UNIVERSITY OF
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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,
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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.

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:

"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***."

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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.

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.

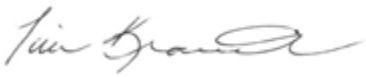
In this situation, with high potential for endangered species habitat on site, there is no question that a Focused EIR is ***required***—indeed, **mandatory**—and that full protocol biological surveys must be conducted prior to approval of the project, with additional public review and input from biological 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.

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.

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.

Sincerely,



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