

# Public Comment on Arrowbear Boat Storage Project

Thank you for the opportunity to comment on the proposed Arrowbear Boat Storage project. The following comments raise serious concerns regarding zoning incompatibility, permit adequacy, environmental impacts, scenic quality, wildfire risk, and alignment with the Countywide Policy Plan and community priorities.

## Incompatible Zoning

The proposed use is incompatible with the site's **CG (General Commercial)** zoning under the San Bernardino County Development Code.

*Table 82-11*

<i>Allowed Land Uses and Permit Requirements for Commercial Land Use Zoning Districts</i>							
<i>Land Use</i>  <i>See Division 10 (Definitions) for land use definitions</i>	<i>Permit Required by District</i>						<i>Specific Use Regulations</i>
	<i>CR</i>	<i>CN</i>	<i>CO</i>	<i>CG</i>	<i>CS</i>	<i>CH</i>	
Storage - Recreational vehicles	CUP	—	—	■	CUP	CUP	

Table 82-11, from § 82.05.040 Commercial Land Use Zoning District Allowed Uses and Permit Requirements, does not allow recreational vehicle storage facilities on CG-zoned parcels. The project attempts to characterize the use as "personal property storage," but this classification is inconsistent with the Development Code's definitions. Division 10 defines Storage-Personal Storage as:

"Structures containing generally small, individual compartmentalized units or lockers rented as individual storage spaces."

Boat storage does not meet this definition. Instead, the proposed use falls under **Storage, Recreational Vehicles**, which requires different zoning.

Comparable boat storage facilities in Lake Arrowhead—Mile High Marine Storage and Kiwi Docks—are both located on **CS-zoned parcels**, which allow this type of use. This comparison demonstrates the project is incompatible with zoning on the proposed parcel.

# Minor Use Permit Is Inadequate

The scale, operational intensity, and environmental sensitivity of the project are inconsistent with the findings required under **Development Code § 85.06.040**.

The project proposes year-round operations with substantial outdoor activity, including regular movement of large vehicles and trailers. These impacts will adversely affect abutting residential properties through traffic, noise, increased wildfire risk, and degradation of community aesthetics.

A Conditional Use Permit (CUP) is the appropriate entitlement to ensure adequate discretionary review, enforceable conditions, and meaningful public oversight.

- The project's adjacency to State Route 18, a USFS designated Scenic Route, combined with its location in the Mountain Region, warrants enhanced review. A Minor Use Permit does not provide sufficient findings to evaluate scenic compatibility and long-term visual impacts.
- The storage of boats containing fuel in a wildfire-prone mountain community raises safety concerns that exceed the scope of Minor Use Permit review. The impact of fire risk and potential loss of life and property in this residential area is a concern in the event of a fire with the cumulative impact of close proximity to a private natural gas facility next door utilized by Burrtec.
- The project itself is controversial, given that the community of Arrowbear and Hilltop as a whole does not have a lake for motorized boats or boats longer than 14 ft. so it does not fulfill a community need. It increases the threat to life and private property in a wildfire prone region and places the burden on a disadvantaged unincorporated community. This is not in line with the San Bernardino Countywide Policy Plan Safety and Security Section.
- Additionally, truck delivery areas are to be located away from residential properties according to Policy HZ-2.7 in the San Bernardino Countywide Policy Plan. In the MND, it is noted that the client would like to truck 252 boats in and out each way every season. This poses a substantial adverse impact to a quiet mountain community.
- Policy HW-3.7 in the San Bernardino Countywide Policy Plan prioritizes “attracting local-serving businesses” such as “desired goods and services in unincorporated communities”, including but not limited to “food stores with fresh produce”, “pharmacies, and other retailers” which Hilltop critically needs.

# Mitigated Negative Declaration Findings Are Inadequate

The following sections respond to the Environmental Factors Potentially Affected. The issues detailed below indicate a finding of Mitigated Negative Declaration is insufficient given the potential impacts to Hydrology/Water Quality, Aesthetics, Biological Resources, Hazards & Hazardous Materials, and Transportation.

## Hydrology/Water Quality

As proposed, this project may have a negative impact on nearby streams and downstream watersheds and the impact on water described in the submitted MND is highly understated.

- Although p. 5 of the Pre Appendix G Preliminary Approved Drainage Report states that “the outlet of the culvert is unknown” this is a feeder stream that feeds into Dry Creek, which feeds into Deep Creek, and the Lahontan watershed.
- Downstream, Deep Creek is a state designated Wild Trout stream. In May 2025, the U.S. Forest Service recognized Deep Creek with National Wild & Scenic River status in recognition of its outstanding scenic, recreational, historical/cultural, fish, wildlife, and ecological values: <https://www.fs.usda.gov/r05/sanbernardino/projects/61613>. The USFS Deep Creek Wild and Scenic River Comprehensive River Management Plan, Figure 1, indicates the project site may be a Riparian Conservation Area. As such, a Section 7 analysis is needed to determine if the project will alter surface or groundwater flows, increase sedimentation or runoff, introduce contaminants or affect peak storm flows.
- The attached photograph indicates unmanaged runoff has created an incised channel on the site and stormwater retention basin plans are likely inadequate.



Site location during rainfall on Dec 26, 2025

- This project proposes use of pesticides and fertilizers above a shallow water table, with runoff potential into local feeder streams, Dry Creek, Deep Creek, and the Lahontan downstream watershed. With the potential to degrade water quality, wildlife will also be at risk that depend on the stream as a source of water, and Hilltop Community residents

and visitors may face potential long-term negative impacts involving use of the creeks for recreation and fishing.

## Aesthetics

As proposed, the recreational vehicle storage building adjacent to a scenic highway that is large and industrial-like in appearance, has minimal buffering or landscaping, and is sited prominently so it dominates the view, should not be approved as designed.

- Because Route 18, Rim of the World Scenic Byway, is part of the United States Forest Service scenic byway system and is eligible for CA State Scenic Highway designation, any activities that could alter aesthetics are considered significant. For decades, the Hilltop Community has identified the goal of transitioning the highway from eligible to official designation as a California State Scenic Highway. This goal is re-stated in the most recent action plan for the community to: "Seek State support and assistance for the designation of SR-18 (Rim of the World Highway) and SR-330 (City Creek Road) as official State Scenic Highways." Any development adjacent to the highway must be carefully reviewed to protect visual character and aesthetics of the community so that this goal can still be realized.
- The proposed 10 ft. high masonry wall would be out of character for the area. This would introduce an industrial look along Powers Lane and along a scenic highway, and would degrade the existing visual community character and aesthetics of the Hilltop Community and abutting residential zones.
- The project is not justifiable in serving a specific community need and the purpose is contrary to Policy HW-3.7 in the San Bernardino Countywide Policy Plan which focuses on "attracting local-serving businesses" such as "desired goods and services."
- The houses along Powers Lane will experience a significant impact in scenic quality due to the height and visual dominance of the proposed structure which would obstruct the views of the homeowners as well as the sun rising in the morning.
- The houses along Cougar Lane are at risk from a new source of substantial light and glare as they all have views onto the project property and the entire community is at risk of new light pollution and viewing the night sky. The report references 83.07.040(a) Glare and Outdoor Lighting – Mountain and Desert Regions from 2014. Please respond to requirements passed in 2020 in section § 83.07.060 Mountain and Desert Requirements. Specifically, will lighting be on 24/7 or will there be a Dark Sky curfew in place when the business is closed? Residents along Cougar Lane will be directly impacted by additional lighting added for the project, especially for parking areas, and exit and entry points.

### **Hilltop Community Action Plan:**

A word cloud was developed from attendees that contributed to the Hilltop Community Action Plan. The majority of issues and opportunities envisioned by community members are not compatible with this project. It detracts from "scenic beauty"; it does not contribute to a "Quaint alpine village" due to the size of the project, nor will it contribute to "quiet", "clean air",

“community”, “safety”, “quality restaurants”, a “museum”; nor a “walkable” community rather, it detracts from one of the strengths and aspirations of the residents, for their community to be: **“Not a drive-thru community”**. Arrowbear and Hilltop residents do not want to be a drive-thru community, which is unfortunately what this project will support with its industrial feel, and transportation services to activities remote from the community.



Source: Hilltop Community Action Plan 2016

Additionally, one of the threats community members identified to the Hilltop community was “growth for the sake of growth”, rather than carefully evaluating what land the community has left to develop and ensure that growth meets the needs of the immediate community.

## Biological Resources

Several endangered, threatened, rare and special species of animals and plants are found in this area. The biological survey submitted is inadequate. A survey was conducted for only one hour on a single day on September 18th 2024, approximately three days after evacuations due to the Line Fire were lifted. Impacts from the fire were still present on the site, which included large piles of willows and other vegetation that had been cut for a fire break and Phos-Chek was widely used in the area which is known to have significant impacts to amphibians and other riparian habitat. This survey is insufficient to capture seasonal species presence.

- The San Bernardino Flying Squirrel, a State Species of Special Concern, has been sighted by arborists and residents 500 ft from the project site.
- While the report discussed some threatened species, it did not address the Southern Mountain Yellow Legged Frog, endangered under both federal Endangered Species Act and California Endangered Species Act. Arrowbear has extensive frog activity in early Spring and Summer. Since this property has a feeder stream along Powers Lane with aquatic plants there is potential habitat at the project site.
- A survey should be done when the Southern Rubber Boa are active.
- Additionally, rare plants including lemon lily (Rank 1B) and Parish's yampah (Rank 2B) have been documented nearby and warrant further investigation.

## Wildfire AND Hazards & Hazardous Materials

Storing recreational vehicles with gasoline and other flammable products both directly and indirectly exposes people and structures to significant increased risk of loss of life and property in wildland fires in a Very High Fire Hazard Severity Zone and has the potential to impair emergency evacuations.

- SR 18 has been used as a containment line in emergencies, as demonstrated during the Line Fire in 2024. The community could have experienced significant loss if explosive materials, planned to be located at the project site, had been present along SR 18. Lives would be endangered along this vital evacuation route, which is part of our emergency evacuation plan. SR 18 is the **only** evacuation route off the mountain for the Hilltop Community and it must not be compromised. The cumulative impact of this project along with the private fueling facility on the parcel alongside it used by Burrtec greatly endangers the people of the community. In fact, if one site is compromised, it could easily start a fire at the facility next to it, endangering Arrowbear. The community cannot afford another fire hazard fuel risk along its evacuation corridor.
- The use of pesticides and fertilizers is concerning, as is already mentioned earlier in this document due to the adjacency next to a feeder stream. Additionally, while the project draft states that the facility is intended for storage, and “no mechanical maintenance activities” would occur, the applicant’s business website states services provided include “winterization” and “mechanic access” indicating 3rd party mechanics have access to vehicles for “maintenance and repairs” at the project site, so this should also be addressed. What are the processes involved with winterizing boats? How will the drainage of fluids, fuel stabilizers, coolants and antifreeze be handled? What will the impact from runoff be on waterways and nearby feeder streams?

## Transportation

The Trip Generation Analysis inaccurately describes an earlier iteration of the project and does not accurately describe the current buildings, number of boats, or anticipated trips.

- The boats should be stored close to the point of use, not approximately 30 minutes of travel from the lakes where they will be used. This type of facility should be sited close to the point of use, reducing the need for transportation, especially since this will require slow trucks with trailers to haul the boats, further impacting single lane travel on highway 18.

## Conclusion

For the reasons outlined above, the proposed Arrowbear Boat Storage project is incompatible with existing zoning which alone should result in denial of the project. The project is also

inconsistent with the Countywide Policy Plan, and the MND did not accurately identify the issues which have been addressed here. It poses unacceptable risks to public safety, water resources, scenic quality and community character. Approval under a Minor Use Permit and MND is inappropriate. At a minimum, the project must be redesigned, relocated, and reviewed under a Conditional Use Permit with a comprehensive environmental assessment.

If the project is considered further, a substantially different site design should be required. Locating the storage building closer to the southwest hillside, rather than sited prominently along SR-18 would reduce visual impacts, improve screening, and better reflect the mountain setting. Enhanced tree retention and landscaping that minimizes the visual impact of the building from the highway and at key viewpoints would further limit scenic degradation and improve compatibility with the surrounding community.