RUNNING SPRINGS WATER DISTRICT
A MULTI-SERVICE INDEPENDENT SPECIAL DISTRICT
31242 Hilltop Boulevard • P.O. Box 2206
Running Springs, CA 92382

January 6, 2026

**VIA E-MAIL AND U.S. MAIL**

Elena Barragan
County of San Bernardino
Land Use Services Department, Planning Division
385 N. Arrowhead Ave 1st Floor
San Bernardino, CA 92415-0187

**Re: Hume SoCal Campground Extension Comment Letter**

Dear Ms. Barragan:

The Running Springs Water District ("District") is in receipt of the Notice of Availability and Notice of Intent to Adopt an Initial Study/Mitigated Negative Declaration ("MND") for the Hume SoCal Campground Extension ("Project"; State Clearinghouse Number 2025110453). The District reviewed the MND and still has serious concerns regarding its proposed reliance on the District's wastewater service. The District also has questions and concerns about the potential impact of the Project on other aspects of our mission.

Given the limited duration of the public review period, the District was only able to conduct a high-level review of the MND. In order to make an accurate determination regarding whether the District can support wastewater services to the Project, additional technical studies are required and should be funded by the Project applicant. As the record currently stands, the District is not in a position to provide wastewater services to meet the forecasted Project demands as described in the MND. The reasons for this determination are outlined below.

## I. The District is a Responsible District pursuant to CEQA.

As a preliminary matter, the MND's proposed reliance on the District's wastewater service would require substantial improvements and expansion of the District's existing facilities and infrastructure and would likely require new facilities. Any such extensive system modifications would require approval by the District's governing board. Accordingly, the District qualifies as a "responsible District" under the California Environmental Quality Act (CEQA), which defines a responsible agency as a public agency, other than the lead agency, that has discretionary approval authority over a portion of a project. (State CEQA Guidelines, §15381.) As a responsible agency, the District was entitled to meaningful consultation by the lead agency and the project applicant during the environmental review process. (State CEQA Guidelines, §15096.) CEQA requires the lead agency to consult with responsible agencies regarding the scope and content of the environmental document, to provide them with a meaningful opportunity to comment, and to consider their expertise and concerns in evaluating the project's potential environmental impacts. (*Id.*) Here, the County and the project applicant failed to satisfy these consultation obligations by not engaging with the District after the District expressly alerted the Project applicant to significant deficiencies in this proposed plan, particularly with respect to the Project's proposed reliance on the District's wastewater services.

Moving forward, we expect the District to be properly identified in the MND as a responsible agency and to be treated accordingly for purposes of CEQA compliance. Consistent with that role, we anticipate engaging in meaningful consultation with the Project applicant to ensure the District's serious technical and operational concerns regarding the Project are fully and adequately addressed. In addition, we expect to be kept informed of any material Project developments as they arise so the District may appropriately evaluate potential impacts within its jurisdiction and exercise its discretionary authority in compliance with CEQA. In the interim, and to facilitate productive discussions, we are providing below a summary of the technical bases for the District's concerns with the Project.

## II. The IS/MND fails to properly analyze the Project's significant impacts to the groundwater, hydrology, water supply, public services, utilities, and infrastructure.

**CEQA Guidelines §§ 15063, 15070, and 15126.4 require that a project applicant and lead agency adequately analyze all potentially significant impacts and adopt feasible, enforceable mitigation measures supported by substantial evidence before relying on a mitigated negative declaration. This IS/MND, however, fails to adequately analyze the Project's impacts on the District's existing infrastructure, including whether increased demand would require system upgrades or otherwise impair the District's ability to operate its facilities or support its mission. More specifically:**

**Wastewater**:

- The Project, as proposed, would result in the need for the construction of new and/or expanded wastewater treatment facilities to accommodate the anticipated increase in sewage treatment needs.
- The 1st Draft Sewer Feasibility Study (draft feasibility study), which is relied upon in the Utilities and Services Systems section of the IS/MND, needs to be updated to incorporate standards and norms used by the District to assess the potential for the District's sewer system to accommodate the Project. The draft feasibility study relies on a sewer generation value of 50 gallons per capita per day. The RSWD standard sewer generation value is 80 gallons per capita per day. Therefore, the sewer generation value used in the draft feasibility study underestimates the per capita contributions of the Project on the sewer system and understates potential impacts.
- Even with the reduced sewer generation values, the draft feasibility study acknowledges the Project exceeds the capacity of the District's sewer system infrastructure. Mitigating factors would be required to accommodate the increased demand. Therefore, the determination in the IS/MND of 'Less Than Significant' for 19(c) Utilities and Service System should be upgraded to "Potentially Significant Unless Mitigation Incorporated" or "Potentially Significant Issues" depending on the results of an updated analysis that should be initiated to more adequately represent the capabilities of the existing system and the projected demand from the Project.
- The sewer analysis relies primarily on average daily flow assumptions and generalized peaking factors, which may not adequately represent short-duration peak wastewater discharges typical of organized camp operations. At full buildout, approximately 3,000 occupants could generate highly synchronized morning peak flows within a compressed timeframe. The documentation does not clearly demonstrate whether these simultaneous-use peak conditions were evaluated with respect to the Running Springs lift station capacity, emergency storage, pump cycling, or overflow risk. It also

remains unclear whether the modeling considered peak-hour scenarios or relied solely on flows averaged over 24 hours. Additionally, the analysis does not address lift station and pump system performance during power outages or other emergency conditions occurring during peak wastewater generation.

- The project may contribute wastewater flows to downstream lift stations within the District's sewer system. Any surcharge, overflow, or spill at these facilities would occur outside the project boundary and could directly impact downstream communities, including Arrowbear and Running Springs. However, the project documentation does not identify the specific locations where overflows could occur, which communities would experience the resulting environmental or public health impacts, or how responsibility and liability for such incidents would be allocated among agencies.
- The Project does not identify or commit to a potable water treatment system capable of removing uranium, which is documented to naturally occur in local groundwater, and therefore does not demonstrate how long-term compliance with drinking water standards would be maintained under increased pumping. The materials also do not evaluate how uranium-bearing treatment residuals would be managed (e.g., discharge to the wastewater system, temporary storage, or off-site disposal), preventing meaningful analysis of whether treatment byproducts could increase uranium loading at the District's WWTP. Because increased influent uranium could affect treatment operations, regulatory compliance, and shared cost and liability among contributing agencies, the CEQA document should fully analyze potential increases in uranium concentrations resulting from expanded groundwater pumping and disclose how any associated wastewater impacts and responsibilities would be managed.
- Based on the existing analysis and RSWD's knowledge of our system, we would expect that at a minimum, improvements to the wastewater interceptor pipeline, Ahwahnee pump station, Deerlick pump station, and wastewater treatment plant (WWTP) would be needed to support the increased demand from the Project. Additional new facilities may be required to accommodate the increased demand. Again, the need for upgrades, expansion, and/or new facilities would need to be supported by an updated feasibility study that incorporates input from RSWD staff and our contract District Engineer. Funding for this study, as well as, the time for the District's contract Engineer and any other reasonably required consultants would need to be born by the Project Proponent.
- All aspects of subsequent analysis and study, design, environmental documentation and permitting, construction, and monitoring and associated reporting would be required to be funded by the Project Proponent, not the District, unless otherwise coordinated and agreed to in writing by the District.

**Groundwater Management**

- Neither the IS/MND, nor the Appendix B1: Water Supply Assessment, nor Appendix G: Preliminary Hydrology Report evaluate potential short or long-term groundwater supply or quality impacts to the Basin and to surface flows to Deep Creek and other nearby creeks from increased extraction. Therefore, it is unclear how the determination of "Less Than Significant" for 10(b) Hydrology and Water Quality in the Environmental Analysis portion of the IS/MND was determined.
- The Water Supply Assessment lacks the aquifer characterization, groundwater basin analysis, drawdown modeling, and well-interference evaluation necessary to determine whether sustained increased groundwater extraction could adversely affect neighboring groundwater users or nearby communities. Although the assessment identifies CLAWA as a potential supplemental source, the Water Supply Assessment does not quantify CLAWA's available supply or provide a binding commitment ensuring imported water would reliably offset project demand during peak, dry-year, or

multiple-dry-year conditions. In the absence of a defined and dependable imported water allocation, it is reasonable to assume that a substantial share of project demand would continue to rely on increased pumping of on-site wells. However, the documentation does not analyze potential impacts from sustained extraction, including long-term aquifer response, cone-of-depression effects extending off-site, or cumulative impacts to surrounding wells under dry or multiple dry-year conditions.

- The IS/MND and supporting appendices do not clearly identify the Project's regional watershed context within the Mojave River Watershed, or the WWTP's discharge to the Santa Ana River Watershed, or evaluate whether groundwater extraction, wastewater conveyance, or treatment activities could result in downstream hydrologic or water quality impacts. The documents do not indicate that potential downstream effects were analyzed.

**Running Springs Fire Department Assessment and Clarification of Emergency Procedures for the Project**

The planned increase to 3,000 occupants at the Hume SoCal camp, as referenced from information on the Project, will significantly influence the camp's emergency preparedness needs, particularly regarding evacuation protocols and medical response. The following paragraphs identify factual inacurracies, outline anticipated impacts, and provide clarification on the procedures for activating the 911 emergency system for injuries and illnesses at the camp that should be factored into the analysis.

The Public Services section of the IS/MND suggests that response distances are a factor when evaluating the Project's impact to fire protection services. The IS/MND also identifies the distance from the Project site to Running Springs Fire Department (RSFD) Station 50 as 1.4 miles and to RSFD Station 51 as 1.7 miles. These distances are straight line distances and do not reflect the actual distance driven by RSFD personnel to respond to the Project site. Those distances are approximately 4.3 miles from Station 50 and approximately 5.9 miles for Station 51. Approximately 2.5 miles of this distance would occur on Highway 18 for RSFD personnel responding from Station 50 and approximately 4.1 for those responding from Station 51. The IS/MND and relevant associated analyses should be updated to reflect these distances and consider potential implications to response times from the distance that needs to be traveled and how this might affect the impact determination for the Fire Services portion of the Public Services section in Chapter 4 [15(a)(i)].

*Impact of Increased Occupancy on Emergency Evacuation Plans*
A substantial increase in camp population will challenge existing emergency evacuation plans. The presence of approximately 2,700 additional occupants means that evacuation times may be extended, resources such as transportation and assembly areas could become strained, and communication lines may be overwhelmed. It is essential to review and update the camp's emergency plans to ensure:

- Clear identification of evacuation routes and assembly points that can accommodate the increased number of people.
- Clear and detailed shelter-in-place procedures are established for scenarios in which evacuation cannot be safely conducted.
- Additional transportation resources (buses, vans, etc.) are available and coordinated for mass evacuation.
- Staff are trained in crowd management and communication during emergencies.

- Regular drills are conducted with both staff and occupants to ensure familiarity with updated procedures.
- Collaboration with local emergency services (fire, police, EMS) is maintained to ensure coordinated response efforts.
- Ensure contracts with additional entities to provide qualified buses and bus drivers familiar with the installation of chains and driving in adverse snow conditions.

*Potential Increase in Medical Aid Calls*
With the proposed occupancy increase, the camp is expected to experience a rise in medical aid calls, estimated at 200 to 350 additional incidents per year. This uptick will require:

- Enhanced on-site medical staffing and resources to manage minor injuries and illnesses.
- Improved first aid training for staff and readily accessible medical supplies throughout the camp.
- Establishment of clear protocols for when to escalate medical incidents to external emergency services.
- Close coordination with local hospitals and EMS providers to prepare for increased call volume.

*Procedures for Activation of the 911 System*
To ensure prompt and effective emergency medical response, the following procedures should be followed for activating the 911 system in the event of injuries or illnesses:

1. Assessment: Staff or trained personnel should quickly assess the situation to determine the severity of the injury or illness. If the condition is life-threatening or beyond the scope of on-site care, the 911 system should be activated immediately. The section on Page 22 of the Emergency plan – Water Front Emergency Plan should be used as a template for other emergencies throughout the planning process.
2. Activation: Dial 911 from the nearest phone (cell or landline). Clearly state the nature of the emergency, the exact location within the camp, and any relevant details about the patient's condition.
3. Communication: Remain on the line with the dispatcher, provide updates as necessary, and follow instructions until emergency responders arrive.
4. On-Site Support: Assign staff to guide emergency vehicles to the scene and ensure clear access. Provide first aid or CPR as needed while waiting for responders.
5. Documentation: Record the incident, response actions taken, and outcomes for post-incident review and future planning.

*Recommendations*

- Conduct a comprehensive review and update of all emergency and evacuation plans to reflect increased occupancy.
- Develop clear, detailed shelter-in-place procedures for situations when evacuation is not possible.
- Increase on-site medical capacity and staff training to reduce unnecessary 911 calls for minor incidents.
- Enhance communication systems (PA systems, radios, signage) for rapid information dissemination during emergencies.

- Establish regular coordination meetings with local emergency service providers to ensure alignment of response strategies.

<u>Fire Flow, Construction Standards, and Access for Emergency Response</u>

*Fire Flow Requirements:*

To ensure effective firefighting capabilities, the camp must maintain adequate fire flow—the volume of water available for fire suppression. This requires:

- Verification that water supply systems can deliver sufficient flow and pressure to meet local fire code standards for all occupied structures. The use of existing water storage systems as well as CLAWA infrastructure to mee the fire flow needs.
- Regular testing and maintenance of water mains and hydrants to ensure operational readiness.

*Hydrant Access and Placement:*

Hydrants must be:

- Strategically located throughout the camp to provide coverage for all buildings and high-risk areas.
- Kept clear of obstructions, with visible signage and direct access routes for emergency vehicles.
- Inspected regularly to ensure functionality and accessibility.

*Fire Engine and Ambulance Access to Buildings:*

To facilitate prompt emergency response:

- All roads and driveways leading to buildings must be wide enough and structurally capable of supporting fire engines, ambulances and other emergency vehicles.
- Turnarounds and staging areas should be provided near major structures.
- Landscaping and parking must not impede emergency vehicle movement.

*Recommendations:*

- Conduct a fire flow analysis and coordinate with local fire authorities to verify compliance.
- Map hydrant locations and ensure all staff are familiar with their placement.
- Schedule regular drills involving fire department and ambulance personnel to test access and response times.

The increase in occupants at Hume SoCal necessitates robust planning and clear procedures to safeguard the health and safety of staff and campers. By updating emergency plans, increasing medical readiness, clarifying 911 activation protocols, and strategic design of infrastructure the camp can effectively manage the challenges posed by higher occupancy and ensure a swift response in times of crisis.

## III. Conclusion

**For the reasons outlined above, the District has identified substantial deficiencies in the IS/MND's analysis of the Project's reliance on the District's wastewater service, potential impacts to local**

**groundwater basins, and emergency response considerations. These issues must be fully and adequately resolved before the County may lawfully rely on a mitigated negative declaration for the Project. As the record currently stands, the IS/MND lacks substantial evidence to support its conclusions and fails to comply with CEQA's consultation and analytical requirements.**

**The assessment and recommendations provided by the Running Springs Fire Department, which is a component of the District, should also be considered to better ensure the safety of Camp visitors and the surrounding community.**

**Moving forward, the District expects to be properly identified and engaged as a responsible agency under CEQA and to be meaningfully consulted regarding the scope, content, and resolution of these issues. The District stands ready to participate in good-faith consultation to ensure that its technical, operational, and regulatory concerns are addressed in a manner consistent with CEQA and the District's statutory obligations.**

Sincerely,

C Jones

Chris Jones
General Manager