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Via E-Mail

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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.

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 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.

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.

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 §

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.

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.

[1] A list of attached exhibits appears at the end of this letter.

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.

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.

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.

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]

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

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[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.

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.

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 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*.

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 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.

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 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").

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.

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 attempts to rely on meager mitigation measures that do little to reduce the Project's significant fire hazard impacts.

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.

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.

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.

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.

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.

- 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.

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 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.

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.

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, 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.

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.

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 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.

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.

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.

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.

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.

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.

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.

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.

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

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).

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.

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.

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.

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.

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.

Very truly yours,

SHUTE, MIHALY & WEINBERGER LLP

Kevin P. Bundy
Shasta Fields
Kristi Bascom, AICP

Exhibits

A. Susanne Rust et al., *How climate change is fueling record-breaking California wildfires, heat and smog*, Los Angeles Times (Sep. 13, 2020)
B. Anne Mulkern, *Fast-Moving California Wildfires Boosted by Climate Change*, Scientific American (Aug. 24, 2020)
C. Cal FIRE, *2020 Wildfire Activity Statistics*
D. Cal FIRE, *20 Largest Wildfires in California History*
E. Tiffany Yap, et al., Center for Biological Diversity, *Built to Burn: California's Wildlands Developments Are Playing With Fire* (Feb. 2021)
F. Mingha Qiu et al., *The rising threat of wildland-urban interface fires in the era of climate change: The Los Angeles 2025 fires*, The Innovation (February 4, 2025)
G. Wenfu Tang et al., *Global expansion of wildland-urban interface (WUI) and WUI fires: insights from a multiyear worldwide unified database (WUWUI)* 2024 Environ. Res. Lett. 19 044028 (March 19, 2024)
H. Volker C. Radeloff et al., *Rapid Growth of the US wildland-urban interface raises wildfire risk*, PNAS (March 27, 2018)
I. Jon E. Keely et al., *Nexus Between Wildfire, Climate Change, and Population Growth In California*, Fremontia: Journal of the California Native Plant Society (March 2020)
J. Union of Concerned Scientists, *Infographic: Wildfires and Climate Change – Visualizing the Connection in Five Sets of Photos and Charts* (Updated May 9, 2022)
K. Westerling, A.L., Hidalgo, H.G. Cayan, D.R. and Swetnam, T.W., *Warming and Earlier Spring Increase Western U.S. Forest Wildfire Activity*, 313 Science 940 (2006)
L. D. Cayan, A. L. Luers, M. Hanemann, G. Franco, and B. Croes, *Scenarios of Climate Change in California: Overview*, CEC-500-2005-186-SF (2006)
M. California State Office of the Attorney General, *Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act*. (October 10, 2022)
N. San Bernardino County, *Multi-Jurisdictional Hazard Mitigation Plan* (2017)
O. SBCSentinel, *Highway 330, Closed for Two Months as A Consequence of the Line Fire, Now Open* (November 29, 2024)
P. KBHR Big Bear News, *SR-330 to Remain Closed Through February 24th for Repairs per CalTrans* (February 14, 2025)
Q. Ruben Vives, Gina Ferazzi, and Seema Mehta, *Lake fire evacuation orders lifted as firefighters make progress in San Bernardino County*, Los Angeles Times (Updated June 29, 2025)

R. National Wild and Scenic Rivers System, Information on Deep Creek from website: https://rivers.gov/apps/river/deep-california (Accessed January 5, 2026)
S. Paul M. Mayer et al., *Where the rubber meets the road: Emerging environmental impacts of tire wear particles and their chemical cocktails,* Science of the Total Environment (March 7, 2024)
T. Alexander Young et al., *Urban stormwater runoff negatively impacts lateral line development in larval zebrafish and salmon embryos,* National Institutes of Health (February 12, 2018)
U. M. J. Paul, S. D. DeLuc, M. G. Lassiter, L. C. Moorhead, P. D. Noyes, S. G. Leibowitz, *Wildfire induces changes in receiving waters: A review with considerations for water quality management*, Water Resour Res (September 15, 2022)
V. Crestline-Lake Arrowhead Water Agency, Historical Timeline from website, https://www.clawa.org/_files/ugd/a07b32_5613e3022a8c4b35981f55f04ad29534.pdf (document undated)
W. San Bernardino County*, Countywide Plan, County Policy Plan* (September 2022)
X. San Bernardino County, *Transportation Impact Study Guidelines* (July 9, 2019)
Y. Google Maps Street View screenshot of the intersection of SR-18 and Green Valley Road (image capture April 2024)
Z. State of California Governor's Office of Planning and Research, *Technical Advisory on Evaluating Transportation Impacts in CEQA* (Dec. 2018)

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