



FRIENDS OF FAWNSKIN

Big Bear Valley Environmental Education & Oversight

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Mr. Oxso Shahriari
County of San Bernardino
Land Use Services/Planning Department
385 North Arrowhead Ave.; First floor
San Bernardino, CA 92415

VIA EMAIL: oxso.shahriari@lus.sbcounty.gov

Re: Planning Project Notice—Minor Use Permit to establish a 6793 square foot convenience store with grocery and type 21 offsite liquor sales and gas station on .9 acres.

Dear Mr. Shahriari,

The Friends of Fawnskin wishes to thank the County of San Bernardino for the opportunity to comment on this proposed Minor Use Permit to establish a 6793 square foot convenience store with grocery and type 21 offsite liquor sales and gas station on .9 acres.

Friends of Fawnskin (FOF) is a non-profit environmental education organization representing a membership of over 500 residents and homeowners of the Big Bear Valley. Residents and visitors come to Big Bear primarily to enjoy the current character of the area and FOF works to preserve and protect these unique environmental surroundings. Our goals are to keep the public informed on issues that may impact their surroundings; to assure proper opportunity for public participation in the decision-making process; to educate the governing agencies regarding concerns of local residents and visitors; and to make certain the environmental laws in place to protect all of us are followed.

This proposed project in an area that is solely residential and so close to National Forest land is of major concern for a number of reasons. We have summarized these concerns below, in no particular order.

- The proposed project would cause potentially significant impacts to traffic flow in the area. Some of the traffic issues include:

1. An intense increase in traffic on State Lane, a residential street.
2. Traffic jams at the end of State Lane for Erwin Lake residents coming in and out of the residential area
3. Increased potential for car accidents at the corner of State Lane and Highway 38 with the increase in traffic and the type of traffic added.
4. High potential for jack-knifing and over-turning type accidents with tanker trucks and other commercial vehicles needing to make the sharp turns required to turn onto State Lane and then into the proposed business driveways. This street was not designed for such traffic.
5. A general increase in the length of time it takes to turn left from Highway 38 onto State Lane, creating backups on Highway 38 and increased potential for accidents as motorists head 'down-the-hill' along that highway.

A full traffic analysis must be conducted to determine all potentially significant impacts prior to any decisions on this project.

- The proposed project would cause potentially significant impacts to noise levels in the area. This is currently a quiet, forest-like area that is distant from any commercial areas and even low-level noise facilities. This proposed 24-hour operation would significantly and permanently increase overall noise levels in the area, changing the entire residential experience of the surrounding neighborhoods, as well as nearby forest experience. Added noise could come from a multitude of sources, including:

1. general increase in traffic in the area
2. increase in often noisy commercial vehicles in the area
3. increase in numbers of people congregating in the area
4. engines left running while passengers run into the market
5. alcohol-induced loud behavior with a liquor store addition
6. addition of people needing to get out of their cars, stretch and make noise after a long trip up the mountain

A full noise analysis must be conducted to determine all potentially significant impacts of this project. This noise analysis must include actual measurements of current noise levels in the area of the proposed project since averages that are normally used for city-type residential areas do not in any way estimate the actual quiet that currently exists.

- The proposed project would cause potentially significant impacts to light pollution in the area. The project itself would create a huge increase in outdoor lighting and though there are existing codes to reduce this impact, the County's code enforcement is currently lax in enforcing lighting requirements and with the current shortfalls in County funding, this enforcement is unlikely to improve. In addition, the increase in traffic light coming into the area rather than simply passing on the highway must be taken into consideration.

A full analysis of potential light pollution must be conducted to determine all potentially significant impacts. Such analysis must include the fact that enforcement of lighting codes is unlikely to be consistent.

- The proposed project would cause other potentially significant impacts to aesthetics in the area. The proposed project would be located along a scenic highway and right in the currently forested, quiet entryway to a mountain resort community.

A full analysis of aesthetics, including current photos and simulated future appearance, must be completed in to determine all potentially significant impacts to properly inform the public.

- The proposed project would cause potentially significant impacts to air quality in this residential area, with the increased traffic, potential of cars left running, increases in toxic and potentially caustic chemicals in the area and the addition of large, fummy commercial vehicles.

A full analysis of air quality must be completed to determine all potentially significant impacts.

- The proposed project could cause potentially significant impacts to biological resources in the area. The site is close to national forest and protected habitats located on that forest, such as the protected ponds of the endangered stickleback fish, among others. With large amounts of toxic chemicals being brought into and stored in the area, the possibility of potentially significant impacts to habitats downstream also increases.

A full analysis of biological resources must be completed to determine all potentially significant impacts, both short and long-term.

- The proposed project could cause potentially significant impacts to hydrology and water quality. With the plan for underground gas tanks being added to this area, there is added potential for leakage and contamination of underground water reservoirs that would impact both biological resources and humans. With nearby personal and community wells, there is added potential for contamination of drinking water. In addition, the increased potential of such things as overturning tanker trucks due to the dangerous nature of the sharp turns and entry patterns to this project would also increase the potential for significant impacts to water quality.

A full evaluation of the hydrology and water quality potentially significant impacts must be completed.

- The proposed project could cause potentially significant impacts to the water availability in the area. There is already a water shortage with limits on outdoor usage in the valley. Therefore, a full analysis of the projected increases from all uses and potential uses must be evaluated to determine the potential significance of the impacts.

- The proposed project would cause potentially significant increases in hazards in the area, due to the toxic chemicals (gasoline) being brought to and stored. In this area that is adjacent to forested habitat, the increase in these chemicals, along with increased potential of traffic accidents and fuel spills, also increases the risk of forest fires being started. A full analysis of the potentially significant impacts due to hazards must be conducted.

- This proposed project has a high likelihood of causing potentially significant impacts in the area of cumulative impacts. The addition of a commercial center in this location has the potential to be growth-inducing by being a catalyst for additional businesses being added and then additional housing tracts being developed. In this area that is currently only residential and with high numbers of biological resources due to the nearby National Forest and the currently dark, quiet conditions, that growth inducement is in itself a potentially significant impact and triggers a mandatory finding of significance on the basis of the potential significance of the cumulative impacts. As such, a full Environmental Impact Report must be completed for this project.

The scope of this proposal is far beyond that of any typical 'community market' established to benefit the local residential area. This is obviously a plan for a major business enterprise, but set wholly within a residential area.

Friends of Fawnskin supports the need for a full Environmental Impact Report to be completed for this proposed project to identify all potentially significant impacts and to properly inform agency officials and the public prior to any decisions being made. We request to be included on the list of recipients for any future notices regarding this proposed project.

Thank you for your consideration.

Sincerely,



Sandy Steers
Executive Director

cc: Ed Wallace, Sierra Club, Big Bear Group
Drew Feldmann, San Bernardino Valley Audubon Society
Adam Keats, Center for Biological Diversity