facilities that support this kind of youth development is, in my view, an investment in the future leaders of our county.

The expansion of Hume Camp will also help strengthen the local mountain economy. By creating jobs and bringing more visitors to the area, the project will support

existing small businesses and may encourage new ones to open. For a community like Green Valley Lake, this kind of economic activity is important for long-term stability and renewal.

I respectfully ask that you consider the long-term benefits that the Hume Camp master plan can bring to Green Valley Lake and the surrounding mountain communities. Its combination of environmental care, youth-focused programming, and economic support makes it a thoughtfully designed project that aligns with the values many of us who grew up here share.

Thank you for your time and consideration. I hope you will support this project and help ensure a strong, sustainable future for Green Valley Lake.

1

Sincerely,

Joseph Parcells

Resident of Green Valley Lake

G69 - Response to Joseph Parcells

G69-1 The comment is introductory in nature. CEQA does not treat economic or social effects as significant environmental impacts unless they result in an environmental impact. The IS/MND evaluates environmental effects. No new environmental effects are presented that were not addressed in the IS/MND. No further response is warranted.

G70 - Joyce Deniz

From: Joyce Deniz
To: Barragan, Elena
Cc: Bull, Robin; planning.commission@lus.sbcounty.gov
Subject: OPPOSITION to Hume SoCal Campground Expansion Project (PROJ-2024-00046)
Date: Wednesday, January 7, 2026 11:22:50 AM

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Dear Senior Planner Barragan,

I am writing to formally submit my opposition to the **Hume SoCal Campground Expansion Project (PROJ-2024-00046)** in Green Valley Lake.

My family purchased a home in Green Valley Lake with the specific intent of retiring here. We chose this community for its quiet, rural character and its safety. The proposal to expand the camp's capacity from roughly 300 to 3,000 occupants is not just an "expansion"—it is a transformation that fundamentally threatens the safety and viability of our community. 1

My concerns are rooted in the following critical issues:

1. Fire Safety and Evacuation (Life Safety) Green Valley Lake is a "one way in, one way out" community. During a wildfire, adding 3,000 additional people (plus staff and service vehicles) to our single evacuation route is a recipe for catastrophe. Our current infrastructure barely supports the existing population during emergencies. To approve a ten-fold increase in occupancy without a guaranteed, separate, and viable evacuation plan is reckless and endangers the lives of every resident and visitor. 2

2. Inadequate Infrastructure (Traffic & Water) Green Valley Lake Road is narrow and winding. It cannot sustain the traffic volume generated by a facility of this magnitude, including the buses, delivery trucks, and staff vehicles required to support 3,000 guests. Furthermore, our local water and sewer infrastructure is designed for a small hamlet, not a high-density resort. The strain on our resources would be unsustainable. 3

3. Destruction of Community Character We invested in this area because it is a peaceful mountain community, not a commercial resort hub. A facility of this scale is incompatible with the surrounding residential zoning and the historic character of Green Valley Lake.

4. Inaccurate Project Description ("No Known Controversy") I must specifically address and correct the applicant's claim in their project description that "There are no known areas of controversy." **This statement is demonstrably false.** The Green Valley Lake community has been vocal and unified in its opposition. Organizations such as the **Mountain Community Alliance** and the **Save Our Forest Association**, along with hundreds of individual residents, have repeatedly raised serious concerns 4

regarding evacuation safety, water rights, and traffic impacts. To suggest there is "no controversy" is misleading and attempts to minimize the very real, life-safety fears of the existing community.

Conclusion Given the massive scale of this expansion and the severe risks regarding wildfire evacuation, a Mitigated Negative Declaration (MND) is insufficient. **I vehemently urge the County to require a full Environmental Impact Report (EIR)** to properly study these life-threatening risks, or to deny the project entirely. 4

Sincerely,

Joyce Deniz, Green Valley Lake Property Owner

G70 - Responses to Joyce Deniz

G70-1 This comment is introductory in nature. No further response is warranted.

G70-2 As analyzed in the IS/MND (**Section 4, Wildfire**) through **Appendix K: Emergency Plan and Procedures**, the Project site is located within a Very High Fire Hazard Severity Zone (VHFHSZ). The Project would be required to adhere to MM WF – 1, which ensures a comprehensive evacuation plan is utilized and would comply with all COA provided by fire jurisdictions. The Project's Emergency Plan includes early evacuation protocols, which reduce on-site occupancy prior to peak hazards conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis. Wildfire impacts would be further reduced to less than significant with the implementation of MMs WF-2 and -3 which requires compliance with existing and proposed development standards such as undergrounded power lines. The measures also reduce risk through requiring fire-resistive plants.

G70-3 The Transportation Section of the IS/MND prepared a Traffic Analysis that is included as **Appendix J** of the IS/MND and determined that traffic conditions, existing road infrastructure and access would be adequate to service the expanded Project site. Traffic generated because of Project implementation would not exceed 110 average daily trips and per San Bernardino County guidelines would be considered a less than significant impact. As evaluated in the IS/MND (**Section 4, Transportation**), the Project would not modify existing roadways, and Project-related traffic would not create a significant hazard or adversely affect emergency access. Seasonal weather conditions and snow removal are addressed by existing County road maintenance operations.

G70-4 As analyzed in the IS/MND (**Section 4, Aesthetics**) the Project was determined to have a less than significant impact with respect to aesthetics. Specifically, the Project would be consistent with the existing zoning, visual character and would not result in substantial impacts to aesthetics. Under CEQA, the Lead Agency, San Bernardino County, determines the appropriate level of environmental review. The IS/MND evaluates all environmental topic areas required under CEQA and identifies compliance requirements and mitigation measures that reduce all potentially significant impacts to less than significant levels. There is not substantial evidence presented that the IS/MND is inadequate or that any significant unavoidable impacts would remain unmitigated. Therefore an Environmental Impact Report (EIR) is not required.

G71 - Juan M. Armenta

From: Juan Armenta
To: Barragan, Elena
Cc: Sadie English; Sue Bredesen; richardwatts@fbo.com; kivinski@cox.net
Subject: Hume Camp expansion
Date: Friday, January 2, 2026 12:25:41 PM

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Ms. Barragan:

My family has owned property since 1959, and we regularly use these homes. 1

An expansion of the Hume camp from a capacity of 300 to 3,000 is alarming. Our water table is already stressed and that load will present problems that we do not think have been vetted. Traffic is another grave concern and in another fire situation with mandatory evacuations, evacuation may not be possible with that many campers. Trash control and pollution do not seem to have been addressed. Before any expansion can be considered we think all these issues must be vetted and perhaps an environmental impact study carried out. 2

Until these issues are fully vetted and local communities given a chance to weigh in, we oppose any expansion or alteration of use permits.

Thank you, and you may reach out to me at your convenience. 3

ENGLISH LLOYD & ARMENTA

JUAN M. ARMENTA, PARTNER
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FAX: (760) 340-6895
EMAIL: ARMENTA@ENGLISHLLOYD.COM
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G71 - Responses to Juan M. Armenta

G71-1 The comment provides concerns regarding water supply and wastewater. The IS/MND, consistent with CEQA analyzes water supply and wastewater management (**Section 4, Utilities and Service Systems** and **Section 4, Hydrology and Water Quality**) through **Appendix B3: Water and Sewer Master Plan**, and the 1st Draft Water Supply Assessment, which has been updated (**Appendix B1: Revised Water Supply Assessment**), existing on-site wells can provide adequate capacity to meet the Project's projected water demand through phase 3. The updated WSA identifies a preferred strategy with CLAWA following phase 3, in which the Applicant would prepare an annual water supplier expectations memorandum. Refer to Master Response – Water. The IS/MND (**Section 4, Utilities and Service Systems**) concludes that Project-related water demand would result in a less than significant impact.

The IS/MND concludes that water-supply impacts and wastewater management would be less than significant with compliance with applicable standards and MMs HYD-1, UTL-1, UTL-3. With MM HYD-1, the Applicant shall conduct well drawdown tests, recovery testing, and water quality retesting before proceeding with each phase, for the wells serving that phase, and use the results to confirm the phase water supply strategy. MM UTL-1 requires that prior to approval of each phase, the Project applicant shall evaluate the available treatment and disposal capacity of the approved on-site wastewater treatment plant (WWTP) to confirm adequate treatment capacity, disposal capacity, operational performance, regulatory compliance, and any improvements necessary to accommodate the proposed occupancy increase. MM UTL-3 requires that prior to the Final Development Plan (FDP) approval for Phase I, the Camp shall install an on-site wastewater system subject to County and Regional Water Board approval. Additionally, Mitigation Measure UTL-3 allows for sewer service buildout as recommended by the revised Sewer Feasibility Study, which concludes that the Camp will utilize, expand, and/or supplement the on-site wastewater treatment system through buildout of all phases. Furthermore, the existing RSWD system is intended to remain available as a secondary wastewater conveyance and treatment option where capacity is available, and use is approved by RSWD. As each phase advances, the required on-site treatment capacity will be confirmed based on the applicable Project flows, the selected advanced treatment system configuration, and regulatory requirements. Continued use of any portion of the RSWD system will remain subject to available District capacity and RSWD approval. These efforts should be aligned with a phased development plan that matches Camp occupancy growth with the completion of required infrastructure improvements. Refer to Master Response – Wastewater/Sewer.

G71-2 The Transportation Section of the IS/MND prepared a Traffic Analysis that is included as **Appendix J** of the IS/MND and determined that traffic conditions, existing road infrastructure and access would be adequate to service the expanded Project site. As evaluated in the IS/MND (**Section 4, Transportation**), the Project would not modify existing roadways, and Project-related traffic would not create a significant hazard or adversely affect emergency access.

Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity.

G71-3 The concerns about the scale of the proposed expansion are acknowledged. The IS/MND analysis evaluated impacts on water supplies, wastewater treatment capacity, solid waste treatment capacity in the Utilities and Service Systems Section of the IS/MND (**Section 4, Utilities and Service Systems**). Under CEQA, the Lead Agency, San Bernardino County, determines the appropriate level of environmental review. The IS/MND evaluates all environmental topic areas required under CEQA and identifies compliance requirements and mitigation measures that reduce all potentially significant impacts to less than significant levels. There is not substantial evidence presented that the IS/MND is inadequate or that any significant unavoidable impacts would remain unmitigated. Therefore, no revisions to the IS/MND are warranted and an Environmental Impact Report (EIR) is not required.

G72 - Juan M. Armenta

From: Juan Armenta
To: Barragan, Elena; Supervisor Rowe
Cc: kivinski@cox.net; richardwatts@fbo.com; guyandsueb@aol.com; riknsade@aol.com
Subject: Hume expansion
Date: Friday, January 2, 2026 4:06:04 PM

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Supervisor Rowe:

We learned only of the proposed ten-fold expansion to 3000 persons of Hume Camp near Green Valley Lake only this weekend. It is reminiscent of the stealthy attempt to kill the Clean Mountain Program by Burrtec a few years ago. You will recall that Green Valley Lake residents turned out in force, and we expect they will again.

An expansion to 3000 is simply not supported by the roads, water resources, traffic resources, refuse resources, fire resources, emergency responses, etc. However, the State Clearinghouse form submitted by the lead agency, San Bernardino, did not recommend a review by Cal Trans, CHP, California Emergency Management Agency, State Water Board just to name a few that should be notified for input. It is unfathomable that just the ones listed were not advised of the plan for comment. 1

Furthermore, while the law may not require notice to all landowners in Green Valley Lake, as the community that will be most affected by traffic, construction, resource management, etc. we think it was incumbent upon our Supervisor to directly advise of this development.

We request that the project by tables until such time as all relevant agencies can comment and that wider notice be given to local communities. 2

ENGLISH LLOYD & ARMENTA

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WWW.ENGLISHLLOYD.COM

G72 - Responses to Juan M. Armenta

G72-1 The IS/MND (**Section 4, Public Services**) evaluates fire protection needs and concludes that the Project would not represent a potential need for expanded fire protection in the area or affect service and response times. Refer to Master Response – Fire Service Capacity.

The IS/MND analysis evaluated impacts on water supplies, wastewater treatment capacity, solid waste treatment capacity in the Utilities and Service Systems Section of the IS/MND (**Section 4, Utilities and Service Systems**). Under CEQA, the Lead Agency, San Bernardino County, determines the appropriate level of environmental review as well as trustee and responsible agencies for the Project. There is no substantial evidence presented that the IS/MND is inadequate or that responsible agencies were not notified of the Project and able to comment within the public review period. No further response is warranted.

G72-2 Public review periods for IS/MNDs are established by the Lead Agency. The Notice of Availability and Notice of Intent to adopt an IS/MND for the Hume SoCal Campground Extension public review began 11/13/2025 and closed with an extended deadline on 1/16/2026. There is no substantial evidence that the review period should have been further extended. No further response is warranted.

G73 - Judy and Kip Gomez

From: Judy Gomez
To: Barragan, Elena
Subject: Camp Hume PROJ-2024-00046, 32355 Green Valley Lake Road
Date: Saturday, November 22, 2025 12:54:26 PM

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We are appalled at the scope of this proposed HUME project and want to go on record as OPPOSED to it. Our main concerns are fire and other emergency evacuations and the impact on our wildlife here at GVL. 1
Thank you.
Judy and Kip Gomez
33477 Fern
GVL, CA 92341

G73 - Responses to Judy and Kip Gomez

G73-1 As discussed in the IS/MND (**Section 4, Wildfire**) MM WF – 1, the Project would continually update and comply with a comprehensive evacuation plan. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on-site occupancy prior to peak hazard conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis.

Natural areas would be impacted by implementation of the Project; however, a large portion of the Project site would remain in its natural condition. Additionally, the Biological Resources Assessment, which is further described in the Biological Resources Section of the IS/MND, has determined that less than significant impacts would occur with implementation of MM BIO – 1 and 2 which require pre-construction clearance surveys and compliance with the Migratory Bird Treaty Act and California Fish and Game Code.

G74 - Judy and Kip Gomez

From: Judy Gomez
To: Barragan, Elena; Bull, Robin; Board Meeting Comments; supervisor.rowe@bos.sbccounty.gov
Subject: PROJ-2024-00046 - Hume SoCal Campground Extension
Date: Thursday, December 18, 2025 5:33:28 PM

You don't often get email from thejudygomez@gmail.com. Learn why this is important

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As owners of a cabin in Green Valley Lake, we are VEHEMENTLY opposed to the proposed expansion of the HUME camp. 1

It is ABSURD, as it says in the HUME report, that "there are no known issues of controversy/issues raised by the public" as the "public was not informed of the expansion nor were their opinions solicited. MANY issues are now being raised raised as we become more aware of the expansion plan including:

- unacceptable water table/wells decreases
- no solid evacuation plans in case of emergency
- increased traffic on HWY330 and GVL road (including many busses)
- the inevitable increase in traffic accidents
- the one road in/out to GVL has been deemed inadequate by CAL FIRE
- needed increase in sewer treatment in Running Springs
- negative effects on wildlife

2

The need for a complete ENVIRONMENTAL IMPACT REPORT (EIR) is imperative. It would be reckless and careless to not require this report.

In summary, please STOP this plan! 3

Judy and Kip Gomez

G74 - Responses to Judy and Kip Gomez

G74-1 The comment is introductory in nature. The comment includes a general statement of opposition. No further response is warranted.

G74-2 The comment includes multiple concerns pertaining to groundwater sustainability, emergency evacuation, traffic on local roads, wastewater capacity, and wildlife. Refer to Master Responses – Water, Wildfire, Transportation/Traffic, Wastewater/Sewer, Biological Resources/Wildlife.

G74-3 The comment is conclusionary in nature and makes a request for an Environmental Impact Report. Refer to Master Response – Request for EIR.

G75 - Judy Gomez

From: Judy Gomez
To: Barragan, Elena
Subject: Phone number to give input on Camp Hume PROJ-2024-00046
Date: Saturday, November 22, 2025 12:55:39 PM

> You don't often get email from thejudygomez@gmail.com. Learn why this is important

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One of my neighbors up here in GVL does not have email and would like a phone number that he can call to express his opinion on the Camp HUME expansion. 1
Thank you.

G75 - Responses to Judy and Kip Gomez

G75-1 The comment is introductory in nature. The comment includes questions about contact information for the Project and does not raise new or substantial issues not covered in the IS/MND. No further response is warranted.

G76 - Julia Irving Gregory

From: Julia Irving Gregory
To: Barragan, Elena
Subject: Hume Camp Expansion, Green Valley Lake
Date: Wednesday, January 7, 2026 10:46:42 AM

You don't often get email from julia.irvinggregory@gmail.com. Learn why this is important

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Ms Barragan,

I am writing to express in the strongest possible terms my dismay and apprehension over the proposed tenfold expansion of Hume Camp's operation.

This proposal, a naked attempt to profiteer from an already stressed ecosystem, will negatively impact everyone who lives in Green Valley Lake and the surrounding area. 1

Road and power infrastructure is already challenged. There isn't sufficient water for the inhabitants, a situation likely to worsen as the climate heats up.

Businesses and livelihoods which are based on the mountain will be impacted in significant and negative ways.

Evacuation, in the inevitable event of fire, will be impossible and will block residents from leaving expeditiously, endangering lives unnecessarily.

From my own perspective I live in RS and my entire business is based in GVL. 2

Access to GVL is already a challenge during peak times. Additional coach traffic will severely impact access and travel times.

My clients all rely on the delicate power, water and sewerage infrastructure which cannot possibly handle an influx of 3000 campers not used to rationing water and power.

It is to be expected that if approved, the residence limit of 3000 campers will be aimed at year-round. This is absolutely environmentally unacceptable and will certainty degrade the delicate and unique ecosystem of GVL. 3

I strongly urge you to commit at the very least to a full Environmenal Impact Study run by a disinterested third party.

We do not want this expansion to go ahead. 4

With regards,

Julia Irving Gregory
310 408-9244

G76 - Responses to Julia Irving Gregory

G76-1 The comment includes a few general concerns with speculative conclusions and opinions regarding business and character. CEQA only addresses environmental impacts and does not address impacts relating to economics or character unless directly tied to an environmental impact. The comment also mentions concerns over energy infrastructure and water. The Project would not substantially affect existing energy or fuel supplies or resources, and new capacity would not be required. All impacts regarding water would be mitigated to less than significant levels. Refer to Master Response – Water.

G76-2 The comment includes concerns generally regarding transportation and emergency evacuation on local roads near the Project. The comment does not provide evidence that the IS/MND was inadequately prepared or that a revision is warranted. Impacts related to wildfire and transportation would be less than significant per CEQA guidelines. Refer to Master Responses – Transportation/Traffic, Wildfire.

G76-3 The comment includes concerns over client needs and occupancy over time. CEQA only evaluates environmental impacts and does not respond to issues like client needs unless directly tied to an environmental effect. The Project would expand gradually over many decades to a maximum capacity previously analyzed at a worst-case scenario of approximately 3,000 occupants, and has been reduced following receipt of public comments and agency input, and additional coordination with the Project's proposed water supplier to 2,400 campers, which will only be met in summer over a certain number of weeks after many decades of buildout. Refer to **Section 3, Errata**.

G76-4 The comment includes a request for further environmental documentation. Refer to Master Response – Request for EIR.

G77 - Justine Whitehead

From: Justine Whitehead
To: Barragan, Elena
Subject: Opposition to Proposed Expansion of Hume SoCal
Date: Sunday, January 4, 2026 2:15:55 PM
Attachments: Appendix A Camp Capacity and Evacuation Constraints - Green Valley Lake Road.pdf

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January 4, 2026

To: Elena Barragan, San Bernardino County Land Use Services / Planning Division

Dear Ms. Barragan,

I am writing to formally oppose the proposed five-phase expansion of Hume SoCal, which would
increase the camp's capacity over time to approximately 3,000 campers.

My name is Justine Whitehead, and I own a cabin located further up Green Valley Lake Road at 33843
Green Valley Lake Road. As a nearby property owner, I am directly and significantly affected by
increased development, traffic, and population along this corridor.

Hume SoCal currently operates at a capacity of up to approximately 365 campers. This places it
within the range of other established camps along Green Valley Lake Road. Camp Pondo operates at
approximately 300–350 campers, and Camp Cedar Crest at approximately 500 campers. All rely on the
same single paved access route with only unpaved Forest Service roads as alternatives.

The proposed expansion would dwarf all other facilities on this corridor and is incompatible with
the physical limitations, evacuation capacity, and public safety realities of this area.

1

Green Valley Lake Road provides only one paved route to Highway 330, which is frequently congested
or closed during storms or emergencies. Alternative evacuation routes are unpaved and unreliable.

Recent history underscores this risk, including the February–March 2023 Snowmageddon, September
2024 wildfire evacuations, and the 2007 Slide Fire.

The expansion would create unacceptable public safety risks and cumulative impacts that cannot be

2

feasibly mitigated.

I respectfully urge denial of the proposed expansion.
Sincerely,

Justine Whitehead
33843 Green Valley Lake Road Green Valley Lake, CA 92341
justine@perframe.com
562-324-8857

2

Appendix A: Camp Capacity and Evacuation Constraints – Green Valley Lake Road

Camp Pondo (Ponderosa Pines Christian Camp)
Capacity: ~300–350 campers
Evacuation Risk: High

Hume SoCal (Current)
Capacity: Up to ~365 campers
Evacuation Risk: High

Camp Cedar Crest
Capacity: ~500 campers
Evacuation Risk: Very High

All camps rely on a single paved evacuation route with limited redundancy. Increasing Hume SoCal to 3,000 occupants would overwhelm evacuation capacity beyond reasonable safety thresholds.

1

G77 - Responses to Justine Whitehead

G77-1 The comment is introductory in nature. The comment includes concerns about overall safety implications and impact. No further response is warranted.

G77-2 As discussed in the IS/MND (**Section 4, Wildfire**) MM WF – 1, the Project would continually update and comply with a comprehensive evacuation plan. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on-site occupancy prior to peak hazard conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis.

G78 - Kari Helton

From: Kari Helton
To: Barragan, Elena
Cc: Supervisor Cook; Supervisor Armendarez; Supervisor Hagman; Supervisor Baca; Supervisor Rowe; assemblymember.lackey@assembly.ca.gov; senator.ochoa-bogh@senate.ca.gov; contact@bigbearchamber.com; info@runningspringschamber.com
Subject: Opposition to Hume SoCal Campground Extension
Date: Friday, January 2, 2026 12:26:21 PM

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Project title: Hume SoCal Campground Extension
Project no.: PROJ-2024-00046
Project location: 32355 Green Valley Lake, CA 92341

I am writing to express my opposition to the above proposed project. Increasing camp facilities from 300 campers to 3,000 campers and staff is an astounding jump that will impact fire evacuation feasibility, traffic, the environment, and residents. 1

1. Fire evacuation: This is an isolated area. There is one road out and in (Green Valley Lake Road). It's a single lane each way. There is absolutely no other way out. I cannot imagine the impact of trying to evacuate the residents of Green Valley Lake PLUS 3,000 people from Hume. It is a Paradise Fire waiting to happen. The impact will not be only to Green Valley Lake Road, but on Highway 18. It would be a significant burden on traffic flow during a crisis. 2
2. Traffic: The impact that so many buses will have on Hwy 18 and Green Valley Lake Road cannot be overstated. Traffic is already at a standstill during busy tourist times. Those buses must turn left from Highway 18 onto Green Valley Lake Road, and they will further back up traffic. This will affect not just the local towns of Running Springs, Arrowbear Lake, and Green Valley Lake, but destinations like Snow Valley and Big Bear. Why would people choose to be mired in traffic when they can drive a little farther and enjoy other mountain destinations like Mammoth? There will be an economic impact on this region. 3
3. The environment: The increase in water use/sewer will mean more water leaving the mountain. Water use has already had an impact on the forest, causing trees to weaken and leaving them susceptible to beetles, like what happened with the dying oaks around here. 4
4. Residents: I touched on some of the impacts for residents above, who will have to contend with increased traffic and increased risk to their lives during times of fire. For residents of Green Valley Lake, there will be ongoing frustration from having to follow slow camp buses for miles with few, if any, turnouts for vehicles of their size. There will be little to no economic benefit of the Hume expansion, as the campers don't visit the 5

town. But meanwhile, the increased traffic will surely reduce the number of people coming to Green Valley Lake to enjoy the lake for fishing and recreation. That means a worsening economy for this town.

I request that you require a proper environmental impact report and a report into the impact on residents. 5

Thank you,
Kari Helton
Green Valley Lake resident

G78 - Responses to Kari Helton

G78-1 The comment is introductory in nature. The comment includes concerns about overall safety implications from expansion of the Project. No further response is warranted.

G78-2 As discussed in the IS/MND (**Section 4, Wildfire**) MM WF – 1, the Project would continually update and comply with a comprehensive evacuation plan. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on-site occupancy prior to peak hazard conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis.

G78-3 The Transportation Section of the IS/MND prepared a Traffic Analysis that is included as **Appendix J** of the IS/MND and determined that traffic conditions, existing road infrastructure and access would be adequate to service the expanded Project site. As evaluated in the IS/MND (**Section 4, Transportation**), the Project would not modify existing roadways, and Project-related traffic would not create a significant hazard or adversely affect emergency access.

Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity.

G78-4 The concerns about the scale of the proposed expansion are acknowledged. The IS/MND analysis evaluated impacts on water supplies, wastewater treatment capacity, and solid waste treatment capacity in the Utilities and Service Systems Section of the IS/MND (**Section 4, Utilities and Service Systems**). Natural areas would be impacted by implementation of the Project; however, a large portion of the Project site would remain in its natural condition. Additionally, the Biological Resources Assessment which is further described in the Biological Resources Section of the IS/MND has determined that less than significant impacts would occur with implementation of MMs BIO – 1 and -2 which require pre-construction clearance surveys and compliance with the Migratory Bird Treaty Act and California Fish and Game Code.

G78-5 CEQA does not treat economic or social effects as significant environmental impacts unless they directly result in an environmental impact. The IS/MND evaluates environmental effects. No new environmental effects are presented that were not addressed in the IS/MND. No revisions are necessary.

G79 - Kayliegh Rashad

From: kk love
To: Barragan, Elena
Subject: Community Perspective on the Proposed Expansion For Hume
Date: Tuesday, January 6, 2026 6:52:39 PM

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Elena,

I hope this message finds you well. I am writing as someone who has been part of the mountain community my entire life and who deeply cares about its people, its future, and the thoughtful growth of the area we all call home.

I understand there are concerns surrounding the proposed expansion plan for Hume lake, and I truly respect the desire to protect the character of our mountain communities. At the same time, I believe this project presents meaningful opportunities that could positively impact our local economy and our youth. 1

An expansion would create new jobs and provide consistent economic support for local, already-established businesses — from service providers to small shops and vendors who rely on sustainable, year-round activity. In a community where employment opportunities can be limited, especially for young adults, this kind of growth can help families remain rooted here rather than being forced to look elsewhere for work.

Hume has also consistently demonstrated a commitment to working with youth and investing in their future. By creating opportunities for mentorship, employment, and skill-building, Hume works alongside young people to help them grow into confident, capable adults. That focus has long been a benefit to our community and aligns with the values many of us share.

Additionally, Hume's longstanding partnership with the church I attended speaks to its dedication to collaboration, service, and being a responsible community partner. That relationship has been built on trust over many years and reflects Hume's commitment to working alongside local organizations rather than operating apart from them.

I believe that with continued open dialogue and intentional planning, this expansion can be approached in a way that honors the mountain community while also supporting its long-term sustainability. Thank you for taking the time to consider the perspective of those who have grown up here and want to see our community thrive for generations to come. 1

Warm regards,

Kayliegh Rashad

G79 - Response to Kayliegh Rashad

G79-1 The comment includes general support for the Project. The commenter's support for the Project has been acknowledged. No further response is warranted.

G80 - Kersey Orton

From: Nail Bunny
To: Barragan, Elena; Bull, Robin
Subject: In regards to project plan PROJ-2024-00046
Date: Wednesday, January 7, 2026 2:04:13 PM

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To whome it may concern,

As a business and home owner that will be dramatically affected by the proposed Hume Christian Camp project plan (PROJ-2024-00046) to expand their occupancy from 300 to 3000, I am writing to inform you of my opposition. 1

This change to the camp will have a VERY damaging effect to the environment (less water, animal displacement, increased waste, pollution) and is going to be a massive danger in the event of a wildfire due the limited single lane highway. The increase in traffic from the proposed plan will cause my business to be hard to reach, and will have a negative effect on my clientele. 2

I am shocked that it would even be considered because Green Valley Lake only has 1,100 houses and between 300/400 full time residents and the camp would be bigger then the entire town.

If this plan is approved, I will be spearheading a protest with ALL the local businesses from Green valley lake, Arrowbear, and Running Springs. I will also be asking my cousin, Nick Shirley, to help me with getting this matter publicized and to interview locals who don't want to have irrevocable harm to come to our home. 3

Thank you for your time.
-Kersey Orton
(909) 708-9811

G80 - Responses to Kersey Orton

G80-1 The comment is introductory and establishes opposition. No further response is warranted.

G80-2 The comment includes concerns generally regarding transportation and emergency evacuation on local roads near the Project. The comment does not provide evidence that the IS/MND was inadequately prepared or that a revision is warranted. Impacts related to wildfire and transportation would be less than significant per CEQA guidelines. Refer to Master Responses – Transportation/Traffic, Wildfire.

G80-3 The comment is conclusionary in nature. The total comment does not provide evidence that the IS/MND or its conclusions are inadequate. No further response is warranted.

G81 - Kevin Cunningham

From: Kevin Cunningham
To: Barragan, Elena
Subject: Comments in Opposition of PROJ-2024-00046, Hume Camp Expansion
Date: Monday, January 5, 2026 7:26:08 PM

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Dear Elena Barragan,

Thanks for taking the time to read my input.

RE: PROJ-2024-00046

I am writing in OPPOSITION to the expansion of Hume Camp, 32355 Green Valley Lake Road GVL CA 92341

I feel like the tenfold expansion of Hume Camp will greatly impact the fragile infrastructure of the area in a negative fashion, while providing little if anything to surrounding communities.

Of PRIMARY concern is the single road that leads to Green Valley Lake. Should an emergency arise, the number of people clogging the one-way-in, one-way-out road from the town of Green Valley Lake could be catastrophic. 1

We already have incredible fire hazards in this dry mountain area as was evident in the recent fires of 2024. This increase in campers will not only clog infrastructure but will also increase the fire hazard by allowing that many campers in the area at any one time.

The Utilities will be impacted.
- Power - we barely make it through seasons without power outages as it is
- Sewer - impact on sewer will be tenfold
- Trash - tenfold the amount of trash generated 2

Taxes - who pays for all the infrastructure required to facilitate a tenfold increase?
Environmental Impacts will be be vast; not only the previously stated issues but the quality of life of the surrounding areas will be impacted by such an increase in traffic.

I don't feel like this massive expansion will add anything of value to the surrounding neighborhoods, nor the region in general.

Thank you for your time.

Sincerely,

Kevin Cunningham
537 Spring Lane
Green Valley Lake, CA 92341 3

From: Kevin Cunningham
To: Barragan, Elena
Subject: Comments in Opposition of PROJ-2024-00046, Hume Camp Expansion
Date: Monday, January 5, 2026 7:26:08 PM

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Elena Barragan,

Thanks for taking the time to read my input.

RE: PROJ-2024-00046

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I feel like the tenfold expansion of Hume Camp will greatly impact the fragile infrastructure of the area in a negative fashion, while providing little if anything to surrounding communities.

Of PRIMARY concern is the single road that leads to Green Valley Lake. Should an emergency arise, the number of people clogging the one-way-in, one-way-out road from the town of Green Valley Lake could be catastrophic. 1

We already have incredible fire hazards in this dry mountain area as was evident in the recent fires of 2024. This increase in campers will not only clog infrastructure but will also increase the fire hazard by allowing that many campers in the area at any one time.

The Utilities will be impacted.
- Power - we barely make it through seasons without power outages as it is
- Sewer - impact on sewer will be tenfold
- Trash - tenfold the amount of trash generated 2

Taxes - who pays for all the infrastructure required to facilitate a tenfold increase? Environmental Impacts will be be vast; not only the previously stated issues but the quality of life of the surrounding areas will be impacted by such an increase in traffic.

I don't feel like this massive expansion will add anything of value to the surrounding neighborhoods, nor the region in general.

Thank you for your time. 3

Sincerely,

Kevin Cunningham
537 Spring Lane
Green Valley Lake, CA 92341

G81 - Responses to Kevin Cunningham

G81-1 The comment is introductory in nature. The comment includes concerns about overall safety implications and impact. No further response is warranted.

G81-2 The concerns about the scale of the proposed expansion are acknowledged. The IS/MND analysis evaluated impacts on water supplies, wastewater treatment capacity, and solid waste treatment capacity in the Utilities and Service Systems Section and the Hydrology and Water Quality Section of the IS/MND (**Section 4, Utilities and Service Systems** and **Section 4, Hydrology and Water Quality**). The IS/MND concludes that impacts would be less than significant to these sections with mitigation measures. MM UTL-1 requires that prior to approval of each phase, the Project applicant shall evaluate the available treatment and disposal capacity of the approved on-site wastewater treatment plant (WWTP) to confirm adequate treatment capacity, disposal capacity, operational performance, regulatory compliance, and any improvements necessary to accommodate the proposed occupancy increase. MM HYD-1 requires that the Applicant shall conduct well drawdown tests, recovery testing, and water quality retesting before proceeding with each phase, for the wells serving that phase, and use the results to confirm the phase water supply strategy. CEQA does not treat economic or social effects as significant environmental impacts unless they result in an environmental impact. The IS/MND evaluates environmental effects. No new environmental effects are presented that were not addressed in the IS/MND. No revisions are necessary. Refer to Master Response – Wastewater/Sewer and Master Response – Water.

G82 - Kip Gomez

From: Kip Gomez
To: Barragan, Elena
Subject: Re: Hume Development
Date: Tuesday, January 6, 2026 2:16:29 PM

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Sent from my iPhone

> On Jan 6, 2026, at 2:12 PM, Kip Gomez <kipgomez@gmail.com> wrote:
>
> This is in regards to the Hume SoCal development. As property owners we are very concerned about the stress it will put on the mountain communities, especially Green Valley Lake where we live. Going from 300 to 3,000 campers is just unthinkable. The amount of water that will be used, the sewage system overload, the increase of buses (40-50) each week/weekend, the removal of forest trees and shrubs. As you know there is only one road in and out to Green Valley Lake so if a bus gets stuck or breaks down there is no other way to get out. So let's say this does happen and there is a fire close by, how do the people in town evacuate? Who will be responsible to get them out? Is it really worth it when human lives could be at stake? 1 2
> I really hope that you request a EIR so that all these items and more are carefully checked.
>
> Thanks, Kip Gomez. 3
> Sent from my iPhone

G82 - Responses to Kip Gomez

G82-1 The comment includes multiple concerns about the potential effects of the increased capacity, mostly regarding water, sewer, transportation, and tree preservation. The amount of water being used was addressed through an updated Water Supply Assessment (**Appendix B1: Revised Water Supply Assessment**). Refer to Master Response – Water. Regarding sewer impacts, the MND in **Section 4, Utilities and Service Systems** incorporates MM UTL-1, which requires that prior to approval of each phase, the Project applicant shall evaluate the available treatment and disposal capacity of the approved on-site wastewater treatment plant (WWTP) to confirm adequate treatment capacity, disposal capacity, operational performance, regulatory compliance, and any improvements necessary to accommodate the proposed occupancy increase. Impacts related to sewer would be less than significant. Refer to Master Response – Wastewater/Sewer. Transportation impacts would be less than significant; refer to Master Response – Transportation/Traffic. Lastly, the Project would not conflict with San Bernardino County Code of Ordinances pertaining to tree conservation; a less than significant impact would occur.

G82-2 The comment includes concerns generally regarding transportation and emergency evacuation on local roads near the Project. The comment does not provide evidence that the IS/MND was inadequately prepared or that a revision is warranted. Impacts related to wildfire and transportation would be less than significant per CEQA guidelines. Refer to Master Responses – Transportation/Traffic, Wildfire.

G82-3 The comment is conclusionary in nature. The comment makes a request for an EIR. Refer to Master Response – Request for EIR.

G83 - Kristy Miller

Elena Barragan
County of San Bernardino Planning Division
385 N. Arrowhead Ave. First Floor
San Bernardino, Ca. 92415-0187

Ms. Barragan

I am writing to express my strong support for the proposed expansion of the Hume Camp(PROJ-2024-00046). This project represents a vital opportunity for our entire community. It will enhance its infrastructure, promote sustainable development, and foster economic growth.

In itself, it will create more jobs for our small community while fostering a place of beauty to be shared with children and families in the beautiful San Bernardino Mountains. Our economy is dependent on visitors, and this is a great opportunity to bring more people to our mountain, while maintaining the Hume Lake plan and camp experience structure. 1

The long-term benefits will create new, much-needed businesses and improve job opportunities in an area where that has been a challenge.

Thank you for your attention to this matter. I hope that you will support this much-needed expansion of Hume Camp.

Kristy Miller
Green Valley Lake
Mountain Resident

G83 - Responses to Kristy Miller

G83-1 The comment includes general support for the Project. The commenter's support for the Project has been acknowledged. No further response is warranted.

G84 - Kylie Buchanan

From: Kylie Buchanan
To: Barragan, Elena
Subject: Formal Opposition to Proposed 3,000-Occupancy Hotel Development in Green Valley Lake
Date: Wednesday, January 7, 2026 2:37:41 PM

You don't often get email from kyliejas93@gmail.com. Learn why this is important

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

To Whom It May Concern,

I am writing to formally oppose the proposed plan to convert an existing 300-person outdoor education facility into a 3,000-occupancy hotel in the community of Green Valley Lake, California. 1

This proposal represents an order-of-magnitude increase in occupancy that is fundamentally incompatible with the existing infrastructure and safety limitations of Green Valley Lake. The community was not designed, nor is it equipped, to support a development of this scale.

First, the current sewage, water, and trash infrastructure is already limited and seasonally stressed. A tenfold increase in daily population would place unsustainable demand on wastewater treatment, potable water supply, and solid waste management systems. There has been no credible demonstration that these systems can be expanded or upgraded without significant environmental impact, long-term disruption, or cost burden to existing residents. 2

Second, and more critically, this proposal presents a serious and unacceptable public safety risk. Green Valley Lake is a high wildfire-risk area. At present, the community relies primarily on a single two-lane road for ingress and egress. In the event of a wildfire or other emergency requiring evacuation, attempting to move an additional 3,000 visitors—many unfamiliar with the area—through this limited roadway would be logistically unrealistic and potentially deadly. This risk is not hypothetical; wildfire events in similar mountain communities have repeatedly demonstrated the consequences of overdevelopment without adequate evacuation capacity. 3

Current residents already face evacuation challenges during peak fire conditions. Introducing a hotel of this scale would significantly increase congestion, delay emergency response, and put both visitors and residents at heightened risk. Any development proposal that meaningfully increases population density must first demonstrate proven, redundant evacuation routes and emergency response capacity. This proposal does not meet that standard.

Finally, converting a small-scale outdoor education facility into a large commercial hotel represents a fundamental change to the character and carrying capacity of Green Valley Lake. Such a transformation should require extraordinary justification, comprehensive infrastructure analysis, and clear evidence that public safety will not be compromised. To date, those requirements have not been met. 4

For these reasons, I strongly urge the City of Green Valley Lake and all relevant planning authorities to reject this proposal in its current form. Development decisions must prioritize public safety, environmental sustainability, and the long-term viability of the community—not short-term commercial gain.

Thank you for your consideration.

Sincerely,
Kylie Buchanan
Green Valley Lake, California

4

G84 - Responses to Kylie Buchanan

G84-1 The comment is introductory in nature. The comment includes a statement of general opposition. No further response is warranted.

G84-2 The comment includes concerns related to infrastructure. Per **Section 4, Utilities and Service Systems**, the Project would not result in inadequate landfill capacity. Refer to Master Responses – Wastewater/Sewer, Water.

G84-3 The comment includes concerns generally regarding transportation and emergency evacuation on local roads near the Project. The comment does not provide evidence that the IS/MND was inadequately prepared or that a revision is warranted. Impacts related to wildfire and transportation would be less than significant per CEQA guidelines. Refer to Master Responses – Transportation/Traffic, Wildfire.

G84-4 The comment includes a concern not within the scope of CEQA, misidentifies the intended use, and provides a request for denial to the Lead Agency. Refer to Master Response - Scale/Zoning. The IS/MND and its conclusions were prepared in accordance with CEQA guidelines, the comment does not provide evidence that the IS/MND warrants change.

G85 - Leah DeSoucy

From: ldesoucy@aol.com
To: Barragan, Elena
Subject: Hume expansion
Date: Monday, January 5, 2026 9:52:09 PM

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Am writing to express my concern over the expansion of the HUME campground in Green Valley Lake to service 3000 campers. This is a BAD idea!! As a resident of GVL I am vehemently opposed to this for many reasons. This would create more traffic and in the event of a fire it would be a traffic nightmare to get both the residents and the campers out safely without causing a major road blockage. Secondly this would impact both the sewer and water services that now provide for the residents of GVL. We purchased in GVL due to the fact it was a small quiet residential area unlike Running Springs, Arrowhead and Big Bear which we also considered but liked GVL for its peace and quiet/ Please leave it that way.
Leah DeSoucy
598 Oak Knoll Circle
Green Valley Lake CA

1
2
3

G85 - Responses to Leah DeSoucy

G85-1 The comment is introductory in nature. The comment includes concerns about overall safety implications and impact. No further response is warranted.

G85-2 The comment includes concerns of the impacts to sewer and water supply. Refer to Master Responses – Wastewater/Sewer and Water

G85-3 Noise impacts were evaluated in the IS/MND (**Section 4, Noise**), which found that operational noise levels associated with the Project would comply with applicable County noise standards and would result in less than significant impacts. Based on this analysis, additional acoustic studies are not required. There is no evidence identifying a new or unaddressed environmental impact. No further response is warranted.

G86 - Lee DeBrabander

From: Lee Citizen
To: Barragan, Elena
Subject: Hume So Cal Project at Green Valley Lake
Date: Tuesday, December 23, 2025 5:55:16 PM

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

To Whom It May Concern,

I am a property owner at 33355 Lakeside Drive, Green Valley Lake, and I am writing to provide formal public comment regarding the proposed Hume SoCal Campground Expansion Project and the County's circulation of the Initial Study/Mitigated Negative Declaration (IS/MND) dated November 2025. After reviewing the IS/MND, I respectfully express my concern that reliance on a Mitigated Negative Declaration is insufficient for a project of this scope and intensity, and I urge the County to require preparation of a full Environmental Impact Report (EIR) before any project approvals or advancement.

The proposed project would expand the existing campground from approximately 107 acres to approximately 252 acres and increase occupancy from roughly 300 persons to as many as 3,000 persons, representing a tenfold increase in population and operational intensity on a largely forested, mountainous site surrounded by San Bernardino National Forest lands. This scale of expansion, by itself, raises substantial questions under the California Environmental Quality Act (CEQA) as to whether all potentially significant environmental effects have been adequately disclosed and analyzed. 1

The IS/MND acknowledges potentially significant impacts across numerous resource areas, including biological resources, hydrology and water quality, wildfire risk, utilities and service systems, transportation, and tribal cultural resources, with significance reduced through proposed mitigation measures. However, CEQA requires preparation of an EIR whenever substantial evidence supports a fair argument that a project may have a significant effect on the environment (Public Resources Code § 21082.2). Given the project's location in a Very High Fire Hazard Severity Zone, its reliance on constrained evacuation routes, its dependence on both community water supplies and on-site groundwater during dry and multiple dry years, and the need for major upgrades to wastewater and utility infrastructure, there is substantial evidence that the project may result in significant environmental effects that warrant a more comprehensive level of review.

In addition, the project site includes tributaries connected to Deep Creek, a waterway recognized for its ecological and recreational values, and the surrounding area supports wildlife movement, sensitive habitats, and tribal cultural resources. While mitigation is proposed, an EIR is necessary to fully evaluate cumulative impacts, 2

growth-inducing effects, long-term operational risks, and reasonable project alternatives, including reduced-intensity or phased alternatives that may lessen environmental harm. These analyses are central purposes of an EIR and cannot be meaningfully substituted through an IS/MND. 2

An EIR would also provide a more transparent and robust public process, allowing decision-makers and the community to fully understand the environmental trade-offs associated with this substantial expansion before irreversible commitments are made. Proceeding without an EIR risks undermining public confidence in the CEQA process and exposes the County to avoidable legal and environmental risk. 3

For these reasons, I respectfully request that San Bernardino County set aside the proposed Mitigated Negative Declaration and require preparation of a full Environmental Impact Report for the Hume SoCal Campground Expansion Project before the project is allowed to move forward.

Thank you for your consideration of these comments and for your commitment to responsible environmental review.

If you are not the best person to express my concerns, please let me know where to send this statement. 4

Additionally, how can I be added to a notification list to track this proposal?

Sincerely,

Lee DeBrabander
714-315-6069
33355 Lakeside Drive
Green Valley Lake, CA 92341

G86 - Responses to Lee Debrabander

G86-1 Under CEQA, the Lead Agency, San Bernardino County, determines the appropriate level of environmental review. The IS/MND evaluates all environmental topic areas required under CEQA and identifies compliance requirements and mitigation measures that reduce all potentially significant impacts to less than significant levels. There is not substantial evidence presented that the IS/MND is inadequate or that any significant unavoidable impacts would remain unmitigated. Therefore an Environmental Impact Report (EIR) is not required.

G86-2 Natural areas would be impacted by implementation of the Project; however, a large portion of the Project site would remain in its natural condition. Additionally, the Biological Resources Assessment, which is further described in the Biological Resources Section of the IS/MND, has determined that less than significant impacts would occur with implementation of MMs BIO – 1 and -2 which require pre-construction clearance surveys and compliance with the Migratory Bird Treaty Act and California Fish and Game Code.

G86-3 Refer to response above regarding preparation of an EIR.

G86-4 This comment is conclusionary in nature. No further response is warranted.

G87 - Leilani Wood

Leilani Wood
PO Box 8573
32981 Maple Lane, Green Valley Lake, CA 92341-8573
(909) 939-0511
karitop45@hotmail.com

January 2, 2026

Elena Barragan
County of San Bernadino
Planning Division
385 N. Arrowhead Ave.
San Bernardino, Ca 92415-0187

Dear Ms. Barragan,

As a full-time resident here in Green Valley Lake for the last nine years, I would like to express my concerns over the proposed expansion of the Hume Camp (PROJ-2024-00046). 1

I truly feel this huge expansion from accommodations for 300 campers to 3000 campers in this relatively remote area would have a devastating impact on our water supplies, the water table in the area, sewers and waste treatment capacity, traffic control, and most importantly, a doable evacuation plan for both the Green Valley Lake community and the Hume Camp in the event of an emergency. We have a singular entrance and exit pathway on a narrow 2-lane, very curvy road (Green Valley Lake Road), set in a high-risk fire area. Additionally, also sharing this same narrow road, are two other camps, Cedar Crest Camp with 600 capacity and Pondo Camp with 350 capacity. Should an emergency arise, we could potentially have a minimum 300+ resident families exiting from the community of Green Valley Lake, another 25-30 families exiting from the Green Valley Lake Campground (in the summer), up to 60 buses carrying 3000 campers from Hume plus their staff vehicles, 12 buses carrying 600 campers plus their staff vehicles from Cedar Crest Camp and 7 buses carrying 350 campers plus their staff vehicles from Pondo Camp, all trying to reach Highway 18 on the same narrow 2-lane road! Traffic at the intersection of Green Valley Lake Road and Highway 18 (itself a narrow 2-lane road) is often gridlocked on weekends due to the heavy traffic leaving Big Bear. In the event of an evacuation, the impact of an extra 3000 people (60 large busses?) from Hume Camp would be a disaster. Cal-Fire has already expressed concern over this single evacuation route even before this proposed project. To me it sounds like a repeat of the tragedy in Paradise, California just waiting to happen. 2

The initial feasibility study (Development Plan) presented by Hume is lacking depth in most areas and presents false information in other areas, such as the statement at the end "There are no known areas of controversy." This project needs a full in-depth Environmental Impact Study before proceeding further! Unless Hume can construct an additional evacuation route (unlikely), and conduct a full in-depth Environmental Impact Study that results in a <u>doable</u> plan addressing evacuation of ALL residents and camps on GVL Road, the strained mountain water supply, the sewer and waste treatment capacity that is already stretched, traffic control at all times, and the impact on wildlife, just to name a few concerns, I seriously urge the County to reject this proposal. 3

Thank You,
Leilani Wood, A concerned resident of Green Valley Lake

G87 - Responses to Leilani Wood

G87-1 The comment includes concerns about water supply, wastewater capacity, and traffic. Refer to Master Responses – Water, Wastewater/Sewer, Transportation/Traffic.

G87-2 The comment includes concerns generally regarding transportation and emergency evacuation on local roads near the Project. The comment does not provide evidence that the IS/MND was inadequately prepared or that a revision is warranted. Impacts related to wildfire and transportation would be less than significant per CEQA guidelines. Refer to Master Responses – Transportation/Traffic, Wildfire.

G87-3 The comment is conclusionary in nature. The comment makes a request for an Environmental Impact Report. Refer to Master Response – Request for EIR.

G88 - Leslie A. Rossiter

January 5, 2026

Ms. Elena Barragan
County of San Bernardino
Land Use Services Department,
Planning Division
385 North Arrowhead Avenue First Floor
San Bernardino, CA. 92415-0187

RE: Project **#PROJ-2024-00046. HUME SOCAL Expansion**

Dear Ms. Barragan,

I met you briefly on December 20, 2025 at the HUME Socal public meeting. Thank you. My name is Leslie Rossiter. I have owned my cabin for 18 years in Green Valley Lake, CA and have been living here full time since I retired for ten years. I could not have made a better decision for my golden years. 1

However, I am very concerned about the afore mentioned expansion. I worked hard, very hard to get where I am today. I am concerned about the water issues that we will come up against. As we are on higher ground the wells and aquifer will naturally be draining to lower levels. When you have that kind of expansion requested and that many more people up to 3000 what will it really do to the natural supply? A neutral third party EIR was never consulted. One of our town members also brought up the problem with Nestle however many years ago. This will become a newer version of that. Where will the supply come from when it dries up? Will it have to be imported as if on homestead living? I cant see myself at 75 years old doing this kind of importation when a proper EIR has not been done. 2

I am also concerned as to why they suddenly decided they would expand it to more than 3000 people. From where did this figure suddenly come? Did their congregation suddenly acquire that many more young campers that they didn't before? Are they importing them from other parts of the country? What is the real reason? Why so many new buildings— a middle school, a high school and adult school? What is to stop them from acquiring more land to buy or lease from government in the future.. this project supposedly is to take up to 40 or 50 years? The previous owner of that property couldn't even redo the ski hill that burned down in Green Valley Lake all those years ago — when they had the leases, I somehow don't think this will only be for a part time summer camping ground when they are talking about building schools. 3

I am saddened that so much of the local flora and fauna will be destroyed. While they claim that they have done the research, once the trees in particular area are gone, they are gone. Just look at how many dead trees are cropping up on the main road going in and out of town. Is so sad to see because the most primary issue has been lack of water. Lack of water leads to dead trees then leads to bark beetle , to dead forrest, and fires. And, all this leads to evacuation and safety of life,

And, finally, in one of the last paragraphs of their public information pages they said that it would have minimal impact on the neighboring community. This is insulting and untrue. 4

I hope you can find a way to change this from happening. It just seems like it is too fast and not enough feedback from neighboring towns. Nor for a proper EIR report to have even been considered.

Sincerely,

Leslie A. Rossiter

G88 - Responses to Leslie A. Rossiter

G88-1 The comment is introductory in nature. The comment includes concerns about overall safety implications and impact. No further response is warranted.

G88-2 The comment includes concerns about the impact to water supply. Refer to Master Response – Water.

G88-3 Comment noted. The concerns about the proposed expansion are acknowledged. The Project is consistent with the existing HT/SD-RES zoning and Rural Living land use designation, which permits campground uses subject to County review. The Project phasing would occur over many decades, gradually increasing capacity. As determined by the IS/MND, no significant and unavoidable impacts would occur which would assist in maintaining the existing character of the surrounding area.

G88-4 Natural areas would be impacted by implementation of the Project; however, a large portion of the Project site would remain in its natural condition. Additionally, the Biological Resources Assessment, which is further described in the Biological Resources Section of the IS/MND, has determined that less than significant impacts would occur with implementation of MMs BIO – 1 and -2 which require pre-construction clearance surveys and compliance with the Migratory Bird Treaty Act and California Fish and Game Code.

G89 - Lorenzo Cervantes

From: lorenzo cervantes
To: Barragan, Elena
Subject: Hume expansion
Date: Monday, January 5, 2026 11:25:41 AM

[You don't often get email from larrycervantes@yahoo.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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This email is to contest the expansion efforts. The plan to expand from 300 to 3,000 capacity is insane especially considering that an expansion will negatively affect Green Valley Lake residents in a number of ways. 1
One is the sheer size. In any evacuation emergency, this will make it literally 10 times more difficult to evacuate if the mountain is on fire.
Another is the fact that Hume doesn't/wont have to pay for the extra strain on our mountain resources.
They would get all the positives and residents would get all of the negatives. Thank you for your attention. 2
Lorenzo Cervantes.

G89 - Responses to Lorenzo Cervantes

G89-1 As discussed in the IS/MND (**Section 4, Wildfire**) MM WF – 1, the Project would continually update and comply with a comprehensive evacuation plan. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on-site occupancy prior to peak hazard conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis.

G89-2 The concerns about the scale of the proposed expansion are acknowledged. The IS/MND analysis evaluated impacts on water supplies, wastewater treatment capacity, and solid waste treatment capacity in the Utilities and Service Systems Section and the Hydrology and Water Quality Section of the IS/MND (**Section 4, Utilities and Service Systems** and **Section 4, Hydrology and Water Quality**). The IS/MND concludes that impacts would be less than significant to these sections with mitigation measures. MM UTL-1 requires that prior to approval of each phase, the Project applicant shall evaluate the available treatment and disposal capacity of the approved on-site wastewater treatment plant (WWTP) to confirm adequate treatment capacity, disposal capacity, operational performance, regulatory compliance, and any improvements necessary to accommodate the proposed occupancy increase. MM HYD-1 requires that the Applicant shall conduct well drawdown tests, recovery testing, and water quality retesting before proceeding with each phase, for the wells serving that phase, and use the results to confirm the phase water supply strategy. Refer to Master Response – Water and Master Response – Wastewater/Sewer.

G90 - Lorri DeBrabander

From: Lorri DeBrabander
To: Barragan, Elena
Subject: Hume Project: need for EIR
Date: Friday, December 26, 2025 12:34:28 PM

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To Whom It May Concern,

I am writing as a community member to share my concerns regarding the proposed Hume SoCal Campground Expansion Project and the County's circulation of the Initial Study/Mitigated Negative Declaration (IS/MND) dated November 2025. While I recognize the value that organized recreation can bring, I strongly believe that this project should not move forward without the preparation of a full Environmental Impact Report (EIR). 1

The proposed expansion would dramatically change the scale and intensity of use at the site, increasing occupancy from approximately 300 people to as many as 3,000. This level of growth represents a major shift for the surrounding Green Valley Lake area, which is characterized by forested land, limited infrastructure, and small mountain roadways. Such a significant increase in population, traffic, and infrastructure demand has the potential to affect not only the project site, but also nearby residents, visitors, and the broader mountain community. 1

Of particular concern are issues related to wildfire risk and emergency evacuation. The project is located in a Very High Fire Hazard Severity Zone, where residents already face real and ongoing wildfire threats. Adding thousands of additional campers and staff raises serious questions about evacuation capacity, emergency response times, and public safety during fire events. These concerns affect not only camp occupants, but also neighboring communities who rely on the same limited road network during emergencies. 2

Water supply and wastewater capacity are also critical community issues. The IS/MND acknowledges reliance on a combination of local water agency supplies and on-site groundwater, including during dry and multiple dry years. In a region that regularly experiences drought conditions, many community members are understandably concerned about long-term water availability, groundwater sustainability, and the impacts of increased wastewater demands on local systems. 3

In addition, the project area includes natural waterways, forest habitat, and culturally sensitive land. These resources are part of what makes this mountain community special and worth protecting. A full EIR would allow for a more thorough evaluation of cumulative impacts, long-term environmental consequences, and meaningful alternatives that could reduce the project's footprint and intensity while still meeting its 4

objectives. 4

An Environmental Impact Report would also provide a more transparent and inclusive process for community members to understand the project, review alternatives, and participate in decisions that may permanently affect their environment and quality of life. Given the size of the expansion and the sensitivity of the area, a higher level of environmental review is both reasonable and necessary.

For these reasons, I respectfully urge San Bernardino County to require preparation of a full Environmental Impact Report and to delay any project approvals until that review is completed and publicly considered. 5

Thank you for your time, consideration, and commitment to protecting the health, safety, and character of our mountain communities.

Sincerely,

Lorri DeBrabander
714-315-6068

33355 Lakeside Drive, Green Valley Lake

G90 - Responses to Lorri DeBrabander

G90-1 The comment is introductory in nature. The comment includes concerns about overall safety implications and impact. No further response is warranted.

G90-2 As analyzed in the IS/MND (**Section 4, Wildfire**), the Project site is located within a Very High Fire Hazard Severity Zone (VHFHSZ). The Project would be required to adhere to MM WF – 1, which ensures a comprehensive evacuation plan is utilized and would comply with all COA provided by fire jurisdictions. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on-site occupancy prior to peak hazards conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis.

G90-3 The comment includes concerns about impacts to sewer capacity and water supply. Refer to Master Responses – Wastewater/Sewer and Water.

G90-4 Natural areas would be impacted by implementation of the Project; however, a large portion of the Project site would remain in its natural condition. Additionally, the Biological Resources Assessment, which is further described in the Biological Resources Section of the IS/MND, has determined that less than significant impacts would occur with implementation of MM BIO – 1 and 2, which require pre-construction clearance surveys and compliance with the Migratory Bird Treaty Act and California Fish and Game Code.

G90-5 Under CEQA, the Lead Agency, San Bernardino County, determines the appropriate level of environmental review. The IS/MND evaluates all environmental topic areas required under CEQA and identifies compliance requirements and mitigation measures that reduce all potentially significant impacts to less than significant levels. There is not substantial evidence presented that the IS/MND is inadequate or that any significant unavoidable impacts would remain unmitigated. Therefore, no revisions to the IS/MND are warranted and an Environmental Impact Report (EIR) is not required.

G91 - Marcia Priest and Don Cowgill

From: Marcia Priest
To: Barragan, Elena
Subject: Hume Camp Expansion
Date: Tuesday, January 6, 2026 10:46:32 AM

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Hi Elena:

We are property owners in Green Valley Lake, and have owned our property for over 8 years. Marcia Priest (me) and Don Cowgill are the owners and we are quite concerned about the Hume Camp expansion.

Currently the summer camps at Hume I understand run between 100 to 200 or so participants. Why they wish to expand to such a huge difference doesn't make sense when the area will be impacted. Not only for Green Valley Lake but the other church camps in the area. Plus there would be more acreage owned by Hume with the county receiving no property taxes. 1

While we pay taxes to the county and Hume does not, they also do not contribute to any improvements to the roads which would certainly be impacted with a large increase in the number of buses and other vehicles on the roads that we pay for as owners in the area. We are also concerned about the impact we would suffer for our water sources in our part of the area, traffic with more vehicles, and are very concerned if there was to be an evacuation for a fire that the roads would be clogged with far more vehicles on the road out of Green Valley Lake.

We respectfully request that the county not allow this huge increase and not forget all of us who have lived in the area and paid our fair share to make our county better. 2

Sincerely,

Marcia Priest, marcia.priest@gmail.com
Don Cowgill, doncowgill@yahoo.com

G91 - Responses to Marcia Priest and Don Cowgill

G91-1 The comment is introductory in nature. The comment includes concerns about taxation structure, which is outside the scope of CEQA review. The Project Applicant already owns the parcels involved with the Project.

G91-2 The comment includes concerns about the impacts to water supply, traffic, and emergency evacuation. Refer to Master Responses – Water, Transportation/Traffic, and Wildfire.

G92 - Margaret Cashion

From: Margaret Cashion
To: Barragan, Elena
Subject: Opposed to expansion at Hume Camp 32355 Green Valley Lake Road GVL CA 92341
Date: Friday, January 2, 2026 1:55:47 PM

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Elena Barragan,

RE: PROJ-2024-00046
Submitting comments **IN OPPOSITION** to Hume Camp Expansion.

Here are some notes/comments/concerns as a taxpayer and property owner I would have:
- Water infrastructure will be impacted, taxpayers will absorb the cost to improvements not Hume Camp 1
- Concerns over ability of the Police and Fire Departments to assist in the event of an emergency > will the county increase staffing/resources.
- Concerns whether fire risk will increase
- Concerns whether wildfire risks remain the same but the pressure on resources/the county/people will cause more problems 2
- Sewer infrastructure would need to be improved and taxpayers bare the financial burden
- Overhead electrical lines have caused huge fires across California and Utility companies file bankruptcy rather than being financially accountable. Will Hume Camp do underground electrical? All new development in the mountain communities should do underground electrical to mitigate exposure to fire. 3
- Concerns over increased traffic. One lane in and one lane out, plus highway 18 in this long stretch has constant traffic, where emergency vehicles, county vehicles have difficulty getting through. Is Hume Camp willing to contribute financially to improving the infrastructure outside of their camp? 4
- what about egress in the event of an emergency > Going from 300 to up to 3000 campers is a tenfold increase
- Air quality issues > long term from increase in vehicles, people, diesel vehicles, construction debris
- concerns in the event of a Natural Disaster and whether Emergency Plans will be sufficient and/or whether the county can handle the additional pressure 5
- impact on endangered species ... the Bald Eagle, Nesting birds, Coopers Hawk, California Spotted Owl 6
- the impact years of construction has on the enjoyability of the quiet. This is a massive expansion. 7
- there are 1000-1200 homes located in Green Valley Lake, property owners will be impacted by the Hume Camp expansion. Their safety will be impacted, infrastructure will be stressed and they bare the costs of improvements outside of Hume Camp's boundaries. 8

- hume camp expansion will be larger than the town of Green Valley Lake, with only one road to enter and exit, this is dangerous and will cause issues.

Expanding serves Hume Camp ONLY.
This expansion does NOT benefit the county. Guests/attendees are bussed in and bussed out, they do not take advantage of local businesses.
Hume tends to NOT hire local. They hire out of area contractors.
This expansion does not benefit the general public, nor the residents, nor the county.
Only taxpayers will foot the bill for impact the expansion has on infrastructure. **100% opposed.** 8

Sincerely,

Margaret Cashion
537 Spring Lane
Green Valley Lake, CA 92341
m. +1 310 795 2200
Margaret@HillsofLA.com

G92 - Responses to Margaret Cashion

G92-1 The comment is introductory in nature. The comment includes concerns about overall safety implications and impact. No further response is warranted.

G92-2 As analyzed in the IS/MND (**Section 4, Wildfire**) through **Appendix K: Emergency Plan and Procedures**, the Project site is located within a Very High Fire Hazard Severity Zone (VHFHSZ). The Project would be required to adhere to MM WF – 1, which ensures a comprehensive evacuation plan is utilized and would comply with all COA provided by fire jurisdictions. The Project's Emergency Plan includes early evacuation protocols, which reduce on-site occupancy prior to peak hazards conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis. Wildfire impacts would be further reduced to less than significant with the implementation of MMs WF-2 and -3 which requires compliance with existing and proposed development standards such as undergrounded power lines. The measures also reduce risk through requiring fire-resistive plants.

G92-3 Refer to response above for discussion of wildfire.

G92-4 The Transportation Section of the IS/MND prepared a Traffic Analysis that is included as **Appendix J** of the IS/MND and determined that traffic conditions, existing road infrastructure and access would be adequate to service the expanded Project site. As evaluated in the IS/MND (**Section 4, Transportation**), the Project would not modify existing roadways, and Project-related traffic would not create a significant hazard or adversely affect emergency access. Seasonal weather conditions and snow removal are addressed by existing County road maintenance operations.

Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity.

G92-5 Refer to responses above for discussion of evacuation.

G92-6 Natural areas would be impacted by implementation of the Project; however, a large portion of the Project site would remain in its natural condition. Additionally, the Biological Resources Assessment, which is further described in the Biological Resources Section of the IS/MND, has determined that less than significant impacts would occur with implementation of MMs BIO – 1 and -2 which require pre-construction clearance surveys and compliance with the Migratory Bird Treaty Act and California Fish and Game Code.

G92-7 Noise impacts were evaluated in the IS/MND (**Section 4, Noise**), which found that operational noise levels associated with the Project would comply with applicable County noise standards and would result in less than significant impacts. Based on this analysis, additional acoustic studies are not required. The acoustical assessment is included as **Appendix I** of the IS/MND. No further response is warranted.

G92-8 CEQA does not treat economic or social effects as significant environmental impacts unless they result in an environmental impact. The IS/MND evaluates environmental effects. No new environmental effects are presented that were not addressed in the IS/MND. No revisions are necessary.

G93 - Margaret Cashion

From: Margaret Cashion
To: Barragan, Elena
Subject: Re: Opposed to expansion at Hume Camp 32355 Green Valley Lake Road GVL CA 92341
Date: Sunday, January 18, 2026 4:54:14 AM
Attachments: image001.png

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Hello Elena,

Last comment on opposition to Hume Camp expansion…

Comments here…

Further analysis of Water Supply for Hume Camp expansion and key takeaways below based on the report provided by the county found here… 1

https://lus.sbcounty.gov/wp-content/uploads/sites/48/Appendix-B1-Water-Supply-Assessment-1.pdf

My review of the draft Water Supply Assessment for the proposed Hume SoCal Camp expansion (300 → ~3,000 occupants) based on the linked report. Below are key potential flaws, gaps, assumptions, and risks in the report's water/infrastructure analysis. Focusing on substantive technical and planning issues rather than general opinion about project size.

—

1. Over-reliance on Assumptions for Demand and Supply

A. Simplified Demand Estimate

The report uses a single planning standard of 200 gallons per capita per day (gpcd) for all occupants; it then extrapolates that to annual demand. This assumes that occupancy, activities, and seasonal use patterns are uniform, which may understate real peak demands (especially for camp activities, fire protection, dishwashing, sanitation, irrigation, laundry). Real-world use in camp settings can be much higher during peak occupancy periods. 2

Why this matters:
• Planning for 200 gpcd without peak/maximum day demand analysis could understate necessary capacity for storage, pumping, and treatment.
• Good water planning often includes maximum daily demand and peak hour demand estimates — not just an average annual figure.

—

2. Groundwater Sustainability and Unknown Aquifer Capacity 3

A. Groundwater Characterization Is Limited

The report admits the underlying groundwater has "not been characterized as a defined aquifer," and long-term sustainability of the existing wells is not verified. It recommends drawdown tests without presenting results.

Potential issues:
• Without formal hydrogeologic study or well performance testing, the assumption that the wells can sustain a tenfold increase in use is premature.
• Groundwater in California and mountain basins is often sensitive to drought and recharge variability, and increased pumping can depress water levels, degrade water quality, and even cause wells to go dry — especially during extended dry periods.

3

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3. Imported Water Supply Risk Understated

A. Imported Water Is a Backup — Not a Reliable Guarantee

The assessment notes a single connection to Crestline-Lake Arrowhead Water Agency (CLAWA) as a supplemental source, but doesn't adequately analyze capacity limits, reliability, or drought/prioritization constraints.

Relevant points from broader context:
• CLAWA serves many users and small districts and its ability to supply extra water during drought years or emergencies is not guaranteed. Agencies often prioritize local residents first, especially in dry years.
• Water transfers and exchanges (e.g., with San Bernardino Valley Municipal Water District) exist, but these do not increase total long-term supply — they only shift who uses water and when.

Why this is a flaw:
• The WSA doesn't model how a drought or SWP allocation reduction would affect CLAWA's ability to deliver water to the Camp.
• It does not examine alternatives if the single connection fails (e.g., pipeline damage, wildfire damage, power loss), which is a crucial risk in mountain communities.

4

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4. No Sensitivity or Drought Scenario Analysis

While the WSA references SB 610/CEQA requirements to consider normal, single dry, and multiple dry water years, the report doesn't clearly show quantitative drought scenarios (e.g., 3+ dry years, reduced imports).

Issues:
• It doesn't show water balances under multiple dryer-than-normal years or peak demand combined with low aquifer recharge.
• Drought risk is high in Southern California, and groundwater responses are delayed yet severe over multiple dry years.

5

Without this analysis, the report fails to demonstrate reliability under the very conditions CEQA requires. 5

—

5. Incomplete Infrastructure Analysis

A. Storage & Distribution System

The assessment lists existing storage and distribution capacity but doesn't appear to model: 6
- Fire-flow requirements (very relevant in mountainous forested areas)
- Peak storage needs
- Redundancy for power or pump failures
- Seasonal storage for dry months

Proper design standards should evaluate facilities against both average and peak demands, not just aggregate projected water volumes.

—

6. No Independent Validation or Peer Review

All data come from:

"All data used in the following analysis was gathered and shared by Bob Mull, Hume Volunteer Fire Chief" 7
— and there's no reference to independent hydrologic or engineering review.

This creates potential bias risk because:
- On-site personnel may not conduct rigorous long-term hydrologic modeling.
- Independent third-party evaluation is typical for significant water supply projections.

—

7. Insufficient Consideration of Long-Term Trends

The report doesn't factor in:
- Population growth or incremental increases beyond 3,000 8
- Climate change impacts on precipitation and aquifer recharge
- Drought cycles increasing in frequency/intensity

These long-term risks can dramatically affect water reliability and are commonly required in thorough CEQA water studies.

—

Summary of Key Flaws & Risks 9

Category Main Concern
Demand Estimation Uses simplistic per capita average without peak/peak day analysis

Groundwater No proper aquifer characterization; sustainability unknown
Imported Water Backup source reliability not tested under drought/emergency
Drought Planning No robust multiple dry-year scenario modeling
Infrastructure Resilience Inadequate assessment of storage, fireflow, redundancy
Independence Lack of third-party review introduces credibility gap
Long-Term Risk Does not incorporate climate & regional water security trends

—

Final Notes

The WSA reads like AN INTERNAL FEASIBILITY SUMMARY MORE THAN A LEGALLY ROBUST WATER ADEQUACY DEMONSTRATION for a 10× increase in population. It meets some CEQA SB 610 structure requirements, but key technical gaps remain — especially related to groundwater sustainability, reliability of imported water under drought, infrastructure capacity, and independent verification.

IF SAN BERNARDINO COUNTY INTENDS TO RELY ON THIS AS A BASIS FOR WATER SUFFICIENCY FINDING, THOSE GAPS COULD BE CHALLENGED BY AGENCIES OR THE PUBLIC AS INSUFFICIENT UNDER CEQA STANDARDS.

Sincerely,

Margaret Cashion

m. +1 310-795-2200
Margaret@HillsofLA.com

Sent from my mobile phone please excuse typos!

9

From: Margaret Cashion <margaret@hillsofla.com>
Sent: Wednesday, January 7, 2026 9:47 AM
To: Barragan, Elena <Elena.Barragan@lus.sbcounty.gov>
Subject: Re: Opposed to expansion at Hume Camp 32355 Green Valley Lake Road GVL CA 92341

> You don't often get email from margaret@hillsofla.com. Learn why this is important

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hello,

And a follow up comment...

Running Springs Water Co. responded to the HUME expansion proposal, "The District has identified substantial deficiencies ...in wastewater services, groundwater basins, and emergency response". The "Mitigated Negative Declaration" submitted by Hume is insufficient and a full EIR is needed. The full letter is here: https://green-valley-lake.com/gvl-clubhouse-update/

10

Sincerely,

Margaret Cashion
537 Spring Lane
Green Valley Lake, CA 92341
m. +1 310-795-2200
Margaret@HillsofLA.com

Sent from my mobile phone please excuse typos!

G93 - Responses to Margaret Cashion

G93-1 This comment is introductory in nature. Following receipt of public comments and agency input and additional coordination with the Project's proposed water supplier, the Project's maximum occupancy has been lowered from approximately 3,000 to 2,400 occupants. This lowers associated impacts compared to the worst-case scenario that was evaluated in the IS/MND.

G93-2 The comment includes concerns regarding an "over-reliance on assumptions for demand and supply" in relation to the WSA. Following IS/MND circulation, the WSA has been updated (**Appendix B1: Revised Water Supply Assessment**). The updated WSA calculates water demand in accordance with the California Code of Regulations (CCR), Title 17, Section 30710, and the 2011 County of San Bernardino Environmental Health Services Organized Camp Program, which establishes a minimum potable water supply standard of 50 gallons per capita per day (GPCPD) for organized camps. Use of a standardized demand rate is consistent with CEQA's analysis level, which evaluates whether sufficient water supply is reasonably available to serve the Project during normal, dry, and multiple dry year conditions (20-year planning horizon), rather than requiring final engineering-level design. CCR requires that organized camps maintain a dependable supply of potable water adequate to furnish a minimum of 50 GPCPD. This standard, established by the California Department of Public Health specifically for organized camp facilities, governs the minimum potable water requirements applicable to this Project. Accordingly, a demand rate of 50 GPCPD is applied to all campers and guests across each project phase. Furthermore, the IS/MND does not rely solely on average annual demand to conclude that impacts would be less than significant. Instead, it includes mitigation requiring confirmation of water system capacity prior to incremental increases in occupancy. Specifically, MM HYD-1 requires that the Applicant conduct well drawdown tests, recovery testing, and water quality retesting before proceeding with each phase, for the wells serving that phase, and use the results to confirm the phase water supply strategy and any required treatment.

G93-3 The comment includes concerns regarding the Project's drawdown tests. Refer to response G93-2. The updated WSA analyzes potential scenarios regarding on-site well quality and quantity availability. The WSA identifies a preferred strategy that incorporates CLAWA as a partner and reduces the effects of on-site well quality or quantity impacts. Additionally, MM HYD-1 would be implemented (see above response) to analyze on-site well viability as drawdown occurs. The comment does not provide adequate evidence that the IS/MND is not within CEQA guidelines or that impacts would be significant.

G93-4 The comment includes concerns that CLAWA would only be used as a backup, which is being seen as unreliable. The updated WSA analyzes multiple scenarios and identifies strategies based on CLAWA water service and on-site well availability. A preferred strategy is identified, which consists of, through phase 3, utilizing on-site groundwater wells to serve the Project. After phase 3, the Applicant would prepare an annual water supplier expectations memorandum. Refer to Master Response – Water.

G93-5 The comment includes concerns regarding analysis of dry conditions. The updated WSA analyzes, in accordance with Senate Bill 52 (California Water Code), water supply options during normal, single dry, and multiple dry year conditions over a 20-year planning horizon. Across all reliance strategies and all CLAWA shortage levels, the Camp's potential CLAWA demand ranges from zero (Strategy 1) to a maximum of approximately 8.6 percent of CLAWA's shortage-tier supply (Shortage Level 6, Strategy 4). Under the Camp's preferred strategy, the Project would be served via on-site wells through phase 3. After phase 3, the Applicant would prepare an annual water supplier expectations memorandum. The comment does not provide evidence that the WSA or the IS/MND is inadequate. Refer to Master Response – Water.

G93-6 The comment includes a concern that the WSA was inadequately prepared and does not analyze all required sections. The updated WSA and MND analyze water infrastructure at an appropriate planning level, consistent with CEQA. The purpose of the WSA is to determine whether sufficient supplies are reasonably available to serve the Project during normal, single-dry, and multiple dry year conditions, instead of completing final design for storage, distribution, fire-flow, etc. The WSA recommends a fire flow test to confirm available system pressure and deliverable flow rate. Storage tank capacity will require evaluation as the Camp phases in expanded occupancy, particularly at Phase 2 and Phase 4 buildout levels. Supply redundancy is achieved with a mixed approach of water supply sources, such as strategy 3.

G93-7 The comment includes a concern that water supply analysis lacks independent peer review. The updated WSA was prepared by Kimley-Horn, an independent, licensed consulting engineering firm, using accepted methodologies and planning level assumptions. CEQA does not require “peer review” or third-party hydrology review for an MND when the technical study contains substantial evidence supporting the conclusions. The comment does not include adequate evidence that the WSA or IS/MND was inadequately prepared.

G93-8 The comment includes a concern that the WSA does not sufficiently consider long-term trends. The maximum occupancy has been reduced, see response G93-1. The updated WSA is prepared within CEQA guidelines and analyzes multiple drought years within a 20-year planning horizon (refer to updated WSA, pages 20-21). The comment does not provide adequate evidence that the WSA or IS/MND was inadequately prepared.

G93-9 The comment is conclusionary in nature. The comment provides a summary of concerns and an opinion of the WSA. No further response is warranted.

G93-10 The comment includes a reference to RSWD. Refer to comment responses L5 and L6. Under CEQA, the Lead Agency, San Bernardino County, determines the appropriate level of environmental review. The IS/MND evaluates all environmental topic areas required under CEQA and identifies compliance requirements and mitigation measures that reduce all potentially significant impacts to less than significant levels. There is not substantial evidence presented that the IS/MND is inadequate or that any significant unavoidable impacts would remain unmitigated. Therefore an Environmental Impact Report (EIR) is not required.

G94 - Matthew and Tiffany Medina

From: Tiffany Medina
To: Barragan, Elena
Subject: Hume Expansion Project
Date: Tuesday, January 6, 2026 9:29:24 AM

You don't often get email from tiffers.medina.5@gmail.com. Learn why this is important

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Ms. Barragan,

I hope you are doing well. I am writing to express my sincere support for the proposed expansion of Hume Camp (PROJ-2024-00046) and to share my appreciation for the positive economic impact this project could bring to our community.

The Hume Camp master plan reflects a thoughtful approach to growth—one that not only considers environmental stewardship but also recognizes the importance of economic sustainability for our mountain community. The proposed expansion presents a valuable opportunity to strengthen our local economy in a way that is both responsible and long-lasting.

One of the most meaningful benefits of this project is its potential to create new jobs, both during construction and through ongoing camp operations. These employment opportunities can provide steady income for local residents and support families who depend on year-round work in our region. In addition, an increase in visitors will naturally support nearby businesses, including shops, restaurants, lodging, and service providers, helping them remain viable and encouraging future investment.

The project's location near Green Valley Lake further enhances its economic value. By attracting visitors who appreciate outdoor recreation and natural beauty, the expansion helps reinforce our area as a destination while still preserving the open spaces that make our community special. This balance supports tourism in a way that respects the character of our region and contributes to long-term economic stability. 1

Hume Camp's commitment to youth programs also plays an important role in the community's future. By investing in young people through education, mentorship, and leadership development, Hume helps prepare the next generation with skills that will benefit the local workforce and strengthen our community over time.

I respectfully encourage you to consider the long-term financial benefits this project may offer. The careful planning behind the Hume Camp expansion has the potential to provide economic renewal, job creation, and sustained support for local businesses, all while remaining aligned with our community values.

Thank you very much for your time and thoughtful consideration. I sincerely hope you will support this project and help foster a strong, resilient, and prosperous future for the Green Valley Lake community.

Warm regards,

Matthew and Tiffany Medina

619 Yukon Dr.

Green Valley Lake, ca 92341-8486

1

G94 - Response to Matthew and Tiffany Medina

G94-1 The comment includes general support for the Project. The commenter's support for the Project has been acknowledged. No further response is warranted.

G95 - Matthew Ele

Barragan, Elena

From: Matthew E <matthewele@gmail.com>
Sent: Tuesday, November 18, 2025 5:06 PM
To: Barragan, Elena
Subject: Public Comment on PROJ-2024-00046 – Opposition to Hume Camp Expansion

You don't often get email from matthewele@gmail.com. Learn why this is important

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Ms. Barragan,

I am writing as a resident of Green Valley Lake to express my strong opposition to the proposed expansion of the Hume Camp facility (Project No. PROJ-2024-00046) to accommodate up to 3,000 campers.

This proposal presents serious safety, environmental, and infrastructure concerns that cannot be ignored. 1

1. Wildfire evacuation capacity is already insufficient

Green Valley Lake Road is a single two-lane road with limited turnouts and no alternative evacuation route. During a wildfire, the current population already faces high risk. Increasing the camp's capacity to 3,000 people would overwhelm the road and make safe evacuation impossible.

2

In addition, camp buses do not remain on site for the duration of their sessions. This means:

- There would be no mass-transport option available to remove large numbers of campers quickly.
- Hundreds or thousands of individuals would be forced to evacuate in private vehicles or on foot.
- The camp has insufficient parking to stage buses or the equivalent number of vehicles needed during an emergency.

This alone poses an unacceptable risk to both campers and the residents of Green Valley Lake. 2

2. Water usage threatens local wells and watershed health

Green Valley Lake and its surrounding community depend heavily on groundwater and the wells located uphill from the camp. Expanding the camp to 3,000 people would dramatically increase:

- Water withdrawals
- Septic and wastewater output
- Impacts on the watershed

3

Our wells and local supply are not designed to support a facility of this scale, especially during drought years that are becoming more common.

3. Environmental and ecological impacts

The location sits within a sensitive forested watershed. A project of this scale risks:

- Soil erosion and sediment runoff into streams and downstream systems
- Habitat disruption for local wildlife
- Increased trash, traffic, and wear on already-strained mountain ecosystems

4

The San Bernardino Mountains have been repeatedly described by county officials as over-developed and in need of more protection, not expansion of high-capacity facilities.

4. Local infrastructure cannot support a project of this size

Green Valley Lake's infrastructure roadways, emergency services, water, and fire response capacity was never designed for a 3,000-person facility. Even existing visitor traffic strains our resources during peak seasons.

5

Approving this expansion would place:

- Local residents at higher fire danger
- Emergency responders at greater risk
- The entire community at risk of gridlock during any emergency event

5

5. The current camp size is already far beyond what the area can safely support

Historically, this camp has operated with a capacity of a few hundred campers. Tripling or quadrupling that number would fundamentally and permanently alter the safety, sustainability, and environmental balance of the entire valley.

6

For these reasons, I strongly urge the County to deny the expansion request.

Thank you for your time and for considering the safety of Green Valley Lake residents and visitors.

Sincerely, Matthew Ele

Green Valley Lake Resident

7

G95 - Responses to Matthew Ele

G95-1 The comment is introductory in nature. The comment includes concerns about overall safety implications and impact. No further response is warranted.

G95-2 As discussed in the IS/MND (**Section 4, Wildfire**) MM WF – 1, the Project would continually update and comply with a comprehensive evacuation plan. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on-site occupancy prior to peak hazard conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis.

G95-3 The comment includes concerns about the impacts to water supply and sewer capacity. Refer to Master Responses – Water, Wastewater/Sewer.

G95-4 Natural areas would be impacted by implementation of the Project; however, a large portion of the Project site would remain in its natural condition. Additionally, the Biological Resources Assessment, which is further described in the Biological Resources Section of the IS/MND, has determined that less than significant impacts would occur with implementation of MMs BIO – 1 and -2 which require pre-construction clearance surveys and compliance with the Migratory Bird Treaty Act and California Fish and Game Code.

G95-5 The IS/MND (**Section 4, Public Services**) evaluates fire protection needs and concludes that the Project would not represent a potential need for expanded fire protection in the area or affect service and response times. Refer to Master Response – Fire Service Capacity.

G95-6 Comment noted. The concerns about the proposed expansion are acknowledged. The Project is consistent with the existing HT/SD-RES zoning and Rural Living land use designation, which permits campground uses subject to County review. The Project phasing would occur over many decades, gradually increasing capacity. As determined by the IS/MND, no significant and unavoidable impacts would occur which would assist in maintaining the existing character of the surrounding area.

G95-7 This comment is conclusionary in nature and does not introduce any new or substantial issues not discussed in the IS/MND.

G96 - Matthew Ele

From: Matthew E
To: Barragan, Elena; Board Meeting Comments; Supervisor Rowe; Supervisor Baca; Supervisor.Hagman@b.sbcounty.gov; Supervisor Cook; Supervisor.Armendariz@bos.sbcounty.gov
Subject: Request for Clarification and Additional Analysis – Water Supply and Mitigation for Hume Lake Development Proposal
Date: Saturday, December 13, 2025 10:37:25 AM

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Thank you Community Leaders, Planning Commission Members, and County Staff,

I am writing as a long-term resident of the mountain region to formally request clarification and additional analysis regarding the water supply, groundwater sustainability, and mitigation measures associated with the proposed Hume Lake development.

Many residents, myself included, are concerned that critical water-related questions remain insufficiently addressed in the current planning documents. Given the cumulative pressures already facing our mountain watershed, these issues are central to the long-term viability of our communities and our ability to remain here in the future. 1

Water Supply & Demand Assumptions

1. What independent verification exists for the projected groundwater yield and recharge rates, particularly under extended drought and climate-change-driven scenarios?
2. How were peak occupancy and seasonal water demand modeled, and do these projections account for worst-case dry-year conditions rather than average years?
3. If imported water from Crestline-Lake Arrowhead Water Agency (CLAWA) is proposed as a contingency:
    - What binding agreements are in place?
    - What are the infrastructure costs, capacity limits, and long-term reliability assumptions?
    - How would reductions or shortages in imported supply be handled?

2

Recharge & Mitigation Measures

3

4. What active groundwater recharge strategies are included to offset increased extraction (e.g., infiltration basins, spreading grounds, stormwater capture)?
5. Have nature-based recharge solutions—such as Beaver Dam Analogs (BDAs), wet meadow restoration, or runoff-slowing structures—been evaluated as part of the mitigation plan?
6. What is the projected net impact to the watershed when comparing withdrawals versus recharge, and how will that balance be maintained over time?

3 Cont

Monitoring, Enforcement, and Adaptive Management

7. What monitoring program will be implemented to track groundwater levels, extraction volumes, and ecological impacts, and how often will this data be made public?
8. What thresholds or triggers will require corrective action if water levels decline or wells are impacted?
9. What enforcement mechanisms exist to ensure mitigation measures remain functional for the full life of the project?

4

Long-Term Outlook (5, 10, and 25 Years)

10. What is the projected water availability outlook for the region at:
    - 5 years
    - 10 years
    - 25 years

    under both normal and multi-year drought conditions?
11. How does this outlook align with regional climate projections indicating warmer temperatures, reduced snowpack, and more intense precipitation events?

5

Impacts to Existing Residents

12. Has the County assessed the risk to existing domestic wells and small community water systems upstream and downstream of the project?
13. What protections or compensations are in place if residents experience well failures or reduced water quality as a result of increased extraction?

6

The mountain region already operates on a narrow margin of water security. Any large-scale development must demonstrate not only short-term adequacy but long-term resilience, with enforceable mitigation measures that protect existing residents and downstream communities.

I respectfully request that these questions be addressed in writing and that any approvals be contingent upon clear, binding, and transparent water sustainability commitments. 7

Thank you for your time and consideration. I look forward to a constructive and data-driven discussion.

Sincerely,

Matthew Ele

resident of Green valley lake since 2008 lake arrowhead in 1998.

909-693-6291

Matthew Ele

G96 - Responses to Matthew Ele

G96-1 The comment is introductory in nature. The comment provides an introduction, a summary of requests, and a summary of concern related to water. No further response is warranted.

G96-2 The comment includes concerns related to water supply and demand. The IS/MND, consistent with CEQA analyzes water supply and wastewater management (**Section 4, Utilities and Service Systems** and **Section 4, Hydrology and Water Quality**) through **Appendix B3: Water and Sewer Master Plan**, and the 1st Draft Water Supply Assessment, which has been updated (**Appendix B1: Revised Water Supply Assessment**), existing on-site wells can provide adequate capacity to meet the Project's projected water demand through phase 3. The updated WSA identifies a preferred strategy with CLAWA following phase 3, in which the Applicant would prepare an annual water supplier expectations memorandum. Refer to Master Response – Water. The IS/MND (**Section 4, Utilities and Service Systems**) concludes that Project-related water demand would result in a less than significant impact.

The IS/MND concludes that water-supply impacts and wastewater management would be less than significant with compliance with applicable standards and MMs HYD-1, UTL-1, and UTL-3. With MM HYD-1, the Applicant shall conduct well drawdown tests, recovery testing, and water quality retesting before proceeding with each phase, for the wells serving that phase, and use the results to confirm the phase water supply strategy. MM UTL-1 requires that prior to approval of each phase, the Project applicant shall evaluate the available treatment and disposal capacity of the approved on-site wastewater treatment plant (WWTP) to confirm adequate treatment capacity, disposal capacity, operational performance, regulatory compliance, and any improvements necessary to accommodate the proposed occupancy increase. MM UTL-3 requires that prior to the Final Development Plan (FDP) approval for Phase I, the Camp shall install an on-site wastewater system subject to County and Regional Water Board approval. Additionally, Mitigation Measure UTL-3 allows for sewer service buildout as recommended by the revised Sewer Feasibility Study, which concludes that the Camp will utilize, expand, and/or supplement the on-site wastewater treatment system through buildout of all phases. Furthermore, the existing RSWD system is intended to remain available as a secondary wastewater conveyance and treatment option where capacity is available, and use is approved by RSWD. As each phase advances, the required on-site treatment capacity will be confirmed based on the applicable Project flows, the selected advanced treatment system configuration, and regulatory requirements. Continued use of any portion of the RSWD system will remain subject to available District capacity and RSWD approval. These efforts should be aligned with a phased development plan that matches Camp occupancy growth with the completion of required infrastructure improvements. Refer to Master Response – Wastewater/Sewer.

G96-3 The comment provides concerns regarding water recharge and mitigation measures. The IS/MND evaluates hydrology and water-quality impacts (**Section 4, Hydrology and Water Quality**) and includes standard stormwater management and Water Quality Management Plan (WQMP). Nature-based recharge strategies are not proposed as part of the Project because CEQA requires

evaluation of feasible mitigation for identified significant impacts. This is based on currently available reporting from water agencies/providers. The WSA evaluates groundwater production capacity, historical pumping data, and Projected demand under full buildout conditions. The analysis incorporates conservative assumptions for peak occupancy and seasonal demand.

G96-4 The comment includes questions regarding monitoring and overall water management. The IS/MND identifies compliance with County and State water-supply regulations, which include operational monitoring and reporting requirements for well production and water quality. Enforcement of these requirements occurs through the County and applicable water agencies. No revisions are warranted.

G96-5 The comment includes questions regarding future water availability. The IS/MND evaluates water-supply reliability based on current and Projected demand and available sources. CEQA requires analysis of whether sufficient water is available for the Project, which is addressed in the updated WSA. This is based on currently available reporting from water agencies/providers. The updated WSA evaluates groundwater production capacity, historical pumping data, and projected demand under full buildout conditions. The analysis incorporates conservative assumptions for peak occupancy and seasonal demand (**Appendix B1: Revised Water Supply Assessment**). Refer to Master Response – Water.

G96-6 The comment includes questions regarding impacts to existing residents near the proposed Project. The IS/MND and WSA evaluate potential groundwater supply strategies and concludes adequate water supply is available to serve the Project. The comment does not identify a new environmental impact requiring revisions to the IS/MND.

G96-7 The comment is conclusionary in nature. The comment provides an opinion on the Project and requests for responses. No further response is warranted.

G97 - Maureen Mann

From: Maureen Mann
To: Barragan, Elena
Subject: Proposed Hume SoCal Campground Expansion Project (Project-2024-00046)
Date: Friday, January 16, 2026 6:47:33 PM

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16 January 2026

County of San Bernardino

Land Use Services

Attn: Elena Barragan, Senior Planner

Thank you for the opportunity to comment on the above-noted proposed Hume SoCal Campground expansion project.

1

It is imperative not only for Federal, State, County & local agencies to weigh in on a proposed project of this size (300 to 3,000 capacity/107 acres to 252.1 acres), but also for local organizations and individual

members of our Mountain Communities to have a meaningful opportunity to review & comment on this Initial Study/Mitigated Negative Declaration (IS/MND). 1

Despite the extension of the formal Comment Period to today (1/16/2026), given the extent of this proposed 10-fold expansion of the Hume SoCal Campground, there has been insufficient time to allow for a comprehensive review by all parties & entities that would be affected. 2

Not only has the notification period been minimal (a mere two months), it is significant that during this notification period 1) many entities and interested parties did not receive notice, 2) the San Bernardino Mountains area has suffered significant & damaging rainfall & mudslides during the December 2025 "atmospheric river", and 3) realistically there have been significant time constraints because of December holidays. 3

Even so, I have taken the opportunity to review a number of the formal comments submitted to date. In addition, I recently have been on site along Highway 18, along Green Valley Lake Road, as well as Camp Hume SoCal property. 4

I agree with those agency, expert, organizational & individual comments already submitted to San Bernardino County Land Use Services that raise significant concerns about the insufficiency of the Initial Study/Mitigated Negative Declaration submitted for this proposed expansion. 4

A more detailed review and analysis is necessary not only to provide for the safety and security of mountain residents and visitors but also to protect the natural resources of our mountain environment.

We are all well aware that the San Bernardino Mountain areas have suffered major disasters, (including loss of life & loss of homes) over very recent decades: major fires, flooding, mudslides, significant road damage causing lengthy road closures, evacuations, power outages, and the ongoing threat of a major earthquake, "not if, but when". 5

Those of us who have lived in our mountain communities for any length of time have learned from personal experience that when a disaster strikes one part of the San Bernardino Mountains, all communities are affected, whether immediately or long-term. As a significant reminder, recall the impact of "Snowmageddon" in 2023.

The major expansion proposed by Hume SoCal Campground, though proposed in 6

stages and to be developed over many years, is required to be evaluated as a whole, not in segments. 6

The impacts are significant beyond the ability to mitigate when considering increased demands on water resources, wastewater treatment, minimal ingress/egress, single-lane winding roads with very few turnouts, potential evacuations, the challenge of providing sufficient utilities, potential destruction of wildlife habitat, ability of local law enforcement & fire suppression agencies at current personnel levels to provide adequate service, to name a few issues of major concern. 7 8

It is clear that the communities of Green Valley Lake, Arrowbear & Running Springs would be most directly affected should this expansion plan be approved as proposed. However, other mountain communities, the infrastructures & agencies that provide services to these communities, (such as Law Enforcement, Emergency & Safety services), our natural mountain resources & economies, would all face challenges such as costly infrastructure improvements as well as increases in personnel to protect and provide the necessary services. 9

I join in the request of many that the Lead Agency, County of San Bernardino, find that the IS/MND is insufficient, deny the Application as proposed, or require a full 10

Environmental Impact Report under CEQA.

I request my name be added to the list of those to be notified about all actions relating to this Project Proposal.

Respectfully submitted,

Maureen E Mann

Past Resident (more than 40 years)

of the San Bernardino Mountains

&

Current Property Owner

10

G97 - Responses to Maureen Mann

G97-1 This comment is introductory in nature. No further response is warranted.

G97-2 Public review periods for IS/MNDs are established by the Lead Agency. The Notice of Availability and Notice of Intent to adopt an IS/MND for the Hume SoCal Campground Extension public review began 11/13/2025 and closed with an extended deadline on 1/16/2026.

G97-3 The comment does not introduce any new or substantial concerns about the IS/MND. No further response is warranted.

G97-4 Please refer to Master Response Public Hearing/Review for discussion of the length of the public review period. The concern about the detail of review and analysis is noted.

G97-5 Emergency evacuations were analyzed as part of Wildfire (Section 4) in the IS/MND. The Project would be required to adhere to MM WF-1, which ensures a comprehensive evacuation plan is utilized and would comply with all COA provided by fire jurisdictions. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on-site occupancy prior to peak hazards conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis.

G97-6 The entirety of proposed future expansions for the Hume SoCal Campground have been analyzed in the IS/MND. No segmentation of analysis for the Project has occurred. No revisions are necessary.

G97-7 The comment raises concern about the adequacy of water supply and wastewater treatment. Please refer to Master Response – Water and Master Response - Wastewater/Sewer. The comment does not provide adequate evidence that impacts would be significant or unavoidable. No further response or revisions are warranted.

G97-8 The Transportation section of the IS/MND prepared a Traffic Analysis that is included as **Appendix J** of the IS/MND and determined that traffic conditions, existing road infrastructure and access would be adequate to service the expanded Project site. As evaluated in the IS/MND (**Section 4, Transportation**), the Project would not modify existing roadways, and Project-related traffic would not create a significant hazard or adversely affect emergency access.

Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation

Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity.

G97-9 The IS/MND (**Section 4, Public Services**) evaluates fire protection needs and concludes that the Project would not represent a potential need for expanded fire protection in the area or affect service and response times. Refer to Master Response – Fire Service Capacity.

G97-10 Under CEQA, the Lead Agency, San Bernardino County, determines the appropriate level of environmental review. The IS/MND evaluates all environmental topic areas required under CEQA and identifies compliance requirements and mitigation measures that reduce all potentially significant impacts to less than significant levels. There is not substantial evidence presented that the IS/MND is inadequate or that any significant unavoidable impacts would remain unmitigated. Therefore an Environmental Impact Report (EIR) is not required.

G98 - Megan Scoggins

January 2nd, 2026

Dear Ms. Barragan,

I am writing to express my strong and personal support for the proposed expansion of Hume Camp (PROJ-2024-00046). As both a resident of this community and the Camp Director of Hume SoCal, I see this project not simply as a development plan, but as a meaningful opportunity to strengthen our community's infrastructure, steward our natural resources, and contribute to the long-term vitality of our local economy.

The Hume Camp master plan reflects a thoughtful and intentional vision—one that balances the needs of guests with a deep respect for the natural environment we all value. The emphasis on sustainable practices and environmentally conscious design aligns closely with our county's goals and priorities. By preserving green spaces and protecting wildlife habitats, this plan demonstrates a commitment to caring for the land while ensuring it remains accessible and beneficial to the broader community.

The camp's proximity to Green Valley Lake is a particularly valuable aspect of this project. Preserving and enhancing this natural area helps safeguard open space that benefits both residents and visitors alike. These efforts ensure that future generations can continue to experience untouched landscapes that promote biodiversity, ecological balance, and a shared sense of stewardship. Protecting these spaces fosters a deeper appreciation for our environment and encourages responsible care of our local resources. 1

At the heart of Hume's mission is a steadfast commitment to the spiritual and personal development of young people. In my role as Camp Director, I have the privilege of witnessing firsthand the impact that this environment has on students. When young people are given space to step away from their everyday life, they are removed from their daily distractions for a time to get immersed in creation, they form meaningful relationships, engage in hands-on experiences, learn and serve together in community, and these forms lasting transformation. Through intentional programming, team-building experiences, and time spent in creation, students develop a deeper understanding of their value; they grow in confidence, responsibility, and a sense of purpose that extends well beyond their time at camp. These moments—often shaped through shared challenges and meaningful conversations—play a vital role in forming the leaders and community-minded individuals that our world needs. Expanding Hume Camp is, at its core, an investment in the future, allowing us to continue equipping the next generation with the values, skills, and vision needed to meet tomorrow's challenges and go forward in love.

In addition to its social and environmental benefits, this project is poised to provide meaningful economic impact for our area. The expansion will create jobs, attract visitors, and generate increased activity that supports local businesses while encouraging new entrepreneurial

opportunities. This economic stimulus is an important step toward the continued renewal and sustainability of our mountain community.

I respectfully urge you to consider the long-term benefits the Hume Camp master plan offers. The care, vision, and foresight behind this project will contribute significantly to our county's growth and sustainability, while also nurturing the next generation of engaged and responsible citizen leaders.

Thank you for your time and thoughtful consideration. I sincerely hope you will support this project and help pave the way for a brighter, more sustainable future for the Green Valley Lake community. 1

Sincerely,

Megan Scoggins

Resident, Hume SoCal

G98 - Response to Megan Scoggins

G98-1 The comment includes general support for the Project. The commenter's support for the Project has been acknowledged. No further response is warranted.

G99 - Michael Ploessel

From: Mike Ploessel
To: Barragan, Elena
Subject: Proposed Expansion of Hume Camp...
Date: Friday, January 16, 2026 10:10:54 PM

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I strongly object to the proposed expansion of Hume Green Valley Lake has been part of my life for more than 70 years. Fire is an ever-present danger. There's only one paved way in and one paved way out. The existing roads are grossly inadequate roads in case of emergency. I don't know how many of us remember being told that the Slide fire was out of control, that they could not save GVL and to leave immediately. Only One Paved Road in and out... It's not nearly enough to serve the proposed Hume expansion. "On Oct. 22 2007, the Slide Fire, pushed by severe Santa Ana winds, burns 12,759 acres and surrounds Green Valley Lake, destroying over 100 homes and three businesses, including Fox Lumber and the ski hill out buildings and ski lift. The cause was embers from the Sept. 14-21 Butler II Fire, which began from embers of the Butler I Fire, which was caused by a lightning strike on Sept. 1." We were fortunate that it wasn't much worse. There was a spot fire withing 20 feet of our cabin. 1

There clearly are other concerns, especially availability of adequate water. Climate change is real and the recent past may not indicate what our water resources will be in the future. Please Do Not approve the proposed Hume Camp expansion. 2

Thank you for your consideration.

Michael Ploessel.

G99 - Responses to Michael Ploessel

G99-1 As analyzed in the IS/MND (**Section 4, Wildfire**) through **Appendix K: Emergency Plan and Procedures**, the Project site is located within a Very High Fire Hazard Severity Zone (VHFHSZ). The Project would be required to adhere to MM WF – 1, which ensures a comprehensive evacuation plan is utilized and would comply with all COA provided by fire jurisdictions. The Project's Emergency Plan includes early evacuation protocols, which reduce on-site occupancy prior to peak hazards conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis. Wildfire impacts would be further reduced to less than significant with the implementation of MMs WF-2 and -3, which requires compliance with existing and proposed development standards such as undergrounded power lines. The measures also reduce risk through requiring fire-resistive plants.

G99-2 The comment raises concern about the adequacy of the water supply. Please refer to Master Response – Water and the Updated WSA, which can be found in **Appendix B1: Revised Water Supply Assessment**. The updated WSA analyzes multiple water source/supply scenarios and identifies a preferred strategy based on those scenarios of utilizing on-site groundwater wells through phase 3. After phase 3, the Applicant would prepare an annual water supplier expectations memorandum. Refer to Master Response – Water.

G100 - Mike and Claudia Pohl

From: Claudia Pohl
To: Barragan, Elena
Subject: Expansion of Hume
Date: Friday, January 2, 2026 8:48:55 AM

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Dear Elena

I would like to express my concern about the potential expansion of Hume SoCal. As a Christian I fully support faith-based camps. However, this proposed expansion raises many questions and concerns for us. We have owned property in Green Valley Lake since 2009 and have been both full-time and part-time residents. 1

As a homeowner in GVL, we are concerned about the change to the landscape to the mountain, the animals and ecosystems that will be affected by the expansion. We are also concerned about the effect on the existing water table to our community in GVL as well as danger if there is an evacuation due to a fire. The existing infrastructure will not be able to handle the **900% increase in campers at the camp**. I can only imagine an evacuation under these conditions - buses and vehicles to evacuate 3000 people and that's IF the buses could get to the camp to evacuate the children. 2

We sincerely hope that these concerns are address and answered before a decision is made. We don't believe that this proposal is in the best interest of the mountain, its environment and the GVL community.

Regards,
Mike and Claudia Pohl

G100 - Responses to Mike and Claudia Pohl

G100-1 The comment is introductory in nature. No further response is warranted.

G100-2 As discussed in the IS/MND (**Section 4, Wildfire**) MM WF – 1, the Project would continually update and comply with a comprehensive evacuation plan. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on-site occupancy prior to peak hazard conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis.

G101 - Mike and Julia Rappleyea

From: Mike Rappleyea
To: Barragan, Elena
Subject: Hume Expansion
Date: Sunday, January 4, 2026 1:25:53 PM

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Please do not approve the Hume expansion. This would put the lives of good people of Green Valley Lake in danger. To much traffic and to much water will be used. The road to GVL is bad enough with out the additional traffic We are GVL home owners. 1

Mike and Julia Rappleyea

G101 - Responses to Mike and Julia Rappleyea

G101-1 The comment includes concerns about overall safety implications and impact. Refer to Master Responses – Transportation/Traffic, Water.

G102 - Miro Galbo

From: Miro Galbo
To: Barragan, Elena
Subject: HUME letter
Date: Friday, December 12, 2025 7:51:08 AM

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Proposing to increase Hume to 3,000 occupants— even 1,000— is unreasonable. Managing that many people, along with the buses and traffic required to move campers on and off the mountain, is already challenging under normal conditions. 1

During holidays or snowfall, Green Valley Lake Road, Highway 18, and 330 are already congested and chaotic. In the event of a fire, earthquake, or any other natural disaster, the risks multiply. This isn't just dangerous for visitors—it's dangerous for those of us who live here. With only one road out, we have a single, fragile evacuation route_that is Green Valley Lake road. Approving a project that would dramatically increase population density in such a vulnerable area is irresponsible. 2

And to suggest that the project will be expanded gradually over the next 30 to 50 years makes no sense. Many of us—whether part-time or full-time residents—cherish this place as a peaceful mountain retreat, something to pass down from generation to generation. I want my granddaughter to be safe here, especially, in times of disaster. 3

Let's be reasonable: this expansion is a for-profit move. Homeowners did not buy property here to profit, but to enjoy living in a peaceful, quiet, and safe environment. Supporting growth on this scale goes against everything this community stands for. Anyone strongly pushing for the Hume expansion appears to have something to gain from it. 4

Sincerely,

Miro Galbo

594 Bolsa Chica Ave

Green Valley Lake, CA 92341

G102 - Responses to Miro Galbo

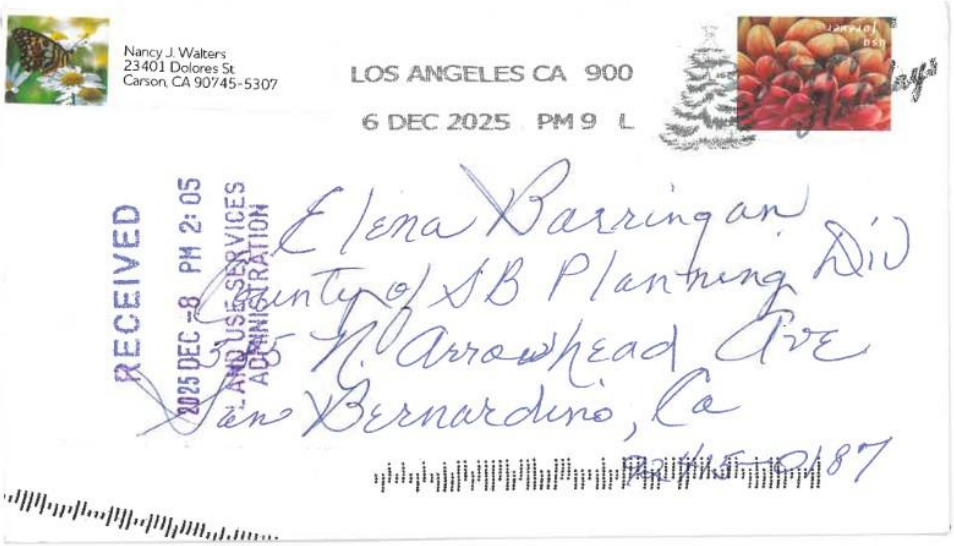
G102-1 The concerns about the scale of the proposed expansion are acknowledged. The IS/MND has analyzed impacts regarding the increased capacity for a worst-case scenario of approximately 3,000 occupants on the Project site. Following receipt of public comments and agency input, and additional technical coordination with the Project's proposed water supplier, the Project's maximum occupancy has been reduced to approximately 2,400 occupants. All impacts for the worst-case scenario were found to be less than significant. This comment is largely in regard to the Transportation Section of the IS/MND, which prepared a Traffic Analysis that is included as **Appendix J** of the IS/MND and determined that traffic conditions would remain adequate with implementation of the Project.

G102-2 The concerns about the scale of the proposed expansion are acknowledged. Traffic conditions do worsen under winter conditions and during the event of an evacuation. To ensure less than significant impacts on traffic in the area, a Traffic Analysis was conducted and is included as **Appendix J** of the IS/NMD. Additionally, applicable mitigation, such as MM WF – 1 and COA would be applied to reduce evacuation vulnerability related to the Project and impacts it would have on the community.

G102-3 The Project phasing would occur over a twenty-to-twenty-five-year period, gradually increasing capacity in five-year increments. As determined by the IS/MND, no significant and unavoidable impacts would occur which would assist in maintaining the existing character of the surrounding area.

G102-4 This comment is conclusionary in nature, no further response is warranted.

G103 - Nancy J. Walters



1

100 percent against the proposed increase in acres for Hume Camp. Safety + traffic in case of emergency, Own a home on Canyon.

RECEIVED

DEC 09 2025

San Bernardino County
Planning Division

G103 - Responses to Nancy J. Walters

G103-1 The comment includes a statement of opposition and concerns over traffic and emergency access. Refer to Master Response – Transportation/Traffic, Wildfire.

G104 - Nancy Kevorkian

Elena Barragan
County of San Bernardino
Land Use Services and Planning Division
385 N. Arrowhead Avenue
First Floor
San Bernardino, CA 92415-0187

Dear Ms. Barragan,

I am writing to you concerning the Hume Camp SoCal Expansion Project that is being considered in the Green Valley Lake area of S. California. I am a property owner of a cabin at 635 Ash Drive in Green Valley Lake. My family has owned this cabin since the 1950s so you can understand why it is of great concern to us to try and understand why such a massive development project is even being considered. 300 campers to 3000 campers? Busses, trash vehicles, food vehicles, maintenance vehicles, etc. would now be using that vital road that we residents have come to depend on to be accessible to us each day. It is literally a lifeline for the residents of the town of Green Valley Lake, as well as the camps along the Green Valley Lake Road. 1

Besides the increase in traffic, it greatly concerns us that there will be much more demand put on our finite well water supply, and the sewer system in Running Springs, that services our area. I am sure you will be upgrading those, but that will mean more planning and construction taking place, which is an inconvenience to everyone up there. New utility lines will have to be installed, which means more maintenance…I don't know if you are aware that there are frequent power interruptions in that area due to the HIGH fire danger, not to mention lines being disrupted by the inclement weather at 7000 feet. Of course the fire danger is much higher in the summer months, which is when you plan to have this camp open. 2 3 4

My main concern is the road being congested in the case of an emergency evacuation. And it is highly likely this will occur with the climate change conditions that are getting worse by the year. How will the residents be able to get out quickly when the camp will be evacuating their campers along the Green Valley Lake Road? How many busses for that many campers? And we have followed the busses up and down that hill for years…they are slow to climb the mountain and slow to descend…I have seen MANY of them catch on fire due to overuse of brakes…so what happens when a bus fire spreads to the surrounding brush and forest? 5

All I am asking is that you SERIOUSLY consider the negative effects this expansion can have—as well as the positive ones —that I am sure the proponents of this project are pushing for. (More business opportunities, more revenue for the county, etc.)

I, as a resident and property owner, want you to be SURE an EIR is done, and done honestly, and properly before this goes any further. It would be best if all the 5 phases of this project are looked at separately, and not all in one proposal. Things can change, and this 10 fold increase in campers is a huge imposition on what has worked for us for many, many years. 6

Thank you for your time and I hope you listen to the existing residents about doing an EIR before you even start to undertake such a massive change affecting our small community.

Sincerely,
Nancy Kevorkian
635 Ash Drive
Green Valley Lake, CA 92341

G104 - Responses to Nancy Kevorkian

G104-1 The comment is introductory in nature. The comment includes concerns about overall safety implications and impact. No further response is warranted.

G104-2 The comment includes concerns about the local water supply. Refer to Master Response – Water.

G104-3 The comment includes concerns about the scale of the proposed expansion are acknowledged. The Project is consistent with the existing HT/SD-RES zoning and Rural Living land use designation, which permits campground uses subject to County review. The Project phasing would occur over many decades, gradually increasing capacity. As determined by the IS/MND, no significant and unavoidable impacts would occur which would assist in maintaining the existing character of the surrounding area.

G104-4 The comment includes concerns about the fire danger in the area especially in summer months. As analyzed in the IS/MND (**Section 4, Wildfire**) through **Appendix K: Emergency Plan and Procedures**, the Project site is located within a Very High Fire Hazard Severity Zone (VHFHSZ). The Project would be required to adhere to MM WF – 1, which ensures a comprehensive evacuation plan is utilized and would comply with all COA provided by fire jurisdictions. The Project's Emergency Plan includes early evacuation protocols, which reduce on-site occupancy prior to peak hazards conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis. Wildfire impacts would be further reduced to less than significant with the implementation of MMs WF-2 and -3 which requires compliance with existing and proposed development standards such as undergrounded power lines. The measures also reduce risk through requiring fire-resistive plants.

G104-5 As evaluated in the IS/MND (**Section 4, Transportation**), the Project would not modify existing roadways, and Project-related traffic would not create a significant hazard or adversely affect emergency access.

Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section

15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity.

G104-6 Under CEQA, the Lead Agency, San Bernardino County, determines the appropriate level of environmental review. The IS/MND evaluates all environmental topic areas required under CEQA and identifies compliance requirements and mitigation measures that reduce all potentially significant impacts to less than significant levels. There is not substantial evidence presented that the IS/MND is inadequate or that any significant unavoidable impacts would remain unmitigated. Therefore an Environmental Impact Report (EIR) is not required.

G105 - Nancy Kevorkian

From: Nancy Kevorkian
To: Barragan, Elena
Subject: Camp Hume Expansion
Date: Monday, November 24, 2025 7:31:39 AM

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To Whom It May Concern:

The ideas people come up with never ceases to amaze me.

My husband's father built our cabin in Green Valley Lake in the 1950s. I joined the family in the 1970s, and since that time, I have been using the Green Valley Lake Roadl from before the 210 fwy even existed, and we had to go all the way up Highland Avenue in order to access the 330 hwy. Times used to be very laid back, relaxed, and fun up there. Of course as times changed, so did the Valley. We saw the widespread growth of cable TV, wifi, generators, cell phone use, and other modern amenities, which made life up there less rustic. I began to see a negative impact in the Green Valley Lake community quiet life with the implementation of Airbnb's. Disrespectful people who come up there to party, make noise, litter, destroy, vandalize, and park on other residential private properties. It has not been a favorable change. 1

AND NOW to get to the crux of the matter…. THE CAMP HUME EXPANSION. Was no one around during the great Slide Fire of October and November 2007 when so many structures were lost (272), and people had to evacuate quickly to save themselves? The GVL road became compromised and firefighters couldn't use it. We didn't know for several days if we still had a cabin! There is only one access road out….and now someone had the bright idea to expand Camp Hume to 10 times its current size! Do they not realize the 300 permanent GVL residents need that road to always remain open, just in case? It is literally a lifeline for them! There are very few amenities up there and the residents also need to get to locations in other areas for food, medical services, etc. You are going to jam the GVL road with more traffic congestion and slow, cumbersome buses that can only go 15 mph up the hill, or might catch fire going down the hill, because their brakes can overheat.

The campers would all have to be evacuated from the camp very quickly in an emergency. How can that even be implemented? And what about the trash trucks and food trucks going in and out of the camp every day? It will be gridlock on the GVL road-- and the Valley residents will be sitting ducks for disaster if they need to get out of there. You saw the Eaton and Palisades fires--warnings came much too late--and how panicked residents jammed the roads with their cars, and as the fire approached, people just left them in the middle of the road and ran for their lives…. keeping other people trapped in harm's way, and emergency vehicles from being able to do their jobs. The abandoned cars had to be bulldozed off the road! WHAT DO YOU THINK WILL HAPPEN IF THE GREEN VALLEY LAKE AREA HAS THAT TYPE OF SITUATION?? They will close the only road out if it gets too dangerous. How can the residents evacuate then, if there is a delay or complete block from all the bus and traffic snarls in an emergency? Let alone the extra load a camp of 3000 people will have on the infrastructure, i.e., sewer lines, more water use (laundry, showers too!), greenhouse gases polluting our wonderful fresh air… and all the additional utility lines that will have to be built to accommodate the extra demand. A signal installed at the intersection of the 18 and GVL road will also cause a slowdown, or a complete shutdown in a drastic escape situation. It will be a nightmare to say the least. I hope there is a way to stop all this from happening. I am a concerned resident who has previously experienced an emergency situation in that area. Someone needs to look more closely at what they are proposing. 2 3

Sincerely,
Nancy Kevorkian
635 Ash Drive 4

Green Valley Lake, CA 92341

4

G105 - Responses to Nancy Kevorkian

G105-1 The comment is introductory in nature. The comment provides general concerns regarding growth in the Project vicinity and is not within the scope of the Project or CEQA. No further response is warranted.

G105-2 The comment includes concerns regarding wildfire and emergency evacuation. As analyzed in the IS/MND (**Section 4, Wildfire**), the Project site is located within a Very High Fire Hazard Severity Zone (VHFHSZ). The Project would be required to adhere to MM WF – 1, which ensures a comprehensive evacuation plan is utilized and would comply with all COA provided by fire jurisdictions and the Lead Agency. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on-site occupancy prior to peak hazards conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis.

G105-3 The concerns about the scale of the proposed expansion are acknowledged. The IS/MND analysis evaluated impacts on water supplies, wastewater treatment capacity, and solid waste treatment capacity in the Utilities and Service Systems Section of the IS/MND (**Section 4, Utilities and Service Systems**) and found that no significant or unavoidable impacts would occur. Refer to Master Response Water, Wastewater/Sewer.

The Project is consistent with the existing HT/SD-RES zoning and Rural Living land use designation, which permits campground uses subject to County review. The Project phasing would occur over many decades, gradually increasing capacity. Additionally, following receipt of public comments and agency input and additional coordination with the Project's proposed water supplier, the Project's maximum occupancy has been reduced from approximately 3,000 to 2,400 occupants, representing an increase of approximately 2,100 occupants upon full buildout. As determined by the IS/MND, no significant and unavoidable impacts would occur.

G105-4 The Transportation Section of the IS/MND prepared a Traffic Analysis that is included as **Appendix J** of the IS/MND and determined that traffic conditions, existing road infrastructure, and access would be adequate to service the expanded Project site. As evaluated in the IS/MND (**Section 4, Transportation**), the Project would not modify existing roadways, and Project-related traffic would not create a significant hazard or adversely affect emergency access.

Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation

Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity.

G106 - Nancy Larsh

From: Nancy Larsh
To: Barragan, Elena
Subject: HUME CAMP EXPANSION PROJECT
Date: Wednesday, January 7, 2026 5:15:25 PM

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My husband and I have owned property in Green Valley Lake since 2016.
I am writing to express concern over the Hume project. From the documents I see I have concerns that all issues have not been considered traffic (road infrastructure) evacuation in case of fire (only one road to access camp and Green Valley Lake) and wastewater disposal 1

Please lead me to documentation that addresses these concerns. 2

G106 - Responses to Nancy Larsh

G106-1 The comment includes concerns that relevant environmental impacts have not been appropriately studied or considered, specifically how the Project will mitigate emergency evacuation. Refer to Master Responses – Wildfire, Transportation/Traffic and **Appendix K: Emergency Plan and Procedures**.

G106-2 The comment includes concerns that relevant environmental impacts have not been appropriately studied or considered, specifically how the Project will address wastewater. Refer to Master Response – Wastewater/Sewer and **Appendix B2: Revised Sewer Feasibility Study**.

G107 - Nancy Russell

From: Nancy Russell
To: Barragan, Elena
Subject: Pro Hume project
Date: Wednesday, January 14, 2026 2:24:32 PM

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Sent from my iPhone
As a resident of Green Valley Lake, I am writing to express my support for the Hume project. This expansion project will provide much-needed economic growth to our struggling mountain community. 1
Thank you,
Nancy Russell

G107 - Responses to Nancy Russell

G107-1 The comment includes general support for the Project. The commenter's support for the Project has been acknowledged. No further response is warranted.

G108 - Natalie Lopez

From: Natalie Lopez
To: Barragan, Elena
Subject: Hume SoCal
Date: Monday, December 15, 2025 4:29:49 PM

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Hi, I'm a resident of Green Valley Lake. I've noticed a lot of people are against Hume SoCal expansion and how they're making it very known, and I would just like to say that I am for it and I think it's a good idea for our small community to get more business and i honestly love the idea of a traffic light. 1
Sent from my iPhone

G108 - Response to Natalie Lopez

G108-1 The comment includes general support for the Project. The commenter's support for the Project has been acknowledged. No further response is warranted.

G109 - Natalie Lopez

From: Natalie Lopez
To: Barragan, Elena
Subject: Hume SoCal
Date: Tuesday, December 30, 2025 8:50:07 AM

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I am writing to share my support for Hume SoCal and the positive impact it has on our mountain community. I live in Green Valley Lake and currently work at Hume SoCal, which has been an important and meaningful place of employment for me.

Hume SoCal provides valuable jobs for local residents, helping people who live on the mountain work close to home. As Hume SoCal continues to grow, it will create even more job opportunities for everyone in our mountain community. This kind of growth supports families, strengthens the local economy, and helps keep our community stable and thriving.

Hume SoCal is especially important to my family. Both of my sisters and I all work at Hume SoCal, making it a place that directly supports our household. Having steady employment on the mountain allows us to remain part of the community we care deeply about. 1

I truly believe that continued growth at Hume SoCal will be good for Green Valley Lake and surrounding areas, providing jobs, stability, and positive opportunities for current and future residents.

Thank you for your time and consideration.

Sincerely,
[Natalie Lopez]
Sent from my iPhone

G109 - Response to Natalie Lopez

G109-1 The comment includes general support for the Project. The commenter's support for the Project has been acknowledged. No further response is warranted.

G110 - Natalie Reinert

From: Natalie Reinert
To: Barragan, Elena; Bull, Robin
Subject: Hume SoCal
Date: Monday, January 5, 2026 8:51:21 PM

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Dear Ms. Barragan and Ms. Bull,

I am writing in regards to the proposed expansion of the Hume SoCal campground in Green Valley Lake, CA. I appreciate your involving the community in this decision. 1

In reviewing the plans as laid out by Hume, I have significant concerns about the expansion in regards to:

- escape routes / egress in case emergency or disaster: In recent years, fire, flood and snow have all caused major egress issues. If Hume SoCal is (appropriately) focused on evacuating hundreds or thousands of campers via bus in an emergency situation, the danger to GVL residents ("behind" the camp in an evacuation route), the campers, and anyone traveling off the mountain (including the entire Big Bear community) will be exponentially increased unless alternate routes are constructed - which is neither proposed nor, I would hazard to guess, feasible. 2
- water usage - in increasing numbers of campers/staff by multiple factors, there is no accounting for water usage and drainage of the water table -- critical to the mountain ecosystem, especially in times of drought. An EIAR is absolutely critical to this evaluation. 3
- impact on wildlife - the increased development per se impacts wildlife, already encroached upon. An EIAR is absolutely critical to this evaluation. 4
- sewer / waste - the impact of additional hundreds/thousands of campers each year in terms of everything from wastewater to litter to air pollution (from both vehicular traffic and fires/campfires) cannot be entirely mitigated. An EIAR is absolutely critical to this evaluation. 5
- noise / light pollution - the impact of hundreds or more campers in any given time means that noise and light will be significantly increased, impacting both wildlife and the surrounding community. 6

From a safety and evacuation perspective, I cannot see this expansion as being feasible. Respectfully, on that basis alone I would request the plans be denied.

From an environmental impact perspective, given the magnitude and scope of easily identified issues - with an undoubted host of others to be considered by experts - I request either that the expansion request be denied, or at a minimum an EIAR be required before further consideration. 7

Sincerely,
Natalie Reinert

G110 - Responses to Natalie Reinert

G110-1 The comment is introductory in nature. No further response is warranted.

G110-2 The comment includes concerns regarding transportation with respect to wildfire and emergency evacuation. The comment does not provide evidence that the IS/MND was inadequately prepared or that a revision is warranted. Impacts related to wildfire and transportation would be less than significant per CEQA guidelines. Refer to Master Responses – Transportation/Traffic, Wildfire.

G110-3 The comment lists concerns about groundwater sustainability and makes a request for an "EIAR". All impacts related to groundwater would be less than significant, refer to Master Response – Water. Per CEQA, the Lead Agency, is responsible for determining the appropriate level of environmental review. The comment does not provide evidence that water-related impacts would not be less than significant or that further environmental documentation is warranted.

G110-4 The comment includes general concerns about wildlife impact and makes a request for an "EIAR". As mentioned in the IS/MND (**Section 4, Biological Resources**) MMs BIO-1 and -2 would be implemented and therefore reduce impacts to less than significant levels. MM BIO-1 requires that a pre-construction survey shall be conducted prior to ground disturbance or vegetation removal activities in order to protect special-status wildlife. The Project biologist shall ensure that impacts to any special-status wildlife observed during preconstruction clearance surveys are reduced or avoided such that impacts are less than significant. MM BIO-2 requires compliance with the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code through the avoidance of site preparation activities, to the greatest extent possible, during the nesting season of potentially occurring native and migratory bird species, including the golden eagle, bald eagle, and California spotted owl. If Project development is proposed during the nesting/breeding season, a pre-activity field survey shall be conducted by a qualified biologist prior to ground-disturbing activities to determine if active nests of species protected by the MBTA or the California Fish and Game Code are present in the construction zone. If active nests are not located within the construction zone during the implementation of the Project and there is a buffer of 500 feet from an active listed species or raptor nest, 300 feet of other sensitive or protected bird nests (nonlisted), or 100 feet of sensitive or protected songbird nests, then construction activity may occur during the nesting/breeding season. However, if active nests are located during the pre-activity field survey, no grading or heavy equipment activity shall take place within at least 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected (under MBTA or California Fish and Game Code) bird nests (nonlisted), or within 100 feet of sensitive or protect songbird nests until the nest is no longer active. Per CEQA, the Lead Agency, is responsible for determining the appropriate level of environmental review. No further response is warranted.

G110-5 The comment includes concerns about sewer and waste and makes a request for an "EIAR". The MND in **Section 4, Utilities and Service Systems** incorporates MM UTL-1, which requires that prior to approval of each phase, the Project applicant shall evaluate the available treatment and disposal capacity of the approved on-site wastewater treatment plant (WWTP) to confirm

adequate treatment capacity, disposal capacity, operational performance, regulatory compliance, and any improvements necessary to accommodate the proposed occupancy increase. Refer to Master Response – Wastewater/Sewer. Per **Section 4, Utilities and Service Systems**, the Project would not result in inadequate landfill capacity. Per CEQA, the Lead Agency, is responsible for determining the appropriate level of environmental review.

G110-6 The comment includes concerns regarding potential noise and light pollution. All impacts related to noise would be less than significant, refer to Master Response – Noise. The Project's impacts relating to light would be less than significant. As mentioned in **Section 4, Aesthetics**, each phase of development in the Project area would be required to comply with policies and regulations set forth by the CWP and San Bernardino County Development Code.

G110-7 The comment is conclusionary in nature. The comment includes a request for an “EIAR”. Per CEQA, the Lead Agency, is responsible for determining the appropriate level of environmental review. The comment does not provide evidence that the IS/MND was inadequately prepared or that further environmental documentation is necessary. No further response is warranted.

G111 - Nate Medina

[Date]

Elena Barragan

County of San Bernadino Planning Division

385 N. Arrowhead Ave. First Floor

San Bernardino, Ca 92415-0187

Dear Ms. Barragan,

I am writing to express my strong support for purposed expansion of the Hume Camp (PROJ-2024-00046). This project represents a vital opportunity for our community to enhance its infrastructure, promote sustainable development, and foster economic growth.

The Hume Camp master plan envisions a well-integrated camp that prioritizes not only the needs of its guests but also the preservation of our natural environment. By focusing on sustainable practices, this development aligns with our county's goals. The incorporation of green spaces and environmentally conscious design will protect open spaces in our community while protecting our local wildlife habitats.

The project's proximity to Green Valley Lake is a valuable aspect that contributes to the preservation of open space in our community. By maintaining and enhancing this natural area, we can ensure that future generations have access to untouched landscapes that promote biodiversity and ecological balance. This commitment to preserving open space not only enriches our environment but also fosters a sense of stewardship among community members, encouraging them to appreciate and protect our natural resources. 1

A critical aspect of Hume mission is its commitment to working with youth, providing programs that help shape future leaders. By engaging young people in enriching activities, mentorship, team building, and outdoor education, Hume plays a pivotal role in developing confident, responsible, and community-minded individuals. Equipping our future leaders with the skills, values, and vision to address tomorrow's challenges is essential, and this requires an investment in our youth.

Moreover, the project is poised to stimulate our local economy by creating jobs and attracting new businesses. The anticipated influx of both residents and visitors will have a positive ripple effect on our local economy, supporting existing businesses and encouraging new entrepreneurial ventures. This economic boost is essential for the renewal of our mountain community. 2

I urge you to consider the long-term benefits that the Hume Camp master plan brings to our community. The thoughtful planning and vision behind this project will contribute significantly to our county's growth and sustainability, while also nurturing the next generation of citizen leaders.

Thank you for your attention to this matter. I hope you will support this project and help pave the way for a brighter, more sustainable future for the Green Valley Lake community. 2

Sincerely,

Nate Medina

Resident Green Valley Lake

G111 - Responses to Nate Medina

G111-1 The comment does not introduce new or substantial concerns about the adequacy of the IS/MND. No further response is warranted.

G111-2 CEQA does not treat economic or social effects as significant environmental impacts unless they result in an environmental impact. The IS/MND evaluates environmental effects. No new environmental effects are presented that were not addressed in the IS/MND. No revisions are necessary.

G112 - Nathan Nikolas Guerra

From: Nathan Nikolas Guerra
To: Barragan, Elena
Subject: Formal Opposition to Proposed 3,000-Occupancy Hotel Development in Green Valley Lake
Date: Wednesday, January 7, 2026 2:33:47 PM

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To Whom It May Concern,

I am writing to formally oppose the proposed plan to convert an existing 300-person outdoor education facility into a 3,000-occupancy hotel in the community of Green Valley Lake, California.

This proposal represents an order-of-magnitude increase in occupancy that is fundamentally incompatible with the existing infrastructure and safety limitations of Green Valley Lake. The community was not designed, nor is it equipped, to support a development of this scale. 1

First, the current sewage, water, and trash infrastructure is already limited and seasonally stressed. A tenfold increase in daily population would place unsustainable demand on wastewater treatment, potable water supply, and solid waste management systems. There has been no credible demonstration that these systems can be expanded or upgraded without significant environmental impact, long-term disruption, or cost burden to existing residents. 2

Second, and more critically, this proposal presents a serious and unacceptable public safety risk. Green Valley Lake is a high wildfire-risk area. At present, the community relies primarily on a single two-lane road for ingress and egress. In the event of a wildfire or other emergency requiring evacuation, attempting to move an additional 3,000 visitors—many unfamiliar with the area—through this limited roadway would be logistically unrealistic and potentially deadly. This risk is not hypothetical; wildfire events in similar mountain communities have repeatedly demonstrated the consequences of overdevelopment without adequate evacuation capacity. 3

Current residents already face evacuation challenges during peak fire conditions. Introducing a hotel of this scale would significantly increase congestion, delay emergency response, and put both visitors and residents at heightened risk. Any development proposal that meaningfully increases population density must first demonstrate proven, redundant evacuation routes and emergency response capacity. This proposal does not meet that standard.

Finally, converting a small-scale outdoor education facility into a large commercial hotel represents a fundamental change to the character and carrying capacity of Green Valley Lake. Such a transformation should require extraordinary justification, comprehensive infrastructure analysis, and clear evidence that public safety will not be compromised. To date, those requirements have not been met. 4

For these reasons, I strongly urge the City of Green Valley Lake and all relevant planning authorities to reject this proposal in its current form. Development decisions must prioritize

public safety, environmental sustainability, and the long-term viability of the community—not short-term commercial gain.

Thank you for your consideration. 4

Sincerely,
Nathan Nikolas Guerra
Green Valley Lake, California

G112 - Responses Nathan Nikolas Guerra

G112-1 The comment is introductory in nature. The comment includes a statement of general opposition. No further response is warranted.

G112-2 The comment includes concerns related to infrastructure. Per **Section 4, Utilities and Service Systems**, the Project would not result in inadequate landfill capacity. Refer to Master Responses – Wastewater/Sewer, Water.

G112-3 The comment includes concerns generally regarding transportation and emergency evacuation on local roads near the Project. The comment does not provide evidence that the IS/MND was inadequately prepared or that a revision is warranted. Impacts related to wildfire and transportation would be less than significant per CEQA guidelines. Refer to Master Responses – Transportation/Traffic, Wildfire.

G112-4 The comment includes a concern not within the scope of CEQA, misidentifies the intended use, and provides a request for denial to the Lead Agency. Refer to Master Response - Scale/Zoning. The IS/MND and its conclusions were prepared in accordance with CEQA guidelines, the comment does not provide evidence that the IS/MND warrants change.

G113 - Nick Zalenski

From: Nick Zalenski
To: Barragan, Elena
Subject: Objection to the Hume expansion plan
Date: Wednesday, January 7, 2026 10:46:28 AM

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Hi,

Please see my objection the Hume expansion below. Thank you. 1

Nick Zalenski

---------- Forwarded message ---------
From: **Nick Zalenski** <nick.zalenski@gmail.com>
Date: Thu, Dec 18, 2025 at 5:22 PM
Subject: Objection to the Hume expansion plan
To: <Supervisor.Rowe@bos.sbcounty.gov>

Supervisor Rowe,

I am writing to express my objection to the proposal to significantly expand the capacity at Hume camp on Green Valley Lake road. As a GVL property owner, I have concerns about traffic, evacuation routes, and our water supply, that are not addressed in their plan. 2

To address traffic and evacuation concerns, I would like to see Hume fund a second egress route out of GVL. It is too dangerous to rely on a single road for evacuation for the whole town of GVL + 3000 campers.

To address the water concern, I would like to see Hume exclusively source water from silver wood or other sources, and not deplete our water table. 3

Hume is claiming their expansion is not controversial, which is objectively not true. Myself and many other GVL property owners are very concerned about this plan. I'm sure you will hear from them as well. 4

Thanks,

Nick Zalenski
33624 Angeles drive, GVL
949-903-0211

G113 - Responses to Nick Zalenski

G113-1 The comment is informatory in nature. No further response is warranted.

G113-2 The comment includes concerns about emergency transportation routes and makes a request for additional egress routes. The comment does not provide evidence that additional egress routes are needed or that the IS/MND is inadequate. Refer to Master Response – Wildfire, Transportation/Traffic.

G113-3 The comment includes concerns about groundwater sustainability and makes a request for alternative water sources. The comment does not provide evidence that alternative water sources are needed or that groundwater conditions are not adequate to meet the demand. Refer to Master Response – Water.

G113-4 The comment is conclusionary in nature. No further response is warranted.

G114 - Nicole Mitescu

From: Nicole Mitescu
To: Barragan, Elena
Subject: Hume expansion project
Date: Tuesday, December 16, 2025 6:07:44 AM

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Dear Ms Barragan,

I am the owner of a vacation home in Green Valley Lake and am unable to come to the to open meeting Hume is holding on Dec 20 regarding its expansion plans.

When we bought our home (33103 Maple Lane, Green Valley Lake) it was surely in part because it was quiet and separated from the traffic on the 18. This was during Covid and it was during that time also that Hume bought the camp from the previous owners. 1

If Hume is allowed to increase the number of campers to 3000, this will impact the community of Green Valley Lake in a number of negative ways. The traffic on the Green Valley Lake Road will increase enormously, the water and sewer resources will be stretched perhaps beyond their limits and the nature of the area will changed with this giant increase in people coming into the area. Certainly in case of emergencies, the ability of the residents to escape will be greatly impeded by the large number of people on the Hume grounds. 2

It will also certainly affect the wildlife and plants in the area and with the increasingly dry conditions and recent fires they are already under serious stress. 3

I know the National Forest is meant to be open to all for recreational use, but this is a commercial expansion that would harm not only the little communities in the area but also the very nature that the National Park is expected to maintain.

Please do not allow this expansion to go forward. 4

Thank you,
Nicole Mitescu

G114 - Responses to Nicole Mitescu

G114-1 This comment is introductory in nature. No further response is warranted.

G114-2 Traffic within the area would increase and utility impacts would occur to the Running Springs Water District absent mitigation as discussed is **Section 4, Transportation**, and **Section 4, Utilities and Service Systems**, of the IS/MND. Traffic increases have been determined to be below levels of significance as determined by the Traffic Analysis, included as **Appendix J** of the IS/MND, and further analyzed in the Transportation Section of the IS/MND (Section 4). MM UTL – 1 would also be implemented regarding utility impacts as potential pump upgrades and storage expansions at lift stations may occur in coordination with the Running Springs Water District as described in the Utilities and Service Systems Section of the IS/MND (Section 4). Additionally, MM WF – 1 would be implemented to ensure a comprehensive evacuation plan is utilized in case of emergency.

G114-3 Natural areas would be impacted by implementation of the Project; however, a large portion of the Project site would remain in its natural condition. Additionally, the Biological Resources Assessment which is further described in the Biological Resources Section of the IS/MND has determined that less than significant impacts would occur with implementation of MM BIO – 1 and 2 which require pre-construction clearance surveys and compliance with the Migratory Bird Treaty Act and California Fish and Game Code.

G114-4 This comment is conclusionary in nature. No further response is warranted.

G115 - Nicole Mitescu

From: Nicole Mitescu
To: Barragan, Elena
Subject: Hume SoCal expansion project
Date: Friday, January 2, 2026 9:41:11 AM

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Dear Ms. Barragan,

I own a house in Green Valley Lake and am very concerned about the proposed expansion of the Hume SoCal camp.

I went to the open meeting held in the chapel of the Hume SoCal Camp on Dec. 20, and want to let you know that I am very strongly opposed to any expansion of the camp for several reasons. 1

One is the environmental impact - water, sewer, wildlife - all will be more stressed with any camp expansion. Did you notice at the meeting that they did not seem to know how much water they are currently using because they are on wells? With the increased number of campers and staff this will become a serious issue and they seem to be unaware and unprepared for it. A full EIR is required to assess this impact, much more than the CEQA and mitigation documentation provided by Candyce Burnett, senior project manager of Kimley Horn. 2

The second reason is plain and simple safety. In case of an emergency such as a wildfire, earthquake, severe storm, high winds, there would be no possible way for residents in Green Valley Lake to get down the only paved road to the 18 with the number of busses that would be required to transport the campers and staff in Hume SoCal.

I think all of us when we bought / rented our homes in Green Valley Lake, whether permanent residents or part-timers, understood the risk of fire or other natural catastrophe, and we accepted that risk. But we never accepted the possibility that due to the number of campers and staff in Hume SoCal there would be NO WAY for us to evacuate in an emergency situation. 3

I did email you previously and received no reply. I'd appreciate knowing that you have received this email and recorded my opinion.

And I'd also appreciate it if you could let me know when there will be other open meetings when the SoCal Hume application will be discussed.

Thanks so much for your help and attention to this matter.

Nicole Mitescu
My Green Valley Lake address is: 33103 Maple Lane, Green Valley Lake. 4

G115 - Responses to Nicole Mitescu

G115-1 The comment is introductory in nature. The comment includes an opinion about the Project. No further response is warranted.

G115-2 The comment includes concerns over water, sewer, and wildlife and makes a request for an EIR. All impacts regarding water would be less than significant, refer to Master Response – Water. Regarding sewer impacts, the MND in **Section 4, Utilities and Service Systems** incorporates MM UTL-1, which requires that prior to approval of each phase, the Project applicant shall evaluate the available treatment and disposal capacity of the approved on-site wastewater treatment plant (WWTP) to confirm adequate treatment capacity, disposal capacity, operational performance, regulatory compliance, and any improvements necessary to accommodate the proposed occupancy increase. Impacts related to sewer would be less than significant. Refer to Master Response – Wastewater/Sewer. As mentioned in the IS/MND (**Section 4, Biological Resources**) MM BIO-1 and 2 would be implemented and reduce any wildlife impacts to less than significant levels. MM BIO-1 requires that a pre-construction survey shall be conducted prior to ground disturbance or vegetation removal activities in order to protect special-status wildlife. The Project biologist shall ensure that impacts to any special-status wildlife observed during preconstruction clearance surveys are reduced or avoided such that impacts are less than significant. MM BIO-2 requires compliance with the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code through the avoidance of site preparation activities, to the greatest extent possible, during the nesting season of potentially occurring native and migratory bird species. If Project development is proposed during the nesting/breeding season, a pre-activity field survey shall be conducted by a qualified biologist prior to ground-disturbing activities to determine if active nests of species protected by the MBTA or the California Fish and Game Code are present in the construction zone. If active nests are not located within the construction zone during the implementation of the Project and there is a buffer of 500 feet from an active listed species or raptor nest, 300 feet of other sensitive or protected bird nests (nonlisted), or 100 feet of sensitive or protected songbird nests, then construction activity may occur during the nesting/breeding season. However, if active nests are located during the pre-activity field survey, no grading or heavy equipment activity shall take place within at least 500 feet of an active listed species or raptor nest, 300 feet of other sensitive or protected (under MBTA or California Fish and Game Code) bird nests (nonlisted), or within 100 feet of sensitive or protect songbird nests until the nest is no longer active. Per CEQA, the Lead Agency, is responsible for determining the appropriate level of environmental review. The comment does not provide evidence additional environmental documentation is warranted.

G115-3 The comment includes concerns regarding transportation with respect to wildfire and emergency evacuation. The comment does not provide evidence that the IS/MND was inadequately prepared or that a revision is warranted. Impacts related to wildfire and transportation would be less than significant per CEQA guidelines. Refer to Master Responses – Transportation/Traffic, Wildfire.

G115-4 The comment is conclusionary in nature. No further response is warranted.

G116 - Oren Siegel

From: Oren Siegel
To: Barragan, Elena
Subject: PROJ-2004-00046
Date: Tuesday, November 25, 2025 1:44:01 PM

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Dear Mrs Barragan
I am a resident of Lake Arrowhead. I live in the area because of the beautiful outdoors. I think the project mentioned above is too large of an expansion for that area. It poses too much of a risk environmentally, both for nature and fire/safety reasons.
Thank you

--
Oren Siegel
Lake Arrowhead Resident
934 Teakwood Dr, Lake Arrowhead, CA 92352

1

G116 - Response to Oren Siegel

G116-1 The comment is speculative in nature. The comment includes general concerns about the Project. As mentioned in the IS/MND all environmental impacts would be less than significant with mitigation incorporated; refer to the Master Responses. The comment does not provide evidence that the IS/MND is inadequate.

G117 - Patrick Huckaby

From: P & S Huckaby
To: Barragan, Elena
Subject: Hume Project PROJ-2024-00046
Date: Wednesday, December 3, 2025 10:55:33 AM

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

I would like to comment on the proposed expansion of the Hume Camp in Green Valley Lake. My primary objection to this project is the enormous expansion to 3000 person occupancy. The town of Green Valley Lake has one winding two lane road in and out. In an evacuation (we have been evacuated 3 times in the last five years) adding 3000 people to the traffic trying to exit onto Hwy 18 is a recipe for disaster. On weekends the traffic from Big Bear can already gridlock Hwy 18. 1
In their report Hume makes no mention of their impact on the town of Green Valley Lake. This project is MUCH too large for the surrounding area.
Thank You,
Patrick Huckaby
33120 Piedras Grandes, PO Box 8253
Green Valley Lake, Ca 92341

G117 - Responses to Patrick Huckaby

G117-1 Traffic impacts on roadways, including Green Valley Lake Road, are evaluated within the Transportation Section of the IS/MND and utilize findings from the Traffic Analysis to determine impacts. MM WF – 1 would be implemented to ensure proper evacuation procedures.

G118 - Patti Huber

From: the Froemel Family
To: Supervisor Rowe; Barragan, Elena
Subject: Hume SoCal Project
Date: Tuesday, January 6, 2026 8:17:39 PM

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Hello

Green Valley Lake has been a go to spot since I was a little girl. I remember summers along the beach there.

Now as a property owner in Green Valley Lake, I have numerous concerns regarding the potential expansion of the local Hume SoCal campground project.

In short, an expansion from 300 to 3,000 visitors in a very small land area is irresponsible and fails to take into consideration the ressources that nearby towns and residents rely on for their livelihoods and daily needs. 1

That the communities only recently learned of the project, and well into its progress, is unconscionable.

From the early stages of this project proposal there have been significant concerns: the lack of communication of the proposed expansion (and the limit to notification within 1,200 feet is short sighted for the location within greater distance of affected mountain communities), severe impacts to the water table (high visit weekends - which is also when the camp would be at its peak - already has to rely on alternate water sources to meet the increased need), sewer systems, and most importantly emergency access to GVL residents in the event of an evacuation due to wild fires or earthquakes. 2

Furthermore, while a portion of the property is being "preserved" for wildlife, realistically any expansion of that caliber will gravely impact the surrounding natural areas, especially wildlife. 3

As some had shared in the meeting at Hume, I request the following be ordered and made public before any approvals are granted -

1. Preparation of a FULL Environmental Report
2. Independent Wildfire Evacuation & Egress Modeling
3. Formal Cal Fire & County Fire Authority Review Letters
4. Comprehensive Traffic & Bus Impact Study
5. Emergency Services Capacity Analysis
6. Cumulative Impact Analysis with Green Valley Lake Population
7. Public Hearings with Full Community Notice 4

I ask that a more careful, realistic look at such a massive expansion (in a small area) nestled alongside a road to a community hugely impacted, be more be conducted with full communication and without regard to any financial incentives the Hume may be presenting.

Any expansion needs to be done in a more transparent, thoughtful manner bringing into consideration all impacted by this project, particularly Green Valley Lake residents and visitors that shares the same two lane road, water, and sewer systems. 4

Respectfully,

Patti Huber
Green Valley Lake, CA

G118 - Responses to Patti Huber

G118-1 The comment is introductory in nature, and no further response is warranted.

G118-2 The comment includes concerns over a potential lack of communication, groundwater sustainability, sewer capacity, and emergency evacuation. The IS/MND was prepared within all CEQA guidelines. Refer to Master Responses – Water, Sewer, Transportation/Traffic, Wildfire.

G118-3 The comment includes concerns about open space preservation and wildlife. The Project would cluster development on approximately 20 acres with approximately 231 acres preserved as open space. Refer to Master Response – Biological Resources/Wildlife.

G118-4 The comment lists multiple concerns and requests for additional studies. As mentioned in the IS/MND all potential environmental impacts would be less than significant with applicable mitigation, refer to Master Responses – Transportation/Traffic, Wildfire, Water, Utilities. The IS/MND was prepared within CEQA guidelines. Under CEQA, the Lead Agency determines the appropriate level of environmental review. The comment has not provided evidence demonstrating the IS/MND or its conclusions are inadequate. No further response is required.

G119 - Patti L Clarkson

From: Patti Clarkson
To: Barragan, Elena
Cc: Kathy Eiler
Subject: Hume Expansion Proposal
Date: Wednesday, January 7, 2026 12:15:17 PM

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Good Morning Ms. Barragan,

As a resident of Green Valley Lake I write to you this morning to rise in opposition to the Hume expansion proposal. 1

Having read The Proposal, I see several deficiencies particularly in regard to water table consumption and more importantly to emergency evacuation egress capacity.

As Im sure you are aware, Green Valley Lake has only one 2 lane hwy to enter, and more importantly, exit our community in an emergency. 2

We have been evacuated from wildfire events in the past and I can tell you from personal experience, the Hume location is already a bottleneck at it current capacity.

These deficiencies have clearly not been mitigated nor have there been sufficient environmental impact studies cited in the proposal.

The community of Green Valley Lake will be gravely harmed by Hume's expansion proposal. The potential for loss of life cannot be overstated. 3

Respectfully Submitted,
Patti L Clarkson
PO Box 8513
33785 Cedar Pine Ln
Green Valley Lake CA

Phone 714 240-7807

G119 - Responses to Patti L Clarkson

G119-1 The comment includes a statement of opposition and includes a concern about water table consumption. The comment does not offer any supportive evidence of deficiencies with regard to the water table. Refer to Master Response – Water.

G119-2 The comment includes concerns generally regarding transportation and emergency evacuation on local roads near the Project. The comment does not provide evidence that the IS/MND was inadequately prepared or that a revision is warranted. Impacts related to wildfire and transportation would be less than significant per CEQA guidelines. Refer to Master Responses – Transportation/Traffic, Wildfire.

G119-3 The comment includes accusations that environmental impacts have not been mitigated and adequate studies have not been done. As mentioned in the IS/MND all impacts have been reduced to less than significant impacts with mitigation measures found In the IS/MND. Appropriate studies pertaining to the two comments above can be found in the WSA, which has been updated (**Appendix B1: Revised Water Supply Assessment**); **Appendix J: Traffic Impact Analysis**; and **Appendix K: Emergency Plan and Procedures**.

G120 - Paul Lackey

From: Paul Lackey
To: Barragan, Elena
Subject: Comments regarding proposed Hume Christian Camp project
Date: Tuesday, January 6, 2026 8:02:06 AM

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Dear Ms. Barragan,

I am writing to express my extreme concern regarding the proposed Hume Christian Camp project on Green Valley Lake Road.
As a 14-year member of the Green Valley Lake community, I know very well the limited resources, access, and services this project would impact. 1
A 10x increase in the number of campers, (plus dining service deliveries, laundry, sewage use, trash hauling, constant bussing, light pollution) should have a thorough review of the impacts before any decision is made.
That Hume's project conclusion says there "are no known areas of controversy" is utterly disrespectful to the communities who will be impacted and verifiably untrue. It seems "do unto others" and telling the truth are not the values being taught by this camp. A quick google search of their other projects and properties indicates they have a history of not being good neighbors, so I urgently ask that this proposal be declined or at the very least, require additional study before adding a rotating community more than half the size of Running Springs into our forest and onto our only access road. 2

Thank-you for the chance to provide comments.

Sincerely,

Paul Lackey
Green Valley Lake

G120 - Responses to Paul Lackey

G120-1 The comment includes general concern toward the Project. CEQA focuses on environmental impacts and does not regulate other impacts unless directly tied to an environmental impact. Regarding environmental impacts, the IS/MND reviews potential impacts and incorporates mitigation where necessary to reduce any potential impacts to less than significant.

G120-2 The comment is informatory in nature. The comment makes general statements about the Project. The comment falls outside the scope of CEQA review. No further response is warranted.

G121 - Randy Varela

From: Randy Varela
To: Barragan, Elena
Subject: Fwd: opposition to proposed expansion of Hume So Cal
Date: Thursday, January 8, 2026 11:54:45 AM

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Dear Ms. Barragan

I am writing to formally oppose the proposed five phase expansion of Hume SoCal.
I have had the privilege to visit the Hume Lake location within Sequoia National forest and found the ability to enjoy the sharing of the natural beauty of the forest with the Christian community to be very pleasant.
However I would like to point out the tremendous difference in geographical locations between Sequoia and San Bernardino Forest's.
Hume lake offers far greater acreage to attendee's than Green Valley lake.
Please understand I am a semi regular visitor to Green Valley Lake who normally visit's on the week day's and do so because of the weekend influx of visitors has greatly diminished the solitude yet increased the traffic, noise and trash pollution. 1
My visits are a mix of recreational and maintenance for a friend who owns a cabin not far from the campground.
I understand this opposition will impact the local establishment's which I give most if not all of my patronage.
I trust you will be fair and unbiased in your assessment and am grateful for the opportunity to have your attention to this matter.

Sincerely:
Randy Varela
kannowerms@gmail.com

G121 - Response to Randy Varela

G121-1 The comment is generally informatory in nature with a statement of opposition. The comment does not provide evidence of an environmental impact not addressed in the IS/MND or that the IS/MND is inadequate.

G122 - Rbstuff@charter.net

From: rbstuff@charter.net
To: Barragan, Elena
Subject: Hume Expansion Proj-2024-00046
Date: Wednesday, January 7, 2026 5:29:03 PM

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The Hume expansion will affect the town Green Valley Lake. Has that been taken into account? 1

1. Will there be water available for the wells in Green Valley lake with such a large increase at Hume, especially during drought years? We have had numerous mandatory evacuations due to fires over the years. The increased population at Hume will impact emergency evacuation traffic. In the 2007 Slide fire we had less than 2 hours' notice to evacuate. There is no way you can evacuate 3000 Hume members and the Green Vally Lake residents on a single 2 lane road which is the only way in and out of town.Can the existing sewer system handle the increase in population? 2

The county should oppose the Hume expansion due to water and safety. 3

G122 - Responses to Rbstuff@charter.net

G122-1 The comment includes concerns about groundwater availability. Refer to Master Response – Water.

G122-2 The comment includes concerns generally regarding transportation and emergency evacuation on local roads near the Project. The comment does not provide evidence that the IS/MND was inadequately prepared or that a revision is warranted. Impacts related to wildfire and transportation would be less than significant per CEQA guidelines. Refer to Master Responses – Transportation/Traffic, Wildfire.

G122-3 The comment includes a question about sewer capacity. Refer to Master Response – Wastewater/Sewer.

G123 - Reneemibeck@gmail.com

From: reneemibeck
To: Barragan, Elena
Subject: Hume expansion project
Date: Monday, January 5, 2026 9:21:23 PM

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I am a FT resident of GVL and am VERY concerned about HUME's proposed expansion from 300 campers to 3000 campers. Their plans to add 5 new wells as well as increased sewage and the consequently additional water treatment requirements will lower the already fragile underground water table which is only replenished through erratic and unpredictable rain or snow fall. This water doesn't return to the mountain but is permanently lost to the environment up there. 1

Also GVL is located above Hume and there is only one road in and out, Green Valley Lake Rd., which Hume will also be using with the 25 buses they have stated they need to evacuate their campers in case of forest fire. This is a great risk for Hume campers and GVL residents competing to evacuate to Hwy18 and further to hwy 330 which are also 2 lane mountain roads.

Please consider having independent environmental impact studies done before the Hume expansion is approved. Thank you. 2

Sent from my Galaxy

G123 - Responses to Reneemibeck@gmail.com

G123-1 The comment includes concerns regarding water and sewer. All impacts related to water would be less than significant, refer to Master Response – Water. Regarding sewer impacts, the MND in **Section 4, Utilities and Service Systems** incorporates MM UTL-1, which requires that prior to approval of each phase, the Project applicant shall evaluate the available treatment and disposal capacity of the approved on-site wastewater treatment plant (WWTP) to confirm adequate treatment capacity, disposal capacity, operational performance, regulatory compliance, and any improvements necessary to accommodate the proposed occupancy increase. With mitigation, sewer impacts would be less than significant. Refer to Master Response – Wastewater/Sewer.

G123-2 The comment includes concerns regarding transportation with respect to wildfire and emergency evacuation. The comment does not provide evidence that the IS/MND was inadequately prepared or that a revision is warranted. Impacts related to wildfire and transportation would be less than significant per CEQA guidelines. Refer to Master Responses – Transportation/Traffic, Wildfire.

G124 - Richard Luczyski

From: richard luczyski
To: Barragan, Elena
Subject: Camp Expansion GVL Road
Date: Friday, December 12, 2025 1:00:01 PM

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Elena Barragan.
I would hope that many issues need to be considered before going ahead with the large expansion being planned for Green Valley Lake
Road properties? Under the need for more camping facilities for the area as well as other uses not determined yet. 1
Those concerns as follows:
1) The volume of traffic coming up the mountain
will strain the capacity of an already saturated
highway system. The need for many different
season traffic counts with accident issues and other Hwy Patrol issues ,need to be included
from existing issues already know of outcomes
on those Hwy"s, 330,18, 38 . 2
2) Water consumption is a greater need. Where will the expanded water come from? State Water
Project allotments when available? Groundwater
Wells? What additional costs to existing Stake
Holders giving up everything and getting nothing of value back? 3
3) There be a greater need for energy for the
entire community? 4
4) Greater police protection needs over a larger
area when protection is becoming very thin already 5
5) Greater need for medical services provided by who? Running Springs Medical services for transport off the mountain? 6
6) Greater need for Sewer Services. That service has now been passed down to Running Springs Sewer service. Water that is treated and never gets back into the Deep Creek Water Basin. Much like all the millions of gallons of groundwater that flows from the Ski Resort to Running Springs Sewer plant and then treated and dumped into the Santa Ana Watershed basin never to pass that water to the mojave
water users? 7
7) The list goes on for environmental concerns.
That's why I believe there is a need for a full
EIR to be completed to point out the issues this citizen is concerned with. I'm a 53 year property
owner in Running Springs. I have experienced
many of the issues listed. Lately I have gotten
no help from the Sheriff department getting back to me once about the 3 break ins to my cabin in RS. This should tell you they don't care about catching criminals or they are
already stretched
too thin to serve existing resident property owners who pay taxes and support the community.
I hope this message opens the issues involved when thinking of planning to develop a better 8

mountain community. Not one that brings along
problems later that should be seen now.
Richard Luczyski
rluczyski@gmail.com

G124 - Responses to Richard Luczyski

G124-1 This comment is introductory in nature. No further response is warranted.

G124-2 The comment includes concerns regarding traffic and transportation impacts on local roadways. The Transportation section of the IS/MND (**Section 4, Transportation**) has analyzed the Traffic Analysis (**Appendix J**) and determined that the Project would have less than significant impacts on transportation. Refer to Master Response – Transportation/Traffic.

G124-3 The comment includes concerns regarding the Project's water supply. Water supply is evaluated in an updated WSA. The updated WSA identifies a preferred strategy and analyzes multiple scenarios. Refer to Master Response – Water.

G124-4 The comment includes a concern over increased energy use. An Energy Assessment was conducted and is included as **Appendix E** of the IS/MND. Construction and operation of the Project is anticipated to have adequate energy supplies. It is expected that construction energy consumption associated with the Project would not be inefficient, wasteful, or unnecessary. The Project would not substantially affect existing energy or fuel supplies or resources, and new capacity would not be required. The Project's cumulative contribution of energy use would be less than significant, and the Project's cumulative energy impacts would also be less than cumulatively considerable.

G124-5 The comment includes concerns regarding the availability of police protection. Police protection would continue to be provided by the San Bernardino County Sheriff Department (SBCSD) Twin Peaks station. It is unlikely that additional deputies would be needed in the Project area. The need for increased police service within the Hilltop Community Action Guide (HCAG) area is determined by increases in service calls, demands on existing personnel, crime levels, and population. The gradual increase in population over a few decades associated with the Project would require continued assessment of the adequacy of law enforcement staffing within the HCAG area by the SBCSD.

G124-6 The comment includes a concern over access to medical facilities. Medical services would be provided by existing medical facilities. The Project also proposes modifications to the existing on-site medical facility.

G124-7 The comment includes concerns regarding the Project's sewer service logistics. As mentioned in the comment, the Project is proposed to obtain public service from Running Springs Water District (RSWD). The IS/MND analyzed impacts to utilities and service systems and found them to be less than significant with mitigation measure UTL-1. MM UTL-1 requires that prior to approval of each phase, the Project applicant shall evaluate the available treatment and disposal capacity of the approved on-site wastewater treatment plant (WWTP) to confirm adequate treatment capacity, disposal capacity, operational performance, regulatory compliance, and any improvements necessary to accommodate the proposed occupancy increase. The Draft IS/MND also includes **Appendix B2,** which has been updated to reflect further coordination (**Appendix B2: Revised**

Sewer Feasibility Study), and **Appendix B3: Water and Sewer Master Plan**. The comment does not provide adequate evidence that utility or hydrology-related impacts would be significant. All wastewater infrastructure would be implemented in accordance with MM UTL-3. Refer to Master Response – Wastewater/Sewer.

G124-8 The comment is conclusionary in nature. The comment includes general concerns regarding the topics above and requests an EIR. Refer to Master Response – Request for EIR.

G125 - Richard Luczyski

From: richard luczyski
To: Barragan, Elena
Subject: Re: PROJ-2024-00046, Circulation Extension to 01/16/2026
Date: Saturday, January 10, 2026 6:55:15 PM
Attachments: image001.png

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Elena, Since groundwater is the main source for the water needs of the Hume project. I would like
the Water Basins the groundwater is coming from to be analyzed showing the size of the basin. Others
using that water basin for their water needs. Would reducing the water table to provide that water, impact
downstream water users and water providers like Arrowbear and Running Springs ability to maintain current
water rates for existing residents. This project provides no advantages to existing communities including
Green Valley Lakes. It provides even greater disruption to the area. Giving plenty of unknown un- certainty,
to be solved in the future, at what costs mountain folks will be willing to accept for the disruption that will
take place. The sewer water from the project will be putting a greater cost to Running Springs Property
owners. We already pay a greater price for sewer water than what is charged for Snow Valley Ski Resort
sewage water. The same arrangement was made for the existing Green Valley Lake sewage water even before
this project was talked about.I believe treated sewage is necessary but the residents of Running Springs have
paid for the existing system and now will be charged even more to build a bigger system that doesn't provide
a second use of Billions of gals. of water that flows away from the Lahontan drainage.
I may have other comments to such a project and wish it was on the west end of the mountain communities.
I believe they wouldn't enjoy the added disruption for their communities. My email address has been used
many times for San Bernardino correspondents over the years. Please don't say I'm an Unknown address or person.
Richard Luczyski
rluvzyski@gmail.com

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G125 - Responses to Richard Luczyski

G125-1 The comment raises concern about adequate water supply and groundwater sustainability. The Project's WSA has been updated (**Appendix B1: Revised Water Supply Assessment**). The updated WSA provides multiple water supply scenarios and strategies and identifies a preferred strategy to pursue. Refer to Master Response – Water. Neither the Hume SoCal Campground nor CLAWA have prepared an Urban Water Management Plans (UWMP) to aid in future projection of domestic and non-domestic water demand. Therefore, the analysis makes assumptions for the Camp's groundwater well sustainability and CLAWA allotted domestic water to the Camp.

G125-2 CEQA does not treat economic or social effects as significant environmental impacts unless they result in an environmental impact. The IS/MND evaluates environmental effects. No new environmental effects are presented that were not addressed in the IS/MND. No revisions are necessary.

G125-3 The IS/MND consistent with CEQA (**Section 4, Utilities and Service Systems** and **Section 4, Hydrology and Water Quality**) through **Appendix B2**, which has been updated (**Appendix B2: Revised Sewer Feasibility Study**) and **Appendix B3: Water and Sewer Master Plan**, analyzes sewer capacity and incorporates MM UTL-1 which requires that prior to approval of each phase, the Project applicant shall evaluate the available treatment and disposal capacity of the approved on-site wastewater treatment plant (WWTP) to confirm adequate treatment capacity, disposal capacity, operational performance, regulatory compliance, and any improvements necessary to accommodate the proposed occupancy increase. Wastewater-related overall impacts would be less than significant. Refer to Master Response – Wastewater/Sewer.

G126 - Richard Watts

From: Richard Watts
To: Barragan, Elena
Cc: Anne Justus; Juan Armenta; riknsade@aol.com; guyandsueb@aol.com; kivinski@cox.net
Subject: Hume Camp Expansion
Date: Tuesday, January 6, 2026 4:14:38 PM

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Elena Barragan:

I am a property owner and part time resident of Green Valley Lake at 33130 Holcomb Creek Drive, Green Valley Lake. I have owned my property since 1990. 1

I am writing in response to the proposed expansion of the Hume Camp. The proposal to expand the camp from 250 campers to 3,000 campers is outrageous and absurd. I have grave concerns about this massive expansion. The already-impacted two lane roads cannot support this increase to the Hume Camp. Additionally, there is no infrastructure in Green Valley Lake to handle the added capacity of vacationers who will undoubtedly spill over into our community. 2

There are real concerns that it substantially impairs evacuation during a wildfire, which this area is a very high fire hazard zone. This will overload the community, sheriff's department, fire department, and other community resources.

Until these issues are fully vetted and we are given a chance to participate, I oppose any alteration or increase in the use permits.

I would like to be advised of every action taken toward the advancement of this proposal. 3

Regards,

Richard Watts, General Counsel
1602 E. Fourth Street, Santa Ana, CA 92701
Telephone: 714-973-4900 • Facsimile: 714-973-4990
www.fbo.com

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G126 - Responses to Richard Watts

G126-1 The comment is introductory in nature. No further response is warranted.

G126-2 The comment includes concerns over transportation on local roads, emergency evacuation, and public service availability. Refer to Master Responses – Transportation/Traffic, Wildfire. Regarding public service availability, the IS/MND concludes fire and police protection services as well as schools and libraries within the Hilltop community are currently considered adequate and the Project, in conjunction with other foreseeable development, would not increase the demand such that there would be a need for new or expanded fire or police protection services or stations, or schools or libraries. Impacts would be less than significant.

G126-3 The comment is conclusionary in nature and makes a request to the Lead Agency. The commenter will be included in future circulation of relevant Project materials. No further response is warranted.

G127 - Robert & Jolene Sedita Jr.

From: Robert Sedita
To: Barragan, Elena
Subject: Hume Camp Proposed Expansion
Date: Tuesday, January 6, 2026 8:53:29 PM

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Good Evening Ms. Barragan,

Our family has owned property in Green Valley Lake since the 1970's and I wanted to express by concern and opposition to the proposed expansion of the Hume Camp Complex. The proposed occupancy expansion from 300 to 3,000 at the Hume facility will have major impacts on the only road into Green Valley Lake and the community itself, reducing the quality of life in the area and increase impacts on the Lake and to the current environment. 1

Green Valley Lake is a small community with only a single road in and out. Having thousands of more vehicles and people flowing into and out of this area using the existing road will a drastic impact on the traffic level and poses an increased hazards not only in the winter months, but during potential evacuations for wildfires as well. Having had property in Green Valley Lake as long as our family has, we have been impacted by a number of fires that have impacted Green Valley Lake and the surrounding mountain communites. This increased traffic will show evacuation times out of the area when every second counts. Green Valley Lake Road also ties directly into the main road from Big Bear. With existing traffic levels there is often already back up at this intersection while traffic waits to merge onto the continuous flow of traffic on Hwy 18 leaving the Big Bear area. 2

Lastly, is the additional air pollution from vehicles, and increased demand on utilities in the area such as water and power. With power shutoffs already a regular occurrence, the additional population and utility demand will continue to put more pressure on the utility infrastructure systems potentially resulting in more outages. 3

While our preference is a denial of the proposed expansion, a detailed and thorough Environmental Impact Study and survey of all residents and property owners in Green Valley Lake needs to be completed before anyone should even consider this proposal. 4

Sincerely,

Robert & Jolene Sedita Jr.

G127 - Responses to Robert & Jolene Sedita Jr.

G127-1 The comment is introductory in nature. The comment includes a general opinion of the Project.

G127-2 The comment includes concerns generally regarding transportation and emergency evacuation on local roads near the Project. The comment does not provide evidence that the IS/MND was inadequately prepared or that a revision is warranted. Impacts related to wildfire and transportation would be less than significant per CEQA guidelines. Refer to Master Responses – Transportation/Traffic, Wildfire.

G127-3 The comment includes concerns about potential increased air pollution and effects on local utilities. Regarding air pollution, the IS/MND (**Section 4, Air Quality**) concludes all impacts would be less than significant with MM AQ-1 implementation. MM AQ-1 ensures that prior to issuance of grading permits, Hume SoCal will prepare and submit documentation to the County that demonstrates all off-road diesel-powered construction equipment greater than 50 horsepower meets California Air Resources Board Tier 4 Final off-road emissions standards and ensures the ability to supply and regulate such equipment. Utility impacts would be less than significant, refer to Master Responses – Water, Wastewater/Sewer, Energy.

G127-4 The comment includes an opinion about the Project and a request for an environmental impact study. An IS/MND is the appropriate level of report and study to serve as environmental documentation for the Project, refer to Master Response – Request for EIR.

G128 - Robert Perrill

From: Robert Perrill
To: Barragan, Elena
Subject: Hume SoCal Campground Expansion Project/Project No. PROJ-2024-00046
Date: Tuesday, January 6, 2026 3:24:01 PM

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Dear Ms. Barragan,

I am writing to you with my thoughts concerning the Hume SoCal camp expansion. My wife and I are full-time Green Valley Lake residents and enjoy our mountain home very much. We were very happy to attend SoCal Hume's informational meeting on December 20,2025 and hear of their plans for this expansion. Hoping to enlarge their camp, by gradually increasing facilities over many years and through several phases. It was stated that the whole 252 acres would not be developed and that the expansion would follow the existing camp footprint, only enlarging slightly and the first phase would only increase campers on sight by 484. We are pleased to see their efforts to bring more young people up to the mountains, to enjoy the peace and beauty. We can think of no better way for Hume SoCal to use their property. Again we were pleased and very thankful to hear of their efforts to preserve much of their property as open space. Understanding their thoughtful stewardship of their property, their careful consideration of both campers an their neighbors, their due diligence during this planning process and the beauty of their very clean and well kept camp, we are in favor of this expansion project. We're confident concerns or problems that might arise, can be resolved. Please approve their project. 1

Sincerely,

Robert Perrill

G128 - Responses to Robert Perrill

G128-1 The comment includes general support for the Project. The commenter's support for the Project has been acknowledged. No further response is warranted.

G129 - Robert Stepp

From: Robert Stepp
To: Barragan, Elena; Bull, Robin; Board Meeting Comments
Subject: Hume SoCal expansion
Date: Tuesday, January 6, 2026 4:21:55 PM

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I was very disappointed to hear from neighbors the plan to expand the near by Hume camp. I am strongly opposed to the project and the consideration for the Green Valley Lake community for the following reasons. 1

- unacceptable water table/well decreases
- no solid evacuation plans in case of emergency (fire, road closures, etc.)
- the one road in/out to GVL has been deemed inadequate by CAL FIRE
- increased traffic on HWY330 and GVL road (including many busses)
- the inevitable increase in traffic accidents
- inadequate sewer treatment facilities in Running Springs
- negative effects on wildlife

2

The need for a complete ENVIRONMENTAL IMPACT REPORT (EIR) is imperative. It would be reckless and careless to not require this report.

Thank you

Robert Stepp

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G129 - Responses to Robert Stepp

G129-1 The comment is introductory in nature. No further response is warranted.

G129-2 The comment includes multiple concerns pertaining to groundwater sustainability, emergency evacuation, traffic on local roads, wastewater capacity, and wildlife. Refer to Master Responses – Water, Wildfire, Transportation/Traffic, Wastewater/Sewer, Biological Resources/Wildlife.

G129-3 The comment is conclusionary in nature and makes a request for an Environmental Impact Report. Refer to Master Response – EIR.

G130 - Robert Sedita Sr.

From: rnsedita@sbcglobal.net
To: Barragan, Elena
Subject: Proposed Expansion of the Hume Facility in Green Valley Lake
Date: Tuesday, January 6, 2026 9:31:54 AM

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Good Morning Ms. Barragan,

I am writing to you today to express by concern and opposition to the proposed expansion of the Hume Camp Complex. We have owned a cabin in Green Valley Lake for over 40 years. One of the draws for us and many others, is that Green Valley Lake offers a quiet and calm environment that can be enjoyed by families and individuals alike. The proposed expansion of the Hume site from 300 guests to 3000 guests would result in a massive increase in those visiting the lake and adjacent community therefore disrupting the current environment. The additional people using the lake would result in increased maintenance costs to provide trash cleanup and other costs related to this increased use. The transportation of 3000 people into and out of this area using the existing narrow 2-lane road will have an adverse effect on the traffic level now existing in the area and pose an increase hazard in the winter months. This is not to mention the additional air pollution that these transport vehicles would release into the environment. Additionally, the increased water usage from such a massive increase in population, could most likely result in water shortage issues facing the community and possible increases in water and possibly sewer fees for existing residents. I feel that this proposed expansion would be to the detriment to the community of Green Valley Lake and at the minimum, a detail and thorough Environmental Impact Study and inclusive participative survey of all residents and property owners in Green Valley Lake need to be completed before anyone should even consider this proposal.

Respectfully,

Robert Sedita Sr.

G130 - Responses to Robert Sedita Sr.

G130-1 The comment is introductory in nature. The comment does not provide evidence of a new environmental effect not analyzed or that the IS/MND was incorrectly prepared. No changes to the IS/MND are warranted.

G130-2 The comment includes concerns of increased maintenance costs. CEQA only evaluates environmental impacts, not economic or social compatibility unless tied to an environmental impact. The comment does not identify a new or unaddressed environmental impact under CEQA.

G130-3 The comment includes concerns about increased traffic, especially in winter conditions. All impacts related to transportation would be less than significant, refer to Master Response – Transportation/Traffic. The comment does not provide adequate evidence that further response is warranted.

G130-4 The comment includes concerns about water availability and how it ties into economics. All impacts related to water would be less than significant, refer to Master Response – Water. Regarding increased fees, CEQA only evaluates environmental impacts, not economic impacts unless tied to an environmental effect.

G130-5 The comment is conclusionary in nature. The comment includes a request for an EIR and survey. The IS/MND was prepared in accordance with CEQA guidelines. The Lead Agency is responsible for determining the appropriate level of environmental review. The comment does not provide evidence an EIR should be prepared or that the IS/MND is inadequate.

G131 - Ron Pearne

From: ron pearne
To: Barragan, Elena
Subject: PROJ-2024-00046, Hume Camp.
Date: Friday, December 5, 2025 9:15:10 AM

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I'm writing in regards to PROJ-2024-00046, Hume Camp.

1. Wildfires evacuations ...It would take at least 60 buses to evacuate that many people from the camp.
2. It would take hours to get that many buses to the camp.
3. A fire just a few years ago started just 1/4 miles from GVL it was put out when it was still small.If it was a windy day it could have been in GVL and Hume Camp with minutes
4. When Cal Chapel had the camp they were running low on water
5. Roads are two lanes are hard for Large buses to navigate
6. If a fire were to start near GVL or the camp there could be huge loss of life.
7. The question will be why did you allow 3000 kids in an area of high fire danger.

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G131 - Responses to Ron Pearne

G131-1 The comment includes concerns regarding emergency evacuation in relation to wildfire. As discussed in the IS/MND (**Section 4, Wildfire**) MM WF – 1, the Project would continually update and comply with a comprehensive evacuation plan. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on site occupancy prior to peak hazard conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis. As evaluated in the IS/MND (**Section 4, Transportation**), the Project would not modify existing roadways, and Project related traffic would not create a significant hazard or adversely affect emergency access

Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity.

G131-2 The comment provides concerns regarding water supply and wastewater. The IS/MND, consistent with CEQA analyzes water supply and wastewater management (**Section 4, Utilities and Service Systems** and **Section 4, Hydrology and Water Quality**) through **Appendix B3: Water and Sewer Master Plan**, and the 1st Draft Water Supply Assessment, which has been updated (**Appendix B1: Revised Water Supply Assessment**), existing on-site wells can provide adequate capacity to meet the Project's projected water demand through phase 3. The updated WSA identifies a preferred strategy with CLAWA following phase 3, in which the Applicant would prepare an annual water supplier expectations memorandum. Refer to Master Response – Water. The IS/MND (**Section 4, Utilities and Service Systems**) concludes that Project-related water demand would result in a less than significant impact.

The IS/MND concludes that water-supply impacts and wastewater management would be less than significant with compliance with applicable standards and MMs HYD-1, UTL-1, and UTL-3. With MM HYD-1, the Applicant shall conduct well drawdown tests, recovery testing, and water quality retesting before proceeding with each phase, for the wells serving that phase, and use the

results to confirm the phase water supply strategy. MM UTL-1 requires that prior to approval of each phase, the Project applicant shall evaluate the available treatment and disposal capacity of the approved on-site wastewater treatment plant (WWTP) to confirm adequate treatment capacity, disposal capacity, operational performance, regulatory compliance, and any improvements necessary to accommodate the proposed occupancy increase. MM UTL-3 requires that prior to the Final Development Plan (FDP) approval for Phase I, the Camp shall install an on-site wastewater system subject to County and Regional Water Board approval. Additionally, Mitigation Measure UTL-3 allows for sewer service buildout as recommended by the revised Sewer Feasibility Study, which concludes that the Camp will utilize, expand, and/or supplement the on-site wastewater treatment system through buildout of all phases. Furthermore, the existing RSWD system is intended to remain available as a secondary wastewater conveyance and treatment option where capacity is available, and use is approved by RSWD. As each phase advances, the required on-site treatment capacity will be confirmed based on the applicable Project flows, the selected advanced treatment system configuration, and regulatory requirements. Continued use of any portion of the RSWD system will remain subject to available District capacity and RSWD approval. These efforts should be aligned with a phased development plan that matches Camp occupancy growth with the completion of required infrastructure improvements. Refer to Master Response – Wastewater/Sewer.

G131-3 The comment includes concerns regarding increased occupancy in fire hazard areas. The IS/MND evaluates wildfire hazards and includes mitigation measures to reduce risk to less than significant levels. Along with MM WF-1 (refer to G131-1), MM WF-2 would be implemented, which requires monitoring construction materials and combustible materials and implementing firebreaks with a reduction of flammable vegetation by 50 percent in vacant lots. Additionally, all new power lines shall be undergrounded. Refer to Figure 7 – Preliminary Fire Fuel Modification Plan. MM WF-3 would also be implemented, which ensures that on-site landscaping must consist of drought-tolerant, fire-resistive plants and be routinely maintained. Furthermore, following receipt of public comments and agency input and additional technical coordination with the Project's proposed water supplier, the Project's maximum occupancy at full buildout has decreased from approximately 3,000 to 2,400 occupants. This change further reduces impacts compared to what was analyzed in the IS/MND. CEQA does not prohibit development in fire hazard areas when impacts can be mitigated. The Project will comply with all applicable fire safety regulations and emergency planning requirements. No revisions are warranted.

G132 - Sandra Huckaby

From: P & S Huckaby
To: Barragan, Elena
Subject: Fwd: Delivery Status Notification (Failure)
Date: Monday, November 17, 2025 4:54:17 PM
Attachments: icon.png
warning_triangle.png

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---------- Forwarded message ---------
From: **Mail Delivery Subsystem** <mailer-daemon@googlemail.com>
Date: Mon, Nov 17, 2025 at 4:51 PM
Subject: Delivery Status Notification (Failure)
To: <huckaby49@gmail.com>

Address not found

Your message wasn't delivered to **elena.berragan@lus.sbcounty.gov** because the address couldn't be found, or is unable to receive mail.

LEARN MORE
This link will take you to a third-party site

The response from the remote server was:

```
550 5.4.1 Recipient address rejected: Access denied. For more information see
https://aka.ms/EXOSmtpErrors [DS1PEPF00017E07.namprd09.prod.outlook.com 2025-11-
18T00:51:56.932Z 08DE2431A01D2621]
```

---------- Forwarded message ----------
From: "P & S Huckaby" <huckaby49@gmail.com>
To: elena.berragan@lus.sbcounty.gov
Cc:

Bcc:
Date: Mon, 17 Nov 2025 16:51:43 -0800
Subject: Fwd: Hume camp expansion on GVL Rd

---------- Forwarded message ---------
From: **P & S Huckaby** <huckaby49@gmail.com>
Date: Mon, Nov 17, 2025 at 4:33 PM
Subject: Hume camp expansion on GVL Rd
To: <Elena.berragan@lus.sbcounty>

In regards to the planned expansion of the Hume camp located on Green Valley Lake Road in the San Bernardino Mountains, PROJ-2024-00046, I am vehemently opposed. Increasing the capacity of the camp to 3000 more people is completely inappropriate. The road dead ends just past the little town of Green Valley Lake; it does not continue on to Fawnskin or Big Bear. In the event of a fire or earthquake, there is no escape; every resident, every car and bus would be on the same small road going the same direction. It would be a complete gridlock. There could be rock slides or disabled vehicles blocking the road. The elevation is 7000 feet, the highest in the mountains, which means there could be snow and icy conditions, further exacerbating the dangerous road conditions and endangering lives. I urge you to deny this permit now before it is too late and it causes a tragedy. 1
Sincerely,
Sandra Huckaby, a full-time resident of Green Valley Lake for 25 years

G132 - Response to Sandra Huckaby

G132-1 The comment includes concerns generally regarding transportation and emergency evacuation on local roads near the Project. The comment does not provide evidence that the IS/MND was inadequately prepared or that a revision is warranted. Impacts related to wildfire and transportation would be less than significant per CEQA guidelines. Refer to Master Responses – Transportation/Traffic, Wildfire.

G133 - Sandy Ellis

From: Sandy Ellis
To: Barragan, Elena
Cc: Supervisor Rowe
Subject: Camp Hume proposed project
Date: Thursday, December 4, 2025 10:41:55 AM

[You don't often get email from fsellis67@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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I am a full time resident of Green Valley Lake and am very concerned about the proposed expansion of Camp Hume. The massive proposed increase of the existing camp would double its size. There are many safety as well as environmental concerns. There is only one road into and out of Green Valley Lake. The safety of both the campers and local residents would be be compromised in the event of an evacuation. Please deny this project. 1

Gratefully,
Sandy Ellis
PO Box 8542
Green Valley Lake, CA
92341

G133 - Response to Sandy Ellis

G133-1 The comment includes concerns generally about environmental impacts and specifically about transportation and evacuation. The comment does not provide evidence that the IS/MND was inadequately prepared or that a revision is warranted. Impacts related to wildfire and transportation would be less than significant per CEQA guidelines. Refer to Master Responses – Transportation/Traffic, Wildfire. Regarding total environmental impacts, all would be less than significant with mitigation. Refer to Master Responses and the IS/MND.

G134 - Sara Green

From: Sara Green
To: Barragan, Elena
Subject: HUME Camp Project - Green Valley Lake
Date: Wednesday, January 7, 2026 8:31:16 AM
Attachments: Outlook-vw1g2ik0.png

You don't often get email from info@wearsthemountain.com. Learn why this is important

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Hello SB County,

I would like to express my concerns over the Camp HUME Project in Green Valley Lake.

The community of Green Valley Lake has a total of 1,100 homes and 300 full-time residents. The camp is proposing to increase the capacity of the camp, and the town for that matter, by 10 times the population. This is not sustainable. 1

We experience natural disasters at an unprecedented rate in the mountain. Green Valley Lake has one way in and one way out. The camp sits between the main roadway and the town. Should an evacuation occur, the one road in and out will have to move 10 times the capacity, and the residents will have to get passed 3,000 campers before they can safely evacuate their own town. 2

This is not a sustainable plan. It could lead to a mass casualty event in the face of a natural disaster.

In addition, I am very concerned on the financial demand on our municipal services, with very little economic impact or benefit to our residents.

Please do not approve this expansion. 3

Sincerely,

Sara Green | Owner
Wears The Mountain
909-285-BEAR (2327)
info@wearsthemountain.com
WEARS THE MOUNTAIN

Consultant, Inland Empire Small Business Development Center
Board of Directors, Rim Educational Foundation
Market Director, The Market at Lake Gregory

G134 - Responses to Sara Green

G134-1 The comment is introductory and informatory in nature. No further response is warranted.

G134-2 The comment includes concerns generally regarding transportation and emergency evacuation on local roads near the Project. The comment does not provide evidence that the IS/MND was inadequately prepared or that a revision is warranted. Impacts related to wildfire and transportation would be less than significant per CEQA guidelines. Refer to Master Responses – Transportation/Traffic, Wildfire.

G134-3 The comment includes concerns about local economic potential impacts. CEQA only evaluates environmental impacts; economic impacts do not fall under the scope of CEQA review. No further response is warranted.

G135 - Sarah Brennan

From: Sarah Brennan
To: Barragan, Elena
Subject: In opposition to Hume expansion green valley lake.
Date: Friday, January 2, 2026 3:55:10 PM

You don't often get email from sarahbrennan13@gmail.com. Learn why this is important

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

My name is Sarah Brennan, and I am a longterm full time resident of Rim Forest adjacent to Green Valley Lake. I am writing today in opposition to the Hume lake property expansion in GVL. I ask you to decline this permit for expansion from 300 to an insane 3000. The water theft alone that this project demands is larger than the amount Nestle illegally pumped a few years ago. That action nearly depleated several of our mountain's Waterways and caused devastating drought and fires. It is common practice for churches with no ties to this mountain to try to make themselves mega campuses that benefit only them. Hume is no different, and they have taken over more than one lake in this way. Their water waste and pollution in those areas is documented. They Flux the local government to push their agenda thru and endanger our communities and ecosystems. The hospital, police and general infrastructure would be immediately overwhelmed. Evacuations and fire danger would be disastrous as the placement of this camp at 300 already has caused seasonal road closures due to large busses transporting too many getting lodged on the road. 1 2 3 4

Please hear our voices and do not allow this expansion. What this project threatens can not be replaced, and no private use of that size should have any rights to that much water or power over our mountain (for reference, they are bigger than most of our communities) 5

Please stand up and say NO.

Thank you for your time.

G135 - Responses to Sarah Brennan

G135-1 The comment is introductory in nature. No further response is warranted.

G135-2 The comment includes concerns about water supply and compares the Project to larger ideas and a historical example. The Water Supply Assessment concluded that there is adequate water to supply the Project and that impacts would remain less than significant. Refer to Master Response – Water.

G135-3 The comment includes concerns about servicing the Project with emergency services. As mentioned in the IS/MND **Section 4, Public Services**, all impacts would be less than significant without mitigation. The comment does not provide evidence that the IS/MND is inadequate in its conclusion.

G135-4 The comment includes concerns generally regarding transportation and emergency evacuation on local roads near the Project. The comment does not provide evidence that the IS/MND was inadequately prepared or that a revision is warranted. Impacts related to wildfire and transportation would be less than significant per CEQA guidelines. Refer to Master Responses – Transportation/Traffic, Wildfire.

G135-5 The comment is conclusionary in nature and does not pertain to the scope of CEQA. No further response is required.

G136 - Sean Ratliff

From: sean ratliff
To: Barragan, Elena
Subject: Hume expansion - Green Valley Lake
Date: Wednesday, January 7, 2026 10:09:09 AM

[You don't often get email from seanratliff@hotmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Dear Elena Barrigan. I am a homeowner in Green Valley Lake - 33794 Meadow Lane. My wife and I are very concerned with the proposed expansion of the Hume camp. Not only would the increased presence at Hume create unwanted congestion on the single road into and out of GVL, but that congestion could prove life threatening in the event of a fire in the area. Furthermore, I am concerned about the strain on our water system, a concern I believe the Running Springs Water Company has also raised with the county. At a minimum, a full environmental impact report should be conducted before approving any expansion. 1 2

I appreciate the opportunity to comment and look forward to a reasoned response to these concerns. 3

Sincerely,

Sean Ratliff
Sent from my iPhone

G136 - Responses to Sean Ratliff

G136-1 The comment includes concerns generally regarding transportation and emergency evacuation on local roads near the Project. The comment does not provide evidence that the IS/MND was inadequately prepared or that a revision is warranted. Impacts related to wildfire and transportation would be less than significant per CEQA guidelines. Refer to Master Responses – Transportation/Traffic, Wildfire.

G136-2 The comment includes concerns about the impacts to wastewater service through Running Springs Water District. Refer to Master Response – Wastewater/Sewer.

G136-3 The comment is conclusionary in nature. The comment includes a request for an Environmental Impacts Report, refer to Master Response – Request for EIR.

G137 - Seth Scoubart

From: Seth Scoubart
To: Barragan, Elena
Subject: Hume SoCal Expansion
Date: Friday, January 2, 2026 7:55:50 PM

You don't often get email from seth.scoubart@hume.org. Learn why this is important

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Ms. Barragan,

I'm writing in support of the proposed expansion of Hume Camp (PROJ-2024-00046). I live here in the Green Valley Lake area with my wife and our two children, and this has been our home for the past few years. I've worked for Hume for the last seven years and have lived on site for the last three, and during that time I've seen firsthand how much Hume cares about the people around them and about this community.

Because I live here, I understand the concerns people have about change and about protecting the environment. Those things matter to me too — I'm raising my family here and I want this area to stay beautiful, healthy, and well-cared for. From what I've experienced, Hume takes those concerns seriously and truly tries to do what is right for both the land and the people who live nearby. 1

I believe that expanding the camp will bring positive things to the area — not just growth, but stability and opportunity. It can create more local jobs and allow more families to live and work here. I also know from working here that the staff are always willing to help when the community needs something. If Green Valley Lake ever needed volunteers or extra hands, there are many of us who would show up and support however we can.

I've seen the heart and character of the people who work here, and that's a big reason I feel good about this project moving forward. As someone who lives here and plans to keep raising my family in this community, I believe the expansion will benefit the area in a responsible and respectful way.

Thank you for taking the time to read my letter and consider my perspective as a resident of Green Valley Lake. 1

Sincerely,

Seth Scoubart

Hume SoCal Resident

Get Outlook for iOS

G137 - Response to Seth Scoubart

G137-1 The comment includes general support for the Project. The commenter's support for the Project has been acknowledged. No further response is warranted.

G138 - Sharon Arvilla

From: C Arvilla
To: Barragan, Elena
Subject: Camp Hume Multiphase Expansion Proposal
Date: Saturday, December 13, 2025 6:10:48 PM

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This existing camp, on Green Valley Lake, has only one ingress/egress, a concern to all in the event of an evacuation. To increase the existing camp from basically 100 to 250 acres and increase the camping capacity from 300 to 3,000 carries with it the liability for safety of all participants and residents alike in addition to the impact of all the intended uses. 1

An Environmental Impact Report is imperative for review prior to any presentation to the Planning Commission. 2

Also, to present this for comments in a 30 day window during the holiday season of 2025 that expires Dec 13, 2025, appears to restrict the kind of community notification this deserves. Please extend the window for comment well into 2026. 3

Thank you for this consideration.

Sharon Arvilla
Skyforest resident

G138 - Responses to Sharon Arvilla

G138-1 The comment includes concerns related to emergency access for Green Valley Lake. As discussed in the IS/MND (**Section 4, Wildfire**) MM WF – 1, the Project would continually update and comply with a comprehensive evacuation plan. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on-site occupancy prior to peak hazard conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis. The expansion would happen slowly over many decades, gradually increasing capacity from 300 to a previously proposed occupancy of approximately 3,000 occupants. Following receipt of public comments and agency input, and additional coordination with the Project's proposed water supplier, the Project's maximum occupancy has been reduced to approximately 2,400 occupants. Refer to **Section 3, Errata**.

Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity.

G138-2 The comment includes a general request for an Environmental Impact Report. Under CEQA, the Lead Agency, San Bernardino County, determines the appropriate level of environmental review. The IS/MND evaluates all environmental topic areas required under CEQA and identifies compliance requirements and mitigation measures that reduce all potentially significant impacts to less-than-significant levels. The commenter does not present substantial evidence that the IS/MND is inadequate or that any significant environmental effect would remain unmitigated. Therefore, no revisions to the IS/MND are warranted.

G138-3 The comment includes a request for the public review period to be extended. Public review periods for IS/MNDs are established by the Lead Agency. The Notice of Availability and Notice of Intent to adopt an IS/MND for the Hume SoCal Campground Extension public review began 11/13/2025 and closed with an extended deadline on 01/16/2026. The comment does not provide

evidence that the review period should have been further extended. No further response is warranted.

G139 - Sharon DiSanto

From: Sharon DiSanto
To: Barragan, Elena
Subject: PROJ-2024-00046 Hume SoCal Campground Expansion
Date: Tuesday, December 16, 2025 11:46:09 AM

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Ms. Berragan -
I am writing to you because of my concerns about the proposed expansion of the Hume SoCal Campground. The most urgent is evacuating all people in the Green Valley Lake community the next time we have a forest fire. 1

After the fire that swept through my town in 2003 - a town hall meeting was held here to discuss disaster preparedness. At that meeting we were told that it was not a matter of "IF we would be evacuated again - but a matter of WHEN". 2

Green Valley Lake has about 1500 properties. It is located at the dead-end of Green Valley Lake Road, a 4 mile long, narrow and winding 2 lane road. In addition to GVL residents there are 3 camps (including Hume) located along this road adding an additional 1300 campers that will need to use the road in case of evacuation.. One fallen tree could trap thousands of people fleeing for their lives. 3

I am sure you are familiar with the 2018 Camp Fire in Paradise, California where there was effectively only one primary evacuation route which led to severe traffic gridlock - contributing to the many deaths that occurred. Add to this an additional 3000 campers, their buses and car and you have a recipe for disaster. 4

During the Slide Fire in 2007, GVL lost nearly 100 homes and businesses in the wildfire. Fire crews had to withdraw due to fears of becoming trapped because there is only one way into GVL and one way out. 5

There are other concerns as well. Will the Running Springs water District be able to handle the increased sewage load? What about water conservation? Also, several environmental and wildlife organizations are planning to have the California mountain lion put on the Endangered Species List because of habitat loss from development. 6

I have read a small part of the report put together by Hume but we here in Green Valley Lake need a full Environmental Impact Report. 7

Thank you for your time
Sharon DiSanto

G139 - Responses to Sharon DiSanto

G139-1 This comment is introductory in nature. No further response is warranted.

G139-2 This comment is conclusionary in nature. The Project would comply with a comprehensive evacuation plan to ensure less than significant impacts on community evacuation in the event of a fire. No further response is warranted.

G139-3 This comment is conclusionary in nature. The Project would comply with a comprehensive evacuation plan to ensure less than significant impacts on community evacuation in the event of a fire. No further response is warranted.

G139-4 The Project would comply with MM WF – 1 ensuring compliance with a comprehensive evacuation plan. The Project would diligently monitor conditions to ensure evacuation happens as the soonest possible available time when risk is present to reduce impacts to the community in the event of an evacuation.

G139-5 The comment includes a description of a historical event in Green Valley Lake. The comment does not provide adequate evidence that the IS/MND or its conclusions are inadequate or that impacts would be significant. Refer to the above responses. No further response is warranted.

G139-6 The comment includes concerns regarding sewer capacity, water conservation, and wildlife impact. Refer to Master Response – Wastewater/Sewer. The Project would be required to adhere to CALGreen water conservation. Impacts to Biological Resources are analyzed in accordance with CEQA guidelines and found to be less than significant to all relevant species. Refer to Master Response – Biological Resources/Wildlife. No further response is warranted.

G139-7 The ISMND has adequately analyzed environmental impacts as determined by the County of San Bernardino. No further response is warranted.

G140 - Sonia A. Montoya

January 7th, 2026

Elena Barragan

County of San Bernadino Planning Division

385 N. Arrowhead Ave. First Floor

San Bernardino, Ca 92415-0187

Dear Ms. Barragan,

I am writing to express my strong support for the proposed expansion of the Hume Camp (PROJ-2024-00046). This project represents a vital opportunity for our community to enhance its infrastructure, promote sustainable development, and foster economic growth.

The Hume Camp master plan envisions a well-integrated camp that prioritizes not only the needs of its guests but also the preservation of our natural environment. By focusing on sustainable practices, this development aligns with our county's goals. The incorporation of green spaces and environmentally conscious design will protect open spaces in our community while protecting our local wildlife habitats.

The project's proximity to Green Valley Lake is a valuable aspect that contributes to the preservation of open space in our community. By maintaining and enhancing this natural area, we can ensure that future generations have access to untouched landscapes that promote biodiversity and ecological balance. This commitment to preserving open space not only enriches our environment but also fosters a sense of stewardship among community members, encouraging them to appreciate and protect our natural resources. 1

A critical aspect of Hume mission is its commitment to working with youth, providing programs that help shape future leaders. By engaging young people in enriching activities, mentorship, team building, and outdoor education, Hume plays a pivotal role in developing confident, responsible, and community-minded individuals. Equipping our future leaders with the skills, values, and vision to address tomorrow's challenges is essential, and this requires an investment in our youth.

Moreover, the project is poised to stimulate our local economy by creating jobs and attracting new businesses. The anticipated influx of both residents and visitors will have a positive ripple effect on our local economy, supporting existing businesses and encouraging new entrepreneurial ventures. This economic boost is essential for the renewal of our mountain community.

I ask that you consider the long-term benefits that the Hume Camp plan brings to our community. The thoughtful planning and vision behind this project will contribute significantly to our county's growth and sustainability, while also nurturing the next generation of citizen leaders.

Thank you for your attention to this matter. I hope you will support this project and help pave the way for a brighter, more sustainable future for the Green Valley Lake community. 1

Sincerely,

Sonia A. Montoya

Resident Green Valley Lake

G140 - Response to Sonia A. Montoya

G140-1 The comment includes general support for the Project. The commenter's support for the Project has been acknowledged. No further response is warranted.

G141 - Stephen A. Mueller

From: Stephen Mueller
To: Barragan, Elena
Cc: Sandra Mueller
Subject: Camp Hume Expansion
Date: Monday, January 5, 2026 6:16:44 PM

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As a Green Valley Lake home owner (33010 Spruce Drive) I would like to register my objection to the Hume Expansion Proposal. 1

I have seen no requirement for a proper Environmental Impact Report. The proposal to date shows absence of comprehensive plans for GVL resident's wildfire evacuation on the narrow, curvey two lane road from GVL past Hume to Highway 330/18 with added congestion from much larger camp population on top of summer traffic. Having lost a home, contents and nearly my life in the 1/2025 fires, I am acutely aware of planning commission faults (and liability) in approving such projects backed by well-financed organizations at the peril of local residents. I urge the commission to reject the current proposal that is far in excess of the local infrastructure to safely accommodate. 2

Thank you for your attention to this matter,
Stephen A. Mueller

Sent from my iPhone

G141 - Responses to Stephen A. Mueller

G141-1 The comment is introductory in nature and does not warrant further response.

G141-2 The comment includes concerns generally regarding transportation and emergency evacuation on local roads near the Project and comments on issues outside the scope of CEQA. The comment does not provide evidence that the IS/MND was inadequately prepared or that a revision is warranted. Impacts related to wildfire and transportation would be less than significant per CEQA guidelines. Refer to Master Responses – Transportation/Traffic, Wildfire.

G142 - Steve Loe

From: Steve Loe
To: Barragan, Elena; Hugh Bialecki; Steven Farrell
Subject: Camp Hume PROJ-2024-00046
Date: Wednesday, December 3, 2025 5:17:42 AM

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I am a retired US Forest Service biologist that has been working with the County for over 40 years trying to maintain the Natural values on the National Forest and San Bernardino Mountains for current and future generations.

I have been trying to review this project on the County website. The Initial Study and Mitigated Negative Declaration are not visible to me and the documents never load when selected. The biological reports and various appendices do download, but not the most important IS/MND.

This must be corrected before the comment period starts in order for residents and other concerned citizens to fully understand the proposal and make educated comments.

This project has potential to have a great impact on the National Forest and San Bernardino Mountains ecological health.

Please get the website working so that all of the documents can be reviewed as soon as possible. Also please extend the comment deadline to start when the documents are all available for review. With the holidays, and the inability to access critical documents, the comment period must be extended beyond January 7.

Based on 40 years of past experience in commenting and involvement in significant County projects in the mountains, a field trip to the project site hosted by the proponent can increase public understanding and allow for project changes that improve the outcome on the ground and gain public support. The Sky Park/ Santa's Village model for public involvement was very successful for the proponent, agencies and the public. The County also benefitted by use of this model.

Please quickly advise myself and others how to proceed with the website not functioning.

Steve Loe, Certified Wildlife Biologist, TWS
33832 Nebraska St, Yucaipa, CA 92399
909-809-9980

1

G142 - Response to Steve Loe

G142-1 The comment is informatory in nature. The comment provides a complaint about issues accessing the IS/MND and a request to extend the comment period. The County was made aware of an issue accessing certain documents on the San Bernardino County website. The County addressed the problem and extended the public review period. All documents for the Project can be found on the San Bernardino County Land Use Services Website[2]. Public review periods for IS/MNDs are established by the Lead Agency. The Notice of Availability and Notice of Intent to adopt an IS/MND for the Hume SoCal Campground Expansion public review began 11/13/2025 and closed with an extended deadline on 01/16/2026. The comment does not provide evidence that the review period should have been further extended.

[2] https://lus.sbcounty.gov/planning-home/environmental/mountain-region/

G143 - Steve Loe

From: Steve Loe
To: Barragan, Elena
Cc: Hugh Bialecki; Steven Farrell; Karla Kellems; Harrison, Danelle - FS, CA; josua.direen@usda.gov; Eric.Chan@wildlife.ca.gov; John_M_Taylor@fws.gov; Bridger Zadina; Martinez, Edith@Wildlife; Timothy Krantz
Subject: Camp Hume Expansion
Date: Monday, January 5, 2026 5:20:11 AM

You don't often get email from steveloe01@gmail.com. Learn why this is important

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Thank you for the opportunity to comment on this very important project and for having a quick public meeting to learn and discus public concerns. Please reply acknowledging receipt so I have a record of your receipt of these comments.

I am a retired Forest Service wildlife biologist that had the responsibility of making sure Forest Service activities considered and protected, to the extent feasible, healthy wildlife habitat and populations for current and future generations. I worked in the Hume Camp area and surrounding habitat for 40 years.

This area is very important to wildlife. As stated in the Biology report, the undeveloped portion of the property that will be developed is high quality habitat for California spotted owl, San Bernardino flying squirrel, and southern rubber boa. These are all imperiled species in Southern California. The area supports a large diversity of plants and animals. The biology report states that the newly developed areas proposed in this project will no longer be suitable habitat for these species with the construction and human use.

I have been working with County staff and developers for 40 years designing projects to maintain wildlife and ecological values on developing properties. 1

The permanent loss of habitat for the imperiled species is significant on-site and in terms of long-term survival in the San Bernardino Mountains. The biological impacts of this proposal have been severely underreported in the environmental impact report. The biology report also minimized effects based on limited on-site studies. The few on-site visits provided for an overall evaluation of species potential on-site based on habitat. However, off-site impacts of user created trails, erosion from increased flows due to hardened areas, increased lighting, noise disturbance, use of and importance of the site for deer and mountain lion seasonally including movement between summer and winter range, and effects on Deep Creek plants and animals were not assessed. 2

Other proponents for large San Bernardino County projects with significant loss of high value habitat for threatened, endangered, and Forest Service Sensitive species have been required to mitigate by purchasing and protecting mitigation lands or dedicating undeveloped portions of the property to long-term preservation through a permanent conservation easement. This project needs to do the same.

The Forest Service should have been involved in the planning for this project as they are managers of the surrounding habitat. The Forest Service has mapped the spotted owl home ranges and nesting, roosting and foraging habitat. This should be evaluated and discussed. 3

The Forest Service GIS should be consulted for species information such as spotted owl nesting, roosting and foraging habitat. 3

The amount of habitat that will be adversely affected for the imperiled species needs to include the area that will require fuels treatment to protect life and property. Mitigation measures need to mitigate or compensate for the loss of this severely altered habitat as well.

Trails that will be used as part of the development need to be identified and mitigation measures included in the proposal. There needs to be a plan included to prevent the creation of user created trails and the resulting erosion and wildlife disturbance. Camp access to the Deep Creek Wild, Scenic and Recreational River (Deep Creek) needs to be discussed and impacts mitigated. If there are existing trails that access Deep Creek, they need to be disclosed and impacts of far greater numbers of campers needs to be described and mitigated for. 4

The increased night lighting needs to be be discussed and designed to be directional and be directed away from the wild areas of the property. The amount of area affected by lighting needs to be quantified and mitigated for. 5

Due to the importance of the site to so many imperiled and other species, the proponent needs to consult with California Fish and Wildlife as well as the Forest Service on ways to reduce impacts of the development on adjacent public lands and on-site. 6

The water source for additional planned development needs to be identified and not left up to some future date. The impact of taking water from whatever source is chosen on water quality and quality in Deep Creek and perennial springs and streams downstream need to be described and mitigated to the greatest extent possible. 7

The ponds on site must be managed to insure that non-native fish, frogs and other aquatic species do not become established and be subject to washing into Deep Creek, a Wild Trout Stream and Wild and Scenic River which supports imperiled species that would be harmed. 8

There needs to be a serious discussion of the cumulative effects on mountain flora and fauna and how this project contributes to the loss of habitat and ecosystem function. This project area is very important habitat locally and for its contribution to the continued functioning of the mountain ecosystem as a whole. Impacts should be avoided and mitigated to the greatest extent possible.

I agree with Dr. Krantz regarding the need for a full EIR and additional public and agency involvement. 9

Please keep me informed as the project progresses. Feel free to contact me if you have any questions regarding these comments.

Steve Loe, Certified Wildlife Wildlife Biologist, TWS.
33832 Nebraska St, Yucaipa, CA 92399.
909-809-9980

G143 - Responses to Steve Loe

G143-1 The comment is introductory in nature and states the commenter's experience. No further response is warranted.

G143-2 The comment includes an opinion about the adequacy of the environmental document, misidentifies the level of environmental documentation prepared, and makes a request for a permanent conservation easement. All potentially significant impacts can and will be mitigated to less than significant, an Initial Study/Mitigated Negative Declaration (IS/MND) was prepared instead of an Environmental Impact Report (EIR) because of this. The comment does not include adequate evidence that a conservation easement should be required as a mitigation measure, with all impacts already mitigated to less than significant.

G143-3 The comment includes a concern that the U.S. Forest Service should have been consulted during the preparation of the IS/MND. Under CEQA, a Responsible Agency is any public agency other than the lead agency that has discretionary approval or legal responsibility to carry out or approve a project. The U.S. Forest Service does not meet this criteria and is not listed as a responsible agency and therefore was not required to have been consulted with. On-site studies were conducted in accordance with CEQA guidelines to determine potential impacts. No further response is required.

G143-4 The comment includes additional thresholds for impacts and opinionated reasoning for analyzing these thresholds. The suggested thresholds are not within CEQA review and do not represent an unidentified environmental impact not already addressed. No further response is required.

G143-5 The comment includes concerns about additional lighting on wild areas. The Project would comply with the County Light Trespass Ordinance which was adopted in December 2021. The ordinance requires light fixtures to be designed with shielding to contain lighting spillage within 0.1 footcandle for the Mountain Region. The comment does not provide evidence that the IS/MND or its conclusions are inaccurate.

G143-6 The comment includes a concern that consultation with the California Department of Fish and Wildlife and the Forest Service is necessary. The Project does not propose development on lands owned by the U.S. Forest Service and does not require Forest Service approval. Following receipt of comments, the IS/MND has been updated to list the California Department of Fish and Wildlife as a Responsible Agency (refer to **Section 3, Errata**). Additionally, the Project acknowledges that a California Department of Fish and Wildlife Section 1602 Lake and Streambed Alteration Agreement prior to Project implementation will be required for any impacts to the on-site jurisdictional areas. Ongoing consultation with regulatory agencies during final design, permitting, and construction is standard practice.

G143-7 The comment includes concerns that a water source has not been identified and that accompanying impacts were not addressed. As documented in the Water Supply Assessment (**Section 4, Hydrology and Water Quality** and 1st Draft Water Supply Assessment), which has been updated (**Appendix B1: Revised Water Supply Assessment**), existing on-site wells can provide

adequate capacity to meet the Project's projected water demand through phase 3. The updated WSA identifies a preferred strategy with CLAWA following phase 3, in which the Applicant would prepare an annual water supplier expectations memorandum. Refer to Master Response – Water. The IS/MND (**Section 4, Utilities and Service Systems**) concludes that Project-related water demand would result in a less than significant impact.

G143-8 The comment includes concerns about on-site ponds and accompanying impacts. Any impacts to the on-site jurisdictional areas will require a USACE Clean Water Act Section 404 Permit, RWQCB CWA Section 401 Water Quality Certification, and a CDFW Section 1602 Lake and Streambed Alteration Agreement prior to Project implementation. The comment does not provide evidence that meeting these guidelines would still produce a significant environmental impact.

G143-9 The comment is conclusionary in nature. The comment makes a request for an EIR. Refer to Master Response – Request for EIR.

G144 - Steven Benz

From: Steve Benz
To: Barragan, Elena
Subject: Hume Camp Expansion Proposal (PROJ-2024-00046)
Date: Thursday, December 11, 2025 2:18:23 PM

You don't often get email from stevebenz@ecosinstitute.com. Learn why this is important

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Ms. Barragan,

On behalf of many, if not the majority, of residents of Green Valley Lake, CA, I am writing to express my concern over the proposed expansion of the Hume Camp (PROJ-2024-00046).

This enormous expansion from an occupancy of a few hundred to 3000 would have devastating impacts on water supplies, waste treatment capacity, and the environment in this National Forest setting.

More important, however, is the danger that this expanded occupancy would present to local residents of Green Valley Lake in the event of an environmental emergency. 1

In addition to our location in a high-risk fire zone (we have been evacuated three times in the last five years), winter storms will routinely result in the closure of Green Valley Lake Rd. until San Bernardino County plows can clear the path. We in the mountain communities are all too familiar with the phenomenon of visitors to the area creating road hazards during winter weather, impeding the flow of traffic, and preventing plows from operating effectively to create safe passage. 2

Green Valley Lake Rd. is a narrow two-lane road that is the only way in and out of our community. In the event of an environmental emergency, the impact from a severely-expanded Hume Camp would present an unacceptable increase in risk to the local community. 3

In addition, taxpaying citizens of San Bernardino County should bear NO financial burden to further the business interests of the Hume organization, by expanding current highways or installing traffic control systems that would otherwise not be necessary. 4

Thank you for your time.

Steven Benz
33228 Juniper Lane
Green Valley Lake, CA 92341

G144 - Responses to Steven Benz

G144-1 This comment is introductory in nature and expresses concern regarding evacuation impacts. The Project would comply with MM WF – 1, which requires compliance with a comprehensive evacuation plan. Additionally, following receipt of public comments and agency input, the Project's maximum capacity at full buildout has been decreased from approximately 3,000 to 2,400 occupants. No further response is warranted.

G144-2 Road hazards are a concern and can lead to delays in evacuations and snow removal services. The Project would comply with a comprehensive evacuation plan as mentioned in MM WF-1 of the IS/MND. A Traffic Impact Analysis has also been conducted to ensure less than significant traffic impacts on the community.

G144-3 The comment expresses concerns regarding local evacuation logistics. The comment does not provide evidence that the IS/MND was inadequately prepared or that a revision is warranted. Impacts related to wildfire and transportation would be less than significant per CEQA guidelines. Refer to Master Responses – Transportation/Traffic, Wildfire.

G144-4 Roadway expansion and traffic signal installations are not planned as part of the Project. Hume would bear cost burdens associated with required traffic improvements to service the Project site if required to do so by the County.

G145 - Sue Walker

From: Sue Walker
To: Barragan, Elena
Subject: Green Vally Lake
Date: Tuesday, November 25, 2025 12:44:14 PM

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Dear Land Use Services,
I think a 3,000 camper expansion is too much for the Camp Hume on an only ingress road.
An Environmental Impact Report is needed to ascertain impacts.
Thank you,
Sue Walker
Lake Arrowhead

1

G145 - Response to Sue Walker

G145-1 The comment includes concerns related to transportation and makes a request for an Environmental Impact Report. Refer to Master Responses – Transportation/Traffic, Request for EIR.

G146 - Susan Carl

From: Susan Carl
To: Barragan, Elena
Cc: Rowe, Dawn; Susan K. Carl
Subject: HUME
Date: Wednesday, January 7, 2026 2:37:02 PM

[You don't often get email from susankcarl@att.net. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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Good afternoon. I'm writing regarding the proposed HUME expansion near Green Valley Lake. This is a terrible idea. Not only is this a non profit who will contribute nothing to the tax base it's a non profit from Orange County. The toll this will take on Green Valley Lake Road (2 lanes) and the 18/330 is already at capacity during ski season, morning and afternoon rush hour and weekends. It is difficult many days to get on and off the 18 from GVL road. There is no other way in or out of GVL. An evacuation during a wildfire or flood would be a disaster with the HUME expansion. The HUME plan completely ignores the community and the road situation in the event of an evacuation or other disaster. Additionally the closest Sheriffs response are stationed in Twin Peaks and GVL has only a part time volunteer fire station. The drain and potential toll on the County and its residents, property owners and tax payers is incalculable. The potential for a disaster in the event of an evacuation or other emergency is not worth the risk. Please listen to the community against this expansion and consider that this proposal only TAKES from San Bernardino County and its resources and gives nothing in return to its citizens. Thank you for your consideration. 1

Sincerely, 2

Susan Carl
Resident of Highland family members full time residents in GVL.
909 936 1266
Sent from my iPhone

G146 - Responses to Susan Carl

G146-1 The comment includes concerns generally regarding transportation and emergency evacuation on local roads near the Project. The comment does not provide evidence that the IS/MND was inadequately prepared or that a revision is warranted. Impacts related to wildfire and transportation would be less than significant per CEQA guidelines. Refer to Master Responses – Transportation/Traffic, Wildfire.

G146-2 The comment includes concerns about the availability of public services. The IS/MND concludes fire and police protection services within the Hilltop community are currently considered adequate and the Project, in conjunction with other foreseeable development, would not increase the demand such that there would be a need for new or expanded fire or police protection services or stations. Impacts would be less than significant.

G147 - Terry and Diane Murphy

From: Diane Murphy
To: Candyce.Burnett@kimley-horn.com; Barragan, Elena
Subject: HUME project
Date: Tuesday, December 16, 2025 3:50:10 PM

[You don't often get email from murphrn62@gmail.com. Learn why this is important at https://aka.ms/LearnAboutSenderIdentification]

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To whom it may concern,

I am a resident of Green Vally Lake , Ca. This development couldn't possibly be considered unless the gross impact of this is being evaluated. 1

Has there been any recognition of the impact to the town, 330 traffic, fire (which has in unfortunately been a very dangerous recurring event), how do all these people escape including GVL residents and Big Bear !!!! Have heavy snowfall arrangements been considered? 330 will not be able to handle these situation given an emergency. The convergence of 330 traffic and Hwy. 18 traffic will be beyond strained and dangerous in a fire emergency , snowstorm, etc. 2

Green Valley Lake is extremely concerned about the future impact of this to our surroundings both in an emergency logistically and environmentally! 3

Thank you,

Terry and Diane Murphy
600 Bolsa Chica
Green Valley Lake , Ca
619-884-1377
619-980-1376
Sent from my iPhone

G147 - Responses to Terry and Diane Murphy

G147-1 The comment is introductory in nature. The comment includes a request for "gross impact" of the Project to be evaluated. The IS/MND evaluates all environmental topics required under CEQA. The commenter does not present new information identifying an unaddressed environmental impact. No changes to the IS/MND are warranted.

G147-2 The comment includes concerns regarding emergency access. As discussed in the IS/MND (**Section 4, Wildfire**) MM WF – 1, the Project would continually update and comply with a comprehensive evacuation plan. Additionally, all COA required by the Lead Agency would be adhered to. The Project's Emergency Plan (**Appendix K**) includes early evacuation protocols, which reduce on-site occupancy prior to peak hazard conditions. These procedures supplement fire code requirements and are reflected in the IS/MND's wildfire analysis. As evaluated in the IS/MND (**Section 4, Transportation**), the Project would not modify existing roadways, and Project-related traffic would not create a significant hazard or adversely affect emergency access. Seasonal weather conditions and snow removal are addressed by existing County road maintenance operations.

Access to the Project would be from Green Valley Lake Road via three access points; refer to Figures 6a through 6f (see Draft IS/MND pages 35-45). The Project would maintain direct vehicular access via two full-movement unsignalized driveways on Green Valley Lake Road as well as provide for the addition of one new full-movement driveway on Green Valley Lake Road (within the Phase 5 area); refer to Figure 6f. Furthermore, the design of driveways, circulation areas, and parking stalls for the proposed Project are based on the County Development Code's standards for such designs (Chapter 83.05 and 83.11). Therefore, the Project would incur no impacts related to inadequate emergency access. During fire emergencies, specific evacuation routes would be designated, and all evacuation procedures would comply with the County's Emergency Operation Plan and Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) Management Plan. Traffic generated because of Project implementation would not exceed 110 average daily trips; therefore, per San Bernardino County VMT Screening thresholds, the Project would screen out of further VMT analysis. Thus the Project would not conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b) and impacts would be considered less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire, Fire Service Capacity.

G147-3 The comment is conclusionary in nature. The comment includes a general concern. Refer to responses above.

G148 - Tessa Dixk

From: Tessa D777
To: Barragan, Elena
Subject: comment Hume Camp Expansion Expansion Project (PROJ-2024-00046)
Date: Wednesday, January 7, 2026 8:26:42 AM

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hume Camp Expansion Expansion Project (PROJ-2024-00046)
COMMENT:
I am concerned about safety for the camp and the surrounding communities. There is only one small road out of Green Valley Lake. Will the camp project include a second road, and a better road for leaving the camp? This is especially important when disasters necessitate evacuations.

Tessa Dixk, Crestline 1

--
Alive, Free, Happy!

G148 - Responses to Tessa Dixk

G148-1 The comment includes concerns generally regarding transportation and emergency evacuation on local roads near the Project. The comment does not provide evidence that the IS/MND was inadequately prepared or that a revision is warranted. Impacts related to wildfire and transportation would be less than significant per CEQA guidelines. Refer to Master Responses – Transportation/Traffic, Wildfire.

G149 - Thomas and Julie Vance

From: Thomas VANCE
To: Barragan, Elena
Subject: Hume project say NO
Date: Monday, January 5, 2026 6:12:38 PM

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hi, my wife and I are homeowners in Green Valley Lake. We have owned since 1999. My wife and I are EXTREMELY AGAINST any expansion of the Hume project/camp/property. It is bad on so many levels, and we want our voices heard that it is horrible for all GVL residents to have this expansion.

We are hoping that you will listen to the residents and deny this project.

I equate this expansion to the same analogy that if a mega-resort wanted to build a 3,000 room hotel in our area, you would shoot it down for so many of the same reasons why we are EXTREMELY AGAINST this project. Environmental, traffic, resources, emergency evacuation, noise and light pollution , and the list goes on and on. 1

Please put an end to this development and say NO!!!

Thanks,
Thomas and Julie Vance
551 Oak Lane
Green Valley Lake, CA 92341
949-212-2047 Sent from Yahoo Mail for iPhone

G149 - Response to Thomas and Julie Vance

G149-1 The comment includes a statement of opposition and reasoning for opposition. Refer to Master Responses – Transportation/Traffic, Wildfire, Noise. Regarding potential light pollution, the Project's impacts relating to light would be less than significant. As mentioned in **Section 4, Aesthetics**, each phase of development in the Project area would be required to comply with policies and regulations set forth by the CWP and San Bernardino County Development Code. The comment does not provide evidence that the IS/MND was inadequately prepared.

G150 - Thomas Lawrence

From: Thomas Lawrence
To: Barragan, Elena
Subject: Hume Lake development
Date: Saturday, January 3, 2026 8:34:23 AM

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I believe this project would be a great opportunity for local Jobs and for local communities! After attending the Hume meeting on December 20th, they have provided all essential information for the development! After the complete build out in 25 years they would average only 757 campers on just a few days mostly during their busy summer months . Being a small business owner in Green Valley Lake, we need this project for commerce for this fledgling community! 1
Thanks
Thomas Lawrence
Green Valley Lake Real Estate
909-615-7121
Sent from my iPhone

G150 - Response to Thomas Lawrence

G150-1 The comment includes general support for the Project. The commenter's support for the Project has been acknowledged. No further response is warranted.

G151 - Thu Buu and Lyle Such

From: thu buu
To: Barragan, Elena
Subject: Hume Expansion
Date: Sunday, January 4, 2026 2:22:56 PM

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Hello Ms. Barragan,

We are Thu Buu and Lyle Such. We own land in Green Valley Lake. We are writing to express our opposition the Hume Camp expansion to the capacity of 3,000 campers. We feel that this expansion will tremendously increase the volume of cars and buses on the one narrow road leading in to and out of Hume Camp and GVL. With the increase in the number of cars and especially buses putting more stress on the road, we fear the road will succumb to deterioration at a much faster rate. This increase also causes alarm during fire season. If there is an evacuation order, the one road out cannot handle so much traffic making evacuations even more dangerous than it already is. Another cause for worry is the affect that such an exponential increase in usage will have on our water table. Thank you for listening to our concerns, and we hope you come to the conclusion that this rate of expansion is unsustainable for our area. 1 2 3

Sincerely,

Thu Buu and Lyle Such

G151 - Responses to Thu Buu and Lyle Such

G151-1 The comment is introductory in nature. The comment includes a concern over increased traffic volume on local roadways. All traffic impacts would be within San Bernardino County guidelines for less than significant impact. Refer to Master Response – Transportation/Traffic.

G151-2 The comment includes concerns about emergency evacuation during wildfire on local roadways. Impacts related to emergency evacuation would be less than significant with mitigation, refer to Master Response – Wildfire.

G151-3 The comment is conclusionary in nature and includes a concern about groundwater sustainability. Impact related to groundwater use would be less than significant, refer to Master Response – Water.

G152 - Tim Callahan

From: Tim C
To: Barragan, Elena
Subject: Fwd: Hume Socal Expansion Proposal
Date: Sunday, January 4, 2026 10:01:47 AM

You don't often get email from tim.m.callahan@gmail.com. Learn why this is important

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I would like to request that you acknowledge receipt of this email. Also, please put me on your list for email updates on this project. Thank you. 1
Tim Callahan
522 Oak Ln, Green Valley Lake, CA 92341
timmcallahan@gmail.com
213-440-2054

Ms. Barragan, I'm writing to express my concern about the Hume Socal expansion. I understand that the camp wants to expand to 10 times its current size. I'm a full time resident and homeowner, and I have a share in the Green Valley Mutual Water Company. Our company has several wells, and I am concerned that Hume's expansion is going to have a detrimental effect on the amount of water our wells produce. I don't think that Hume Socal should be allowed to take out any more groundwater than they already are. 2

Also, I am concerned with the impact that such a large number of people at Hume could have on a rapid evacuation. Green Valley Lake has a permanent population of 300-400 according to Google. Creating a town of 3000 at Hume is likely going to cause problems during an evacuation, particularly because a lot of these people will not be familiar with the area and prepared for such a chaotic event. 3

Fire danger is often high in this area. Will Hume management be able to monitor this many guests, most of them kids, for reckless fire behavior?

Finally, I am concerned with the impact the Hume expansion will have on our quality of life. I moved here for the peace, quiet, and a slower pace of the area. Adding 10 times more people to this valley so quickly can't help but to undermine these qualities. I understand that we all have to adjust to changes, but couldn't this expansion happen more slowly? Is it reasonable for a facility to expand so quickly in such a delicate environment? 4

G152 - Responses to Tim Callahan

G152-1 The comment includes two requests not within the scope of CEQA review. The requests are the responsibility of the Lead Agency, no further response is warranted.

G152-2 The comment includes concerns over groundwater availability. Impacts related to water and groundwater would be less than significant, refer to Master Response – Water. The comment does not provide evidence that goes against the Water Supply Assessment or that the IS/MND warrants a change.

G152-3 The comment includes concerns generally regarding transportation and emergency evacuation on local roads near the Project. The comment does not provide evidence that the IS/MND was inadequately prepared or that a revision is warranted. Impacts related to wildfire and transportation would be less than significant per CEQA guidelines. Refer to Master Responses – Transportation/Traffic, Wildfire.

G152-4 The comment includes concerns regarding community character. The expansion would take place gradually, expanding over many decades, not years. CEQA addresses environmental impacts rather than social or community-identity changes unless they result in an environmental impact. No changes to the IS/MND are warranted.

G153 - Timothy Krantz

From: Krantz, Tim
To: Barragan, Elena
Cc: john_m_taylor@fws.gov; Martinez, Edith@Wildlife; Eric.Chan@wildlife.ca.gov
Subject: Comments on Camp Hume Project--PROJ-2024-00046
Date: Sunday, January 4, 2026 9:18:06 AM
Attachments: image.png
Camp Hume_Krantz Comments.pdf

You don't often get email from tim_krantz@redlands.edu. Learn why this is important

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Ms. Barragan:

Please find attached these comments on the Camp Hume Campground Expansion Project. I would appreciate acknowledgement of receipt of these comments by reply to this email and submit them for the administrative record and public review. Please also include me on the notification mail list for all public meetings and actions regarding this project in the future.

If you have any further questions in these regards, do not hesitate to reach out to me via the contact numbers below or by direct email reply. Thank you for your consideration in this matter.

Respectfully submitted,
Tim

Dr. Timothy Krantz
Professor Emeritus, Environmental Studies Program
University of Redlands
1200 E. Colton Avenue, Lewis Hall 121
Redlands, CA 92374
tim_krantz@redlands.edu
Direct Line: (951)267-9170

1

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Reverence for Life. - Albert Schweitzer

UNIVERSITY OF Redlands

January 3, 2026

SUBJECT: Comments on the Hume SoCal Campground Expansion Project/Camp Hume
Camp Hume Project No.: PROJ-2024-00046

TO: Elena Barragan, Senior Planner
County of San Bernardino, Planning Division,
385 N. Arrowhead Ave., San Bernardino, CA 92415-0187
Email : elena.barragan@lus.sbcounty.gov

CC: State Clearinghouse—Office of Planning and Research
California Department of Fish and Wildlife
U.S. Fish and Wildlife Service

Dear Ms. Barragan:

Please accept these comments on the Camp Hume Campground Expansion Project. Situated in a remote area of the San Bernardino Mountains, the proposed development calls for expansion of the existing campground facilities from 107 acres to approximately 252.1 acres—an addition of 145 acres—to accommodate 3,000 persons—a ten-fold increase of the present Camp Hume capacity. 1

As a professional biological consultant with 49 years of experience working with the endangered flora and fauna of the San Bernardino Mountains; and service on the San Bernardino County Planning Commission representing the Mountain Area district from 1983-1988, I have developed particular expertise with the rare, threatened and endangered species in the project area and of the legal requirements of environmental impact assessment and review.

The Biological Resources Assessment (BRA) for the project, prepared by ELMT Consulting, correctly identifies three Species of Concern that are known to occur in the immediate project area: the California spotted owl, the southern rubber boa, and the San Bernardino flying squirrel.

The California spotted owl (CSO) is an extremely rare Species of Special Concern (as designated by the California Department of Fish and Wildlife and the San Bernardino National Forest), with less than 133 known territories in the San Bernardino Mountains (LaHaye and Gutierrez 2005). The actual numbers of individuals have declined substantially since that time as a result of impacts of wildfires, habitat fragmentation and development over the last 20 years. The BRA concludes that the project site has a "high potential" for CSO on site: 2

> "The project site supports high quality habitat and generally primarily consists of undisturbed forested areas along with areas which have undergone varying levels of disturbance in association with campground development and recreational areas. The canopy varies in density, but there are many areas with closed canopy which is favorable for cover for the species. Additionally, there are many trees that are both tall and mature enough to provide nesting cavities and perching opportunities for this species. Therefore, it was determined that there is a ***high potential for California spotted owl to occur onsite***."

1200 East Colton Avenue • P.O. Box 3080 • Lewis Hall, Room 121 • Redlands, CA 92373-0999
tel: 909-748-8590 • fax: 909-335-4068 • http://www. redlands.edu

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I personally have observed a spotted owl nest territory within two miles of the Camp Hume property and can affirm the very high potential for spotted owls to occur on site.

Southern rubber boas (SRB) are listed as Threatened in accordance with the California Endangered Species Act and are considered a Sensitive Species of Concern by the San Bernardino National Forest. The Camp Hume property is in the middle of the SRB's primary range (Crestline to Big Bear), where the reclusive snakes live in forested rocky outcrops and under downed logs, often emerging from their dens in the Spring after snowmelt or after summer thundershowers. The Camp Hume property contains highly suitable habitat with dense forest canopy cover, downed logs and rock outcrops. Thus, I disagree with the BRA's conclusion that the property has only "moderate" potential to support SRBs. Rather, with the Camp Hume property lying in the middle of the prime SRB habitat distribution, and with abundant logs and rocks, the property has a very high potential to support the Threatened species.

The San Bernardino flying squirrel (SBFS) is designated as a Species of Special Concern according to the California Department of Fish and Wildlife and is considered a Sensitive Species by the San Bernardino National Forest. SBFS habitat is generally the same as CSO—older growth, closed canopy conifer forest, with open understory. In fact, the standard census method for SBFS is to look for fur in CSO pellets. The BRA correctly concludes that the potential for SBFS is also high, as it is for CSO.

Thus, the Biological Resources Assessment finds that the Camp Hume property represents high potential for both CSO and SBNF and moderate (I would argue "very high") potential for SRB habitat. 2

According to the California Environmental Quality Act (CEQA) Mandatory Findings of Significance (§15065), if the Project has…

"a) …***the potential*** to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially ***reduce the number or restrict the range of a rare or endangered plant or animal***…?"

…then an Environmental Impact Report is ***required*** to address the issue. Reduce the number means reduce by one. This is mandatory. It is not a discretionary action on the part of the Lead Agency. The biological consultants are wrong when they assume that: "The proposed project will be installed adjacent to previously disturbed areas that do not provide as high of quality habitat for spotted owl [and SRB and SBFS] as the undeveloped areas on the periphery of the project site." In fact, when one considers the substantial expansion of the development area from 107 to 252.1 acres, with a ten-fold increase in activity from 300 to 3,000 persons, one can clearly see that, even if on-the-ground development could be limited to already disturbed areas (the development plans indicate expansion into high quality potential habitat for all three species), the intensity of the proposed activities represents a potentially significant adverse impact to these critically endangered species. To simply defer more thorough biological surveys until pre-construction is not a valid mitigation measure.

1200 East Colton Avenue • P.O. Box 3080 • Lewis Hall, Room 121 • Redlands, CA 92373-0999
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In this situation, with high potential for endangered species habitat on site, there is no question that a Focused EIR is ***required***—indeed, **mandatory**—and that full protocol biological surveys must be conducted prior to approval of the project, with additional public review and input from biological experts on these species. To simply defer further focused biological review to "clearance survey[s] should be conducted" prior to construction, as the consultants propose, is inadequate and legally in violation of the CEQA. 2

I strongly urge you to reconsider your Initial Study/Environmental Checklist. Check the box for Potentially Significant Issues under Section 21(a), Mandatory Findings of Significance; and require a full Focused EIR on potential impacts to biological resources.

Finally, under the Wildfire Issue of the Environmental Checklist, Section 20, the mitigation measures proposed for this issue deserve a much more detailed analysis of potential fuel modification programs on the Camp Hume property. Are there potential conflicts between fuel modification or vegetation treatments and potential endangered species habitats? (Yes, there are significant environmental conflicts, as exemplified by other CalFire vegetation treatments in the Lake Arrowhead area involving CSO and SRB habitat that have resulted in litigation.) The development plans should include strict construction standards requiring fireproof or fire-resistant architectural standards. With only one access/egress road from the property to Green Valley Lake Road and out to Highway 18, the potential for 3,000 people to evacuate in such a high fire potential area is very significant and deserves more thorough consideration and public review in an Environmental Impact Report. God forbid the Camp Hume campers never experience a catastrophic fire as happened in Paradise, California, in 2018. 3

In conclusion, I strongly recommend that the County re-issue the Initial Study/Environmental Checklist to require a Focused EIR on at least these two issues. The ten-fold increase of human activity from 300 to 3,000 people represents a very significant change in land use and calls for the full environmental analysis and public input of an Environmental Impact Report. 4

Sincerely,

Dr. Timothy Krantz
Professor Emeritus, Environmental Studies Program
University of Redlands
1200 E. Colton Avenue, Lewis Hall 121
Redlands, CA 92374
tim_krantz@redlands.edu
(951)267-9170 Office

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G153 - Responses to Timothy Krantz

G153-1 The comment is introductory in nature and makes a request to the Lead Agency. No further response is required.

G153-2 The comment shares an opinion about the conclusions of the Biological Resources Assessment and makes a request for an Environmental Impact Report based on these opinions. As mentioned in the IS/MND (**Section 4, Biological Resources**), MMs BIO-1 and -2, which require pre-construction clearance surveys and compliance with the Migratory Bird Treaty Act and California Fish and Game Code, would be implemented and reduce any impact to less than significant levels. The comment does not provide adequate evidence that the IS/MND or its conclusions are false. Refer to Master Response – Request for EIR. No further response is warranted.

G153-3 The comment shares an opinion about the conclusions of **Section 4, Wildfire** of the IS/MND, and makes a request for an Environmental Impact Report based on these opinions. The Project would be required to adhere to MM WF-2, which requires a San Bernardino County third-party fuel modification zone inspector to review plans and construction material lists. Refer to Master Responses – Transportation/Traffic, Wildfire. The comment does not provide adequate evidence that the IS/MND or its conclusions are false. Refer to Master Response – Request for EIR. No further response is warranted.

G153-4 The comment is conclusionary in nature. The comment makes a request for an Environmental Impact Report. Refer to Master Response – Request for EIR.

G154 - Todd Arnett

1/5/26

Elena Barragan

County of San Bernardino Planning Division

385 N. Arrowhead Ave. First Floor

San Bernardino, Ca 92415-0187

Dear Ms. Barragan,

As a pastor deeply invested in the well-being of our county, I am writing to express my enthusiastic support for the Hume Camp master plan application. (PROJ 2024-00046) This project presents a unique opportunity to enrich our community, promote sustainable development, and nurture our youth and invest in the next generation of leaders.

The Hume master plan envisions a harmonious community that not only addresses the needs of its residents but also safeguards our precious natural environment. By prioritizing sustainable practices, this development aligns beautifully with our shared values of stewardship and respect for creation. The incorporation of open spaces and green areas will not only enhance the beauty of our surroundings but also provide vital habitats for local wildlife, ensuring that our mountains remain connected to the natural world. 1

In particular, ensuring that future generations can enjoy its beauty and tranquility of the mountains. This commitment to maintaining open areas fosters a spirit of stewardship among our congregation and the broader community, encouraging everyone to appreciate and protect the gifts of nature that God has entrusted to us.

As a Lead Pastor of a church that is sending high school students to Hume SoCal this summer, I am especially passionate about Hume's mission of working with youth. The programs they offer are instrumental in shaping the future leaders, and providing hope for of our community. By engaging young people through recreation, worship, mentorship and leadership training, Hume is helping to cultivate responsible, compassionate individuals who will carry our values forward. This investment in our youth is not merely an investment in the present, but a foundation upon which we can build a brighter future.

I urge you to consider the profound benefits that the Hume project will bring to our community. The thoughtful planning and vision behind this project will contribute

significantly to our county's growth and sustainability while nurturing the next generation of leaders who will guide us in the years to come.

Thank you for your attention to this important matter. I hope you will lend your support to the Hume master plan and help pave the way for a more hopeful and sustainable future for our community. 1

Blessings,

Todd Arnett

Lead Pastor

High Desert Church

G154 - Response to Todd Arnett

G154-1 The comment includes general support for the Project. The commenter's support for the Project has been acknowledged. No further response is warranted.

G155 - Tommy Tomblin

From: Tommy Tomblin
To: Barragan, Elena
Subject: The Hume Camp on Green Valley Lake Road . The expansion of campers will cause problems on GVL Road with fire evacuation. Many residents could die.
Date: Saturday, January 3, 2026 2:10:39 PM

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1

G155 - Response to Tommy Tomblin

G155-1 The comment is speculative in nature. The comment includes concerns about emergency evacuation on local roadways. All impacts related to emergency evacuation would be less than significant. Refer to Master Responses – Transportation/Traffic, Wildfire.

G156 - Toni Frederick

From: Toinette Frederick
To: Barragan, Elena
Cc: bphillips@huc.edu; Toinette Frederick
Subject: expansion of camp Hume
Date: Friday, January 2, 2026 3:13:30 PM

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Dear Ms. Barragan,
I own a home in Green Valley Lake and I am adamantly opposed to the expansion of Hume Camp.

As a homeowner, I pay a premium in property taxes, water maintenance, tree maintenance, and property insurance to live in this mountain community. Hume Camp should do the same. I do not want my maintenance fees to go up to support the additional strain their expansion will cause to the area's infrastructure. I am not a follower of the global Christian ministry and do not want to subsidize their activities. Their expansion will increase the risk of wildfires, use of the sewer systems, electrical use, increased noise and traffic, and affect endangered species of wildlife. 1

Please deny their request for expansion. It is not fair to the homeowners who pay to support the infrastructure of the quiet mountain life to have to support this Christian Church which I'm sure has a lot more money than the average homeowner in the area.

Thank you.

Toni Frederick, PhD
Associate Professor
Dept. of Pediatrics
University of Southern California
Keck School of Medicine
LAC + USC Medical Center
1640 Marengo St. HRA 300, MC 9264
Los Angeles, CA 90089-9300
(323) 865-1552
Fax: (323) 865-1579

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information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply e-mail and destroy all copies of the original message.

G156 - Response to Toni Frederick

G156-1 The comment brings concerns over finances, economics, and fees in the nearby area and briefly mentions generalized concerns. CEQA evaluates environmental impacts only, unless other issues are tied to an environmental effect. The comment does not identify a new or unaddressed environmental impact under CEQA. All impacts would be less than significant per CEQA guidelines. Refer to Master Responses. The comment does not provide additional evidence that the IS/MND is inadequate. No revisions to the IS/MND are warranted.

G157 - Tyler Lambert-Perkins

From: Tyler Lambert-Perkins
To: Barragan, Elena
Subject: Public Comment Submission – Camp Hume Project (PROJ-2024-00046)
Date: Wednesday, January 7, 2026 4:44:40 PM
Attachments: Project No. PROJ-2024-00046 Hume SoCal Campground Expansion - Public Comment - Lambert-Perkins.pdf

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

To the San Bernardino County Planning Division,

Please find attached my written public comment regarding the Camp Hume SoCal Campground Expansion Project, Project No. PROJ-2024-00046.

I am a homeowner and community member in Running Springs, and my comments focus on public safety, evacuation feasibility, wildfire risk, traffic impacts, and broader community effects associated with the proposed expansion. I respectfully request that this letter be included in the official project record and considered as part of the CEQA review process. 1

Thank you for your time and consideration.

Sincerely,
Tyler Lambert-Perkins
2550 Valhalla Dr.
Running Springs, California

Elena Barragan
San Bernardino County
Planning Division
385 N. Arrowhead Avenue
San Bernardino, CA 92415

Project No. PROJ-2024-00046 – Hume SoCal Campground Expansion

Dear Land Use Services Department,

I am a homeowner and invested community member in Running Springs, writing to formally submit comments on the Initial Study/Mitigated Negative Declaration for the Camp Hume SoCal Campground Expansion Project.

My concerns are not philosophical objections to growth or recreation in our community. They are grounded in public safety, evacuation feasibility, wildfire risk, and cumulative impacts on surrounding mountain communities, all of which are directly relevant under CEQA and are not adequately addressed in the current analysis. 1

Wildfire Risk and Fuel Conditions

The project site is designated within a Very High Fire Hazard Severity Zone (FS-1), as acknowledged in the project materials. Based on direct, firsthand familiarity with the terrain in the canyon below the project site, I can attest that the surrounding slopes contain substantial, unaddressed wildfire fuel loads. The combination of steep topography, dense mixed-conifer forest, unspent dead fuel from oak-beetle infestations, and prevailing wind patterns creates conditions that enable rapid, unpredictable fire spread as recently seen in the nearby 2024 Line Fire. The IS/MND does not meaningfully address how a population of up to 3,000 campers and staff would be protected in a fast-moving wildfire scenario beyond generalized compliance statements. 2

Single Access Road and Evacuation Constraints

Green Valley Lake Road is a two-lane mountain road and the sole practical access and egress route for both the Camp Hume site and the Green Valley Lake community. In the event of a wildfire, severe storm, or other emergency requiring evacuation, this road would be required to simultaneously serve up to 3,000 campers and staff evacuating the project site, as well as the residents of Green Valley Lake, who rely on the same corridor as their only reliable evacuation route.

This represents a clear single-point-of-failure condition. The project proposes a significant population increase without providing redundant evacuation routes or binding operational guarantees and structural plans to ensure evacuation demand does not overwhelm the roadway. 3

First Responder Resource Diversion

If Green Valley Lake Road becomes impassable due to fire, debris flow, snow, or collision—conditions that occur regularly in this region—campers would need to be evacuated by airlift or large-scale first-responder intervention. This would divert emergency resources from active fire suppression and resident evacuation, increasing the overall risk of loss of life. This is an entirely unnecessary and avoidable increased risk to campers, residents, and first responders. The IS/MND does not adequately analyze and prepare this cascading failure scenario. 4

Inadequate Emergency Planning for a De facto Institutional Use

While described as a campground, the project operates as a large institutional facility, comparable in population to a school campus or a small town. Emergency planning standards must reflect this reality. General or aspirational emergency procedures are insufficient, especially in a proven high-risk area. A facility of this scale in a high-risk mountain environment requires specific, enforceable, and independently verifiable evacuation and disaster response plans to safeguard against predictable negative impact to the region and catastrophic consequences in the event of a disaster. 5

Noise and Wildlife Impacts

The introduction of thousands of additional occupants, amplified outdoor activities, and multiple amphitheaters raises serious concerns regarding chronic noise impacts on surrounding wildlife corridors and habitats. These impacts extend beyond humans and will affect wildlife in the National Forest where the camp is located. 6

Traffic and Regional Congestion

Highway 18 and Highway 330 already experience severe congestion during weekends, holidays, and winter conditions. With no reliable alternative transportation, the additional bus traffic required to support this project—particularly if buses are not permanently staged on-site—will compound congestion and increase collision risk. In winter conditions, stalled or crashed buses routinely block lanes for extended periods. In an evacuation scenario, such delays would be catastrophic. 7

In conclusion, expanding a facility to house thousands of people in a location with no redundant evacuation routes and limited emergency capacity places campers, staff, and surrounding residents at unacceptable risk. Proceeding without a binding, enforceable evacuation and emergency operations plan is negligent. At a minimum, the project requires further environmental review focused on evacuation modeling, wildfire behavior, traffic failure scenarios, and first-responder capacity under worst-case conditions.

I respectfully request that these issues be fully addressed before any approval is considered. 8

Sincerely,
Tyler Lambert-Perkins
2550 Valhalla Dr.
Running Springs, California

Project No. PROJ-2024-00046 – Hume SoCal Campground Expansion – 01/07/2026

G157 - Responses to Tyler Lambert-Perkins

G157-1 The comment is introductory in nature. The comment includes a summary of concerns. No further response is warranted.

G157-2 The comment includes concerns over wildfire preparedness. In order to mitigate impacts related to imminent wildfire an Evacuation Plan and Working Guide strongly implemented by the Southern California Hume Lake Christian Camp ("Hume SoCal") based on CAL FIRE's "Ready, Set, Go!" model has been developed. The Evacuation Plan and Working Guide would be updated and submitted to Land Use Services for review and approval, upon completion of construction activities for each Phase to ensure adequate preparation for higher campground occupancy. Hume SoCal will also work with local fire agencies and hold annual fire safety and evacuation preparedness informational meetings that will help Hume SoCal Campground guests and employees familiarize themselves with their own "Ready, Set, Go!" evacuation plan.

G157-3 The comment includes concerns generally regarding transportation and emergency evacuation on local roads near the Project. The comment does not provide evidence that the IS/MND was inadequately prepared or that a revision is warranted. Impacts related to wildfire and transportation would be less than significant per CEQA guidelines. Refer to Master Responses – Transportation/Traffic, Wildfire.

G157-4 The comment includes a speculative opinion about the conclusions in the IS/MND. The IS/MND was prepared within applicable guidelines. The comment mentions a scenario that is outside the scope of CEQA review.

G157-5 The comment includes concerns regarding emergency planning for the Project. The Project would have an Evacuation Plan and Working Guide approved by Land Use Services implemented to reduce impacts to less than significant levels.

G157-6 The comment includes concerns about the Project's effects on wildlife especially relating to noise. The IS/MND concludes that with mitigation there would be a less than significant impact for a substantial adverse effect (including noise) on identified wildlife.

G157-7 The comment includes concerns about transportation effects on local roads. Refer to Master Response – Transportation/Traffic.

G157-8 The comment is conclusionary in nature. The comment includes a request for further environmental review. Refer to Master Response – Request for EIR.

G158 - Tyler Reed

From: Tyler Reed
To: Barragan, Elena
Subject: Support for Hume Camp Expansion (PROJ-2024-00046)
Date: Monday, January 5, 2026 9:56:22 AM

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CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you can confirm the sender and know the content is safe.

Dear Ms. Barragan,

I'm writing to express my support for the proposed Hume Camp expansion. As someone who lives in Green Valley Lake, I care deeply about our mountain's natural beauty and community that makes this place so special. This project feels like a step in the right direction for both.

First off, Hume isn't just adding buildings—they're planning carefully to make sure the camp fits in with the environment and protects the land we all love. Green Valley Lake is a treasure, and this expansion will help keep it that way for future generations. They're thinking about green spaces, wildlife, and sustainability, which really matters to me.

Beyond the environmental side, Hume has always been about people—especially kids and teens. Their programs help young people grow, learn leadership, and build confidence. I've seen firsthand how much these experiences mean to families. Expanding the camp means more opportunities for youth to connect with nature and each other, which is something we need more of these days. 1

And let's not forget the practical benefits. This project will bring jobs and give a boost to local businesses. More visitors mean more life in our community, which helps everyone—from small shops to service providers. It's a chance to strengthen our local economy while keeping the character of our mountain town.

I truly believe this expansion will make a positive difference for Green Valley Lake—protecting what we love, supporting our kids, and helping our community thrive. Thank you for taking the time to consider it. I hope you'll see the value this project brings and help make it happen.

Sincerely,

Tyler Reed
Resident, Green Valley Lake

G158 - Response to Tyler Reed

G158-1 The comment includes general support for the Project. The commenter's support for the Project has been acknowledged. No further response is warranted.

G159 - William and Marguriette Bowden

Jan 5, 2026

To: Elena Barraga
(also via email elena.barragan@lus.sbcounty.gov)
Planning Division
385 N Arrowhead Ave
San Bernardino, CA 92415

Re:HUME SoCal Campground Extension Project
PROJ # 2024-00046

We as Green Valley Lake property owners are appalled at the expansion request we have just heard about and, venomously oppose this project.

The current infrastructure cannot support a project of this magnitude. From 300 campers to 3000 campers and staff, this is a 10 fold increase. This is incomprehensible. The one-lane in and one-lane out would not support the traffic created by this large of a project over five years. Can we manage an evacuation with the addition of 3000 people and their vehicles in the effect of an emergency, such as a Forest fire. 1

Hume SoCal does not contribute to the maintenance or improvement of Green Valley Lakes infrastructure. What benefit does Green Valley Lake receive with this large scale expansion? NONE. The residents of Green Valley Lake desire better. 2

We encourage you to deny this application. Kindly respond.

Thank you, William and Marguriette Bowden
1199 Oak Ave Carlsbad, CA 92008

G159 - Responses to William and Marguriette Bowden

G159-1 The comment includes concerns generally regarding transportation and emergency evacuation on local roads near the Project. The comment does not provide evidence that the IS/MND was inadequately prepared or that a revision is warranted. Impacts related to wildfire and transportation would be less than significant per CEQA guidelines. Refer to Master Responses – Transportation/Traffic, Wildfire.

G159-2 The comment includes concerns about the Project benefiting the community. This comment is outside the scope of CEQA review. CEQA only responds to environmental impacts. No further response is warranted.

3.0 ERRATA

3.1 Introduction to the Errata

In accordance with the California Environmental Quality Act (CEQA) Guidelines, this Errata section of the Final Mitigated Negative Declaration (MND) presents additional information that provides clarification, amplification, and/or insignificant modifications to the Initial Study/Mitigated Negative Declaration (IS/MND). Any changes identified in this section are intended to clarify or supplement the environmental analysis and mitigation measures developed for the Project. The revisions reflected in this Errata do not alter the conclusions of the IS/MND, including the determination that all potential environmental impacts can be mitigated to a less-than-significant level. The changes result from public, agency, or interested party comments received during the public review period, as well as from continued County review of the IS/MND. The clarifications, corrections, or minor revisions presented in this Errata do not constitute substantial revisions to the IS/MND and therefore do not require recirculation of the IS/MND pursuant to CEQA Guidelines Section 15073.5. None of the changes reflected in the Errata are anticipated to identify a new avoidable significant environmental effect, a substantial increase in the severity of an environmental impact, or the need for additional feasible project alternatives or mitigation measures beyond those already disclosed.

Changes in this Errata Section are listed by section, page, and (where appropriate) by paragraph. Added or modified text is shown with double underlining (example), while deleted text is shown with strikethrough (~~example~~).

3.2 Master Errata

Occupancy Reduction

Following agency comments, public comments, and additional technical coordination with the water supplier (Crestline-Lake Arrowhead Water Agency [CLAWA]), the Applicant has reduced the Project's proposed maximum occupancy from approximately 3,000 to approximately 2,400 occupants. This refinement reduces the Project's maximum on-site population and associated impacts to water, wastewater, traffic, noise, and wildfire relative to the scenario evaluated in the circulated IS/MND. The IS/MND intentionally evaluated a conservative, worst-case scenario of operating conditions at 3,000 occupants. Because the revised 2,400 occupancy limit is less impactful than the total analyzed in the IS/MND, the change does not create a new significant environmental effect, substantially increase the severity of a previously identified significant effect, or present new information of substantial importance. Accordingly, no further environmental review or recirculation is required, and all conclusions in the IS/MND remain valid or are more conservative under the reduced occupancy scenario.

Updated Water Supply Assessment and Sewer Feasibility Study

Since circulation of the Draft IS/MND, an updated Water Supply Assessment (WSA) and Sewer Feasibility Study have been prepared to reflect additional analysis and coordination with CLAWA and Running Springs Water District (RSWD). The revised WSA and Sewer Feasibility Study replace the prior version included in the Draft IS/MND and are provided as **Appendix B1: Revised Water Supply Assessment and Appendix B2: Revised Sewer Feasibility Study**. The revised WSA continues to evaluate water demand and supply under conservative, worst-case assumptions and demonstrates that water supply impacts would be equal

to or less than those previously analyzed. Furthermore, the revised WSA recommends that the existing on-site groundwater wells serve the camp up to Phase 3. After Phase 3, the Camp will prepare an annual water supplier expectations memorandum following CLAWA's receipt of its draft annual State Water Project allocation. During drought or low-allocation years, the planned guest/staff population may be required to be reduced if verified on-site supply and confirmed CLAWA deliveries are insufficient. The assessment demonstrates that sufficient water is available to serve the Project via groundwater wells through phase 3, after which the Project Applicant will prepare an annual water supplier expectations memorandum. The revised Sewer Feasibility Study evaluates the revised camper population from 3,000 campers to 2,400 campers and the revised average sewer generation rate of 50 gallons per capita per day, reducing the total gallons per day (GPD) average from the initial assessment. Additionally, the revised Sewer Feasibility Study analyzes the primary use of an advanced on-site wastewater treatment system while also evaluating an alternative strategy using the Ahwahnee Lift Station, Deer Lick Lift Station, and RSWD Wastewater Treatment Plant under a conservative condition in which Project expansion flows are assumed to be conveyed through the existing RSWD system. Accordingly, the updated WSA and sewer feasibility study do not identify any new or more severe environmental impacts, and no additional environmental review or recirculation is required pursuant to CEQA Guidelines Sections 15073.5 and 15162. Although not required, because there were changes to both the Hydrology and Water Quality and Utilities and Service Systems Sections of the MND, and to provide for public review, the IS/MND and Final MND will be recirculated for public review for 20 days.

Accordingly, (Mitigation Measure) **MM HYD-1** and **MM UTL-1** have been updated, and **MM UTL-2** and **MM UTL-3** are new. See Section 4.0, Environmental Analysis, Hydrology and Water Quality, and Section 4.0, Environmental Analysis, Utilities and Service Systems below.

The refinement to **MM HYD-1** and the addition of **MM UTL-2** reflect updated recommendations identified in the updated WSA and clarify the well testing necessary to verify sustained yield and water quality prior to full operational use. Sewer service will be built out in accordance with **MM UTL-1** and **MM UTL-3**, which require the Project Applicant to demonstrate adequate wastewater treatment and disposal capacity prior to approval of the applicable Final Development Plan (FDP) and occupancy increases associated with each phase. As identified in **MM UTL-3**, the Project's primary wastewater strategy is development of an on-site wastewater treatment plant (WWTP), subject to County and Lahontan Regional Water Board approval. Additionally, **MM UTL-3** allows for utilization of alternative or supplemental wastewater solutions, including service from Running Springs Water District (RSWD), where sufficient capacity is demonstrated and approved by RSWD.

The revised WSA identifies an adequate water supply pathway through Phase 3 using the Camp's on-site wells and storage. The three existing active domestic wells (Wells 1, 4, and 5) have a combined planning-level production capacity of approximately 163,440 GPD, which exceeds full buildout demand under the base case scenario by approximately 28 percent. The revised Sewer Feasibility Study concludes that the Camp's wastewater needs may be accommodated through development, expansion, and/or supplemental use of the on-site WWTP throughout project buildout. Furthermore, the existing RSWD system is intended to remain available as a secondary wastewater conveyance and treatment option where capacity is available and use is approved by RSWD. As each phase advances, the required on-site treatment capacity will be confirmed based on the applicable Project flows, the selected advanced treatment system configuration, and regulatory requirements in accordance with **MM UTL-1**. Continued use of any portion of the RSWD system will remain subject to available District capacity and RSWD

approval. Overall, the revised Sewer Feasibility Study concludes that wastewater service availability for the Project is not contingent upon RSWD acceptance of additional Project wastewater flows.

These modifications enhance the effectiveness and enforceability of the mitigation measures and do not alter the significance conclusions of the IS/MND or defer the identification of mitigation. Rather, they provide additional implementation detail and phased performance standards that ensure adequate water supply and wastewater treatment and disposal capacity is available prior to occupancy increases, thereby maintaining impacts at a less-than-significant level.

3.3 IS/MND Errata

Table of Contents

Page iii, Figures.

Figure 7: Preliminary Fire Fuel Modification Plan ……165

Section 2.1, Project Background, Location, and Setting

Page 3, First Paragraph.

The Hume SoCal Campground Expansion Project is a proposal to enlarge the existing Hume SoCal Campground from the existing campground size of approximately 107 acres to approximately 252.1 acres – an addition of approximately 145 acres. The existing Hume SoCal Campground, owned by Calvary Chapel, currently accommodates approximately 300 persons, including both campers, camp staff and facility/office staff. The proposed expansion of Hume SoCal Campground and the increase in camp facilities would allow the Project to accommodate an additional approximately ~~2,700~~2,100 persons for a maximum of approximately ~~3,000~~2,400 campers, camp staff and facility/office staff.

Page 3, Add After Fourth Paragraph.

Additionally, because the Project's final occupancy limit has been refined, the County prepared the IS/MND to be circulated with a conservative, worst-case analysis for the resource areas most sensitive to occupancy assumptions (e.g., Hydrology and Water Quality, Utilities and Service Systems, Transportation, Noise, Biological Resources, Wildfire, etc.). That analysis evaluated the Project at a maximum occupancy of 3,000 persons across the five phases, thereby presenting the highest reasonably foreseeable demand for domestic water, wastewater generation, trip-making, on-site activity levels, and emergency evacuation loading. Following public/agency comments and additional coordination with CLAWA, the Applicant has reduced the Project's maximum occupancy to approximately 2,400 persons. Because the refined 2,400-occupant limit is less than the conservative scenario evaluated, it does not: create a new significant effect, substantially increase the severity of a previously identified effect, or present new information of substantial importance that would trigger recirculation or subsequent review. Accordingly, no additional environmental review or recirculation is required, and the IS/MND's conclusions remain valid and more conservative under the reduced occupancy condition.

Page 9, Subsection "Existing General Plan Designations and Zoning Districts", Second Paragraph, First Sentence.

As stated above, the Project proposes a Planned Development amendment to rescind and replace the previously approved Planned Development Permit, (PUD/82-0097) for the expansion of campground uses

at the existing Hume SoCal Campground to a total approximately 252.1 acres to allow for an additional approximately ~~2,700~~2,100 persons.

Page 11, Subsection "Utilities and Service Systems", Water Usage, Second Paragraph, Last Sentence.

The Hume SoCal Campground's 2022 Annual Report to the California State Water Resource Control Board (SWRCB) detailing potable water production and sample reports is included in **Appendix B1: Revised Water Supply Assessment.**

Page 11, Subsection "Utilities and Service Systems", Water Usage, Last Paragraph, First Sentence.

As discussed in the 1st Draft Water Supply Assessment (WSA), **Appendix B1**, Domestic Wells No. 1, 4, and 5 are used to supply the Camp's domestic and irrigation needs.

Page 11, Subsection "Utilities and Service Systems", Wastewater/Sewage Disposal, First Sentence.

As discussed in **Appendix B2: Revised Sewer Feasibility Study**, public s~~S~~ewer service is currently provided by RSWD.

Page 24, Subsection "Proposed Project", First Paragraph.

The Project involves the expansion of the existing Hume SoCal Campground from the existing campground size of approximately 107 acres to approximately 252.1 acres – an addition of approximately 145 acres. The existing Hume SoCal Campground, owned by Calvary Chapel, currently accommodates approximately 300 persons, including both campers, camp staff and facility/office staff. The proposed expansion of Hume SoCal Campground and the increase in camp facilities would allow the Project to accommodate an additional approximately ~~2,700~~2,100 persons for a maximum of approximately ~~3,000~~2,400 campers, camp staff and facility/office staff. Expansion of the campground would involve the construction/installation of new camp structures including residential dorms and semi-permanent tents, staff housing, dining/meeting halls, and indoor/outdoor recreational facilities and campground infrastructure (internal roads, pedestrian trails, etc.), and the addition of recreational activities and programming. The existing campground's structures, facilities, and amenities will continue to be used. The Project would be implemented in five phases.

Page 24, Proposed Project, Subsection "Project Objectives".

The purpose of the Hume SoCal Campground Expansion is to implement the vision laid out in the Project objectives by expanding the campground to be able to accommodate an additional approximately ~~2,700~~2,100 guests/users/visitors (a maximum of ~~3,000~~2,400 persons) through the continued use of existing campground structures and the development of additional campground and recreational structures. The Project would further the goals of the County's CWP on a currently underutilized site by enhancing the County's outdoor recreation/hospitality economy and increasing local employment opportunities. This updated PDP produces an economically efficient land use and will ensure compatibility between existing and proposed land uses.

The objectives of the Hume SoCal Campground Expansion Project are as follows:

- Reinforce Hume SoCal Campground as a premier campground and regional outdoor recreation destination.

- Provide new campground expansion development that would accommodate and serve an additional approximately ~~2,700~~2,100 guests/maximum ~~3,000~~2,400 persons including campers and staff.
- Provide new quality amenities and facilities to support outdoor recreation.
- Establish Green Valley Lake Community as an economically sound enclave of specialized outdoor recreation and campground venues. Provide up to approximately 231 acres of open space by clustering the proposed development area for the future campground facilities within approximately 15 acres that limits impacts to sensitive habitats and identified waters of the state/federal waters.

Page 25, Proposed Project, Subsection "Construction Phasing", Last Paragraph.

Phase 1 would include the development of Camp Middle School which would raise campsite capacity by approximately ~~484~~500 occupants from 300 to ~~784~~800 occupants; refer to **Figure 6b**. Implementation of Phase 1 would involve the facilities listed below and would be constructed over approximately 1-5 years with capacity slowly rising from 300 occupants to ~~784~~800 occupants at the end of the last year of construction. Phase 1 would involve the following facilities (The following square footages are estimates, subject to change with the final site plans and permits, and are intended to provide a maximum total square footage for the purpose of the CEQA Analysis. The total square footages may change during the final site design, but would not exceed approximately 10.2 building footprint acres as analyzed in the technical studies prepared for the Project.):

Page 25, Proposed Project, Subsection "Construction Phasing", "Existing Structures (Modifications)", Phase 1: Item 3.

3. Multipurpose ~~Facility~~/Small Meeting Space
    a. The existing ~~Multipurpose~~original chapel facility would be expanded from its current 5,521 sf to 7,521 sf. This expansion would convert the building to a multipurpose/small meeting space~~facility~~ to allow for greater capacity and increased floor space for activities and events. Current utilities including plumbing, electricity, and natural gas would be utilized.

Page 25, Proposed Project, Subsection "Construction Phasing", "Existing Structures (Modifications)", Phase 1: Item 5.

5. Dining/Meeting Hall
    a. The existing dining facility in the central area of the Project site would be altered from approximately ~~8,816~~8,500 sf to ~~15,648~~13,500 sf to allow for a greater range of space uses while expanding to accommodate ~~784~~800 occupants. The Dining/Meeting Hall would provide an indoor gathering space for dining and for large meetings. An expansion of the food service kitchen will be included. Utilities included at the current facility such as plumbing, electricity, and gas would be required for the expanded Dining/Meeting Hall.

Page 26, Proposed Project, Subsection "Construction Phasing", "New Structures", Phase 1: Item 4.

4. Dorm Facilities
    a. Dormitory (Dorm) facilities for campers would be constructed within the northern and central portions of the Phase 1 site. Dorms would be constructed as two different figuration types: 40-bed dorms and 80-bed dorms, which would add lodging capacity in conjunction with the

existing 54-bed dorms. Phase One includes (~~6~~8) new 40-bed dorm facilities, which would be approximately 3,160 sf each. Phase One includes (2) new 80-bed dorms, which would be approximately 5,462 sf. each. The dorm facility naming represents a typical bed count configuration and does not imply an exact number of beds within a given facility. Dorm facilities within each phase would still be required to meet occupancy limits regardless of the proposed typical bed count and may provide a range of beds within a given facility. New dorm facilities would allow for greater occupancy of the campground. Electrical, plumbing, and natural gas utilities would be required to service the dorms.

Page 26, Proposed Project, Subsection "Construction Phasing", "New Structures", Phase 1: Item 6.

6. Multipurpose Recreation ~~Center~~/Gym
    a. The ~~Recreation~~multipurpose ~~Center~~room would be a 28,500-sf recreation center for camper activities. This might include Basketball, Volleyball, and related summertime indoor activities such as a climbing wall, snack area, ping pong, etc. Winter activities might include ice skating. New utility connections would be needed.

Page 27, Proposed Project, Subsection "Construction Phasing", "New Structures", Phase 1: Item 7.

7. Multipurpose Chapel
    a. The Chapel would be constructed toward the center of the Project site. The new ~~16,900~~19,800 sf Chapel facility would have a greater occupancy capacity than the old Chapel. The Chapel would be utilized primarily for worship services and activities. The Chapel would require electrical, plumbing, and natural gas services to allow for occupancy.

Page 27, Proposed Project, Subsection "Construction Phasing", Phase 2.

Phase 2 will be for the development of Camp High School which would raise campsite capacity by approximately 1,000 occupants from ~~784~~800 to ~~1,784~~1,800 occupants; refer to **Figure 6c: Phase 2 Site Plan**. Implementation of Phase 2 would occur over approximately 5 years with capacity slowly rising from ~~784~~800 occupants to ~~1,784~~1,800 occupants over the 5-year interval. Phase 2 would involve the following facilities (The following square footages are estimates, subject to change with the final site plans and permits, and are intended to provide a maximum total square footage for the purpose of the CEQA Analysis. The total square footages may change during the final site design, but would not exceed approximately 10.2 building footprint acres as analyzed in the technical studies prepared for the Project.):

Page 28, Proposed Project, Subsection "Construction Phasing", Phase 2: Item 5.

5. 40-Bed and 80-Bed Dorms
    a. Dormitory (Dorm) facilities for campers would be constructed within the eastern and central portions of the Phase 2 site. Approximately 22 Dorm facilities would be constructed as two different figuration types: 40-bed dorms and 80-bed dorms. 40-bed dorm facilities would be approximately 3,160 sf and 80-bed dorms would be approximately 5,462 sf. The dorm facility naming represents a typical bed count configuration and does not imply an exact number of beds within a given facility. Dorm facilities within each phase would still be required to meet occupancy limits regardless of the proposed typical bed count and may provide a range of beds within a given facility. New dorm facilities would allow for greater occupancy of the campground. Electrical, plumbing, and natural gas utilities would be required to service the dorms.

Page 28, Proposed Project, Subsection "Construction Phasing", Phase 2: Item 7.

7. Multipurpose Chapel
    a. The Chapel would be constructed toward the eastern portion of the Phase 2 site. The Multipurpose Chapel would be constructed at approximately ~~22,500~~23,000 sf and allow for 1,000 occupants. The Chapel would be utilized primarily for worship services and activities. The Chapel would require electrical, plumbing, and natural gas services to allow for occupancy.

Page 29, Proposed Project, Subsection "Construction Phasing", Phase 3.

Phase 3 would include the development of Camp Adult Lodge which would raise campsite capacity by approximately ~~100~~ 140 occupants from ~~1,784~~1,800 to ~~1,924~~1,940 occupants; refer to **Figure 6d: Phase 3 Site Plan**. Implementation of Phase 3 would occur over approximately 5 years upon completion of Phase 2 with capacity slowly rising from ~~1,784~~1,800 occupants to ~~1,924~~1,940 occupants over the 5-year interval. Phase 3 would involve the following facility (The following square footages are estimates, subject to change with the final site plans and permits, and are intended to provide a maximum total square footage for the purpose of the CEQA Analysis. The total square footages may change during the final site design, but would not exceed approximately 10.2 building footprint acres as analyzed in the technical studies prepared for the Project.):

Page 29, Proposed Project, Subsection "Construction Phasing", Phase 4.

Phase 4 would include the development of Camp Elementary, which would raise campsite capacity by approximately 250-~~500~~340 occupants from ~~1,924~~1,940 to ~~2,424~~2,280 occupants; **refer to Figure 6e: Phase 4 Site Plan**. Implementation of Phase 4 would occur over approximately 5 years upon completion of Phase 3 with capacity slowly rising from ~~1,924~~1,940 occupants to ~~2,424~~2,280 occupants over the 5-year interval. Phase 4 would involve the following facilities (The following square footages are estimates, subject to change with the final site plans and permits, and are intended to provide a maximum total square footage for the purpose of the CEQA Analysis. The total square footages may change during the final site design, but would not exceed approximately 10.2 building footprint acres as analyzed in the technical studies prepared for the Project.):

Page 30, Proposed Project, Subsection "Construction Phasing", Phase 4: Item 3.

3. 40-Bed Dorm
    a. Dorm facilities for campers would be constructed within the central portion of the Phase 4 site. Approximately eight (8) Dorm facilities would be constructed as one figuration type: 40-bed dorms. 40-bed dorm facilities would be constructed at approximately 3,160 sf. The dorm facility naming represents a typical bed count configuration and does not imply an exact number of beds within a given facility. Dorm facilities within each phase would still be required to meet occupancy limits regardless of the proposed typical bed count and may provide a range of beds within a given facility. New dorm facilities would allow for greater occupancy of the campground. Electrical, plumbing, and natural gas utilities would be required to service the dorms.

Pages 30-31, Proposed Project, Subsection "Construction Phasing", Phase 5.

Phase 5 would include the development of Camp Wildwood which would raise campsite capacity by approximately 120 occupants from ~~2,424~~2,280 to ~~2,544~~2,400 occupants; refer to **Figure 6f**.

Implementation of Phase 5 would occur over approximately 5 years with capacity slowly rising from ~~2,424~~2,280 occupants to ~~2,544~~2,400 occupants over the 5-year interval. Phase 5 would involve the following facilities (The following square footages are estimates, subject to change with the final site plans and permits, and are intended to provide a maximum total square footage for the purpose of the CEQA Analysis. The total square footages may change during the final site design, but would not exceed approximately 10.2 building footprint acres as analyzed in the technical studies prepared for the Project.):

Page 31, Proposed Project, Subsection "Construction Phasing", Phase 5: Item 3.

3. 40-Bed Dorm
    a. Dorm facilities for campers would be constructed within the central portion of the Phase 5 site. Approximately 2 Dorm facilities would be constructed as one figuration type: 40-bed dorms. 40-bed dorm facilities would be constructed at approximately 3,160 sf. The dorm facility naming represents a typical bed count configuration and does not imply an exact number of beds within a given facility. Dorm facilities within each phase would still be required to meet occupancy limits regardless of the proposed typical bed count and may provide a range of beds within a given facility. New dorm facilities would allow for greater occupancy of the campground. Electrical, plumbing, and natural gas utilities would be required to service the dorms.

Page 33 (end of), Proposed Project, New Subsection "Responsible Agencies".

Responsible Agencies

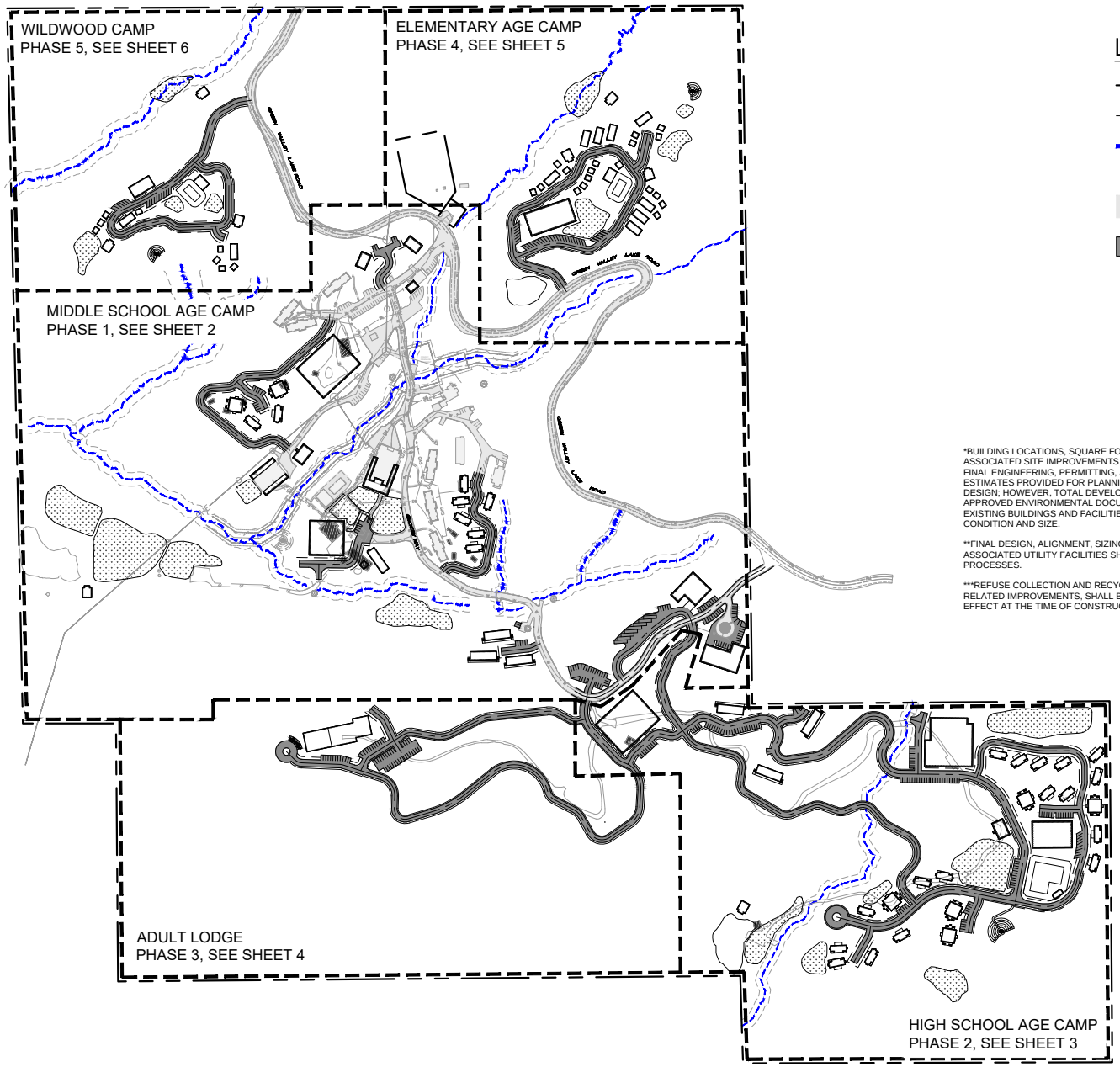
Under CEQA, a Responsible Agency is a public agency other than the Lead Agency that has discretionary approval authority over one or more aspects of the Project. In response to agency comments, the County has clarified that certain service providers will exercise discretionary permitting or service-connection approvals related to the Project. Accordingly, the following entities are identified as Responsible Agencies for the Project under CEQA:

- Crestline-Lake Arrowhead Water Agency (CLAWA)
- Running Springs Water District (RSWD)
- Lahontan Regional Water Quality Control Board
- California Department of Fish and Wildlife (CDFW)

This clarification does not alter the environmental conclusions of the IS/MND. Responsible Agency involvement is accounted for through existing mitigation measures and regulatory compliance requirements, and no new significant impacts or more severe impacts occur as a result of this clarification.

Page 35, Proposed Project

Update Figure 6a.



LEGEND:

- SUBJECT PROPERTY
- CENTERLINE
- EXISTING WATER COURSE
- EXISTING ASPHALT PAVEMENT
- PROPOSED ASPHALT PAVEMENT
- EXISTING BUILDING
- PROPOSED BUILDING

*BUILDING LOCATIONS, SQUARE FOOTAGES, UTILITY INFRASTRUCTURE, REFUSE COLLECTION FACILITIES, AND ASSOCIATED SITE IMPROVEMENTS SHOWN ON THIS PLAN ARE CONCEPTUAL AND SUBJECT TO REFINEMENT DURING FINAL ENGINEERING, PERMITTING, AND BUILDING PLAN REVIEW. PROPOSED BUILDING SQUARE FOOTAGES ARE ESTIMATES PROVIDED FOR PLANNING AND ENVIRONMENTAL REVIEW PURPOSES AND MAY BE MODIFIED DURING FINAL DESIGN; HOWEVER, TOTAL DEVELOPMENT SHALL NOT EXCEED THE MAXIMUM DEVELOPMENT ANALYZED IN THE APPROVED ENVIRONMENTAL DOCUMENT. ONLY PROPOSED NEW CONSTRUCTION SQUARE FOOTAGE IS IDENTIFIED, EXISTING BUILDINGS AND FACILITIES NOT IDENTIFIED FOR MODIFICATION SHALL REMAIN IN THEIR CURRENT APPROVED CONDITION AND SIZE.

**FINAL DESIGN, ALIGNMENT, SIZING, AND CONFIGURATION OF WATER, WASTEWATER, GAS, ELECTRICAL, AND ASSOCIATED UTILITY FACILITIES SHALL BE DETERMINED THROUGH SUBSEQUENT ENGINEERING AND PERMITTING PROCESSES.

***REFUSE COLLECTION AND RECYCLING FACILITIES, INCLUDING BINS, COMPACTORS, ENCLOSURES, SCREENING, AND RELATED IMPROVEMENTS, SHALL BE PROVIDED IN ACCORDANCE WITH THE APPROVED PDP, COUNTY STANDARDS IN EFFECT AT THE TIME OF CONSTRUCTION, AND APPLICABLE SERVICE PROVIDER REQUIREMENTS.

Source: Kimley-Horn, 2025.

Figure 6a: Hume SoCal Campground Expansion Overall Plan Site Plan

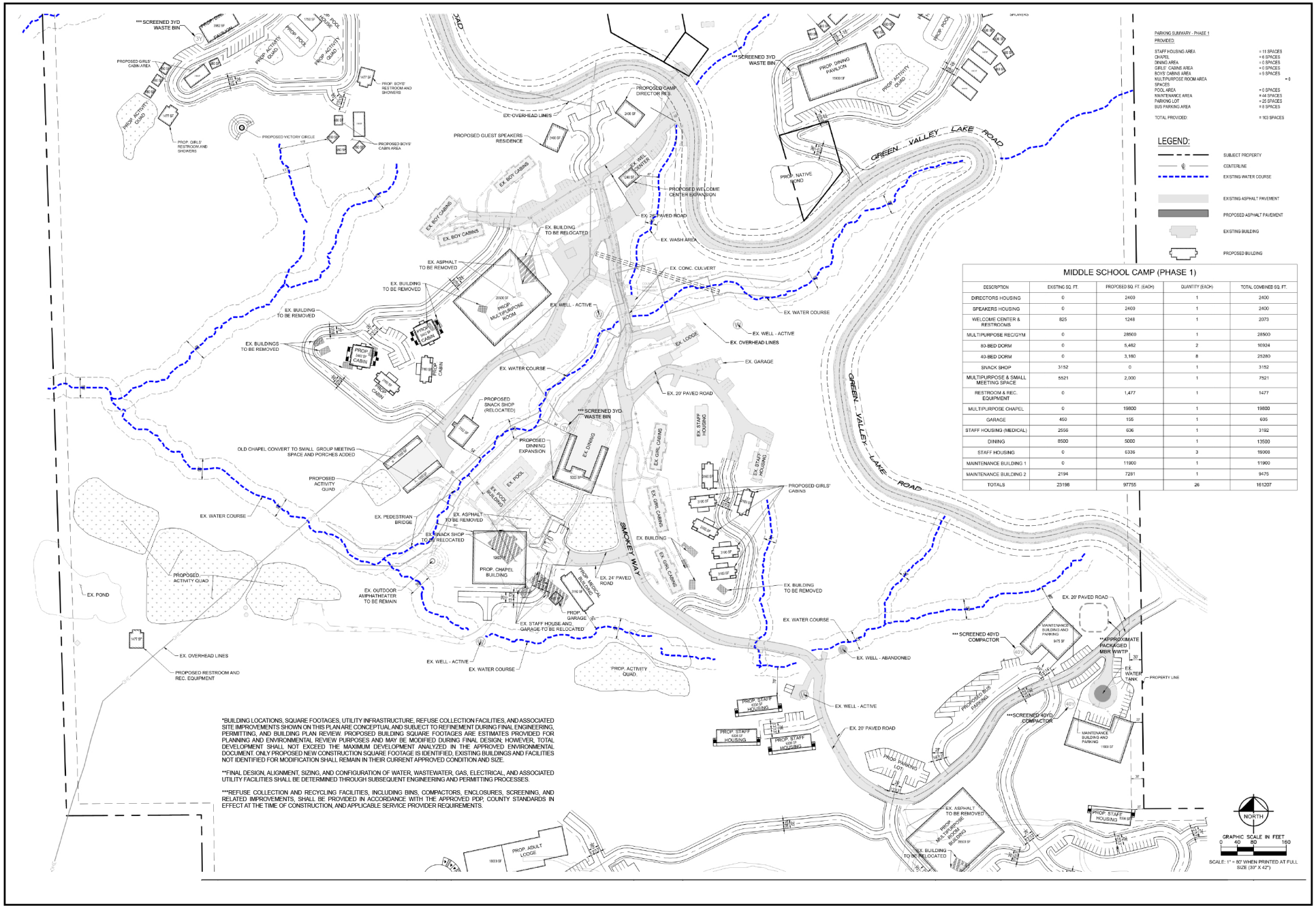
Hume SoCal Campground Expansion Project
San Bernardino County

Not to scale

Kimley»Horn

Page 37, Proposed Project

Update Figure 6b.



MIDDLE SCHOOL CAMP (PHASE 1)

DESCRIPTION	EXISTING SQ. FT.	PROPOSED SQ. FT. (EACH)	QUANTITY (EACH)	TOTAL COMBINED SQ. FT.
DIRECTORS HOUSING	0	2400	1	2400
SPEAKERS HOUSING	0	2400	1	2400
WELCOME CENTER & RESTROOMS	825	1248	1	2073
MULTIPURPOSE REC/GYM	0	28500	1	28500
80-BED DORM	0	5,462	2	10924
40-BED DORM	0	3,160	8	25280
SNACK SHOP	3152	0	1	3152
MULTIPURPOSE & SMALL MEETING SPACE	5521	2,000	1	7521
RESTROOM & REC. EQUIPMENT	0	1,477	1	1477
MULTIPURPOSE CHAPEL	0	19800	1	19800
GARAGE	450	155	1	605
STAFF HOUSING (MEDICAL)	2556	636	1	3192
DINING	8500	5000	1	13500
STAFF HOUSING	0	6336	3	19008
MAINTENANCE BUILDING 1	0	11900	1	11900
MAINTENANCE BUILDING 2	2194	7281	1	9475
TOTALS	23198	97755	26	161207

Source: Kimley-Horn, 2025.

Figure 6b: Phase 1 Site Plan

Hume SoCal Campground Expansion Project

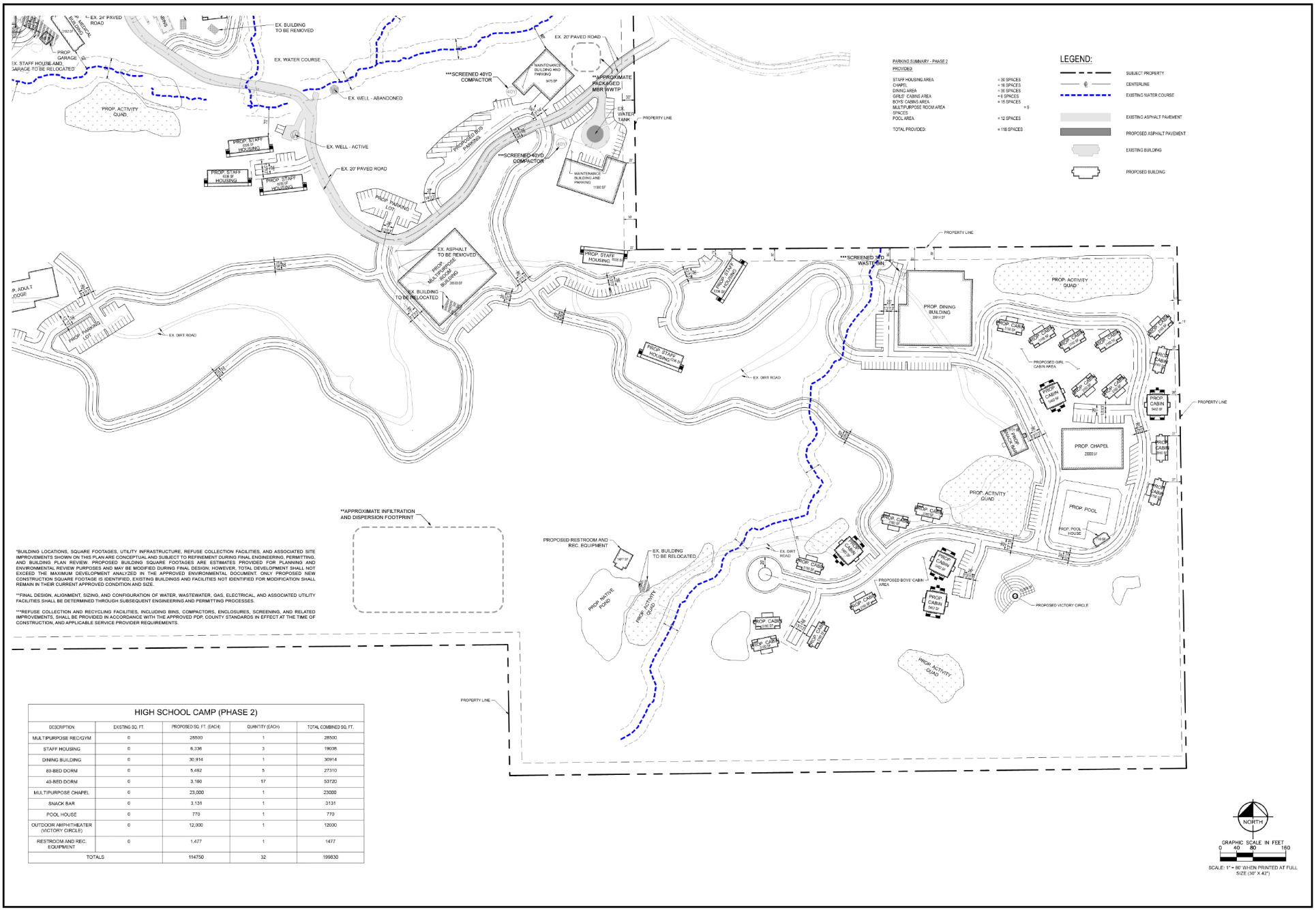
San Bernardino County

Not to scale

Kimley»Horn

Page 39, Proposed Project

Update Figure 6c.



HIGH SCHOOL CAMP (PHASE 2)

DESCRIPTION	EXISTING SQ. FT.	PROPOSED SQ. FT. (EACH)	QUANTITY (EACH)	TOTAL COMBINED SQ. FT.
MULTIPURPOSE REC/GYM	0	28500	1	28500
STAFF HOUSING	0	6,336	3	19008
DINING BUILDING	0	30,914	1	30914
80-BED DORM	0	5,462	5	27310
40-BED DORM	0	3,190	17	53720
MULTIPURPOSE CHAPEL	0	23,000	1	23000
SNACK BAR	0	3,131	1	3131
POOL HOUSE	0	770	1	770
OUTDOOR AMPHITHEATER (VICTORY CIRCLE)	0	12,000	1	12000
RESTROOM AND REC. EQUIPMENT	0	1,477	1	1477
TOTALS		114750	32	199830

Source: Kimley-Horn, 2025.

Figure 6c: Phase 2 Site Plan

Hume SoCal Campground Expansion Project

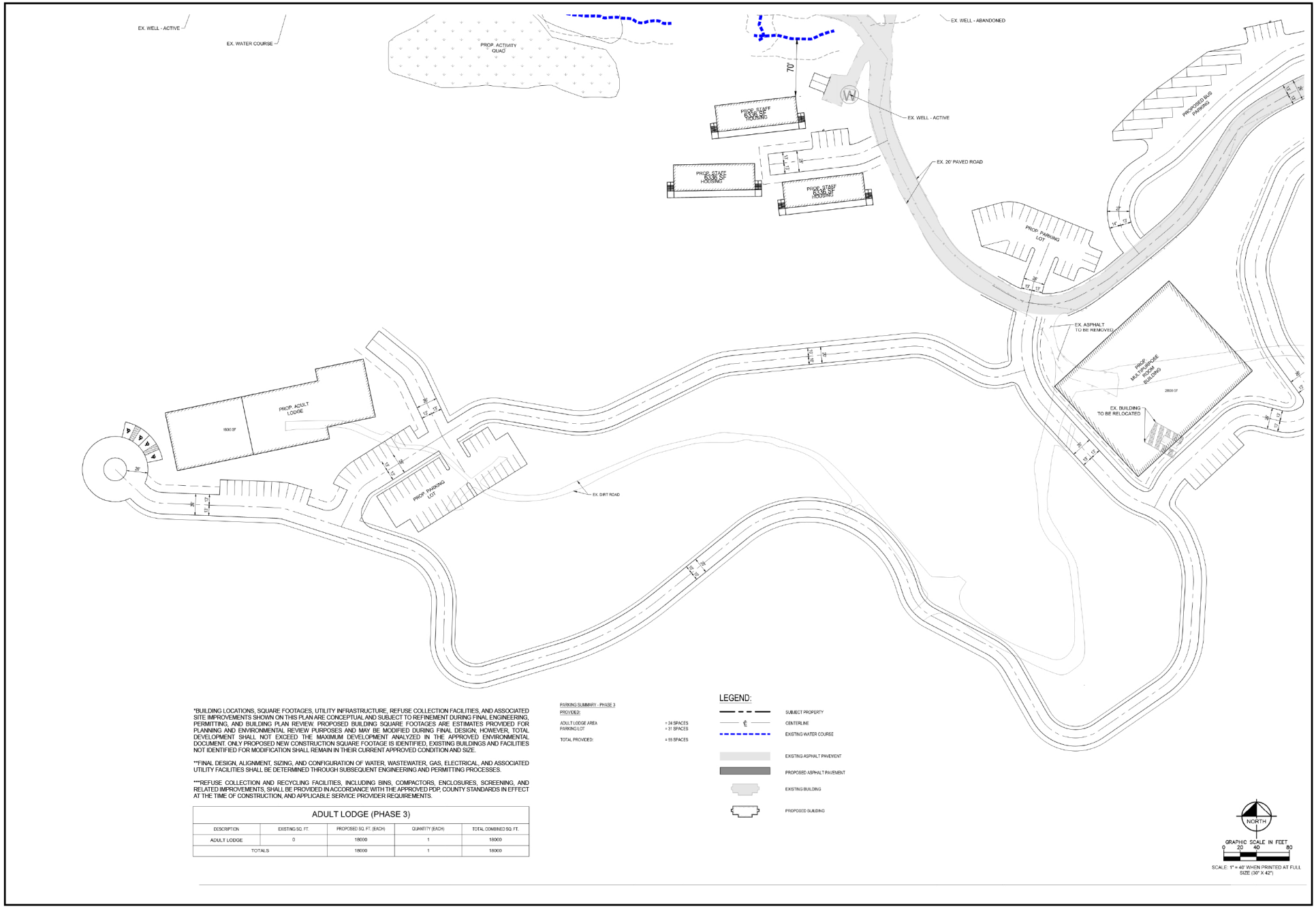
San Bernardino County

Not to scale

Kimley»Horn

Page 41, Proposed Project

Update Figure 6d.



*BUILDING LOCATIONS, SQUARE FOOTAGES, UTILITY INFRASTRUCTURE, REFUSE COLLECTION FACILITIES, AND ASSOCIATED SITE IMPROVEMENTS SHOWN ON THIS PLAN ARE CONCEPTUAL AND SUBJECT TO REFINEMENT DURING FINAL ENGINEERING, PERMITTING, AND BUILDING PLAN REVIEW. PROPOSED BUILDING SQUARE FOOTAGES ARE ESTIMATES PROVIDED FOR PLANNING AND ENVIRONMENTAL REVIEW PURPOSES AND MAY BE MODIFIED DURING FINAL DESIGN. HOWEVER, TOTAL DEVELOPMENT SHALL NOT EXCEED THE MAXIMUM DEVELOPMENT ANALYZED IN THE APPROVED ENVIRONMENTAL DOCUMENT. ONLY PROPOSED NEW CONSTRUCTION SQUARE FOOTAGE IS IDENTIFIED, EXISTING BUILDINGS AND FACILITIES NOT IDENTIFIED FOR MODIFICATION SHALL REMAIN IN THEIR CURRENT APPROVED CONDITION AND SIZE.

**FINAL DESIGN, ALIGNMENT, SIZING, AND CONFIGURATION OF WATER, WASTEWATER, GAS, ELECTRICAL, AND ASSOCIATED UTILITY FACILITIES SHALL BE DETERMINED THROUGH SUBSEQUENT ENGINEERING AND PERMITTING PROCESSES.

***REFUSE COLLECTION AND RECYCLING FACILITIES, INCLUDING BINS, COMPACTORS, ENCLOSURES, SCREENING, AND RELATED IMPROVEMENTS, SHALL BE PROVIDED IN ACCORDANCE WITH THE APPROVED PDP, COUNTY STANDARDS IN EFFECT AT THE TIME OF CONSTRUCTION, AND APPLICABLE SERVICE PROVIDER REQUIREMENTS.

ADULT LODGE (PHASE 3)

DESCRIPTION	EXISTING SQ. FT.	PROPOSED SQ. FT. (EACH)	QUANTITY (EACH)	TOTAL COMBINED SQ. FT.
ADULT LODGE	0	18000	1	18000
TOTALS		18000	1	18000

PARKING SUMMARY - PHASE 3

PROVIDED:

ADULT LODGE AREA	= 24 SPACES
PARKING LOT	= 31 SPACES
TOTAL PROVIDED:	= 55 SPACES

LEGEND:

- SUBJECT PROPERTY
- CENTERLINE
- EXISTING WATER COURSE
- EXISTING ASPHALT PAVEMENT
- PROPOSED ASPHALT PAVEMENT
- EXISTING BUILDING
- PROPOSED BUILDING

Source: Kimley-Horn, 2025

Figure 6d: Phase 3 Site Plan

Hume SoCal Campground Expansion Project

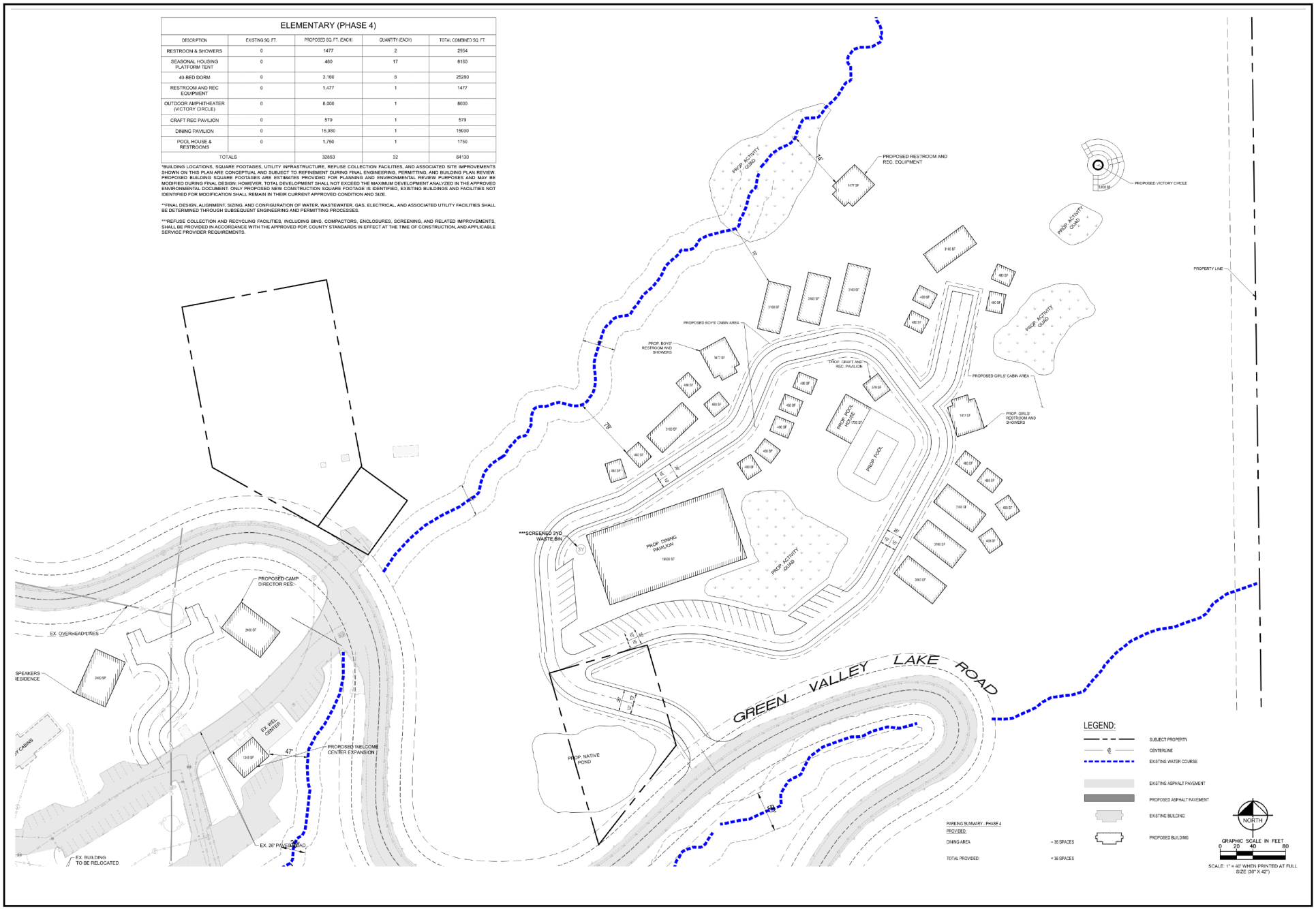
San Bernardino County

Not to scale

Kimley»Horn

Page 43, Proposed Project

Update Figure 6e.



Source: Kimley-Horn, 2025.

Figure 6e: Phase 4 Site Plan

Hume SoCal Campground Expansion Project

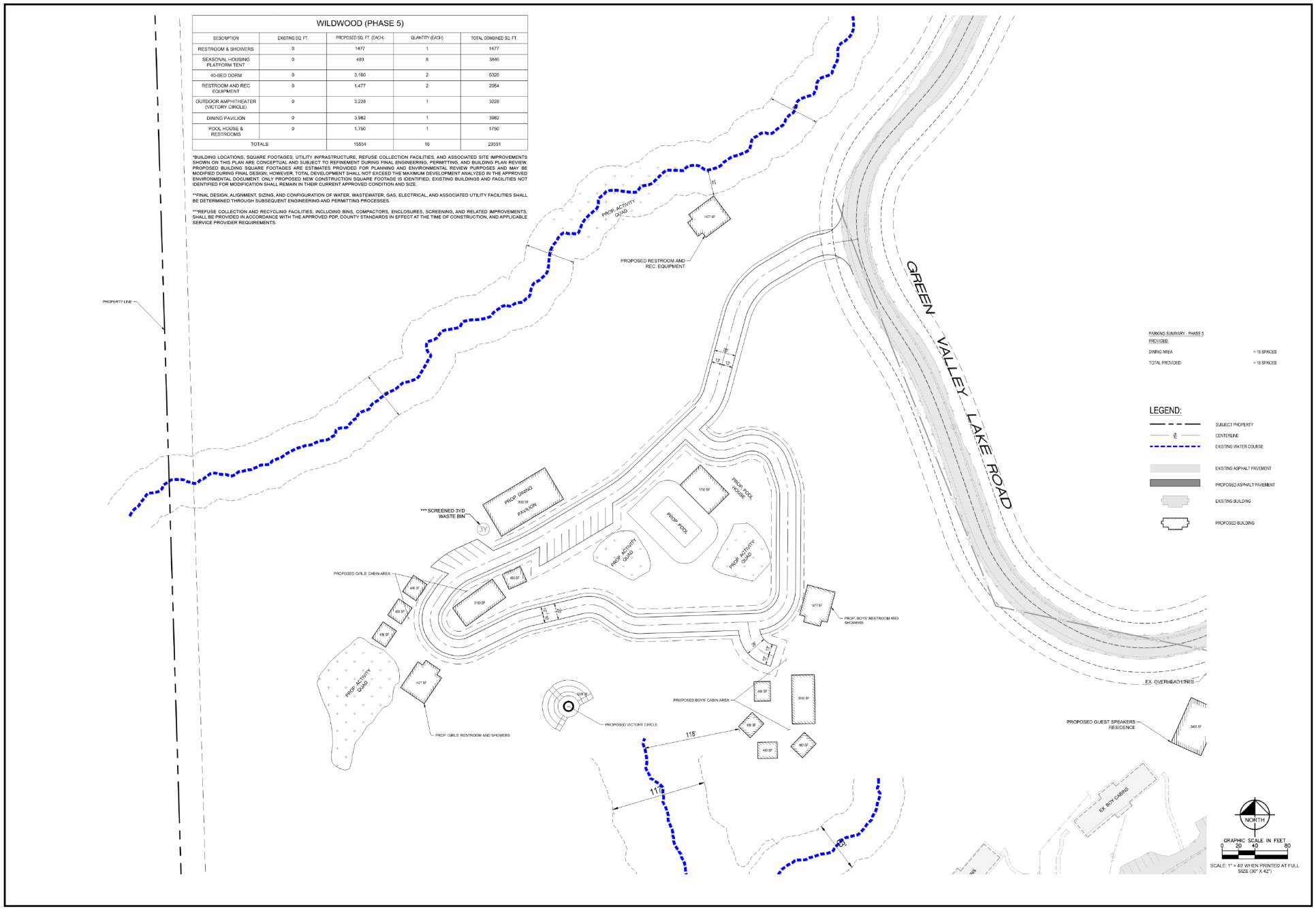
San Bernardino County

Not to scale

Kimley»Horn

Page 45, Proposed Project

Update Figure 6f.



Source: Kimley-Horn, 2025

Figure 6f: Phase 5 Site Plan

Hume SoCal Campground Expansion Project

San Bernardino County

Not to scale

Kimley»Horn

Section 3.0, Initial Study Checklist

Page 47, Item 8.

8. Description of project: (Describe the whole action involved, including but not limited to later phases of the project, and any secondary, support, or off-site features necessary for its implementation. Attach additional sheets if necessary.)

The Project is the expansion of an existing 107-acre Hume SoCal Campground that currently has a guest capacity of 300 persons and is operated by Hume Lake Christian Camps. The Project will enlarge the area of the campground by approximately 144 acres and increase the number of guests that could be accommodated by up to ~~2,700~~2,100 persons. Upon completion of the Project, the total area of the campground would be approximately 252.1 acres and would have a capacity of up to ~~3,000~~2,400 persons. The Project would be constructed in up to five phases.

Section 4.0, Environmental Analysis

Page 51, New Subsection "Introduction".

The Project's maximum occupancy has been reduced from 3,000 to approximately 2,400 persons. Because the IS/MND evaluated a conservative worst-case scenario based on the higher 3,000-person population, all resource areas analyzed in this section would experience lower demand and less intensity under the refined occupancy. No new significant impact would occur, and no previously identified impact would become more severe.

Section 4.0, Environmental Analysis, Aesthetics

Page 52, Footnote.

[13] County of San Bernardino. 2019. *San Bernardino Countywide Plan Draft PEIR Section 5.1 Aesthetics.* Page 5.1-1. Available at ~~https://countywideplan.com/wp-content/uploads/sites/68/2021/01/Ch_05-01-AE.pdf~~ https://countywideplan.sbcounty.gov/wp-content/uploads/sites/125/2021/01/Ch_05-01-AE.pdf(accessed August 2023).

[14] County of San Bernardino. 2020. *San Bernardino Countywide Policy Plan Map NR-2*. ~~https://countywideplan.com/wp-content/uploads/sites/68/2021/02/NR-3-Scenic-Routes-Highways-201027.pdf~~ https://countywideplan.sbcounty.gov/wp-content/uploads/sites/125/2021/02/NR-2-Parks-Open-Space-Resources-201027.pdf(accessed July 2025).

Section 4.0, Environmental Analysis, Agriculture and Forestry Resources

Page 58, Footnote.

[20] California Department of Fish and Wildlife. 2016. *BIOS, NLCD 2016 Land Cover layer*. Available at ~~https://apps.wildlife.ca.gov/bios/?bookmark=940~~ https://data-cdfw.opendata.arcgis.com/maps/CDFW::nlcd-2016-land-cover-california-subset/explore.

Section 4.0, Environmental Analysis, Biological Resources

Page 77, Impact a), Last Paragraph.

Additionally, in order to ensure no impact to nesting birds, including Cooper's hawk, golden eagle, bald eagle, long-eared owl, olive-sided flycatcher, bald eagle, purple martin, and California spotted owl do not occur, the Project would comply with **MM BIO-2**. After implementation of **MM BIO-1** and **MM BIO-2**, Project impacts would be less than significant.

Page 77, Impact a), Mitigation Measures, MM BIO-2, First Sentence.

MM BIO-2 In order to avoid violation of the Migratory Bird Treaty Act (MBTA) and the California Fish and Game Code, site-preparation activities (removal of trees and vegetation) for all Projects shall be avoided, to the greatest extent possible, during the nesting season (generally February 1 to August 31) of potentially occurring native and migratory bird species, including the golden eagle, bald eagle, and California spotted owl.

Section 4.0, Environmental Analysis, Cultural Resources

Page 84, Impact a), "Operations", First Paragraph.

Operations. Following completion of construction of the Project and disturbances of the site, the Project would include expanded campground uses to accommodate up to ~~3,000~~2,400 total occupants. This would be accomplished through the use of existing campground structures as well as the development of additional campground and recreational structures.

Page 87, Mitigation Measures

MM CUL-~~2~~5 If previously unknown cultural resources, including human remains, are identified during grading activities, a qualified archaeologist shall be retained to assess the nature and significance of the find. If human remains are encountered, State Health and Safety Code Section 7050.5 states that no further disturbance shall occur until the County Coroner has made a determination of origin and disposition pursuant to Public Resources Code Section 5097.98. The County Coroner shall be notified of the find immediately. If the remains are determined to be prehistoric, the Coroner shall notify the NAHC, which shall determine and notify a Most Likely Descendant (MLD). With the permission of the landowner or his/her authorized representative, the MLD may inspect the site of the discovery. The MLD shall complete the inspection within 24 hours of notification by the NAHC. The MLD may recommend scientific removal and nondestructive analysis of human remains and items associated with Native American burials.

Section 4.0, Environmental Analysis, Hydrology and Water Quality

Page 114, Last Paragraph.

The Project's updated ~~Water Supply Assessment (~~WSA~~)~~ evaluates various aspects of water demand, supply, and management strategies, particularly in relation to its reliance on CLAWA and the Hume SoCal Campground's groundwater resources. The analysis, considering multiple scenarios of water shortages and demand, details the Camp's current and future water demand and its impact on available water resources. The updated WSA evaluates water demand under an increased occupancy scenario, which represents a worst-case scenario beyond the camps' proposed occupancy of 2,400; refer to **Appendix B1: Revised Water Supply Assessment.**

Page 116, Impact b)

Less Than Significant Impact. The proposed Project requires the continued use of local groundwater supplies via the existing groundwater wells. Water ~~would~~could be provided by CLAWA and internal wells.

Up to Phase 3, the Project will utilize the local groundwater supplies via the existing groundwater wells. The Camp's three active domestic wells (Wells 1, 4, and 5) have a combined planning-level production capacity of approximately 163,440 GPD, which exceeds full buildout demand under the base case by approximately 28 percent. Tables 5 and 6 retain the required WSA contingency scenarios and identify potential supplemental supply if one or more wells are unavailable. These calculations are planning scenarios and do not establish a predetermined CLAWA request. The WSA identifies an adequate water supply pathway through Phase 3 using the Camp's on-site wells and storage. Prior to proceeding with each phase, water quality and drawdown/recovery testing will confirm the wells, operating rates, and treatment included in the phase water strategy. Before issuance of the certificate of occupancy for the final Phase 3 improvements, the Camp will complete the required infrastructure improvements to establish the CLAWA connection and enable supplemental deliveries. After phase 3, the Project Applicant will prepare an annual water supplier expectations memorandum following CLAWA's receipt of its draft annual State Water Project allocation. The memorandum will identify the anticipated peak-period population, projected demand, available on-site supply, and any requested CLAWA deliveries for the upcoming year. During drought or low-allocation years, the planned guest/staff population may be required to be reduced if verified on-site supply and confirmed CLAWA deliveries are insufficient. ~~has been determined to have sufficient water supplies for the Project regarding the water supply for the Camp's future expansions if used in conjunction with internal wells~~; refer to **Appendix B1: Revised Water Supply Assessment**. Neither the Hume SoCal Campground nor CLAWA have prepared an Urban Water Management Plan (UWMP) to aid in future projection of domestic and non-domestic water demand. Therefore, the following analysis makes assumptions for the Camp's groundwater well sustainability and CLAWA allotted domestic water to the Camp. The WSA explores multiple scenarios to determine water supply and sustainability under varying conditions; refer to **Appendix B1: Revised Water Supply Assessment**.

As outlined in ***Section 2.0: Description of Proposed Project***, the FY 2022 domestic water usage of the existing Hume SoCal Campground was 5,946,099 gallons, or 18.4 AFY. The Campground's water supply consisted of 100 percent groundwater, sourced from four private, on-site wells. According to the WSA, the preferred water supply strategy for the Project involves a ~~predominant~~ reliance on on-site wells through phase 3 before preparing an annual water supplier expectations memorandum ~~CLAWA, complemented by the utilization of its groundwater wells~~. The approach is aimed at ensuring a consistent and sustainable water supply over the long term. To support and validate this strategy, the WSA advises, prior to each phase, conducting drawdown, recovery tests~~and water quality tests~~ , and water quality testing on all wells serving that phase. These tests are essential for a technical evaluation of the groundwater wells' sustainability and operational reliability. With the completion of the WSA, the Camp aims to ensure water supply sustainability from existing on-site domestic wells and public water service connections.

Domestic Water Demand. With the proposed expansion, the Camp's capacity is projected to increase by approximately ~~1,000~~800 percent. This will proportionally increase the number of staff required. The expected increase in domestic water demand, corresponding to the increase in occupants and expansion of facilities, is detailed in **Table 13: Estimated Camp Expansion Water Demand.**

Page 116, Impact b), Table 13: Estimated Camp Expansion Water Demand.

Table 13: Estimated Camp Expansion Water Demand

~~**Occupant Type**~~	~~**Count**~~	~~**Occupancy Duration (% of year)**~~	~~**Equivalent Days**~~	~~**Annual Domestic Demand[1] (Gallons)**~~
~~**Employee**~~				
~~Full Time Employees~~	~~120~~	~~100%~~	~~365~~	~~8,760,000~~
~~Part Time Employees~~	~~200~~	~~50%~~	~~182.5~~	~~7,300,000~~
~~Winter Seasonal~~	~~350~~	~~17%~~	~~63.145~~	~~4,420,150~~
~~Summer Seasonal~~	~~680~~	~~17%~~	~~63.145~~	~~8,587,720~~
~~**Camper/Guest**~~				
~~High School Guests~~	~~1,000~~	~~13%~~	~~50~~	~~10,000,000~~
~~Middle School Guests~~	~~784~~	~~13%~~	~~50~~	~~7,840,000~~
~~Adult Lodge~~	~~140~~	~~13%~~	~~50~~	~~1,400,000~~
~~Elementary Age Guests~~	~~500~~	~~13%~~	~~50~~	~~5,000,000~~
		~~**Total Domestic Demand**~~	~~**54,607,870 Gallons per Year (GPY)**~~	
			~~**167.58 Acre-Feet per Year (AFY)**~~	
			~~**149,610 Gallons per Day (GPD)**~~	
~~1. Annual domestic Demand = Equivalent Days *Count* (180 gallons per capita per day [GPCPD] (San Bernardino County, Special Districts Department, Standards for Domestic Water Systems, 2020) + 20 GPCPD (Camp irrigation sourced from domestic wells)~~				
~~Source: Kimley-Horn. 2024. *1st Draft Water Supply Assessment Hume SoCal Camp Expansion,* page 6.~~				

Phase	Occupant Type	Max Guests	Demand Rate (GPD/Person)	Peak Day Demand (GPD)
Phase 1	Middle School Guests	784	50	39,200
Phase 2	High School Guests	1,000	50	50,000
Phase 3	Adult Lodge	140	50	7,000
Phase 4	Elementary Age Guests	*500*	50	25,000
Phase 5	Wildwood Camp	130	50	6,500
Total	**Full Buildout**	**2,554**	-	**127,700**
Table 13 presents the conservative peak-day water-demand analysis based on the prior Project phase occupancies totaling 2,554 guests. These analysis occupancies are intentionally retained for water-supply planning and do not represent the current 2,400-guest Project occupancy.				
Source: Kimley-Horn. 2026. *Water Supply Assessment Hume SoCal Camp Expansion,* page 7.				

Page 117, Impact b), Last Paragraph.

FY 2022 flow data for Non-Domestic Well No. 2, retrieved from the Camp's well pumping logs, and proposed post-Project demand are displayed in **Table 14: Summary of Project Water Demand**. Water demand for the expansion is calculated in accordance with the California Code of Regulations (CCR), Title 17, Section 30710, and the 2011 County of San Bernardino Environmental Health Services Organized Camp Program, which establish a minimum potable water supply standard of 50 gallons per capita per day (GPCPD) for organized camps. The demand accounts for filling of the ponds at the beginning of the summer season and periodic refilling, primarily driven by evaporation.

Page 117, Impact b), Table 14: Summary of Project Demand.

Table 14: Summary of Project Demand

~~Demand Type~~	~~Existing Demand~~	~~Proposed Demand~~
~~Domestic[1]~~	~~5,946,099 Gallons~~ ~~18.4 AFY~~	~~54,607,870 Gallons~~ ~~167.6 AFY~~
~~Non-Domestic~~	~~3,718,190 Gallons~~ ~~11.4 AFY~~	~~7,436,380 Gallons~~ ~~22.8 AFY~~
~~Water Loss[2]~~	~~193,286 Gallons~~ ~~0.6 AFY~~	~~1,131,670 Gallons~~ ~~3.5 AFY~~
~~**Total Demand**~~	~~**9,857,575 Gallons**~~ ~~**30.2 AFY**~~	~~**63,175,920 Gallons**~~ ~~**173.3 AFY**~~
~~1. Domestic water demand includes irrigation demand~~ ~~2. Water losses are assumed to be 2 percent of total domestic and non-domestic water demand~~		
~~Source: Kimley-Horn. 2024. *1st Draft Water Supply Assessment Hume SoCal Camp Expansion*, page 11.~~		

Demand Type	Existing Demand (Pre-Project)	Proposed Demand (Full Buildout)
Domestic (50 GPCPD)	5,946,099 Gal/yr 18.4 AFY ~16,290 GPD avg	46,590,500 Gal/yr 143 AFY
Non-Domestic (Recreation)	3,718,190 Gal/yr 11.4 AFY	7,436,380 Gal/yr 22.8 AFY
Water Loss (2%)	193,286 Gal/yr 0.6 AFY	1,080,540 Gal/yr 3.3 AFY
Total	**9,857,575 Gal/yr** **30.2 AFY**	**55,107,420 Gal/yr** **169.1 AFY**
1. Peak day demand of 127,700 GPD occurs when all five phases operate simultaneously at full guest capacity. 2. Water losses assumed at 2 percent of combined domestic and non-domestic water use.		
Source: Kimley-Horn. 2026. *Water Supply Assessment Hume SoCal Camp Expansion*, page 8.		

Page 118, Impact b), First Paragraph.

The projected Campground water demand is assessed against CLAWA's 2,500 AFY baseline, 3,480 AFY long-term, and 5,800 AFY maximum entitlement allocations to determine the impact of the Camp's potential source scenarios on CLAWA. It is assumed that the Camp's non-domestic demand and water losses are supplied by Camp groundwater wells. The following analysis is based on the future Camp annual

domestic demand of ~~54,607,870~~55,107,420 gallons, or ~~167.6~~169.1 AFY. Refer to **Table 15: Project Water Demand Compared Against CLAWA's Allocation Levels.**

Page 118, Impact b), Table 15: Project Water Demand Compared Against CLAWA's Allocation Levels.

Table 15: Project Water Demand Compared Against CLAWA's Allocation Levels

~~Allocation Type~~	~~CLAWA Allocation (AFY)~~	~~Majority Reliance Camp Demand Impact (125.7 AFY)~~	~~Balanced Reliance Camp Demand Impact (83.8 AFY)~~	~~Supplementary Reliance Camp Demand Impact (41.9 AFY)~~
~~Baseline~~	~~2,500~~	~~5.03%~~	~~3.35%~~	~~1.68%~~
~~Long-Term~~	~~3,480~~	~~3.61%~~	~~2.41%~~	~~1.20%~~
~~Maximum~~	~~5,800~~	~~2.17%~~	~~1.44%~~	~~0.72%~~
~~Source: Kimley-Horn. 2024. *1st Draft Water Supply Assessment Hume SoCal Camp Expansion*, page 13.~~				

Allocation Type	CLAWA Allocation (AFY)	Majority Reliance (107.3 AFY)	Balanced Reliance (71.5 AFY)	Supplementary Reliance (35.8 AFY)	No Reliance (0 AFY)
Baseline	2,500	4.29%	2.86%	1.43%	0%
Long-Term Average	3,480	3.08%	2.05%	1.03%	0%
Maximum Entitlement	5,800	1.85%	1.23%	0.62%	0%
All percentages are based on the Camp's annual domestic demand at full five-phase buildout (143.0 AFY). Non-domestic demand and water losses are supplied by on-site groundwater wells and are not included in CLAWA demand figures. Strategy 1 reflects on-site wells as the primary operational source with CLAWA as an active supplemental source, particularly in the event of well water quality issues; Strategy 3 is the Camp's preferred long-term strategy once a formal CLAWA service agreement is in place.					
Source: Kimley-Horn. 2026. *Water Supply Assessment Hume SoCal Camp Expansion*, page 18.					

Page 118, Impact b), Last Three Paragraphs.

As discussed in **Appendix B1: Revised Water Supply Assessment**, CLAWA has implemented a Water Shortage Contingency Plan (WSCP) that would go into effect during dry years. The Project would be required to implement conservation efforts during dry year scenarios to mitigate the impact on groundwater and CLAWA's imported water demand.

As mentioned above, multiple strategies were identified for the Camp's water supply, ranging from ~~majority~~ reliance on CLAWA to complete independence on its groundwater wells. Each strategy has been considered for its feasibility, sustainability, and impact on the overall water supply system, including during dry years and drought conditions. The integration of CLAWA as either a primary, supplementary, or emergency water source offers a range of benefits for both the Camp and CLAWA, should the connection need to be utilized. Based on communication with CLAWA, a formalized agreement between the Hume SoCal Campground and CLAWA is required. The Service Agreement outlines CLAWA's supply limitations and establishes a cap on the water provided to the Camp based on the scenarios outlined in the WSA (**Appendix B1: Revised Water Supply Assessment**). Based on the analysis presented in **Appendix B1: Revised Water Supply Assessment**, the ~~preferred~~ Project strategy focuses on utilizing on-site wells through phase 3. After phase 3, the Project Applicant would prepare an annual water supplier

expectations memorandum following CLAWA's receipt of its draft annual State Water Project allocation. The memorandum will identify the anticipated peak-period population, projected demand, available on-site supply, and any requested CLAWA deliveries for the upcoming year. During drought or low-allocation years, the planned guest/staff population may be required to be reduced if verified on-site supply and confirmed CLAWA deliveries are insufficient.~~leans towards maximizing its reliance on CLAWA, supplemented by its groundwater wells to establish a stable, long-term water supply.~~

Additionally, it is recommended that the Camp conduct, prior to each phase, well drawdown tests, recovery testing ~~after the completion of Phase 2~~ as well as water quality retesting on all wells serving each phase to determine the sustainability and reliability of its groundwater wells; refer to **MM HYD-1**. The results of the tests will provide insights into the capacity of the groundwater wells and will inform the development of an effective water management strategy for the Camp. Therefore, with implementation of WSA recommendations and conditional implementation of CLAWA WSCP requirements, potential impacts associated with the depletion of or interference with groundwater would be less than significant.

Page 119, Impact b), Mitigation Measures.

MM HYD-1 The Applicant shall conduct well drawdown tests ~~upon completion of Phase 2~~, recovery testing, and water quality retesting before proceeding with each phase, for the wells serving that phase, and use the results to confirm the phase water supply strategy and any required treatment. ~~which shall be submitted to Crestline-Lake Arrowhead Water Agency (CLAWA) for review prior to approval of Phase 3 to determine sustainability and reliability of its groundwater wells.~~

Page 121, Subsection "Cumulative Impacts", New Final Sentence.

The Project's maximum occupancy has been reduced from 3,000 to approximately 2,400 persons. Because the hydrology and water quality analysis evaluated a conservative worst-case scenario based on a higher occupancy, the refined Project would result in less total water reliance and use, and therefore does not result in any new or more severe cumulative impacts.

Section 4.0, Environmental Analysis, Noise

Page 130, Impact a), "Operations", First Paragraph, First Sentence.

Operations. The Project would expand the existing Hume SoCal Campground to accommodate up to ~~3,000~~2,400 persons within a 252.1-acre site.

Page 133, Subsection "Cumulative Impacts", New Final Paragraph.

The Project's maximum occupancy has been reduced from 3,000 to approximately 2,400 persons. Because the noise analysis evaluated a conservative worst-case scenario based on the higher 3,000-person occupancy, the refined Project would result in lower on-site population, reduced or similar stationary noise levels, and therefore does not result in any new or more severe cumulative impacts.

Section 4.0, Environmental Analysis, Population and Housing

Page 134, Impact a), First Paragraph, Second Sentence.

Development would involve the expansion of campground uses for the existing Hume SoCal Campground to accommodate up to an additional ~~2,700~~2,100 persons (an increase from 300 to ~~3,000~~2,400 persons).

Section 4.0, Environmental Analysis, Public Services

Page 137, Impact a), Subsection i), Second Paragraph, Fifth Sentence.

The RSFD Station 50, located at 32151 Hunsaker Way in Running Springs, is approximately ~~1.4~~4.3 miles ~~south of~~ from the Project site, and RSFD Station 51, located at 31250 Hilltop Boulevard in Running Springs, is approximately ~~1.7~~5.9 miles ~~southwest of~~ from the Project site.

Section 4.0, Environmental Analysis, Recreation

Page 141, Impact a), First Paragraph, Seventh Sentence.

The Project involves the expansion of the existing Hume SoCal campground to accommodate up to an additional ~~2,700~~2,100 persons (an increase from 300 for a total of ~~3,000~~2,400 of persons).

Page 141, Impact a), Second Paragraph, First Sentence.

Due to the nature of the Project, which would provide expanded recreational amenities to an increased user group of ~~3,000~~2,400 persons, the Project would not increase the use of nearby local, neighborhood, or regional parks such that substantial physical deterioration of the park facilities would occur.

Section 4.0, Environmental Analysis, Transportation

Page 146, Subsection "Cumulative Impacts", New Final Paragraph.

The Project's maximum occupancy has been reduced from 3,000 to approximately 2,400 persons. Because the transportation analysis evaluated a conservative worst-case scenario based on the higher 3,000-person occupancy, the refined Project would generate fewer trips and a smaller cumulative transportation load, and therefore does not result in any new or more severe cumulative impacts.

Section 4.0, Environmental Analysis, Tribal Cultural Resources

Page 151, Subsection "Cumulative Impacts"

The Project would not result in tribal cultural resources impacts beyond what was contemplated for the Project site. To ensure proper handling of unanticipated cultural resources, **MM CUL-1, MM CUL-2,** and **MM T~~R~~CR 1-3-2** would be implemented. Therefore, less than significant cumulative impacts related to tribal cultural resources would result from Project implementation with mitigation included.

Section 4.0, Environmental Analysis, Utilities and Service Systems

Page 152, Impact a), First Two Paragraphs.

Less Than Significant With Mitigation Incorporated. The Project site is currently occupied by the Hume SoCal Campground. Upon Project implementation, the Project site could~~would~~ receive water service from CLAWA~~, wastewater service from RSWD~~, solid waste disposal from Burrtec, natural gas service from SoCal Gas,~~ and~~ electricity from SCE~~.~~, and if utilized, public wastewater service from RSWD, as a secondary strategy to supplement the on-site wastewater system, subject to available District capacity and RSWD approval in accordance with **MM UTL-1** and **MM UTL-3**.

A Water and Sewer Master Plan was prepared for the Project to analyze the capacity of the campground water and sewer infrastructure for the proposed expansion from a capacity of 300 persons to a capacity of approximately 2,400~~3,000~~ persons. The Water and Sewer Master Plan is provided as **Appendix B3: Water and Sewer Master Plan**. This would be accomplished through the continued use of existing campground infrastructure as well as the development of additional campground and recreational water and sewer infrastructure within an approximately 252.1-acre area of the Green Valley Lake community. Development of the Project would require new utility connections, including water, wastewater, stormwater, electricity, and natural gas facilities to serve the Project. All utilities shall be undergrounded where feasible or to the extent possible.

Page 153, Impact a), Sanitary Sewer.

The Project's proposed wastewater strategy is development of an onsite advanced wastewater treatment plant (WWTP), subject to approval by the Lahontan Regional Water Quality Control Board. Running Springs Water District (RSWD) may serve as a supplemental or alternative wastewater conveyance and treatment option where adequate capacity is available and approved by RSWD.~~The public sewer service provider for the Project is the Running Springs Water District.~~ If RSWD service is available, approved, and utilized, the Project generally proposes new sewer connections to existing lines within Green Valley Lake Road. The existing sewer system contains four-, six-, and eight-inch gravity sewer lines heading southwest through the Camp to an existing pump station located at the southwestern point of the existing property. This pump station has an estimated five-foot diameter wet well. From the pump station, the sewage is pumped through an existing force main, estimated to be six inches in diameter, and discharges into the existing sewer system in Green Valley Lake Road. To accommodate the Camp's expansion, which includes additional accommodations and facilities, significant updates to the existing sewer system are required. Specifically, due to the hilly natural terrain of the camp, a traditional gravity sewer system would not be feasible.

The planning for the expanded sewer system, if connection to RSWD is proposed, is segmented into three parts, each aimed at servicing the proposed buildings and integrating the proposed sewer system into the existing infrastructure. Detailed layouts for the proposed sewer improvements are provided in **Appendix B3**, with a summary of each phase improvement below:

1. Phases 1, 2, and 3: Improvements in these phases include conveying the sewer generation into the Camp's existing sewer system. A lift station is proposed at the southern edge of Phase 2 to manage the elevation differential across Phases 2 and 3. The sewage would travel by gravity to this lift station, labeled Lift Station 1 in *Appendix B* of **Appendix B3**, where it would be pumped by force main into the existing sewer system near the existing water tank and gravity flow to the existing lift station located in Phase 1. The existing lift station would pump the additional sewage by six-inch force main off-site and discharge into the Running Springs Water District's system in Green Valley Lake Road.
2. Phase 4: Located across Green Valley Lake Road, sewer generation from Phase 4 would connect directly into Running Springs Water District's sewer lift station located along Green Valley Lake Road. Connecting directly into the public lift station eliminates the need for an easement through the Green Valley Lake Road right-of-way. An additional off-site

lift station analysis is underway to determine the lift station's capacity and potential point of connection.

3. Phase 5: Sewer from this phase would connect to Running Springs Water District's eight-inch gravity sewer in Green Valley Lake Road by proposed lift station, labeled Lift Station 2 in *Appendix B* of **Appendix B3**, and force main. Lift Station 2 shall be located at the southern end of Phase 5, at the lowest elevation. The force main would connect to a proposed discharge manhole within the Camp property and be conveyed by eight-inch gravity sewer into Running Springs Water District's public system. To connect to the public system, a manhole shall be constructed in Green Valley Lake Road within Running Springs Water District's right-of-way.

Wastewater infrastructure necessary to serve the Project will be implemented in accordance with **MM UTL-1**. The Project's primary wastewater strategy is development of an onsite wastewater treatment plant (WWTP), subject to approval by the Lahontan Regional Water Quality Control Board and other applicable agencies. As each phase advances, wastewater treatment and disposal capacity will be evaluated to confirm adequate capacity exists to accommodate the proposed occupancy increases. If the onsite WWTP is not developed, is not approved, or does not provide sufficient capacity for a future phase, additional wastewater service from Running Springs Water District (RSWD) may be utilized where available capacity is demonstrated, and any required infrastructure improvements are approved and constructed. In that event, downstream conveyance capacity, lift station improvements, storage expansion, and other associated infrastructure requirements would be evaluated pursuant to **MM UTL-1**.

Accordingly, the Project may require construction of new or expanded wastewater infrastructure, including onsite treatment and disposal facilities and, if utilized, offsite conveyance improvements associated with RSWD service. However, the proposed onsite wastewater facilities are contained within the Project site and associated environmental effects are addressed within this IS/MND. Any future offsite wastewater improvements would be implemented in accordance with applicable agency requirements and Project mitigation measures. Therefore, impacts associated with construction of wastewater infrastructure would be less than significant with mitigation incorporated.

~~Incorporating a segmented sewer system approach overcomes the Camp's topography challenges while meeting sewer design criteria. This approach ensures the sewer infrastructure is adequately planned to support the Camp's future development needs, maintaining operational efficiency and compliance with regulatory standards, which includes the County's design criteria for sanitary sewer. Additionally, **MM UTL-1** would be implemented to ensure proper facility expansion occurs prior to construction of additional phases. Therefore, the Project would require the construction of new wastewater infrastructure the construction of which could cause significant environmental effects. The proposed on-site wastewater facilities are contained within the Project site and therefore associated impacts are addressed within this IS/MND. All Project wastewater facilities would be constructed and operated in accordance with the applicable guidelines and regulations of CLAWA, RSWD, the County, and would also follow applicable IS/MND mitigation measures in each topical area addressed in the IS/MND.~~

Page 154, Impact a), Domestic Water, First Two Sentences.

Domestic Water. The Project would receive domestic water service from CLAWA when available as determined by **MM UTL-2** and would supply on-site domestic water during years when water service from CLAWA is unavailable. The projected Project water demand, discussed in ***Hydrology and Water Quality*** and below, could ~~would~~ be fulfilled by a combination of CLAWA and groundwater water sources through implementation of **MM UTL-2**, aiming for a balanced reliance between the two.

Page 155, Impact a), Mitigation Measures.

MM UTL-1 Prior to approval of each subsequent phase, the Project applicant shall evaluate the available treatment and disposal capacity of the approved on-site ~~**It is recommended that the Project initiate preliminary design for pump upgrades and storage expansion at both lift stations, and coordinate with Running Springs Water District (RSWD) to evaluate near-term and long-term strategies for increasing**~~ Wastewater Treatment Facility (WWTP) to confirm adequate treatment capacity, disposal capacity, and identify any improvements necessary to accommodate the proposed occupancy increase. These evaluations shall be coordinated with the Project's phased development plan to ensure adequate wastewater treatment and disposal capacity is available prior to occupancy increases associated with each phase. ~~**seasonal capacity. Concurrently, the downstream gravity sewer system should be evaluated for potential bottlenecks under future lift station conditions. These efforts should be aligned with a phased development plan that matches Camp occupancy growth with the completion of required infrastructure improvements.**~~

- If, in accordance with **MM UTL-3**, the on-site WWTP is not developed or approved, does not have sufficient capacity to serve a proposed phase, or if additional service from Running Springs Water District (RSWD) is proposed, the Applicant shall coordinate with RSWD and applicable regulatory agencies to evaluate available wastewater treatment and conveyance capacity, downstream gravity sewer system constraints, pump upgrades, storage expansion at both lift stations, and any infrastructure improvements necessary to accommodate the proposed wastewater flows.

Page 156, Impact b).

Less Than Significant Impact. The Project could~~would~~ receive domestic water service from CLAWA, which would require an adequate Service Agreement, which acknowledges that the Project's future water demand cannot be met solely by CLAWA. Therefore, a combination of CLAWA's supply and the Camp's groundwater resources would be used. Kimley-Horn conducted an updated WSA in July~~February~~ 2026~~4~~ to determine the sufficiency of the Camp's water supplies. Neither the Hume SoCal Campground nor CLAWA have prepared an Urban Water Management Plans (UWMP) to aid in future projection of domestic and non-domestic water demand. Therefore, the following analysis makes assumptions for the Camp's groundwater well sustainability and CLAWA allotted domestic water to the Camp. The WSA explores multiple scenarios to determine water supply and sustainability under varying conditions; refer to **Appendix B1: Revised Water Supply Assessment**. The preferred Project scenario would see the Project dependent on ~~CLAWA for 75 percent of its domestic water needs supplemented by~~ the Camp's groundwater wells up to phase 3, and would then prepare an annual water supplier expectations memorandum following CLAWA's receipt of its draft annual State Water Project allocation. The memorandum will identify the anticipated peak-period population, projected demand, available on-site supply, and any requested CLAWA deliveries for the upcoming year. During drought or low-allocation

years, the planned guest/staff population may be required to be reduced if verified on-site supply and confirmed CLAWA deliveries are insufficient. ~~for the remaining 25 percent. Previous correspondence with CLAWA indicated a lack of system capacity to fully provide the Camp with adequate water supply, therefore, this scenario is assumed to be the maximum reliance on CLAWA's supply.~~ This scenario ensures a ~~significant~~ portion of the water supply ~~is~~could be sourced from CLAWA, mitigating the reliance on groundwater wells, which is particularly beneficial during dry years when groundwater levels might be lower. This approach aligns with the Camp's preference to utilize on-site groundwater wells through phase 3 and adjusting guest/staff population based on potential CLAWA deliveries as needed following phase 3. ~~This approach aligns with the Camp's preference for a balancedmajority reliance on CLAWA to alleviate the stress on their groundwater supply and meet long-term water demands.~~

It is assumed that the Camp's non-domestic demand and water losses are supplied by Camp groundwater wells. ~~According to the WSA, the Camp's domestic water demand is based on San Bernardino County's standard of 180 GPCPD.~~ The expected increase in domestic water demand, corresponding to the increase in occupants and expansion of facilities, is estimated to be ~~54,607,870~~55,107,420 gallons per year (GPY), or 169.1~~167.58~~ acre-feet per year (AFY). With the proposed expansion, the Camp's capacity is projected to increase by approximately 800~~1,000~~ percent. A summary of existing and proposed water demand is provided in **Table 14**. The projected Project water demand, discussed in ***Hydrology and Water Quality***, from CLAWA is assessed against their 2,500 AFY baseline, 3,480 AFY long-term, and 5,800 AFY maximum entitlement allocations to determine the impact of the Camp's potential source scenarios on CLAWA. **Table 19: Analysis of Project Water Demand Against CLAWA's Allocation Levels** compares these baselines to the three water supply scenarios analysis in the WSA.

Page 157, Impact b), Table 19: Analysis of Project Water Demand Against CLAWA's Allocation Levels.

Table 19: Analysis of Project Water Demand Against CLAWA's Allocation Levels

~~Allocation Type~~	~~CLAWA Allocation (AFY)~~	~~Majority Reliance Camp Demand Impact (125.7 AFY)~~	~~Balanced Reliance Camp Demand Impact (83.8 AFY)~~	~~Supplementary Reliance Camp Demand Impact (41.9 AFY)~~
~~Baseline~~	~~2,500~~	~~5.03%~~	~~3.35%~~	~~1.68%~~
~~Long-Term~~	~~3,480~~	~~3.61%~~	~~2.41%~~	~~1.20%~~
~~Maximum~~	~~5,800~~	~~2.17%~~	~~1.44%~~	~~0.72%~~
~~Source: Kimley-Horn. 2024. *1st Draft Water Supply Assessment Hume SoCal Camp Expansion*, page 13.~~				

Allocation Type	CLAWA Allocation (AFY)	Majority Reliance (107.3 AFY)	Balanced Reliance (71.5 AFY)	Supplementary Reliance (35.8 AFY)	No Reliance (0 AFY)
Baseline	2,500	4.29%	2.86%	1.43%	0%
Long-Term Average	3,480	3.08%	2.05%	1.03%	0%
Maximum Entitlement	5,800	1.85%	1.23%	0.62%	0%
All percentages are based on the Camp's annual domestic demand at full five-phase buildout (143.0 AFY). Non-domestic demand and water losses are supplied by on-site groundwater wells and are not included in CLAWA demand figures. Strategy 1 reflects on-site wells as the primary operational source with CLAWA as an active supplemental source, particularly in the event of well water quality issues; Strategy 3 is the Camp's preferred long-term strategy once a formal CLAWA service agreement is in place.					

Source: Kimley-Horn. 2026. *Water Supply Assessment Hume SoCal Camp Expansion*, page 18.

Page 157, Impact b), Final Paragraph, First Sentence.

As shown by **Table 19**, Project water demand would comprise, at most, 4.29~~5.03~~ percent of CLAWA's 2,500 AFY baseline.

Page 157, Impact b), Mitigation Measures.

MM UTL-2 Prior to Final Development Plan Approval (FDP) for Phase III

Prior to approval of the Phase III FDP Approval and/or an increase of total guest/staff population which exceeds 1,924 guests, as noted in the Hydraulic Evaluation, the following shall occur:

A. As established in a separate agreement, Crestline-Lake Arrowhead Water Agency (CLAWA) shall design, install, and own an upsized water meter assembly and vault, and Hume SoCal Campground (Hume) shall reimburse CLAWA for the same. Hume shall install further infrastructure improvements, designed as required and approved by CLAWA, including the standards and criteria governing wholesale connections, prior to the issuance of the Certificate of Occupancy by San Bernardino County for the final building improvements associated with the construction of Phase III. These improvements shall include the following:

- Lateral pipeline upsizing to allow for greater water delivery rates.
- Upgrade of existing backflow prevention facilities to accommodate upsized water meter and associated lateral pipeline.
- Install an additional on-site water tank to allow for reliable water deliveries.
- All construction/improvement plans shall be submitted to both the County and CLAWA for review and approval prior to installation of improvements.

After Phase III is completed, by October 1 of each year, Hume (or the campground's then-current operator if not Hume) shall prepare an expected peak period camper population (peak population anticipated during summer) and anticipated water supplier expectations memo to the satisfaction of CLAWA staff to determine anticipated water usage demands and service need for the upcoming water year. The guest/staff population and supplier expectations memo shall identify whether Hume anticipates requesting water from CLAWA based on its draft adequate water allocations from the California Department of Water Resources or, rather, if Hume anticipates providing water service from its on-site water storage tanks and other sources for that water year. During extremely low allocation years, or drought years as determined by CLAWA staff, CLAWA may reduce deliveries to Hume or cease them altogether in its discretion, and Hume may be required to reduce guest/staff population at the campground as a result. CLAWA commits to providing as much water to Hume as it can in any given water year while still meeting its obligations to other customers in its service area.

Page 157, Impact c), First Paragraph.

Less Than Significant Impact. The Project's proposed wastewater strategy is development of an on-site advanced wastewater treatment plant (WWTP), subject to approval by the Lahontan Regional Water

Quality Control Board and other applicable regulatory agencies. Running Springs Water District (RSWD) may serve as a supplemental or alternative wastewater conveyance and treatment option where adequate treatment and conveyance capacity is available, and service is approved by RSWD. ~~The Project would continue to be served by RSWD.~~ As determined in **Appendix B2**, RSWD utilizes the RSWD Wastewater Treatment Facility (WWTP), which, as of 2015, had a capacity of 1.0 MGD and an average daily flow of 0.5 MGD. According to the Water and Sewer Master Plan included as **Appendix B~~2~~3**, the Project would generate approximately 59,844 gpd, or 0.06 MGD. This represents six percent of the current 1.0 MGD treatment capacity. In accordance with the County standards, a peaking factor of 3.4 was applied to average daily demand to determine peak flow for the Camp. The average daily sewer generation and corresponding peak flows for individual occupant types are shown in **Appendix B3**. The Project would generate approximately 203,470 gpd, or 0.20 MGD, total peak sewage flows. This represents 20 percent of the current 1.0 MGD treatment capacity. Flows in excess of the 1.0 MGD may cause the system to overload. However, RSWD is able to defer treatment for up to 9.7 hours until the peak instantaneous flows have subsided to a more manageable rate. The revised Sewer Feasibility Study concludes that wastewater treatment and disposal for the Project can be accommodated through development and phased expansion of the proposed on-site WWTP. **MM UTL-1** and **MM UTL-3** require that adequate wastewater treatment and disposal capacity be demonstrated prior to approval of each project phase and prior to occupancy increases associated with each phase. Specifically, **MM UTL-3** requires approval of the proposed on-site WWTP prior to operation of the system and occupancy increases that rely upon the system. **MM UTL-1** requires evaluation of available treatment capacity, disposal capacity, operational performance, regulatory compliance, and any improvements necessary to accommodate future occupancy increases.

If the proposed on-site WWTP is not approved, does not provide sufficient capacity, or is otherwise unavailable to serve a future phase, occupancy shall remain limited to the capacity supported by the existing approved wastewater infrastructure until an alternative wastewater solution has been identified, approved, and implemented. Additional wastewater service from RSWD may be utilized where adequate treatment and conveyance capacity is demonstrated, and any required infrastructure improvements are approved and constructed pursuant to **MM UTL-1** and **MM UTL-3**.

Accordingly, implementation of **MM UTL-1** and **MM UTL-3** ensures that adequate wastewater treatment and disposal capacity will be available prior to approval of each phase and prior to occupancy increases associated with those phases. Therefore, the Project would not result in a determination that adequate wastewater treatment capacity is unavailable to serve the Project's projected demand in addition to existing commitments. ~~Upon completion of Phase 2, pump upgrades and storage expansion at the Deer Lick Lift Station and the Ahwahnee Lift Station would be required, as outlined in **MM UTL-1**, which requires implementation of additional wastewater facilities and coordination with RSWD. Therefore, the Project would take adequate measures to ensure the wastewater treatment has adequate capacity to serve the Project's project demand in addition to the provider's existing commitments. A less than significant impact would occur.~~

Page 157, Impact c), Mitigation Measures.

MM UTL-3 Prior to Final Development Plan Approval (FDP) for Phase I

Prior to approval of the Phase I FDP and/or any increase in guest/staff population that exceeds 300 guests, the Applicant shall demonstrate that adequate wastewater treatment and disposal capacity is available

through the approved on-site WWTP or another approved wastewater solution to serve the proposed phase.

A. The Applicant shall develop an on-site wastewater treatment plant (WWTP) as the Project's primary wastewater treatment and disposal strategy, subject to approval by the Lahontan Regional Water Quality Control Board, County Environmental Health Services, and other applicable regulatory agencies.
B. Approval of the on-site WWTP by the Lahontan Regional Water Quality Control Board shall be obtained prior to operation of the system and prior to occupancy increases that rely upon the system.
C. If the proposed on-site wastewater treatment and disposal system is not approved by the Lahontan Regional Water Quality Control Board, occupancy shall remain limited to 300 guests, supported by the existing approved wastewater service infrastructure until an alternative wastewater solution has been identified, approved by the applicable agencies, and implemented.
D. Additional service from Running Springs Water District (RSWD) may be utilized as a supplemental or alternative wastewater solution if RSWD confirms available treatment and conveyance capacity and any required infrastructure improvements are approved and constructed to the satisfaction of RSWD, in accordance with **MM UTL-1**.
E. Prior to approval of each subsequent FDP, the Applicant shall demonstrate to the satisfaction of the County that adequate wastewater treatment and disposal capacity exists for the guest/staff population proposed for that phase through the approved on-site WWTP, approved RSWD service, approved infrastructure improvements, or another approved wastewater solution.

Page 158, Footnote.

[78] San Bernardino County. 2019. *Countywide Plan. Draft Environmental Impact Report, Section 5.18, Utilities and Service Systems*, page 5.18-54. Available at ~~https://countywideplan.com/wp-content/uploads/sites/68/2021/01/Ch_05-18-USS.pdf?x23421~~ https://countywideplan.sbcounty.gov/wp-content/uploads/sites/125/2021/01/Ch_05-18-USS.pdf(accessed March 2024).

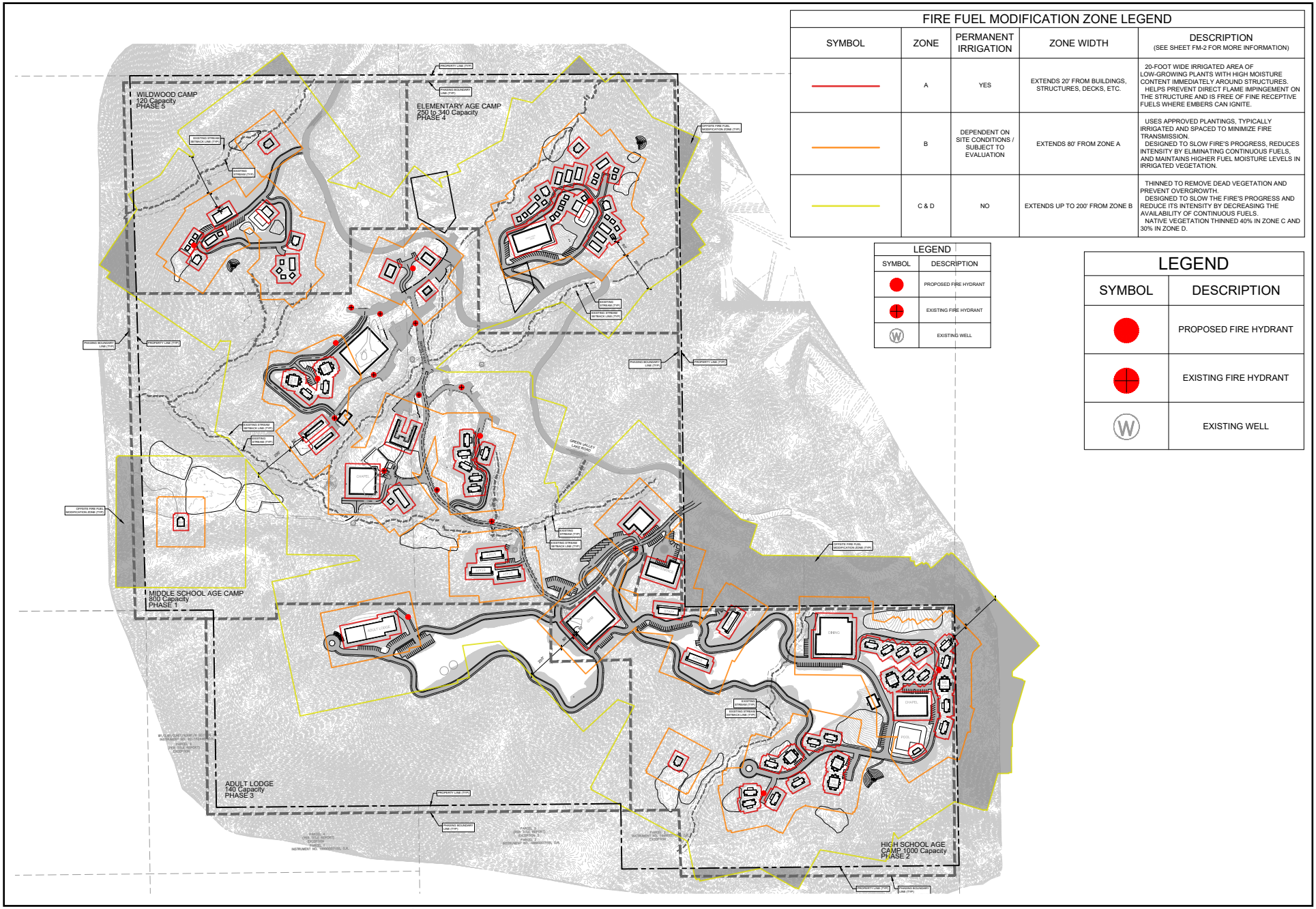
Page 160, Subsection "Cumulative Impact", New Final Paragraph.

The Project's maximum occupancy has been reduced from 3,000 to approximately 2,400 persons. Because the utilities and service systems analysis evaluated a conservative worst-case scenario based on the higher 3,000-person occupancy, the refined Project would result in less or similar utility and service system use, alignment with CLAWA, and therefore does not result in any new or more severe cumulative impacts.

Section 4.0, Environmental Analysis, Wildfire

Page 164, Impact a).

Insert Figure 7: Preliminary Fire Fuel Modification Plan after page 164.



FIRE FUEL MODIFICATION ZONE LEGEND

SYMBOL	ZONE	PERMANENT IRRIGATION	ZONE WIDTH	DESCRIPTION (SEE SHEET FM-2 FOR MORE INFORMATION)
	A	YES	EXTENDS 20' FROM BUILDINGS, STRUCTURES, DECKS, ETC.	20-FOOT WIDE IRRIGATED AREA OF LOW-GROWING PLANTS WITH HIGH MOISTURE CONTENT IMMEDIATELY AROUND STRUCTURES. HELPS PREVENT DIRECT FLAME IMPINGEMENT ON THE STRUCTURE AND IS FREE OF FINE RECEPTIVE FUELS WHERE EMBERS CAN IGNITE.
	B	DEPENDENT ON SITE CONDITIONS / SUBJECT TO EVALUATION	EXTENDS 80' FROM ZONE A	USES APPROVED PLANTINGS, TYPICALLY IRRIGATED AND SPACED TO MINIMIZE FIRE TRANSMISSION. DESIGNED TO SLOW FIRE'S PROGRESS, REDUCES INTENSITY BY ELIMINATING CONTINUOUS FUELS, AND MAINTAINS HIGHER FUEL MOISTURE LEVELS IN IRRIGATED VEGETATION.
	C & D	NO	EXTENDS UP TO 200' FROM ZONE B	THINNED TO REMOVE DEAD VEGETATION AND PREVENT OVERGROWTH. DESIGNED TO SLOW THE FIRE'S PROGRESS AND REDUCE ITS INTENSITY BY DECREASING THE AVAILABILITY OF CONTINUOUS FUELS. NATIVE VEGETATION THINNED 40% IN ZONE C AND 30% IN ZONE D.

LEGEND

SYMBOL	DESCRIPTION
	PROPOSED FIRE HYDRANT
	EXISTING FIRE HYDRANT
W	EXISTING WELL

LEGEND

SYMBOL	DESCRIPTION
	PROPOSED FIRE HYDRANT
	EXISTING FIRE HYDRANT
W	EXISTING WELL

Source: Kimley-Horn, 3/6/2024.

Figure 7: Preliminary Fire Fuel Modification Plan

Hume SoCal Campground Expansion Project

San Bernardino County

Not to scale

Kimley»Horn

Page 167, Impact d), First Paragraph, First Sentence.

Less Than Significant. As described in ***Section 2.0: Description of Proposed Project,*** the physical expansion of Hume SoCal Campground, the new construction of campground-related structures, features, and infrastructure, and the intensification of its associated uses would allow the existing Hume SoCal Campground to increase the campground's current 300-person capacity to accommodate up to an additional ~~2,700~~2,100 persons for a total capacity of ~~3,000~~2,400 persons.

Page 167, Footnote.

[96] Office of Planning and Research. 2022. *Fire Safety Overlay Zone: San Bernardino County*. Available at ~~https://opr.ca.gov/docs/20220817-San_Bernadino_County_Case_Study.pdf~~ https://lci.ca.gov/docs/20220817-San_Bernadino_County_Case_Study.pdf(accessed February 2024).

Page 168, Subsection "Cumulative Impacts", New Final Paragraph.

The Project's maximum occupancy has been reduced from 3,000 to approximately 2,400 persons. Because the wildfire analysis evaluated a conservative worst-case scenario based on the higher 3,000-person occupancy, the refined Project would result in lower on-site population, reduced evacuation loading, and similar or fewer potential ignition sources, and therefore does not result in any new or more severe cumulative impacts.

4.0 MND APPENDICES

The documents identified below have either been revised or added in response to comments received during the public review period, additional analysis, or further coordination. These documents are incorporated into the MND and should be considered together with the technical appendices included with the Draft IS/MND. Except for the documents modified or added that are listed below, all appendices included in the Draft IS/MND (Appendices A1, A2, B3, B4, C, D, E, F, G, H, I, J, and K) remain unchanged.

Appendix B1 – Revised Water Supply Assessment

Since circulation of the Draft IS/MND, an updated Water Supply Assessment (WSA) has been prepared to reflect ongoing coordination with CLAWA, additional analysis, and coordination with water service providers. The revised WSA replaces the prior version included in the Draft IS/MND and is provided as **Appendix B1- Revised Water Supply Assessment**.

Appendix B2 – Revised Sewer Feasibility Study

Following additional coordination since circulation of the Draft IS/MND, the Sewer Feasibility Study has been updated to reflect enhanced recommendations for mitigation and current Project assumptions. The Revised Sewer Feasibility Study replaces the prior version included in the Draft IS/MND and is provided as **Appendix B2 – Revised Sewer Feasibility Study**.

Appendix L – Truck Turns

This appendix provides vehicle turning exhibits prepared for the Project and demonstrates the ability of buses and other large vehicles to safely access and maneuver at connections to Green Valley Lake Road.

Appendix M – Hydraulic Evaluation

This appendix contains a Hydraulic Evaluation prepared by Albert A. Webb Associates on behalf of the Project Applicant. The study evaluates the hydraulic characteristics of the Crestline-Lake Arrowhead Water Agency (CLAWA) distribution system to assess system capability under worst-case conditions.

Appendix N - Comment O8 Attachments

Comment letter O8, Save Our Forest Association, included a 24-page comment letter written by Kevin P. Bundy, Shasta Fields, and Kristi Bascom (Shute, Mihaly & Weinberger LLP). The total comment also included 894 pages of attachments or “exhibits”. The 24-page comment letter with a written response from the County can be found in **Section 2.5: Organizations/Interested Parties** with the comment reference “O8”. The remaining 894 pages of attachments are included as **Appendix N – Comment 08 Attachments** for reference and completeness.

Appendix O – Mitigation Monitoring and Reporting Program

This appendix contains the Mitigation Monitoring and Reporting Program (MMRP) for the Project.

Appendix P – Chambers Group Technical Review Comment Matrix and Applicant Responses

This appendix contains review comments prepared by Chambers Group on behalf of the County of San Bernardino as part of the third-party technical review process for **Section 2: Comments and Responses** and the Water Supply Assessment. Responses have been prepared by the Applicant and its consultants and incorporated into the Final MND, as **Appendix P – Chambers Group Technical Review Comment Matrix and Applicant Responses.**