



ARNOLD SCHWARZENEGGER
GOVERNOR

STATE OF CALIFORNIA

GOVERNOR'S OFFICE of PLANNING AND RESEARCH

STATE CLEARINGHOUSE AND PLANNING UNIT



CYNTHIA BRYANT
DIRECTOR

RECEIVED
AUG 01 2007

Notice of Preparation

CITY OF SAN BERNARDINO
DEVELOPMENT SERVICES
DEPARTMENT

July 27, 2007

To: Reviewing Agencies

Re: University Hills Specific Plan EIR
SCH# 2007071155

Attached for your review and comment is the Notice of Preparation (NOP) for the University Hills Specific Plan EIR draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Terri Rahhal
City of San Bernardino
300 North D Street
San Bernardino, CA 92418-0001

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Project Analyst, State Clearinghouse

Attachments
cc: Lead Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2007071155
Project Title University Hills Specific Plan EIR
Lead Agency San Bernardino, City of

Type NOP Notice of Preparation

Description The project proposes 980 residential units on 159.3 acres within a site that encompasses 404.2 acres. Housing densities range from 3.2 up to 20 units per acre with a gross density of 2.4 units per acre and a net density of 6.1 units per acre. This document will be a Supplemental EIR to the Paradise Hills Specific Plan EIR (SCH# 1991012055). Compared to the previously approved project, the University Hills project proposes to concentrate units mainly below or south of the San Andreas Fault which traverses the site, and eliminates units in upper Badger Canyon. The project contains 7 acres of developed parkland/trails and 245 acres of natural open space.

Lead Agency Contact

Name Terri Rahhal
Agency City of San Bernardino
Phone 909-384-5057 **Fax**
email
Address 300 North D Street
City San Bernardino **State** CA **Zip** 92418-0001

Project Location

County San Bernardino
City San Bernardino
Region
Cross Streets West Northpark Boulevard and Devil Canyon Levee Road
Parcel No.
Township 1N **Range** 4W **Section** 4, 5 **Base** SBB&M

Proximity to:

Highways I-215, SR-18
Airports
Railways BNSF
Waterways Badger Creek, East Branch CA Aqueduct
Schools CSU San Bernardino, Cajon HS, and others
Land Use Specific Plan/Specific Plan

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Growth Inducing; Landuse; Cumulative Effects; Other Issues; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Wetland/Riparian

Reviewing Agencies Resources Agency; Department of Conservation; Office of Historic Preservation; Department of Parks and Recreation; Department of Water Resources; Department of Fish and Game, Region 6; Native American Heritage Commission; State Lands Commission; California Highway Patrol; Caltrans, District 8; Regional Water Quality Control Board, Region 8; Department of Toxic Substances Control

Date Received 07/27/2007 **Start of Review** 07/27/2007 **End of Review** 08/27/2007

Regional Water Quality Control Board (RWQCB)

Caltrans, District 8
Dan Kopulsky

Public Utilities Commission
Ken Lewis

Fish & Game Region 2
Banky Curtis

Resources Agency
Nadell Gayou

RWQCB 1
Cathleen Hudson
North Coast Region (1)

Caltrans, District 9
Gayle Rosander

Santa Monica Bay Restoration
Guangyu Wang

Fish & Game Region 3
Robert Floerke

Dept. of Boating & Waterways
David Johnson

RWQCB 2
Environmental Document
Coordinator
San Francisco Bay Region (2)

Caltrans, District 10
Tom Dumas

State Lands Commission
Jean Sarino

Fish & Game Region 4
Julie Vance

California Coastal Commission
Elizabeth A. Fuchs

RWQCB 3
Central Coast Region (3)

Caltrans, District 11
Mario Orso

Tahoe Regional Planning Agency (TRPA)
Cherry Jacques

Fish & Game Region 5
Don Chadwick
Habitat Conservation Program

Colorado River Board
Gerald R. Zimmerman

RWQCB 4
Teresa Rodgers
Los Angeles Region (4)

Caltrans, District 12
Bob Joseph

Business, Trans & Housing
Caltrans - Division of Aeronautics
Sandy Hesnard

Fish & Game Region 6
Gabrina Gatchel
Habitat Conservation Program

Dept. of Conservation
Sharon Howell

RWQCB 5S
Central Valley Region (5)

Air Resources Board
Airport Projects
Jim Lerner

California Highway Patrol
Shirley Kelly
Office of Special Projects

Fish & Game Region 6 IM
Gabrina Gatchel
Inyo/Mono, Habitat Conservation Program

California Energy Commission
Paul Richins

RWQCB 5F
Central Valley Region (5)
Fresno Branch Office

Transportation Projects
Ravi Ramalingam

Housing & Community Development
Lisa Nichols
Housing Policy Division

Dept. of Fish & Game M
George Isaac
Marine Region

Dept. of Forestry & Fire Protection
Allen Robertson

RWQCB 5R
Central Valley Region (5)
Redding Branch Office

California Integrated Waste Management Board
Sue O'Leary

Dept. of Transportation
Caltrans, District 1
Rex Jackman

Other Departments
Food & Agriculture
Steve Shaffer
Dept. of Food and Agriculture

Office of Historic Preservation
Wayne Donaldson

RWQCB 6
Lahontan Region (6)

State Water Resources Control Board
Regional Programs Unit
Division of Financial Assistance

Caltrans, District 2
Marcelino Gonzalez

Dept. of General Services
Public School Construction

Dept. of Parks & Recreation
Environmental Stewardship Section

RWQCB 7
Colorado River Basin Region (7)

State Water Resources Control Board
Student Intern, 401 Water Quality Certification Unit
Division of Water Quality

Caltrans, District 3
Jeff Pulverman

Dept. of General Services
Environmental Services Section

Reclamation Board
DeeDee Jones

RWQCB 8
Santa Ana Region (8)

State Water Resources Control Board
Steven Herrera
Division of Water Rights

Caltrans, District 4
Tim Sable

Dept. of Health Services
Veronica Malloy
Dept. of Health/Drinking Water

S.F. Bay Conservation & Dev't. Comm.
Steve McAdam

RWQCB 9
San Diego Region (9)

Dept. of Toxic Substances Control
CEQA Tracking Center

Caltrans, District 5
David Murray

Independent Commissions, Boards
Delta Protection Commission
Debbie Eddy

Dept. of Water Resources
Resources Agency
Nadell Gayou

Other

Department of Pesticide Regulation

Caltrans, District 6
Marc Blimbaum

Office of Emergency Services
Dennis Castrillo

Dept. of Fish & Game
Scott Flint
Environmental Services Division

Other

Department of Pesticide Regulation

Caltrans, District 7
Cheryl J. Powell

Govemor's Office of Planning & Research
State Clearinghouse

Dept. of Water Resources
Resources Agency
Nadell Gayou

Conservancy

Dept. of Fish & Game
Scott Flint
Environmental Services Division

Native American Heritage Comm.
Debbie Treadway

Govemor's Office of Planning & Research
State Clearinghouse

Dept. of Fish & Game
Scott Flint
Environmental Services Division

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
 SACRAMENTO, CA 95814
 (916) 653-6251
 Fax (916) 657-5390
www.nahc.ca.gov
ds_nahc@pacbell.net



RECEIVED
 AUG 8 6 2007

August 2, 2007

CITY OF SAN BERNARDINO
 DEVELOPMENT SERVICES
 DEPARTMENT

Ms. Terri Rahhal
City of San Bernardino
 300 North D Street
 San Bernardino, CA 92418-0001

Re: SCH# 20007071155: CEQA Notice of Preparation (NOP) draft Environmental Impact Report (DEIR) for University Hills Specific Plan; City of San Bernardino; San Bernardino County, California

Dear Ms. Rahhal:

Thank you for the opportunity to comment on the above-referenced document. The California Environmental Quality Act (CEQA) requires that any project that causes a substantial adverse change in the significance of an historical resource, that includes archeological resources, is a 'significant effect' requiring the preparation of an Environmental Impact Report (EIR per CEQA guidelines § 15064.5(b)(c). In order to comply with this provision, the lead agency is required to assess whether the project will have an adverse impact on these resources within the 'area of potential effect (APE),' and if so, to mitigate that effect. To adequately assess the project-related impacts on historical resources, the Commission recommends the following action:

- √ Contact the appropriate California Historic Resources Information Center (CHRIS). Contact information for the 'Information Center' nearest you is available from the State Office of Historic Preservation in Sacramento (916/653-7278). The record search will determine:
 - If a part or the entire (APE) has been previously surveyed for cultural resources.
 - If any known cultural resources have already been recorded in or adjacent to the APE.
 - If the probability is low, moderate, or high that cultural resources are located in the APE.
 - If a survey is required to determine whether previously unrecorded cultural resources are present.
- √ If an archaeological inventory survey is required, the final stage is the preparation of a professional report detailing the findings and recommendations of the records search and field survey.
 - The final report containing site forms, site significance, and mitigation measures should be submitted immediately to the planning department. All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure.
 - The final written report should be submitted within 3 months after work has been completed to the appropriate regional archaeological Information Center.
- √ Contact the Native American Heritage Commission (NAHC) for:
 - * A Sacred Lands File (SLF) search of the project area and information on tribal contacts in the project vicinity who may have information on cultural resources in or near the APE. Please provide us site identification as follows: USGS 7.5-minute quadrangle citation with name, township, range and section. This will assist us with the SLF.
 - Also, we recommend that you contact the Native American contacts on the attached list to get their input on the effect of potential project (e.g. APE) impact.
- √ Lack of surface evidence of archeological resources does not preclude their subsurface existence.
 - Lead agencies should include in their mitigation plan provisions for the identification and evaluation of accidentally discovered archeological resources, per California Environmental Quality Act (CEQA) §15064.5 (f). In areas of identified archaeological sensitivity, a certified archaeologist and a culturally affiliated Native American, with knowledge in cultural resources, should monitor all ground-disturbing activities.
 - Lead agencies should include in their mitigation plan provisions for the disposition of recovered artifacts, in consultation with culturally affiliated Native Americans.

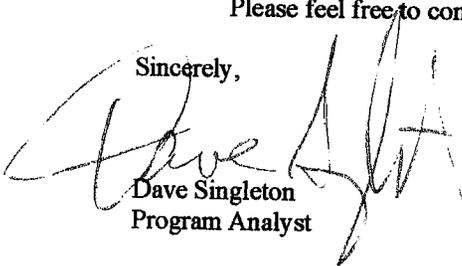
√ Lead agencies should include provisions for discovery of Native American human remains or unmarked cemeteries in their mitigations plans.

- CEQA Guidelines §15064.5(d) requires the lead agency to work with the Native Americans identified by this Commission if the Initial Study identifies the presence or likely presence of Native American human remains within the APE. CEQA Guidelines provide for agreements with Native American groups, identified by the NAHE, to ensure the appropriate and dignified treatment of Native American human remains and any associated grave goods.
- Health and Safety Code §7050.5, Public Resources Code §5097.98 and CEQA Guidelines §15064.5(d) mandate procedures to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery.

√ Lead agencies should consider avoidance, as defined in CEQA Guidelines §15370 when significant cultural resources are discovered during the course of project planning or execution.

Please feel free to contact me at (916) 653-6251 if you have any questions.

Sincerely,



Dave Singleton
Program Analyst

Attachment: Native American Contact List

Native American Contacts
San Bernardino County
August 2, 2007

Cahuilla Band of Indians
Anthony Madrigal, Jr., Interim-Chairperson
P.O. Box 391760 Cahuilla
Anza, CA 92539
tribalcouncil@cahuilla.net
(951) 763-2631

(951) 763-2632 Fax

Ramona Band of Mission Indians
Joseph Hamilton, vice chairman
P.O. Box 391670 Cahuilla
Anza, CA 92539
admin@ramonatribe.com
(951) 763-4105

(951) 763-4325 Fax

San Manuel Band of Mission Indians
Henry Duro, Chairperson
26569 Community Center Drive Serrano
Highland, CA 92346
(909) 864-8933
(909) 864-3370 Fax

Chemehuevi Reservation
Charles Wood, Chairperson
P.O. Box 1976 Chemehuevi
Chemehuevi Valley, CA 92363
chemehuevit@yahoo.com
(760) 858-4301
(760) 858-5400 Fax

Gabrieleno/Tongva Tribal Council
Anthony Morales, Chairperson
PO Box 693 Gabrielino Tongva
San Gabriel, CA 91778
ChiefRBwife@aol.com
(626) 286-1632
(626) 286-1758 - Home
(626) 286-1262 Fax

Gabrielino/Tongva Council / Gabrielino Tongva Nation
Sam Dunlap, Tribal Secretary
761 Terminal Street; Bldg 1, 2nd floor Gabrielino Tongva
Los Angeles, CA 90021
office @tongvatribes.net
(213) 489-5001 - Officer
(909) 262-9351 - cell
(213) 489-5002 Fax

Gabrielino Band of Mission Indians of CA
Ms. Susan Frank
PO Box 3021 Gabrielino
Beaumont, CA 92223
(951) 897-2536 Phone/Fax

Morongo Band of Mission Indians
Britt W. Wilson, Cultural Resources-Project Manager
49750 Seminole Drive Cahuilla
Cabazon, CA 92230 Serrano
britt_wilson@morongo.org
(951) 755-5206
(951) 755-5200/323-0822-cell
(951) 922-8146 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native American with regard to cultural resources for the proposed SCH#2007071155; CEQA Notice of Preparation (NOP) draft Environmental Impact Report (DEIR for the University Hills Specific Plan; City of San Bernardino; San Bernardino County, California.

Native American Contacts
San Bernardino County
August 2, 2007

San Manuel Band of Mission Indians
Ann Brierty, Environmental Department
101 Pure Water Lane **Serrano**
Highland , CA 92346
abrierty@sanmanuel-nsn.gov
(909) 863-5899 EXT-4321

(909) 862-5152 Fax

Serrano Band of Indians
Goldie Walker
6588 Valeria Drive **Serrano**
Highland , CA 92346
(909) 862-9883

Cahuilla Band of Indians
Maurice Chacon, Cultural Resources
P.O. Box 391760 **Cahuilla**
Anza , CA 92539
cbandodian@aol.com
(951) 763-2631

(951) 763-2632 Fax

This list is current only as of the date of this document.

Distribution of this list does not relieve any person of statutory responsibility as defined in Section 7050.5 of the Health and Safety Code, Section 5097.94 of the Public Resources Code and Section 5097.98 of the Public Resources Code.

This list is only applicable for contacting local Native American with regard to cultural resources for the proposed SCH#2007071155; CEQA Notice of Preparation (NOP) draft Environmental Impact Report (DEIR for the University Hills Specific Plan; City of San Bernardino; San Bernardino County, California.

DEPARTMENT OF PUBLIC WORKS

FLOOD CONTROL • SOLID WASTE MGMT • SURVEYOR • TRANSPORTATION

COUNTY OF SAN BERNARDINO
PUBLIC AND SUPPORT
SERVICES GROUP



825 East Third Street • San Bernardino, CA 92415-0835 • (909) 387-8104
Fax (909) 387-8130

RECEIVED
PATRICK J. MEAD
Director of Public Works
AUG 02 2007

July 31, 2007

CITY OF SAN BERNARDINO
DEVELOPMENT SERVICES
DEPARTMENT

File #10(ENV)-4.01

Terri Rahhal, City Planner
City of San Bernardino
Planning Department
300 North "D" Street
San Bernardino, CA 92418

**RE: NOTICE OF PREPARATION OF SUPPLEMENTAL EIR FOR UNIVERSITY
HILLS SPECIFIC PLAN**

Dear Ms. Rahhal:

Thank you for giving the San Bernardino County Department of Public Works the opportunity to comment on the above-referenced project.

After reviewing the submitted document, our Department has determined that we would like to receive a copy of the environmental document and any Technical Reports that will be prepared for this project, when they become available. At that time, our Department will review the project and provide comments.

Sincerely,

A handwritten signature in cursive script that reads "Frank Molina".

FRANK MOLINA, Supervising Planner
Environmental Management Division

FM:mb/CEQA Rec'd_SB City_University Hills SP_EIR Reqst'd

cc: Naresh P. Varma
VRO/MK Reading File

MARK H. UFFER
County Administrative Officer

NORMAN A. KANOLD
Assistant County Administrator
Public and Support
Services Group

BILL POSTMUS
PAUL BIANE

Board of Supervisors
First District
Second District
JOSIE GONZALES

DENNIS HANSBERGER
GARY C. OVITT
Fifth District

Third District
Fourth District



South Coast
Air Quality Management District

21865 Copley Drive, Diamond Bar, CA 91765-4182
(909) 396-2000 • www.aqmd.gov

August 3, 2007

Ms. Terri Rahhal
City Planner
City of San Bernardino, Development Services Department
300 North "D" Street
San Bernardino, CA 92418-0001

RECEIVED
AUG 06 2007

CITY OF SAN BERNARDINO
DEVELOPMENT SERVICES
DEPARTMENT

Dear Ms. Rahhal:

**Notice of Preparation of a Draft Supplemental Environmental Impact Report
(Draft SEIR) for the
University Hills Specific Plan**

The South Coast Air Quality Management District (SCAQMD) appreciates the opportunity to comment on the above-mentioned document. The SCAQMD's comments are recommendations regarding the analysis of potential air quality impacts from the proposed project that should be included in the draft supplemental environmental impact report (SEIR). Please send the SCAQMD a copy of the Draft SEIR upon its completion. **In addition, please send with the draft SEIR all appendices or technical documents related to the air quality analysis and electronic versions of all air quality modeling and health risk assessment files. Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.**

Air Quality Analysis

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. Alternatively, the lead agency may wish to consider using the California Air Resources Board (CARB) approved URBEMIS 2007 Model. This model is available on the SCAQMD Website at: www.aqmd.gov/ceqa/models.html.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has developed a methodology for calculating PM_{2.5} emissions from construction and operational activities and processes. In connection with developing PM_{2.5} calculation methodologies, the SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD requests that the lead agency quantify PM_{2.5} emissions and compare the results to the recommended PM_{2.5} significance thresholds. Guidance for

calculating PM2.5 emissions and PM2.5 significance thresholds can be found at the following internet address: http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html.

In addition to analyzing regional air quality impacts the SCAQMD recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

It is recommended that lead agencies for projects generating or attracting vehicular trips, especially heavy-duty diesel-fueled vehicles, perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment ("Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis") can be found on the SCAQMD's CEQA web pages at the following internet address: http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html. An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

Mitigation Measures

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additional mitigation measures can be found on the SCAQMD's CEQA web pages at the following internet address: www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html Additionally, SCAQMD's Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD's Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/prdas/agguide/agguide.html>. In addition, guidance on siting incompatible land uses can be found in the California Air Resources Board's Air Quality and Land Use Handbook: A Community Perspective, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

Data Sources

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD's Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD's World Wide Web Homepage (<http://www.aqmd.gov>).

The SCAQMD is willing to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. Please call Charles Blankson, Ph.D., Air Quality Specialist, CEQA Section, at (909) 396-3304 if you have any questions regarding this letter.

Sincerely,



Steve Smith, Ph.D.

Program Supervisor, CEQA Section

Planning, Rule Development and Area Sources

SS:CB:LI

SBC070731-01AK

Control Number



**CALIFORNIA STATE UNIVERSITY
SAN BERNARDINO**

5500 University Parkway, San Bernardino, CA 92407-2397

COLLEGE OF NATURAL SCIENCES
Department of Biological Sciences

(909) 537-5305

fax: (909) 537-7038

RECEIVED
AUG 27 2007

CITY OF SAN BERNARDINO
DEVELOPMENT SERVICES
DEPARTMENT

Ms. Terry Rahal
City of San Bernardino
Development Services Department
300 North "D" Street
San Bernardino, CA 92418-0001

August 27, 2007

Dear Ms. Rahal,

I would like to comment on specific aspects of the NOP for the University Hills Specific Plan. I am a faculty member in the Biology Department at California State University, San Bernardino (CSUSB), which borders the proposed project to the south.

My major concern has to do with the offsite "fuel modification zone" mentioned in the NOP. This zone is not specifically outlined in the NOP. However, if it includes adjacent CSUSB property, this would have serious adverse effects on our teaching and research mission. A self-study of class and research use of undeveloped portions of CSUSB was carried out last year to prioritize areas for protection and aid in campus planning. The north side of Badger Hill, the ridgelines, and a portion of the alluvial vegetation south of Badger Hill and the levee were found to be the most heavily used areas for teaching. These areas serve at least 14 classes distributed over three colleges, most of which depend on the vegetation being in its native, unmodified state. I have attached a copy of this report. Please note that the additional Land Lab property proposed to be donated by the developer to CSUSB, while appreciated, will not replace the needs of these specific classes.

It looks as if the Specific Plan allows for approximately 40 feet of fuel break between townhouses and CSUSB's on-campus Land Lab (a fuel break consisting of a concrete drainage channel and a dirt road). If this is sufficient and the development can be carried out with no disturbance of the native vegetation on CSUSB property, then my concerns are met. If a larger fuel break is needed, the developer should provide fire-safe zones on his own property, rather than taking CSUSB property for such purposes. Such a taking would severely impair the educational activities of several departments at CSUSB.

Sincerely,

Kimberlyn Williams

Associate Professor of Biology

Phone: (909) 537-7656

Email: williams@csusb.edu

The California State University

Bakersfield • Channel Islands • Chico • Dominguez Hills • East Bay • Fresno • Fullerton • Humboldt • Long Beach • Los Angeles • Maritime Academy
Monterey Bay • Northridge • Pomona • Sacramento • San Bernardino • San Diego • San Francisco • San Jose • San Luis Obispo • San Marcos • Sonoma • Stanislaus

New Proposal for Land Lab (March 2007)

Over the past few years, numerous discussions have occurred on campus about the northern part of campus, which has been used by various classes for laboratory instruction over the last twenty years. Efforts to identify these instructional areas as a "Land Laboratory" have met with frustration due to conflicts between the desire to protect these areas in a natural state for continued use by these classes and the need to protect the future development of other campus facilities. This report has been prepared by Kim Williams and Sally McGill in an effort to bring focus to this discussion in hopes that an agreement can be facilitated on campus and a change to the CSUSB Master Plan be approved.

Description and Need

The attached maps show:

- 1) Natural areas proposed for permanent preservation in a Land Lab and prioritization of other areas (areas that should be saved as long as possible vs. areas that are of less use in teaching) – see Attachment 1.
- 2) The teaching areas of different CSUSB units and departments – see Attachment 2.

Maps of teaching areas were solicited from the campus at large and served as the basis for the proposed boundaries of a permanent Land Lab. In general, these maps do not show all of the areas used by classes, only those most critical to their mission. (ROTC's map is an exception, showing all of its usage in natural areas.) Short synopses of the specific needs of different classes, explaining why they need certain areas or types of areas, are given in Appendix A. To better show areas used by individual classes where overlap among classes is high, maps of teaching areas for individual units are provided in Appendix B.

The Land Lab serves at least 14 courses distributed over three colleges (the College of Natural Sciences, the College of Social and Behavioral Science, and the College of Education), plus ROTC, ASI's campus orientation activities, and the cross-country team. All but one of these 14 courses rely on the natural character of the vegetation and topography. Special topics courses, summer Education workshops, and high school outreach activities that use the area are not included in this tally.

As proposed, the Land Lab covers a total of 68 acres, but only 23 of these acres are on flat, easily build-able terrain. (To put this in perspective, athletic fields currently consume approximately 33 acres of flat, easily build-able terrain, in addition to Athletics' indoor facilities.) The remaining 45 acres of the proposed Land Lab are on the slopes of Little Badger Hill below the planned Observatory, along the ridgeline of Badger Hill, and on the northern slopes of Badger Hill. A narrow corridor, linking Land Lab areas south of Badger Hill to those on the north slope is requested. Most of the south slope of Badger Hill (the side facing the campus core) is **not requested for inclusion in the Land Lab**. The proposed preserve includes most of the land deemed critical for specific courses, as well as land that is of high priority for teaching (used but not critical to the viability of a course), and corridors that link critical teaching areas and provide biological corridors.

The flat alluvial areas included in the proposed "Land Lab" are the most heavily used areas for classes. These are followed closely by the main north-facing slope of Badger Hill and certain

areas on Little Badger Hill. The ridgelines of Badger Hill are critical for fewer classes, but are also occupied by rare plants, the subject of student research projects.

Of the 13 non-ROTC classes that rely on the natural character of vegetation and soil, 10 require use of these flat alluvial areas, and 4 use these flat alluvial areas exclusively. This area also contains the features in the proposed "Land Lab" that are used by Anthropology, ASI, Kinesiology, and the cross-country team.

Little Badger Hill, the site of the planned Observatory, supports activities of at least 6 classes. The most heavily used part of Little Badger Hill, however, is a road cut on the west side of Little Badger Hill near the flood control dikes. This could be preserved with careful planning and construction of the Observatory. This road cut has features that are used by 4 classes in Geology and Geography. The south-facing slope, used by two classes in Biology, also appears to be outside the footprint of the planned Observatory, and might be preserved with careful planning, construction, and coordination. Only two classes (in Geology and Geography) incorporate lessons that use the peak of Little Badger Hill, which would be eliminated with the construction of the Observatory.

The north-facing slope of Badger Hill, from Little Badger Hill eastward to the first hairpin curve in the dirt road maintained by county flood control, is used by 9 courses. Some classes concentrate their activities along the road at the base of this slope, while others use all of the topographical features (outcrops, ridges, and vegetation types) on this part of Badger Hill.

The other ridges of Badger Hill and other areas along the back side of Badger Hill (that facing away from the campus core) are used by three courses (in Geology and Geography) and are used for research in two disciplines (Geology and Biology).

Planning for Long-term Viability of the Land Lab

To allow the natural areas to continue to function as effective teaching areas for all the courses it currently serves, the Land Lab should be designed such that it is not likely to lose species or become degraded over time. Toward that end, (1) the Land Lab boundaries should be protected from invasive non-native species that may eliminate native species from the Land Lab and (2) connections to habitat off-campus should be maintained to allow movement of species and potential recolonization of species that may be lost from the Land Lab. (Decades of research have shown that small islands of isolated habitat tend to lose species over time.) The proposed boundaries of the permanent Land Lab include biological corridors that link critical teaching areas to each other and link the proposed Land Lab to county flood control areas adjacent to campus. Landscaping of areas adjacent to the Land Lab (e.g., the observatory, the future dorms, etc.) should be planned in coordination with a faculty Land Lab committee to ensure that this landscaping is compatible with long-term persistence of the biological communities in the Land Lab.

Costs of Losing these Teaching Areas

Over the history of CSUSB, the natural areas used by classes have shrunk. This has been caused by development both on campus and on adjacent properties where CSUSB departments have

historically also conducted field labs. The campus is now approaching a point where careful planning is required to maintain the viability of these courses. If these areas are lost:

- 1) More of the labs in field courses will have to move off campus. Small courses may achieve this readily by coping with increased costs of class time spent in travel, vehicle costs, and the added liability inherent in taking off-campus field trips. These costs are probably acceptable. Larger field courses will need to move toward smaller lab enrollments to accommodate the current van-size limitations and increased logistics of conducting off-campus labs. Therefore, in addition to the costs mentioned for small classes, these classes will either need to reduce overall enrollment or offer a greater number of lab sections with attendant increased costs of hiring more instructors and finding lab space in buildings for a greater number of lab offerings. (Courses with field components are not conducted entirely in the field.)
- 2) Outreach activities will suffer. Over the past several years, Geology high school outreach activities have used these areas, science education summer workshops have used these areas, ASI has used the area in dorm orientation activities, and campus tours have featured the Fairview archeological site as a unique campus landmark.
- 3) The unique character of CSUSB, with its on-campus natural areas that contribute to CSUSB's ability to attract grants in certain fields, enhance ROTC's training capability, and attract faculty in certain fields, will be lost.
- 4) The unique ability of CSUSB to provide field instruction to certain students with disabilities (i.e., those in wheelchairs), given the accessibility of natural vegetation near hard dirt roads in flat terrain on campus, will be lost.

The Land Lab and the Growth of CSUSB

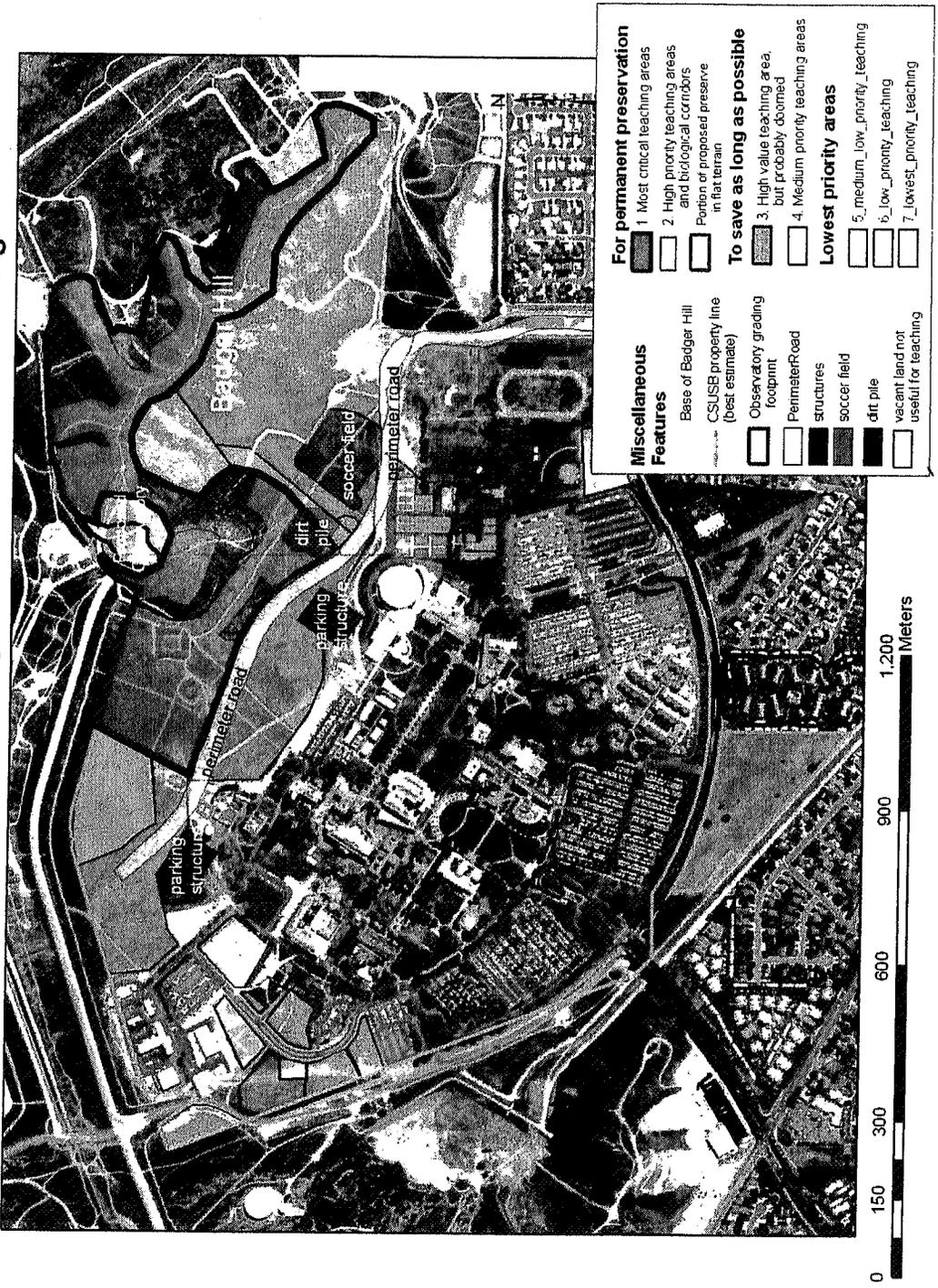
As CSUSB grows, the number of field courses, the number of offerings of these courses, the number of students taking these courses, and the number of faculty teaching these courses will grow. Therefore, the use of the Land Lab will intensify, requiring closer coordination of activities in the Land Lab. Toward that end, the faculty have initiated a committee, consisting of representatives from Anthropology, ASI, Biology, Science Education, Geography, Geology, and ROTC, to help prevent conflicts from arising among classes, researchers, and other units currently using the area.

As the campus grows, there will also be a need for more buildings, parking, and other facilities.

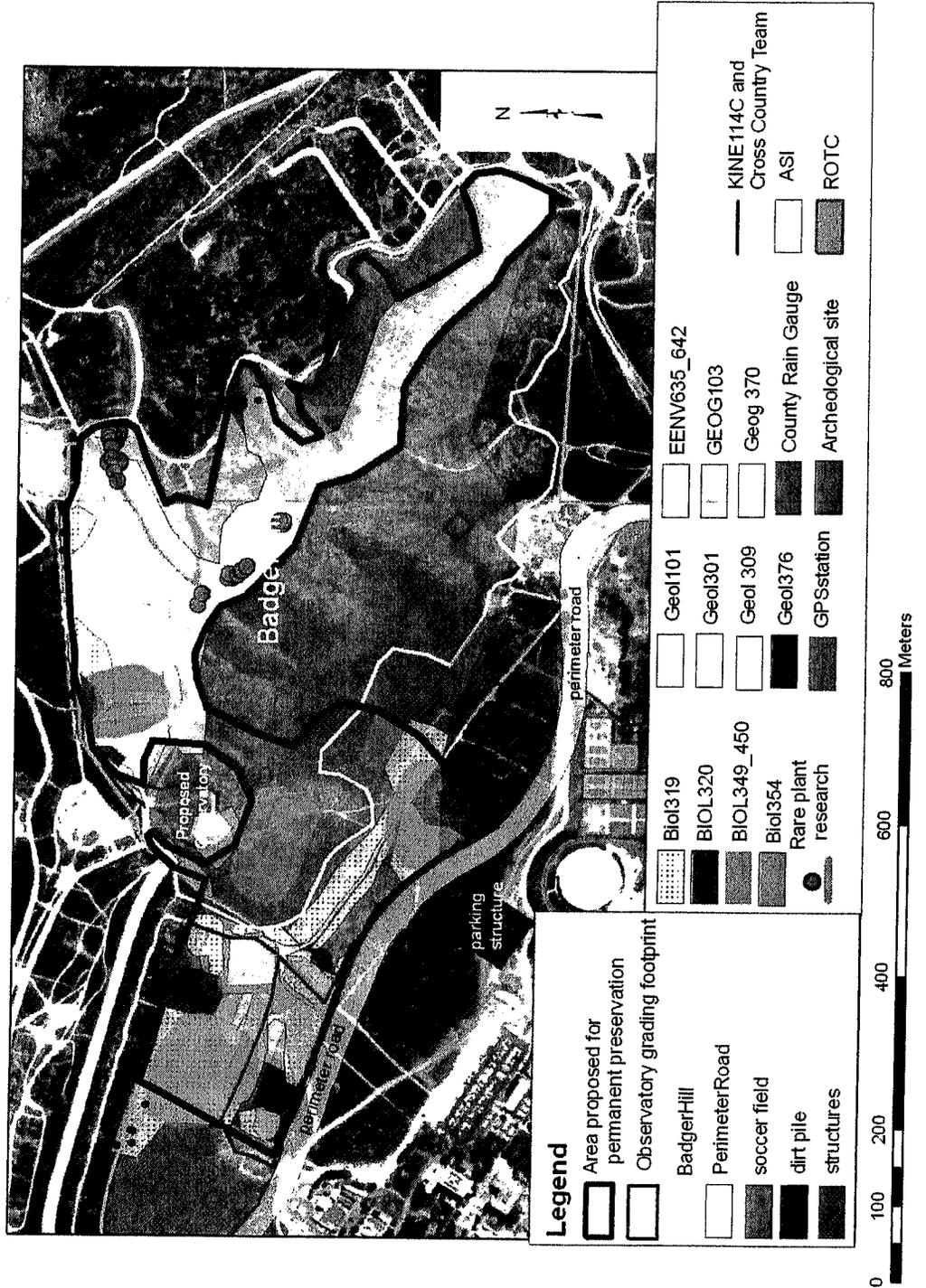
There are several ways in which the proposed Land Lab can be preserved while maintaining growth. Most involve converting some of the existing surface parking lots to parking structures. (One would hope for attractive parking structures). Quick back-of-the-napkin sketches suggest that parking capacity could be doubled, academic building capacity could be doubled, the area in athletic fields could be increased by 50%, and the area devoted to on-campus dorm facilities could be increased by 50-60% without building on the Land Lab area as proposed, without building on grassy malls north and south of the library, without building on the south slope of Badger Hill, and without even utilizing all of the flat terrain on campus. These latter areas would be available for even further campus development without giving up the Land Lab. (One strategy for accomplishing this growth is given in Attachment C, but there are others.)

Natural areas proposed for preservation
prioritized according to usefulness for teaching

23 March 2007



Composite map of uses of natural areas on north side of campus



Appendix A

Specific Needs and Uses of Natural Areas by Individual Classes and Units

Archeological Site (Anthropology): The olive grove at the base of Little Badger Hill marks the site of the Fairview School, an 1800's one-room schoolhouse. The olive trees are part of the windbreak that was planted around the school, and the cistern that served the school still exists at the northwest corner of the site. The site has been largely excavated by students and faculty in the Anthropology Department, but the privy, which could yield valuable historical information, has not yet been located.

ASI (Associated Students, Inc.) uses the olive grove in campus orientation activities. It is used by on-campus residents during dorm orientation week, and it is a featured landmark on campus tours. A number of urban legends have arisen regarding this circle of trees, and the students value it as a unique campus landmark.

BIOL 319 (Local Flora) uses the natural areas on campus primarily to teach plant identification. It deals with native and introduced species (i.e., those described in the Jepson Manual, the standard plant key for California), but not horticultural plants. It needs (1) the largest variety non-horticultural plant species possible, (2) areas where students can be shown the plants, and (3) other areas where students' identification skills can be tested. (The objective is to be able to identify a species no matter where it occurs: learning to recognize specific individuals is not consistent with this goal.) Additionally, part of a standard plant taxonomy class is to teach students to make museum-quality herbarium specimens from collected plants. This aspect of the class has been reduced because other professors have complained that over-collecting by BIOL 319 students is degrading the natural areas they use for their classes. However, this aspect of the course is still an important part of the students' training.

BIOL 320 (Microorganisms) requires a variety of substrates and vegetation types (eg., undisturbed alluvium, south-facing slopes, spoil piles, wetland soils, etc.) to teach students how to isolate microorganisms from the environment and how to identify them. Students utilize enrichment and isolation schemes to find previously unstudied bacteria in these diverse environments. In addition to teaching skills in microbial isolation and identification, these lab exercises demonstrate how soil microbial communities differ among different environments and allow students to incorporate their investigations into experimental design.

BIOL 354 (Biology of Higher Plants) is a course for biology majors that covers structure and function of plants, focusing on seed plants. This course has minor requirements in the natural areas, using them primarily as sources from which students can gather tissues from a variety of plant species, examine them microscopically, and discuss consequences that differences in plant anatomy would have on the plants' interactions with their environment.

BIOL 349 (Biology of Ecosystems) is a non-majors class in ecology, with a lab and with requirements that are similar to those of BIOL 450 (below).

BIOL 450 (Ecology) is a core course in the Biology major. It teaches basic concepts in ecology and includes a lab that teaches students how to conduct ecological research. The labs require the use of coastal alluvial sage scrub communities to estimate plant species richness and species

diversity. The natural areas on campus are ideally suited for such outdoor laboratory use. They provide flat, north-facing and south-facing slopes where students measure and estimate both the numbers and variation of species in these different, yet nearby habitats that comprise the larger community. Because a key concept in these lessons is how to randomly sample a community (to avoid bias in the data), the areas have to be of sufficient size for all student teams in a lab to lay out transects at random without crossing roads, crossing each other, or running out of the boundaries of the area to be sampled. In practice, four unbroken areas 2-3 acres in size are needed for the various laboratory lessons in this class. This class sometimes also includes comparisons of bird diversity in adjacent natural and parkland (i.e. developed campus) transects to estimate habitat preference and the effects of habitat alteration on the status and distribution of over-wintering species. These transects in the natural lands should be 1 km long, but can be located anywhere in flat natural areas adjacent to the developed areas on campus.

EENV 635 (Environmental Education in the Curriculum) and **EENV 642 (Developing the Curriculum Through Outdoor Education)** are required courses in the Master of Arts in Education, Environmental Education Option. Both classes deal with curriculum development in environmental education. Both use the natural areas to explore and demonstrate techniques to teach environmental concepts in an outdoor setting. Of the two courses, EENV 642 uses the natural areas most heavily, with the first hour of almost every class session being an outdoor education activity. These classes exclusively use the flat terrain on campus, not Badger Hill. The classes have used the Biology Pond in the past, but lack of water and restricted access have reduced their use of the pond.

GEOG 103 (Physical Geography) uses the natural areas on and directly adjacent to campus to teach patterns and processes of sedimentation, erosion, flooding, vegetation patterns, and fire, and to give students an introduction to spatial relationships. The flat alluvial areas on campus, the road cut on Little Badger Hill, the north slope of Badger Hill, and the percolation basins and sediment ponds adjacent to campus are used to demonstrate interacting patterns soil depth, vegetation type, erosion, flooding, and, when applicable, fire effects. The peak of Little Badger Hill gives students a vantage point from which to attempt to orient themselves visually on a map and check their success with a compass. This class used to proceed to the nudist camp to discuss springs, but students these days are in such bad shape, the professor has stopped taking them that far.

GEOG 370 (Landscape Analysis) teaches students to analyze patterns from a landscape perspective, incorporating principles of biogeography and ecology and linking these to land use planning. The course uses the north side of Badger Hill to analyze plant distribution patterns produced by variation in such factors as soils and topography.

GEOL 101 (Introductory Geology) is a general education course. One of the lab exercises for this class involves a hike to observe geologic features, both off campus (at the San Andreas fault), and on campus, along the road cuts along the northwest side of Little Badger Hill. Here we can observe the rock-type schist as well as evidence for weathering, erosion, mass wasting and soil formation. If development of private property north of campus prevents us from using that area in the future, then this lab exercise will be modified to use additional areas of Badger Hill, which are already marked as being used for Geol 301.

GEOL 301 (Introduction to Geologic Mapping) is a required class for all of the bachelor's

degree options in geology. This class uses Badger Hill as the first of three areas in which students learn to conduct geologic field mapping. The on-campus location allows for maximal use of class time, without wasting time driving to an off-campus location. Eight hours of class time are spent on Badger Hill, and students spend additional time outside of class (about 3 8-hour days on average) conducting mapping on Badger Hill as a homework exercise. The attached map shows only the most critical areas that are needed for the class, including all rock outcroppings, which are mostly located along the ridge lines and along the road cuts on the north side of the Badger Hill. It is important for these areas to be contiguous and to be unaffected by landscaping.

GEOL 309 (Earth: The Blue Planet) is a course geared toward K-12 teachers. It covers Earth's place in the solar system and the interacting factors that shape it. The lab uses the natural areas on campus to examine natural and anthropogenic forces that shape Earth's surface. The flat areas south of Badger Hill are used to examine sedimentation processes and evidence of patterns caused by humans. Road cuts and outcrops on Little Badger Hill and Badger Hill are used to examine soil formation and interactions with vegetation. Topographic features and benchmarks on Badger Hill are used to introduce students to the use of topo maps. Displacement of features on Badger Hill and features north of the San Andreas Fault (off campus) are used to demonstrate effects of movement of tectonic plates.

GEOL 376 (Field Methods in Groundwater Hydrology) uses undeveloped flat areas of campus for several student projects and laboratory demonstrations. These include demonstration of infiltrometer use, and a student project measuring and mapping infiltration rates; demonstration of soil moisture measurement, and a student project measuring and mapping soil moisture; and demonstration of soil shear strength and compaction measurements. The class utilizes sites that differ in soil characteristics, such as spoil piles and adjacent undisturbed vegetation. Since most of the techniques taught in this class are inappropriate for rocky steep slopes, labs in this class are concentrated in the flatter, alluvial areas on campus, rather than on Badger Hill.

The **GPS station** on the ridge of Badger Hill is part of the Earthscope project funded by the National Science Foundation to study tectonic motion of the Earth's crust. The instrument array in our area detects minute shifts and bending of the Earth's crust associated with active faults. An overview of the project is given at <http://www.earthscope.org>.

KINE 114C (Jogging) and the **Cross Country Team** use trails in the flat portions of the natural areas on campus. Trails through the area proposed for preservation in the Land Lab, as well as trails and dirt roads outside the proposed Land Lab are used. The area proposed for inclusion in a Land Lab specifically includes parts of trails that are valuable in a measured 1-mile training route for the women's cross country team. The natural character of the landscape is not needed for these uses.

Rare Plant Research: Research on Plummer's mariposa lily (*Calochortus plummerae*) is currently being conducted on campus. A population of this species was discovered on campus in 2004. The first phase of the research was conducted as a class project (BIOL 490), and has been published as a paper with six student coauthors (Williams, K., D. Coffey, Y. Osorio, K. Maher, A. Meyer, K. Myers, H. Contreras, and K. VinZant. 2006 "Habitat correlates of *Calochortus*

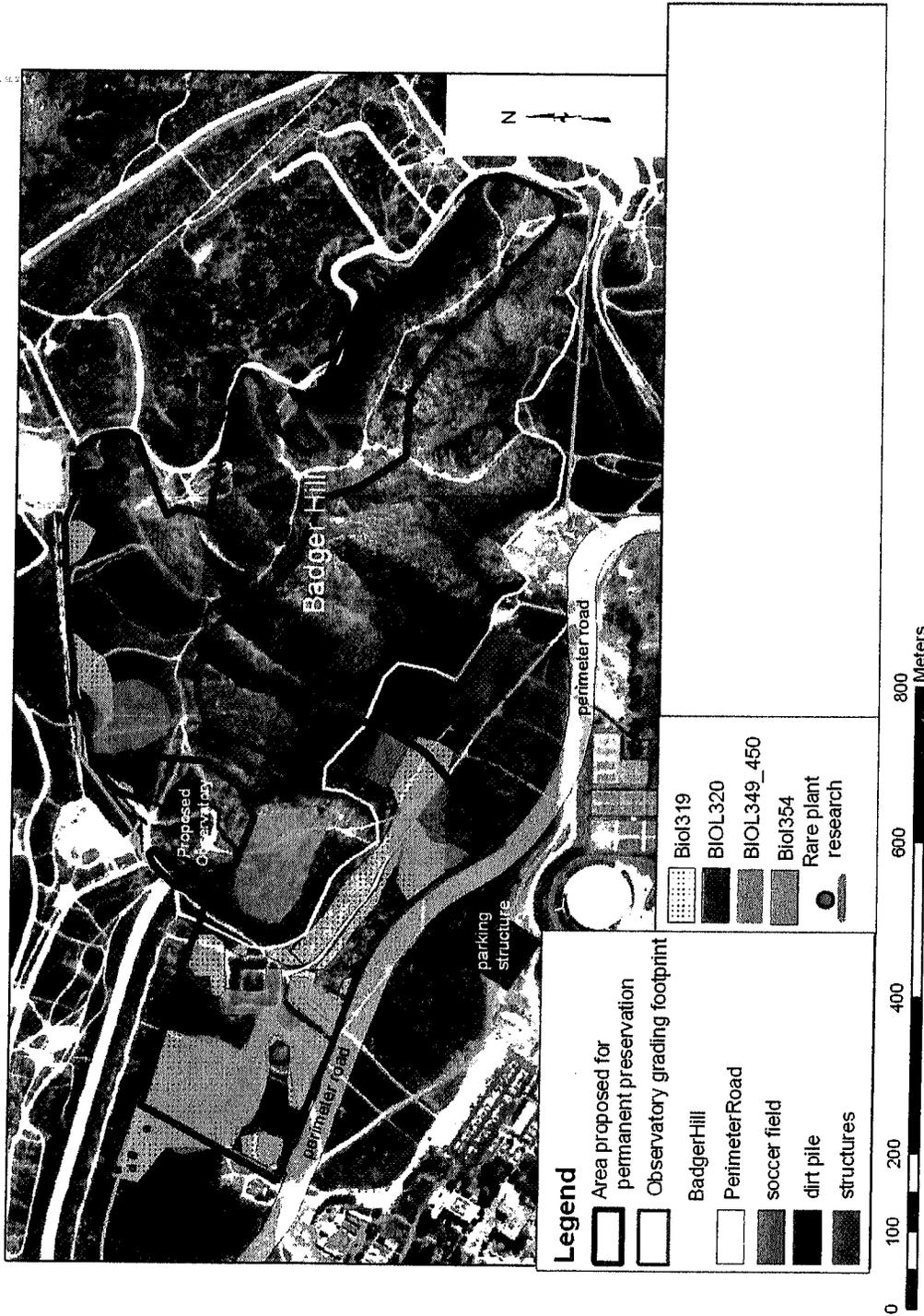
plummerae, a rare mariposa lily, on the campus of California State University, San Bernardino", *Crossosoma* 32(2): 75-82.) This species is included in the California Native Plant Society's List 1B.2, indicating that it is rare throughout its range, is fairly endangered (i.e., 20-80% of the species' occurrences are threatened), and must be considered under CEQA when development is planned. Ongoing research focuses on the plant's demography and factors that favor its success.

ROTC uses most of the natural areas in the northern part of campus for field training courses (MILS 100, 152, 252, 352, and 452). Most of the year, these activities are concentrated on the south slopes of Badger Hill and in the alluvial areas at its base. Four times a year, ROTC uses the entire hill, including the north slope and ridge, for land navigation training. There is no permanent or particular area needed for these courses, except for a place for a small bunker (currently located northeast of the soccer field and indicated as a small square on the map). ROTC training can be conducted on a campus without natural areas, but the availability of natural areas at CSUSB make this campus a uniquely desirable location for ROTC training.

Appendix B

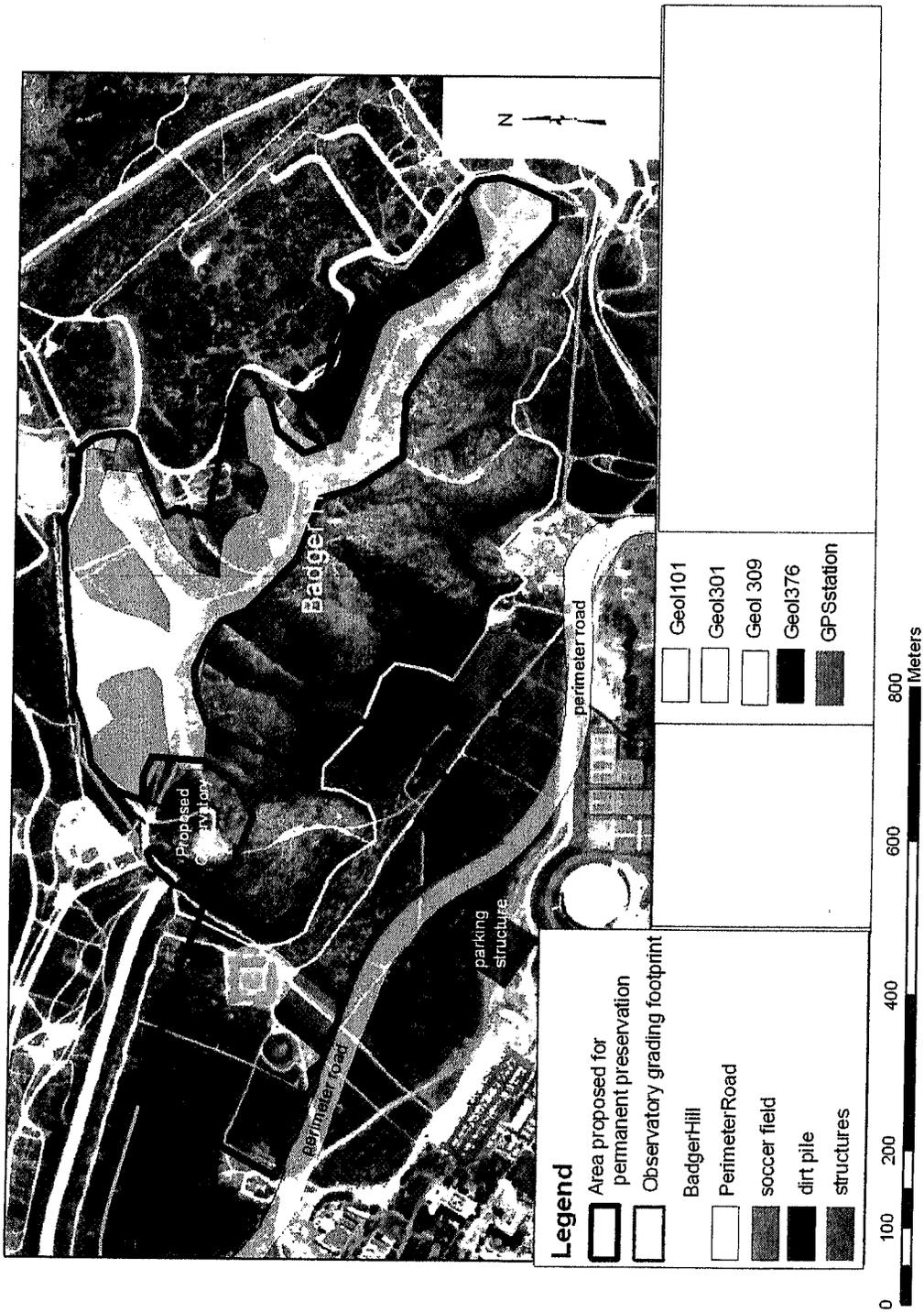
Maps of Areas Used by Individual Units

Department of Biology: uses of natural areas on north side of campus



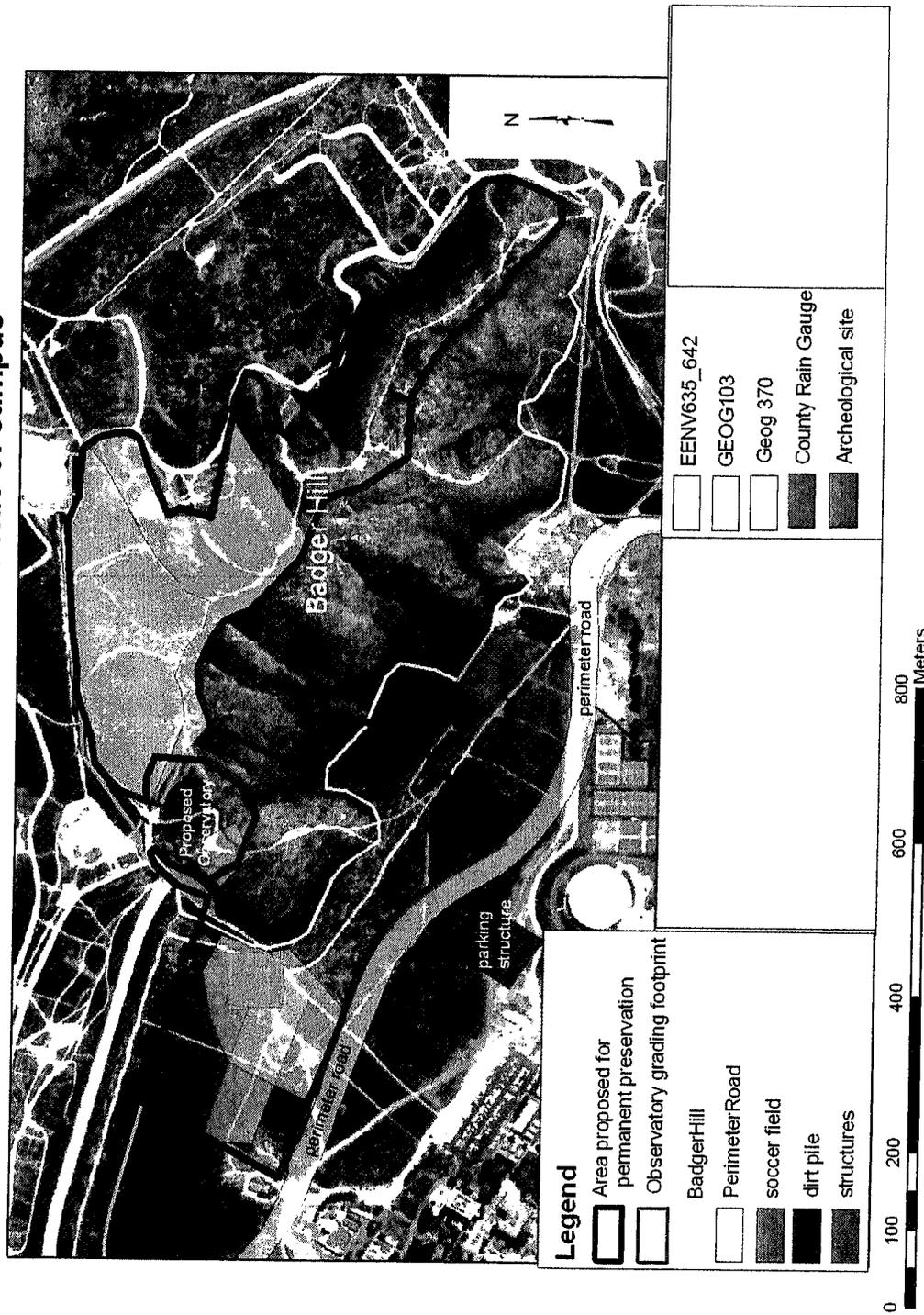
16 March 2007

Department of Geology: uses of natural areas on north side of campus



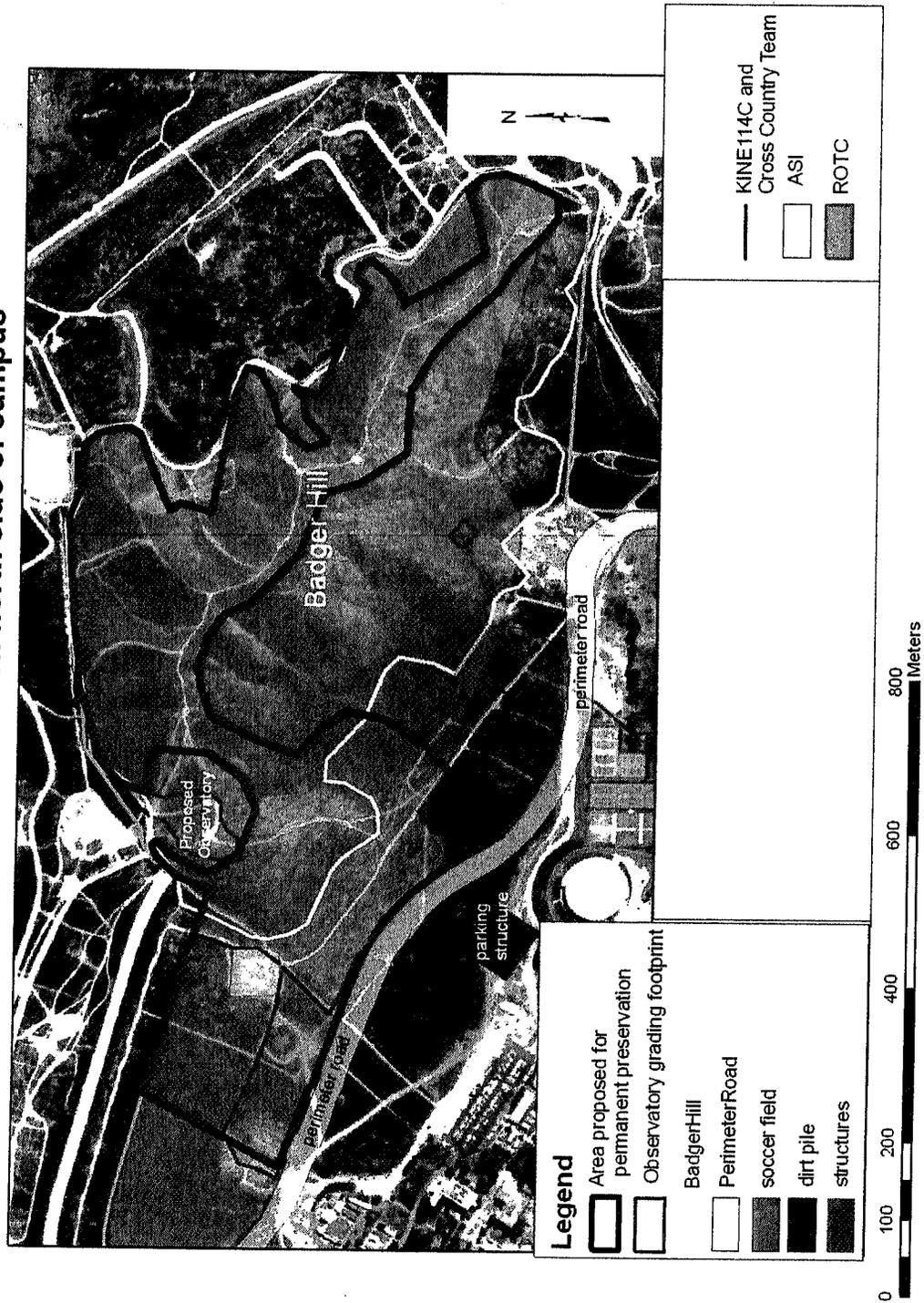
16 March 2007

**Social & Behavioral Sciences and Education:
uses of natural areas on north side of campus**



16 March 2007

**Kinesiology, athletics, ASI and ROTC:
uses of natural areas on north side of campus**



**San Bernardino Valley Audubon Society
P.O. Box 10973
San Bernardino, CA 92423**

August 26, 2007

Ms. Terri Rahal
City of San Bernardino
Development Services Department
300 North "D" Street
San Bernardino, CA 92418-0001

RECEIVED
AUG 27 2007

CITY OF SAN BERNARDINO
DEVELOPMENT SERVICES
DEPARTMENT

Dear Ms. Rahal,

The San Bernardino Valley Audubon Society (SBVAS) wishes to take this opportunity to comment on the NOP for the proposed University Hills Specific Plan.

First, we request that the comment period be extended for two more weeks to give sufficient time to provide input. The NOP gives little information other than to state that most of the environmental issues were discussed in the 1993 DEIR for the Paradise Hills, the previous incarnation of this project. We have not had the opportunity to study that document in detail, and we suspect other agencies and individuals have not either.

Second, we think it is necessary to prepare a new DEIR for this project, rather than a SEIR comparing the older project with the newer one. Under CEQA, if environmental conditions have changed significantly since the original DEIR, a new document should be prepared to reflect those changed conditions.

For the DEIR or SEIR that is prepared, we expect robust analysis of the effects of the project on air quality, including the production of greenhouse gases and their contribution to climate change. We also expect analysis of the medical effects (including costs) of the air pollution generated by the project, including transportation related sources. We believe the ecological and human costs of this additional air pollution is unacceptable for our region, which is plagued with some of the worst air in the nation.

With respect to hydrology, we believe that this is an inappropriate place for a housing development. The project area is an alluvial fan that is subject to severe flooding. This is why County Flood Control has retention basins right among what will be housing units in the proposed development. It was our understanding that flooding danger was one of the main reasons why Paradise Hills was shelved; not simply that it was economical as suggested in the NOP. We are doubtful that insurance companies will cover flood damages, given the experience of homeowners in similar locations as well as the

insurance companies heightened awareness and reluctance to pay out following the Katrina disaster.

We have similar concerns regarding fire danger. The Old and Panorama Fires have brought the public and the government to the realization that our foothill areas are exceptionally dangerous when it comes to fire. Our prolonged drought may become the norm rather than the exception, making any housing in the urban/wildland interface particularly vulnerable. To approve additional housing at the base of steep, brushy slopes in this windy area is asking for a disaster.

Seismic activity is another concern. We will be looking closely at the plans for University Hills with regard to the San Andreas fault zone. In most areas along the San Andreas, additional seismic studies identify previously hidden faults. Rarely are geological studies complete enough to guarantee that housing is not at risk from seismic activity. We request that no approvals be granted to this project until all faults are located and analyzed.

Access is always a concern for housing placed in dangerous locations. It is not clear in the NOP what the secondary access route will be. It is our understanding that University Hills is hoping to be allowed to cross California State University land at the east end of Badger Hill, and connect up with the university perimeter road. This or any route must be finalized before any approvals are given, along with a detailed analysis of the environmental effects of the access routes. If the Cal State route is indeed chosen, then the interaction of University Hills residents with the emergency evacuation of the campus must be fully analyzed.

The NOP does not indicate a water supply for this proposed development. If a will-serve letter is in hand, then the EIR must weigh the probability that enough water actually can be provided in perpetuity. California is in the midst of a water crisis, and promises can be made that have no basis in reality. The environmental effects of each potential water source must be examined. If no will-serve letter exists, no approvals should be granted.

With regards to Biological Resources, it is our position that the landowners have been derelict in their responsibility to protect their land. It is due to this neglect, including that of San Bernardino County Flood Control, that much of the lower portion of the project area has been overrun with motorcycles and ATVs. It is this disturbance that has promoted the invasion of non-native plants and the degradation of the native sage scrub habitat. It is patently unfair and inaccurate to characterize areas as ruderal and disturbed sage scrub, when historically it was healthy alluvial and Riversidean sage scrub, and could be once again with restoration and relief from the motorcycles and earthmoving activities of Flood Control. The ongoing disturbance of this site has made it difficult for California gnatcatcher, San Bernardino kangaroo rat and other sensitive animals and plants to persist. The habitat must be looked at as historic and potential habitat for these species, and must be analyzed with regards to their recovery, not just simple presence/absence surveys.

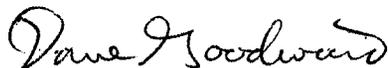
Any species depending on sage scrub will be cut off by this development, eliminating habitat connectivity to the Etiwanda Fan, Cajon and Lytle Creek and other foothill areas. Leaving the steep slopes as open space is not a biologically viable approach, as the habitat is chaparral, not sage scrub.

This development will also eliminate habitat connectivity with the Badger Hill Land Lab Preserve. This preserve, currently in danger of being developed by Cal State San Bernardino, is valuable expressly because 1) it features sage scrub, a threatened plant community, and 2) it is within easy walking distance from the classrooms. The steep, inaccessible chaparral slopes behind this proposed development cannot be a substitute for the Land Lab. In fact, the proposed development will isolate the current Land Lab Preserve, making it extremely unlikely that the biota will have genetic exchange and renewal, and its value as a biological preserve will be greatly diminished.

As with any major project, we will be looking carefully at all areas of environmental impacts, including cumulative impacts. We believe that this project in conjunction with the intense development of the region since the original approvals were granted will lead to highly significant cumulative impacts.

We look forward to reading the full analysis of all impacts in the EIR, and request being notified of any changes in the project that may come about. We are available for consultation at any stage in the development of this project.

Thank you,



Dave Woodward
Conservation Chair
San Bernardino Valley Audubon Society
Davegoodward@earthlink.net



United States
Department of
Agriculture

Forest
Service

Front Country
Ranger District
Lytle Creek Station

1209 Lytle Creek Road
Lytle Creek, CA 92358
(909)382-2851
(909)383-5783 TDD

FAX COVER SHEET

Date: 8-27-07 URGENT? Yes [] No []

PLEASE NOTIFY THE FOLLOWING INDIVIDUAL THAT THIS FAX HAS ARRIVED

This FAX is directed to:

Full Name: Terry Rakhal

Unit: City Planning Staff: _____

Telephone Number: _____ FAX Number: 909-384-5080

Total Number of Pages Including this Cover Sheet: 4

Special Instructions:

*Please confirm receipt:
jpcollier @ FS.FED.US*



This FAX Was Sent By:

Full Name: J. Collier Staff: LANDS

Telephone Number: (909) 382 Ext: 2869

FAX Number: (909) 887-8197



A particular issue that has become more important in recent years and is becoming a growing concern district and forest wide is trespassing. The extreme urban interface on this forest is a continued battle for boundary definition and protection. Trespassing has consumed many acres of public land and must not continue. We request that this proposal include defined boundaries such as fencing, block walls, and other ascetic barriers that will:

- Clearly define the forest boundary to the casual observer
- Impede the insurgence of any type of illegal occupation by future homeowners
- Reduce the conflicts between humans and wildlife entering developed areas

Preventing future trespasses will ensure that public lands are not lost to illegal activity and we thank you for your cooperation in this effort.

Wildlife, botanical, and cultural

- Clearly address direct, indirect, and cumulative impacts to wildlife and botanical resources to the area and nearby National Forest lands in the supplemental EIR. Much more development in the foothills below the SBNF has occurred over the past 14 years (since the original Paradise Hills EIR was completed) and low elevation foothill species and communities are becoming increasingly rare than when original proposal was analyzed.
- A development of this size in a relatively undeveloped area will have a significant impact on the biological resources of the area, including the adjacent National Forest. Analysis impacts to the riparian and rare habitats (ie sage scrubs), Threatened, Endangered, Sensitive species and other wildlife (such as deer). Consider impacts such as habitat loss and modification, stream de-watering, loss of habitat connectivity and wildlife movement corridors, noise, light, increased fire starts, non-native species introductions, and the impacts of pets on forest resources.
- Also address potential impacts to spring snails (*Pyrgulopsis californiensis*) known from Ben and Badger Canyons and the potential loss one of few remaining populations of spadefoot toads known to exist in the project vicinity.
- The area has recently burned, so the habitat is in the process of recovery. Therefore, the riparian habitat and sage scrub habitats is currently degraded. However, the analysis of impacts and protection plans should be based on the potential habitat that will be present in the long-term. There may be potential for California gnatcatcher and San Bernardino Kangaroo rat as the habitat recovers. Include analysis of loss of critical habitat for these listed species in the analysis.
- We encourage wildlife movement be maintained up and down the relocated stream course through the open space preserve.
- We would encourage the City to require mitigation for riparian habitat loss on site if at all possible. Riparian habitat in the San Bernardino Valley has been severely impacted and this has potential to affect riparian dependent species on the National Forest. The use of native cottonwood, alder, sycamore, and willow as the primary tree species in suitable areas of the redesigned stream would be very beneficial and help meet the needs of the riparian dependent species.
- We request a plan for long-term removal of nonnative invasive plants and animals be made and funded by the project proponent. This is a major concern at the new ponded areas, which are very attractive to nonnative species. Bullfrogs, African clawed frogs and other nonnative species can seriously impact closely adjacent National Forest wildlife populations.
- We encourage minimizing nighttime lighting adjacent to National Forest lands by shielding or directing light away from National Forest and away from the open space reserve.
- Prevent net loss of important habitats.
- Strive towards preserving the integrity of the entire ecosystem without focusing on property lines.

- Information regarding cultural resources is not for public distribution and is to be kept confidential.

Water, water sources and vegetation

- No new water development proposals will be accepted by the Forest Service for domestic water use or fire protection; the development will have to be supplied off-forest.
- We recommend incorporating gray water systems for irrigation of vegetation.
- We ask that no invasive plants or trees be used in the landscaping to reduce potential invasions onto the National Forest.
- We request that a local stock of walnuts for the walnut grove be used since there are native walnuts on SBNF lands in some locations. We support the use of native walnut in this development since it is a rare habitat in Southern California.

Flood and erosion control

- The City shall not rely on National Forest land for flood or erosion control measures, whether they be the location and construction of engineered structures, or resource management techniques that could be designed to reduce flood/erosion impacts. Such needs should be provided for within the proposed project boundaries.
- The City should consider the fact that recurrent flooding and debris flow events are somewhat predictable, natural events, the likelihood and severity of which increases when upland watersheds are burned by periodic wildfire. Floods and debris flows, although they may originate on National Forest as natural and predictable events are uncontrollable by the National Forest.

Please keep me advised as this project develops.

Sincerely,

Mary M. Long
Acting for
 GABE GARCIA
 District Ranger

Received 08-27-2007 02:47pm From-9098878197 To-CITY OF SAN BERNARDI Page 001



United States
Department of
Agriculture

Forest
Service

San Bernardino National Forest
Front Country Ranger District

1209 Lytle Creek Road
Lytle Creek, CA 92358
909-382-2600 #3 (Voice)
909-887-8197 (FAX)

Terri Rahhal
City Planner
Development Service Dept.
300 North "D" Street
San Bernardino, CA 92418

Dear Ms Rahhal,

Thank you for the opportunity to comment on the *University Hills Specific Plan*. Enclosed are the comments I would like to submit for inclusion in the analysis process and development of this project. Since the proposal for this development is proposing to tier to the old Paradise Hills EIR, I trust the analysis clearly addresses the changes in conditions that have occurred since the original EIR was completed and changes in the current project proposal are clearly contrasted with those considered in the old analysis.

The forest's concerns are related to this project's sphere of influence that directly border or are within close proximity to the San Bernardino National Forest (SBNF). The issues of *fire safety, access, recreation, open space, trespass, biological resources, water and erosion* are addressed in this letter.

Fire safety

Wildfire in the foothill areas of the City are recurring, natural processes. Wildland fire's return to the landscape is not a matter of if, but rather when, and with what consequences.

- Fuel modification zones, including fuel breaks, need to be fully contained on private land. Public land will not be available for this purpose. The maintenance of these zones is a key aspect to their effectiveness.
- According to Exhibit 4, a number of proposed residential building sites are to be located with very little buffer to the National Forest boundary; this would not likely allow for effective fuel modifications on private land.
- The SBNF supports the emergency helicopter landing zones provided for in the open space park within the proposed development.
- The development should strive to include perimeter roads as part of the design process for developments that abut National Forest. These roads can not only effectively serve as ingress points for suppression forces to extinguish fire starts, but also can double as another firebreak or anchor point from which to burn out vegetation during suppression operations.
- Reservoirs associated with this development should be available for helicopter dipping for wildfire activity in the foothills.

Access, recreation, open space, and trespass

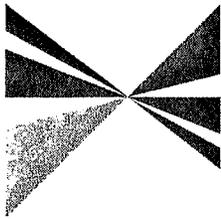
We support the effort to maintain the open space elements for recreation and open space opportunities within the development. Recreation opportunities, including hiking and equestrian trails, are to be provided for within the boundary of the development, not proposed on National Forest Lands.

We encourage the City to work with the National Forest to avoid conflicts over access, both in terms of the new development creating access problems for the Forest, and pre-existing National Forest access points creating problems for new developments.



7-2007

SOUTHERN CALIFORNIA



ASSOCIATION of GOVERNMENTS

Main Office

818 West Seventh Street

12th Floor

Los Angeles, California

90017-3435

t (213) 236-1800

f (213) 236-1825

www.scag.ca.gov

Officers: President: Gary Oviatt, San Bernardino County - First Vice President: Richard Dixon, Lake Forest - Second Vice President: Harry Baldwin, San Gabriel - Immediate Past President: Yvonne B. Buike, Los Angeles County

Imperial County: Victor Carrillo, Imperial County - Jon Diney, El Centro

Los Angeles County: Yvonne B. Buike, Los Angeles County - Zev Yaroslavsky, Los Angeles County - Richard Aiarcon, Los Angeles - Jim Aldinger, Manhattan Beach - Harry Baldwin, San Gabriel - Tony Cardenas, Los Angeles - Stan Carroll, La Habra Heights - Margaret Clark, Rosemead - Gene Daniels, Paramount - Judy Dumlup, Inglewood - Rae Gabelich, Long Beach - David Gaffin, Downey - Eric Garcetti, Los Angeles - Wendy Greuel, Los Angeles - Frank Gurule, Cudahy - Janice Hahn, Los Angeles - Isadore Hall, Compton - Keith W. Hanks, Azusa - Jose Huizar, Los Angeles - Jim Jeffra, Lancaster - Tom LaBonge, Los Angeles - Paula Lantz, Pomona - Barbara Messina, Alhambra - Larry Nelson, Artesia - Paul Nowatka, Torrance - Pam O'Connor, Santa Monica - Bernard Parks, Los Angeles - Jan Perry, Los Angeles - Ed Reyes, Los Angeles - Bill Rosendahl, Los Angeles - Greig Smith, Los Angeles - Tom Sykes, Walnut - Mike Ten, South Pasadena - Inna Reyes Uranga, Long Beach - Antonio Villaraigosa, Los Angeles - Dennis Washburn, Calabasas - Jack Weiss, Los Angeles - Herb J. Wesson, Jr., Los Angeles - Dennis Zine, Los Angeles

Orange County: Chris Norby, Orange County - Christine Barnes, La Palma - John Beaman, Brea - Lou Bone, Tustin - Debbie Cook, Huntington Beach - Leslie Daigle, Newport Beach - Richard Dixon, Lake Forest - Troy Edgar, Los Alamitos - Paul Glaab, Laguna Niguel - Robert Hernandez, Anaheim - Sharon Quirk, Fullerton

Riverside County: Jeff Stone, Riverside County - Thomas Buckley, Lake Elsinore - Bonnie Flickinger, Moreno Valley - Ron Lovelidge, Riverside - Greg Pettit, Cathedral City - Pon Roberts, Temecula

San Bernardino County: Gary Oviatt, San Bernardino County - Lawrence Dale, Barstow - Paul Eaton, Montclair - Lee Ann Garcia, Grand Terrace - Tim Jasper, Town of Apple Valley - Larry McCallon, Highland - Deborah Robertson, Rialto - Alan Wapner, Ontario

Tribal Government Representative: Andrew Masie! Sr., Pecharanga Band of Luiseno Indians

Ventura County: Linda Parks, Ventura County - Glen Becerra, Simi Valley - Carl Morehouse, San Buenaventura - Tom Young, Port Hueneeme

Orange County Transportation Authority: Art Brown, Buena Park

Riverside County Transportation Commission: Robt. Lowe, Hemet

Ventura County Transportation Commission: Keith Millhouse, Moorpark

RECEIVED
AUG 20 2007

August 13, 2007

Ms. Terri Rahhal, City Planner
City of San Bernardino
300 North D Street
San Bernardino, Ca. 92418-0001

CITY OF SAN BERNARDINO
DEVELOPMENT SERVICES
DEPARTMENT

RE: SCAG Comments on the Notice of Preparation of a Supplemental Environmental Impact Report for University Hills Specific Plan - SCAG No. I20070470

Dear Ms. Rahhal,

Thank you for submitting the Notice of Preparation (NOP) of a Supplemental Environmental Impact Report (SEIR) for the University Hills Specific Plan, SCAG No. I20070470, to the Southern California Association of Governments (SCAG) for review and comment. As the clearinghouse for regionally significant projects per Executive Order 12372, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

SCAG staff has reviewed the aforementioned NOP and has determined that the proposed project is regionally significant per the California Environmental Quality Act (CEQA) Guidelines (Section 15125(d) and 15206). The project proposes the development of 980 housing units. The project is located northeast of California State University, San Bernardino (generally north of Northpark Boulevard and east of Devil's Canyon Road).

CEQA requires that EIR's discuss any inconsistencies between the proposed project and applicable general plans and regional plans (Section 15125 [d]). If there are inconsistencies, an explanation and rationalization for such inconsistencies should be provided.

We expect the DEIR to specifically cite all SCAG policies and address the manner in which the project is consistent, not-consistent, or not applicable to these policies, and provide supportive analysis as to why it is consistent, not-consistent, or not applicable to these policies. Policies of SCAG's Regional Comprehensive Plan and Guide (RCPG), Regional Transportation Plan (RTP), and Compass Growth Vision (CGV) that may be applicable to your project are outlined in the attachment. Also, for ease of review, we would encourage you to use a side-by-side comparison of all SCAG policies with a discussion of the consistency, non-consistency or not applicable of the policy and supportive analysis in a table format (attached). The RCPG, RTP and CGV can be found on the SCAG web site at: <http://scag.ca.gov/igr>

Please provide a minimum of 45 days for SCAG to review the DEIR when this document is available. If you have any questions regarding the attached comments, please contact James R Tebbetts at (213) 236-1915. Thank you.

Sincerely,

Jonathan Madell for J. Lieb
Jacob Lieb
Manager, Environmental Division

DOCS# 138932v1

**COMMENTS ON THE NOTICE OF PREPARATION OF A DRAFT ENVIRONMENTAL
 IMPACT REPORT FOR UNIVERSITY HILLS SPECIFIC PLAN, SCAG NO. I 20070470**

PROJECT DESCRIPTION

The proposed project as a whole would allow for the development of 980 housing units (Single Family and Multi-Family), seven acres of parks, including a 2-acre clubhouse with pool and tennis courts and a 5-acre linear park, pedestrian/walking trails, and 245 acres of opens space. The project is located northeast of California State University, San Bernardino (generally north of Northpark Boulevard and east of Devil's Canyon Road).

CONSISTENCY WITH REGIONAL COMPREHENSIVE PLAN AND GUIDE POLICIES

The **Growth Management Chapter (GMC)** of the Regional Comprehensive Plan and Guide (RCPG) contains the following policies that are particularly applicable and should be addressed in the DEIR for the Eagle Valley Project.

3.01 The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies shall be used by SCAG in all phases of implementation and review.

Regional Growth Forecasts

The DEIR should reflect the most current, adopted SCAG forecasts, which are the 2004 RTP (April 2004) Population, Household and Employment forecasts. The adopted forecasts for your region, subregion, adjoining un-incorporated area, and city are as follows:

Adopted SCAG Regionwide Forecasts

	2010	2015	2020	2025	2030
Population	19,208,661	20,191,117	21,137,519	22,035,416	22,890,797
Households	6,072,578	6,463,402	6,865,355	7,263,519	7,660,107
Employment	8,729,192	9,198,618	9,659,847	10,100,776	10,527,202

Adopted SANBAG Forecasts

	2010	2015	2020	2025	2030
Population	2,059,420	2,229,700	2,397,709	2,558,729	2,713,149
Households	618,782	686,584	756,640	826,669	897,739
Employment	770,877	870,491	972,243	1,074,861	1,178,890

Adopted City of San Bernardino Forecasts

	2010	2015	2020	2025	2030
Population	207,021	208,860	210,672	212,404	214,069
Households	58,288	60,211	62,290	64,440	66,734
Employment	99,337	110,056	120,965	131,943	143,045

The 2004 RTP growth forecast at the regional, county and subregional level was adopted by RC in April, 2004. City totals are the sum of small area data and should be used for advisory purposes only.

3.03 The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies

GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL STANDARD OF LIVING

The Growth Management goals to develop urban forms that enable individuals to spend less income on housing cost, that minimize public and private development costs, and that enable firms to be more competitive, strengthen the regional strategic goal to stimulate the regional economy. The evaluation of the proposed project in relation to the following policies would be intended to guide efforts toward achievement of such goals and does not infer regional interference with local land use powers.

- 3.04 *Encourage local jurisdictions' efforts to achieve a balance between the types of jobs they seek to attract and housing prices.*
- 3.05 *Encourage patterns of urban development and land use which reduce costs on infrastructure construction and make better use of existing facilities.*
- 3.09 *Support local jurisdictions' efforts to minimize the cost of infrastructure and public service delivery, and efforts to seek new sources of funding for development and the provision of services.*
- 3.10 *Support local jurisdictions' actions to minimize red tape and expedite the permitting process to maintain economic vitality and competitiveness.*

GMC POLICIES RELATED TO THE RCPG GOAL TO IMPROVE THE REGIONAL QUALITY OF LIFE

The Growth Management goals to attain mobility and clean air goals and to develop urban forms that enhance quality of life, that accommodate a diversity of life styles, that preserve open space and natural resources, and that are aesthetically pleasing and preserve the character of communities, enhance the regional strategic goal of maintaining the regional quality of life. The evaluation of the proposed project in relation to the following policies would be intended to provide direction for plan implementation, and does not allude to regional mandates.

- 3.11 *Support provisions and incentives created by local jurisdictions to attract housing growth in job-rich subregions and job growth in housing-rich subregions.*
- 3.12 *Encourage existing or proposed local jurisdictions' programs aimed at designing land uses which encourage the use of transit and thus reduce the need for roadway expansion, reduce the number of auto trips and vehicle miles traveled, and create opportunities for residents to walk and bike.*
- 3.13 *Encourage local jurisdictions' plans that maximize the use of existing urbanized areas accessible to transit through infill and redevelopment.*
- 3.17 *Support and encourage settlement patterns, which contain a range of urban densities.*
- 3.18 *Encourage planned development in locations least likely to cause adverse environmental impact.*
- 3.19 *Support policies and actions that preserve open space areas identified in local, state, and federal plans.*
- 3.20 *Support the protection of vital resources such as wetlands, groundwater recharge areas, woodlands, production lands, and land containing unique and endangered plants and animals.*
- 3.21 *Encourage the implementation of measures aimed at the preservation and protection of recorded and unrecorded cultural resources and archaeological sites.*
- 3.22 *Discourage development, or encourage the use of special design requirements, in areas with steep slopes, high fire, flood, and seismic hazards.*
- 3.23 *Encourage mitigation measures that reduce noise in certain locations, measures aimed at preservation of biological and ecological resources, measures that would reduce exposure to seismic hazards, minimize earthquake damage, and to develop emergency response and recovery plans.*

GMC POLICIES RELATED TO THE RCPG GOAL TO PROVIDE SOCIAL, POLITICAL, AND CULTURAL EQUITY

The Growth Management Goal to develop urban forms that avoid economic and social polarization promotes the regional strategic goal of minimizing social and geographic disparities and of reaching equity among all segments of society. The evaluation of the proposed project in relation to the policy stated below is intended guide direction for the accomplishment of this goal, and does not infer regional mandates and interference with local land use powers.

- 3.24 *Encourage efforts of local jurisdictions in the implementation of programs that increase the supply and quality of housing and provide affordable housing as evaluated in the Regional Housing Needs Assessment.*
- 3.27 *Support local jurisdictions and other service providers in their efforts to develop sustainable communities and provide, equally to all members of society, accessible and effective services such as: public education, housing, health care, social services, recreational facilities, law enforcement, and fire protection.*

AIR QUALITY CHAPTER

The Air Quality Chapter core actions related to the proposed project include:

- 5.11 *Through the environmental document review process, ensure that plans at all levels of government (regional, air basin, county, subregional, and local) consider air quality, land use, transportation, and economic relationships to ensure consistency and minimize conflicts.*

OPEN SPACE AND CONSERVATION CHAPTER

The Open Space and Conservation Chapter goals related to the proposed project include:

- 9.1 *Provide adequate land resources to meet the outdoor recreation needs of the present and future residents in the region and to promote tourism in the region.*
- 9.2 *Increase the accessibility to open space lands for outdoor recreation*
- 9.3 *Promote self-sustaining regional recreation resources and facilities.*
- 9.4 *Maintain open space for adequate protection to lives and properties against natural and manmade hazards.*
- 9.5 *Minimize potentially hazardous developments in hillsides, canyons, areas susceptible to flooding, earthquakes, wildfire and other known hazards, and areas with limited access for emergency equipments.*
- 9.6 *Minimize public expenditure for infrastructure and facilities to support urban type uses in areas where public health and safety could not be guaranteed.*
- 9.7 *Maintain adequate viable resource production lands, particularly lands devoted to commercial agriculture and mining operations.*
- 9.8 *Develop well-managed viable ecosystems or known habitats of rare, threatened and endangered species, including wetlands.*

WATER QUALITY CHAPTER RECOMMENDATIONS AND POLICY OPTIONS

The Water Quality Chapter goals related to the proposed project include:

- 11.07 *Encourage water reclamation throughout the region where it is cost-effective, feasible, and appropriate to reduce reliance on imported water and wastewater discharges. Current administrative impediments to increased use of wastewater should be addressed.*

REGIONAL TRANSPORTATION PLAN

The **2004 Regional Transportation Plan (RTP)** also has goals and policies that are pertinent to this proposed project. This RTP links the goal of sustaining mobility with the goals of fostering economic development, enhancing the environment, reducing energy consumption, promoting transportation-friendly development patterns, and encouraging fair and equitable access to residents affected by socio-economic, geographic and commercial limitations. The RTP continues to support all applicable federal and state laws in implementing the proposed project. Among the relevant goals and policies of the RTP are the following:

Regional Transportation Plan Goals

- RTP G1 Maximize mobility and accessibility for all people and goods in the region.*
- RTP G2 Ensure travel safety and reliability for all people and goods in the region.*
- RTP G5 Protect the environment, improve air quality and promote energy efficiency.*
- RTP G6 Encourage land use and growth patterns that complement our transportation investments.*

GROWTH VISIONING

The fundamental goal of the Compass Growth Visioning effort is to make the SCAG region a better place to live, work and play for all residents regardless of race, ethnicity or income class. Thus, decisions regarding growth, transportation, land use, and economic development should be made to promote and **sustain** for future generations the region's **mobility, livability and prosperity**. The following "Regional Growth Principles" are proposed to provide a framework for local and regional decision making that improves the quality of life for all SCAG residents. Each principle is followed by a specific set of strategies intended to achieve this goal.

Principle 1: Improve mobility for all residents

- GV P1.2 Locate new housing near existing jobs and new jobs near existing housing.*

Principle 2: Foster livability in all communities

- GV P2.1 Promote infill development and redevelopment to revitalize existing communities.*
- GV P2.2 Promote developments, which provide a mix of uses.*
- GV P2.3 Promote "people scaled," walkable communities.*
- GV P2.4 Support the preservation of stable, single-family neighborhoods.*

Principle 3: Enable prosperity for all people

- GV P3.1 Provide, in each community, a variety of housing types to meet the housing needs of all income levels.*
- GV P3.3 Ensure environmental justice regardless of race, ethnicity or income class.*
- GV P3.5 Encourage civic engagement.*

Principle 4: Promote sustainability for future generations

- GV P4.1 Preserve rural, agricultural, recreational and environmentally sensitive areas.*
- GV P4.2 Focus development in urban centers and existing cities.*
- GV P4.3 Develop strategies to accommodate growth that uses resources efficiently, eliminate pollution and significantly reduce waste.*
- GV P4.4 Utilize "green" development techniques*

CONCLUSION

All feasible measures needed to mitigate any potentially negative regional impacts associated with the proposed project should be implemented and monitored, as required by CEQA.

Suggested Side by Side Format - Comparison Table of SCAG Policies

For ease of review, we would encourage the use of a side-by-side comparison of all SCAG policies with a discussion of the consistency, non-consistency or not applicable of the policy and supportive analysis in a table format. All policies and goals must be evaluated as to impacts. Suggest format is a follows:

SCAG RCPG, RTP, and/or CGV Policies		
Growth Management Chapter		
Policy Number	Policy Text	Statement of Consistency, Non-Consistency, or Not Applicable
3.01	<i>The population, housing, and jobs forecasts, which are adopted by SCAG's Regional Council and that reflect local plans and policies shall be used by SCAG in all phases of implementation and review.</i>	Consistent: Statement as to why Not-Consistent: Statement as to why Not Applicable: Statement as to why
3.02	<i>In areas with large seasonal population fluctuations, such as resort areas, forecast permanent populations. However, appropriate infrastructure systems should be sized to serve high-season population totals.</i>	Consistent: Statement as to why Not-Consistent: Statement as to why Not Applicable: Statement as to why
3.03	<i>The timing, financing, and location of public facilities, utility systems, and transportation systems shall be used by SCAG to implement the region's growth policies.</i>	Consistent: Statement as to why Not-Consistent: Statement as to why Not Applicable: Statement as to why
Etc.	Etc.	Etc.

RECEIVED

Terri

CITY OF SAN BERNARDINO
PUBLIC WORKS SERVICES
DEPARTMENT

City of
HIGHLAND
Inc. 1987



August 17, 2007

27215 Base Line
Highland, CA 92346
(909) 864-6861
FAX (909) 862-3180
www.ci.highland.ca.us

City of San Bernardino
Terri Rahhal, City Planner
300 North "D" Street
San Bernardino, CA 92418-0001

City Council

Subject: Notice of Preparation (Inland Communities Corporation - University Hills Specific Plan)

Mayor
Ross B. Jones

Dear Terri:

Mayor Pro-Tem
Penny Lilburn

The City of Highland is in receipt of the subject Notice of Preparation and have no comment at this time.

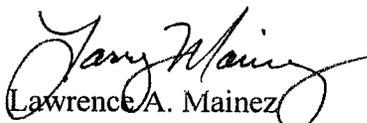
Larry McCallon
Jody Scott
John P. Timmer

Thanks for the opportunity to participate during this phase of the CEQA process, and we look forward to the opportunity to review the Draft EIR when it becomes available to the public.

City Manager
Joseph A. Hughes

Should you have questions, please contact me at (909) 864-8732, Ext. 215.

Sincerely,


Lawrence A. Mainez
City Planner

cc: John Jaquess, Community Development Director
Ernie Wong, Public Works Director/City Engineer