Tom Dodson and Associates' Revised Addendum

Attachment 4

TOM DODSON & ASSOCIATES
2150 N. ARROWHEAD AVENUE
SAN BERNARDINO, CA 92405
TEL (909) 882-3612 • FAX (909) 882-7015
E-MAIL tda@tdaenv.com

September 10, 2013

Ms. Kathleen Rollings-McDonald
Executive Officer
San Bernardino LAFCO
215 North "D" Street, Suite 204
San Bernardino, CA 92415

Dear Kathy:

I am pleased to forward to the County of San Bernardino Local Agency Formation Commission (LAFCO) the revised Addendum to support the California Environmental Quality Act (CEQA) recommendation for LAFCO project SC#375. SC#375 is an application by the Running Springs Water District (District) to extend an Outside Sewer Service Agreement to Camp Pali, which is located within the northwestern Sphere of Influence of the District. As originally approved, the Conditional Use Permit (CUP) approved for the Camp Pali expansion authorized the Camp to utilize a subsurface septic tank leach line wastewater management system. However, subsequent to the County's approval the Regional Board directed Camp Pali owners to connect to a sewer collection system and wastewater treatment plant (WWTP). Since Camp Pali falls within the District's Sphere, an application for an out-of-area service agreement was submitted to LAFCO for consideration.

Upon initial review of SC#375, it was determined that due to this change in the project, LAFCO would not be able to totally rely upon the Initial Study and Mitigated Negative Declaration (IS/MND) approved by the County in September 2012. After conferring with the District and the camp owner, it was determined that an Addendum could be prepared because the change in the project, as defined in the attached Addendum, will not cause any new substantial or significant environment impacts. This includes potential effects to the Crestline-Lake Arrowhead Water Agency distribution pipeline easement which will be controlled to a less than significant impact. Therefore, based on the information and analysis provided in the attached SC#375 Addendum, I recommend that the Commission can adopt the Addendum to the County's IS/MND as the appropriate CEQA environmental determination for SC#375.

If the Commission adopt the Addendum, LAFCO will have to file a second-tier Notice of Determination (NOD) with the County. A copy of the Addendum package and the NOD should be retained in the project file as documentation fo CEQA compliance. Should you have any questions, please contact me.

Sincerely,

Tom Dodson

Tom Dodson

Attachments

ADDENDUM TO THE COUNTY OF SAN BERNARDINO NEGATIVE DECLARATION FOR THE CAMP PALI CONDITIONAL USE PERMIT

I. PROJECT DESCRIPTION

This document is prepared as an Addendum to the Negative Declaration prepared by the County of San Bernardino for a Conditional Use Permit issued to Camp Pali. The Conditional Use Permit (CUP) authorizes a variety of changes to the existing Camp Pali facilities, including expansion of the existing camp/conference center to relocate/replace existing facilities, add 11 structures, a suspended slide at the existing lake, and a new 150,000 gallon water reservoir that will be capable of serving a maximum of 520 guests and 55 staff members on the 73.2 acre site. The County adopted a Mitigated Negative Declaration (MND) for the CUP and approved the project in September 2012. The Notice of Determination was filed on September 11, 2012. A copy of the Initial Study and Notice of Determination are provided in Appendix 1 of this document. This MND represents the current environmental determination for compliance with the California Environmental Quality Act (CEQA).

The County approved this project to use subsurface septic tank leach systems to manage the domestic wastewater that would be generated by future uses. However, the Lahontan Regional Water Quality Control Board rejected the use of the septic tank-leach line system and is requiring the project to connect to the Running Springs Water District's (District) sewer collection system and wastewater treatment plant. Since Camp Pali is located just west of the District's service area, the Camp Pali owners requested that the District provide sewer service through an Outside Sewer Service Agreement. The County of San Bernardino Local Agency Formation Commission (LAFCO) is the agency that reviews and considers whether to approve such Agreements. LAFCO assigned this request the following title: LAFCO SC#375.

Because the County's original MND for the CUP did not analyze extension of sewer service to the project site by the District, the LAFCO staff is required to expand the evaluation of this specific facility before the Commission can make a decision regarding LAFCO SC#375. Therefore, LAFCO Staff is preparing this Addendum to the adopted MND to address the incorporation of this additional project facility into the approved Camp Pali CUP that would occur if LAFCO SC#375 is approved by the Commission.

Under a standard environmental review process for compliance with the California Environmental Quality Act (CEQA) on LAFCO SC#375, LAFCO would act as a CEQA Responsible Agency and rely totally upon the environmental documentation adopted by the County of San Bernardino. However, when the District submitted LAFCO SC#375, it was determined that the County's original MND did not address extension of sewer to the Camp Pali project site. Thus, this Addendum addresses only the extension of a private sewer line from the Camp Pali site to the District sewer, the connection to this sewer line and treatment of the wastewater at the District Wastewater Treatment Plant (WWTP). LAFCO has prepared this follow-on environmental evaluation for LAFCO SC#375 as a CEQA lead agency to comply with the CEQA.

Based on the analysis presented below, LAFCO has determined that implementation of the proposed project, approval of LAFCO SC#375, as identified above, will result in impacts that

are consistent with the impact findings contained in the County's adopted MND. Although LAFCO has concluded that the physical impacts of the original CUP are adequately addressed in the County's Initial Study/Mitigated Negative Declaration (IS/MND), the original evaluation did not consider the new sewer line and supporting pump stations. Thus, LAFCO has prepared this Addendum to summarize the basis for taking action before considering LAFCO SC#375 as proposed by the District. Assuming the Addendum is adopted by the Commission for this modified project, it, combined with the original Initial Study, will represent the Commission's CEQA determination as a CEQA lead agency for this action.

The specific project characteristics being considered in this document consists of the following: The proposed sewer line will extend approximately 2,200 lineal feet from the core area of Camp Pali south to an existing District manhole and 8" gravity sewer on Knob Hill. The new sewer line will consist of a 3" diameter plastic force main with two pump stations along the alignment to deliver the domestic wastewater to the District's existing 8" gravity flow trunk sewer. During the review of this project, an additional issue was raised that did not exist for the original project. Specifically, the Camp Pali force main must cross the Crestline Lake Arrowhead Water Agency's (CLAWA) existing easement that contains a 14 inch potable water line. The installation of this crossing posed a new potential impact to an existing water supply pipeline that did not exist under the original project. The sewer line alignment is shown on drawings that accompany the District's "Feasibility Study for 30778 Highway 18 – Pali Mountain" (Revised, January 24, 2012).

Detailed discussions were held with the various interested parties. This effort culminated in general agreement on the sewer line design within the CLAWA easement. The letters in Appendix 3 verify that Camp Pali can meet the design requirements of CLAWA within the easement. Based on this information, it was concluded that the installation of the sewer line through the CLAWA easement would not result in any additional significant environmental impacts.

The Camp Pali management has also submitted a letter to LAFCO indicating the method of construction to ensure that no listed species will be impacted by installation of this sewer force main. A copy of this letter is provided in Appendix 4.

Based on the proposed project modification outlined above, no actual change in the use of the Camp Pali property is proposed. There will be additional ground disturbance to install the new sewer force main, but these additional physical changes to the environment are forecast to result in minimal changes in the overall Camp Pali project approved by the County, if LAFCO SC#375 is approved by the Commission. As documented in the following analysis, the environmental impact from the Camp Pali project modifications outlined above do not rise to a level of a new substantial or significant impact on the environment.

II. PROCEDURAL PROCESS

This document, together with all other environmental documents incorporated by reference herein, serve as the CEQA environmental determination basis for this project being considered for implementation at this time. This Addendum modifies the County's adopted MND by incorporating information regarding a design change in the project; specifically, the Camp Pali facilities will be required to connect to the Running Springs Water District sewer collection

system and WWTP. No other changes in the referenced LAFCO action would occur if SC#375 is approved by the Commission.

LAFCO will utilize the City's adopted MND as the base environmental document for considering the proposed Outside Sewer Service Agreement, SC#375. In this circumstance, LAFCO is acting as a CEQA Lead Agency and has made a decision that additional environmental documentation is required to consider and, if appropriate, approve LAFCO SC#375. In this role, LAFCO is required to review and consider the potential environmental effects that could result from approving a "minor" project modification, the switch from managing wastewater with as subsurface septic tank-leach line system to a sewer collection system and delivery of Camp Pali domestic wastewater to the District's WWTP. LAFCO has compiled this Addendum as the basis for making a follow-on CEQA environmental determination for the proposed extension of sewer service outside the District's existing service area to ensure that the impacts originally identified will not be significantly increased as a result of this project modification.

In accordance with CEQA and the State CEQA Guidelines, this Addendum has been prepared in order to determine whether the project modifications, summarized above, could result in conditions that would require new environmental documentation to be prepared because of new or additional adverse environmental impacts. This Addendum also reviews any new information of substantial importance that was not known and could not have been known with exercise of reasonable diligence at the time the MND was adopted by the County of San Bernardino in September 2012. This examination includes an analysis in accordance with the provisions of Sections 15164 and 15162 of the State CEQA Guidelines, which outline the criteria and procedures for preparing an Addendum to a previously adopted MND.

Pursuant to CEQA and the State CEQA Guidelines, LAFCO's environmental review of the proposed project modification is limited to examining the environmental effects associated with the physical changes in the environment from implementing the modified project in comparison to the approved project, i.e., addressing the effect of installing the facilities to connect to the District's sewer collection system compared to installing a subsurface septic tank-leach line system to manage domestic wastewater. This narrow focus is based on the fact that the County's MND has already addressed the physical environmental impacts of implementing the future uses authorized by the approved CUP. This previous document met the provisions of CEQA for the original project as envisioned by the County, including development of the project site as may be permitted by the CUP entitlements.

This Addendum has been prepared in accordance with the current CEQA Statutes and Guidelines for implementing CEQA. CEQA Section 15164 includes the following procedures for the preparation and use of an Addendum:

- (b) An addendum to an adopted negative declaration may be prepared if only minor technical changes or additions are necessary <u>or none of the conditions in Section 15162 calling for the preparation of a subsequent EIR or negative declaration have occurred</u>.

- (c) An addendum need not be circulated for public review, but can be included in or attached to the Final EIR or adopted negative declaration.

- (d) The decision-making body shall consider the addendum with the Final EIR or adopted negative declaration prior to making a decision on the project.

- (e) A brief explanation of the decision not to prepare a subsequent EIR pursuant to Section 15162 should be included in an addendum to an EIR, the lead agency's required findings on the project, or elsewhere in the record. The explanation must be supported by substantial evidence.

This Addendum to the County's MND includes those changes or additions necessary to make the adopted documentation adequate under CEQA for action by LAFCO, including the project modification identified above. This Addendum relies on and includes the adopted County MND, this document, and all staff reports and information submitted to the decision-makers regarding environmental issues affected by the proposed modification to the project originally defined in the CUP and supporting MND. This Addendum is intended as a supplemental information document to integrate all of the information required for decision-makers and others, as appropriate, on this modified project. Collectively, these materials provide decision-makers with an objective assessment of potential environmental impacts associated with the authorization of SC#375.

III. PURPOSE AND NEED

Due to the requirements of the Regional Board for managing wastewater generated by the Camp Pali project; both Camp Pali and the Running Springs Water District seek to connect the project site in order to ensure adequate management of wastewater generated at the Camp. This Addendum provides LAFCO with the information substantiating that the extension of sewer service to Camp Pali by the District will not cause substantial or significant physical changes in the environment. Therefore, this project change will not require the preparation of a new negative declaration or environmental impact report. Such documentation would only be required due to the involvement of new significant environmental effects or a substantial increase in the severity of previously identified significant effects of the original project. This determination allows for the use of an Addendum in accordance with Section 15164(a) of the State CEQA Guidelines.

IV. ENVIRONMENTAL EVALUATION

Following the decision by LAFCO to consider the modified Camp Pali wastewater management system (LAFCO SC#375), a decision was made to compile sufficient information to determine what the appropriate environmental determination would be for implementation of this modified project. This Addendum considers the environmental effects of the modified project in the context of the adopted MND prepared by the County of San Bernardino. Based on the findings in the analysis presented below, LAFCO chose to prepare this Addendum to provide a summary evaluation of potential project effects that would result from approving and implementing LAFCO SC#375. As stated above, this analysis is based on a comparison of the proposed project to the impact forecast contained in the adopted County. The following evaluation provides a summary analysis of potential environmental impacts in relation to the facts and findings contained in the referenced document. The following conclusions were developed regarding potential impacts from approval and implementation of the proposed project modification if LAFCO approves SC#375.

a) POTENTIAL TO DEGRADE: Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict

the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?

Less than Significant Impact/No Changes or No New Information Requiring Preparation of an Additional Environmental Document. The sewer line alignment (refer to Appendix 2) is moderately disturbed, but it does contain habitat that may support the Southern rubber boa (SRB). The SRB is a State listed Threatened Species and is protected under the California Endangered Species Act (CESA). A qualified biologist reviewed the sewer force main alignment and the applicant has committed to a program that will ensure no incidental take of SRB will occur during construction of the force main. Refer to Appendix 4. No other potential biology or cultural resources effects have been identified along the sewer force main alignment. The same concerns were identified for the other facilities on the project site and the proposed sewer force main will disturb only about one additional acre of land. The findings were based on data compiled by the Camp Pali biologist and a site visit by the LAFCO environmental consultant. No new or different construction activities that would expose subsurface resource are proposed.

Since no significant biological or cultural resources will result by the project modification, no potential to cause new or more significant adverse cultural or biological resources can occur from implementing the proposed project. The proposed project is not forecast to degrade or substantially reduce natural habitats, eliminate natural communities, or eliminate important examples of California history or prehistory. Therefore, impacts related to these issues will exceed those identified in the adopted MND, but they do not rise to a level that would exceed the thresholds in Section 15162 of the State CEQA Guidelines. Thus, the installation of the sewer force main if SC#375 is approved will result in a potential to cause significant impacts, but monitoring commitments on behalf of Camp Pali eliminate the potential to cause significant adverse change in the environment and no additional mitigation needs to be implemented.

b) CUMULATIVE IMPACTS: Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when reviewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future project.)

Less than Significant Impact/No Changes or No New Information Requiring Preparation of an EIR. Those environmental resources or issues subject to cumulative effects include the following: air quality, hydrology/water quality, noise, public services, transportation/traffic, and utilities/service systems. Since additional physical changes will occur as a result of the proposed modification to the project, it is forecast to cause or make a minor contribution to air quality and noise cumulative impacts to the issues summarized above. Based on the type of project (trenching and installation of the 3" sewer force main) and the potential environmental effects of approving SC#375, no new or additional significant cumulative effects will result from implementing the proposed project relative to the forecast contained in the County's Initial Study.

c. ADVERSE IMPACTS ON HUMANS: Does the project have environmental effects on human beings, either directly or indirectly?

Less than Significant Impact/No Changes or No New Information Requiring Preparation of an EIR. The Initial Study prepared for the proposed project addressed those issues which may potentially impact human beings. These issues include: geology/soils, air quality, water quality, noise, hazards and aesthetics. Note that this project has no potential to adversely impact the area population or housing. None of the circumstances associated with the above referenced issues will be significantly altered by installing the sewer force main within the alignment shown in Appendix 2. The agreement between Camp Pali and CLAWA ensures that the installation of the private sewer line will not cause a degradation of water quality in the CLAWA potable water line. Thus, implementation of the proposed project is not forecast to create or result in new or more significant direct environmental impacts on humans, and such impacts will remain less than significant as identified and addressed in the previous environmental documentation.

V. CONCLUSION

The earlier analyses in the County's Initial Study were used as a basis for this Addendum, updated with current information from sources cited and provided as appendices to this document. It is the conclusion of this Addendum that the potential adverse environmental impacts from implementation of the proposed modified project, as described in Section IV of this document, will not be significantly greater than that identified in the City's Initial Study and adopted MND. There are new impacts that result from the project that were not previously disclosed, but these impacts do not rise to a level of significance that would require the preparation of a more detailed environmental document. This Addendum provides an update of the project, revised with the project modification.

Pursuant to CEQA Section 15164, the County's Initial Study and adopted MND, as updated with this Addendum, can be relied upon for documentation of the effects of the proposed project (SC#375) on the environment. Because the changes in the project do not exceed the thresholds outlined in Section 15162 of the State CEQA Guidelines, no further analysis of the environmental impacts of the project is required in a new negative declaration or supplemental/subsequent EIR. Based on all of the data presented above, it is recommended that LAFCO SC#375 be processed under an Addendum to the adopted, referenced documentation. The proposed project modification does not alter the conclusions contained in the County's Initial Study and adopted MND. The analysis presented above of the changes and additions to the adopted project justify the issuance of an Addendum by the Commission as the appropriate environmental determination for compliance with CEQA for the LAFCO SC#375.

VI. REVIEW AUTHORITY

LAFCO serves as a CEQA lead agency for this project because it will consider whether to approve to Outside Sewer Service Agreement relative to that identified in the County's approved CUP in its role as decision maker for LAFCO SC#375. It is recommended that an Addendum be adopted as the appropriate CEQA environmental determination for the modified project considered in this document.

VII. CERTIFICATION

KATHLEEN ROLLINGS-McDONALD
Executive Officer

APPENDIX 1

CLERK OF THE BOARD
SEP 11 2012
COUNTY OF
SAN BERNARDINO

Notice of Determination

To: ☐ Office of Planning and Research
1400 Tenth Street, Room 121
Sacramento, CA 95814

☒ Clerk of the Board of Supervisors
County of San Bernardino
385 North Arrowhead Avenue, Second Floor
San Bernardino, CA 92415-0130

From: San Bernardino County Planning Department
385 North Arrowhead Avenue, Third Floor
San Bernardino, CA 92415-0182

Documentary Handling Fee ($50.00)

Receipt Number 424959

SUBJECT:
Filing of Notice of Determination in Compliance with Section 21108 or 21152 of the Public Resources Code.

APN: **0328-042-15**
APPLICANT: O-ONGO, INC.
COMMUNITY: HILLTOP RUNNING SPRINGS/THIRD SUPERVISORIAL DISTRICT
LOCATION: EAST SIDE OFHIGHWAY 18 APPROX. 460 FEET NORTH OF NOB HILL COURT
PROJECT NO: P201100262
STAFF: CHRIS WARRICK
REP('S): TONLY LEES
PROPOSAL: REVISION TO APPROVED ACTION FOR THE CONSTRUCTION OF A 29,005 SQUARE-FOOT DINING FACILITY, 10 CABINS EACH WITH A FLOOR AREA OF 1,872 SQUARE FEET, A SUSPENDED SLIDE AT THE EXISTING LAKE, A NEW 150,000 GALLON WATER TANK, AND A 1,118 SQUARE FOOT OFFICE FOR AN EXISTING ORGANIZATIONAL CAMP AND ADULT CONFERENCE CENTER FOR A MAXIMUM OF 520 GUESTS AND 55 STAFF MEMBERS ON 73.2 ACRES.

Applicant

O-Ongo, Inc.
Name

P.O. Box 2237
Address

Running Springs, CA 92382

(909) 867-5743
Phone

Representative

Jonathan Zane
Name

958 N. La Cadena Drive
Address

Colton, CA 92324

(909) 825-7500
Phone

State Clearing House Number: N/A

Chris Warrick, Planner
Lead Agency Contact Person

(909) 387-4112
Area Code/Telephone Number

This is to advise that the County of San Bernardino has approved the above described
☒ *Lead Agency* ☐ *Responsible Agency*

project on September 11, 2012 with an effective date of Sept. 21, 2012 and has made
Date *Date*

the following determinations regarding the above project:

1. The project [☐ will ☒ will not] have a significant effect on the environment.
2. ☐ An Environmental Impact Report was prepared for this project pursuant to the provisions of CEQA.
   ☒ An Addendum to the Negative Declaration was prepared for this project pursuant to the provisions of CEQA.
3. Mitigation measures [☒ were ☐ were not] made a condition of the approval of the project.
4. A statement of Overriding Considerations [☐ was ☒ was not] adopted for this project.
5. Findings [☒ were ☐ were not] made pursuant to the provisions of CEQA.

This is to certify that the Addendum to the Mitigated Negative Declaration and record of project approval are available to the General Public at: 385 N. Arrowhead Avenue, San Bernardino, CA

September 11, 2012 Planner

Signature and Title: Chris Warrick
Land Use Services Dept, Planning Division

Date Title

DATE FILED & POSTED

Date received for filing at OPR:

San Bernardino County Land Use Services Department, Current Planning Division

MITIGATED NEGATIVE DECLARATION
(Addendum)

385 North Arrowhead Avenue, First Floor, San Bernardino, CA 92415-0182

Project Description

APN:	**0328-042-15**
APPLICANT:	O-ONGO, INC.
COMMUNITY:	HILLTOP RUNNING SPRINGS/THIRD SUPERVISORIAL DISTRICT
LOCATION:	EAST SIDE OFHIGHWAY 18 APPROX. 460 FEET NORTH OF NOB HILL COURT
PROJECT NO:	P201100262
STAFF:	CHRIS WARRICK
REP('S):	TONLY LEES
PROPOSAL:	REVISION TO APPROVED ACTION FOR THE CONSTRUCTION OF A 29,005 SQUARE-FOOT DINING FACILITY, 10 CABINS EACH WITH A FLOOR AREA OF 1,872 SQUARE FEET, A SUSPENDED SLIDE AT THE EXISTING LAKE, A NEW 150,000 GALLON WATER TANK, AND A 1,118 SQUARE FOOT OFFICE FOR AN EXISTING ORGANIZATIONAL CAMP AND ADULT CONFERENCE CENTER FOR A MAXIMUM OF 520 GUESTS AND 55 STAFF MEMBERS ON 73.2 ACRES.

Vicinity Map

Effective date of Addendum to the Mitigated Negative Declaration: SEPTEMBER 21, 1012

Plans and specifications for the referenced project are available for public inspection in the San Bernardino County Land Use Services Department, Planning Division.

Pursuant to provisions of the California Environmental Quality Act and the San Bernardino County Environmental Review Guidelines, the above referenced project has been determined not to have a significant effect upon the environment. An Environmental Impact Report will not be required.

Reasons to support this finding are included in the written Initial Study prepared by the San Bernardino County Land Use Services Department, Planning Division.

The decision may be appealed by any aggrieved person, organization or agency to the County Planning Commission. Appeals shall be filed before the effective date of the Negative Declaration listed above. The Notice of Appeal shall be in writing and shall be filed with the appropriate fee at the San Bernardino County Government Center Public Information Counter during normal business hours.

Signature and Title: Chris Warrick, Planner
Land Use Services Dept, Planning Division

September 11, 2012
Date of Determination

Rev. 7/94 IAP

CLERK OF THE BOARD
SEP 11 2012
COUNTY OF
SAN BERNARDINO

DATE FILED & POSTED

SAN BERNARDINO COUNTY
INITIAL STUDY ENVIRONMENTAL CHECKLIST FORM

This form and the descriptive information in the application package constitute the contents of Initial Study pursuant to County Guidelines under Ordinance 3040 and Section 15063 of the State CEQA Guidelines.

ProjectLabel:
APN: 0328-042-02*
Applicant: O-Ongo, Inc. (Camp Pali)
Proposal: Conditional Use Permit to expand an existing camp/conference center to relocate/replace existing facilities and to add 11 structures (40,000 s.f.), including a new dining hall, conference center and 8 cabins for a total of 55 buildings (96,182 sq. ft.) to serve 520 campers and 55 staff on 73.2 acres
Community: Hilltop Planning Area (Running Springs)/ 3rd Supervisorial District
Location: East side of Highway 18 at terminus of Nob Hill Drive
File: 10604CU/M243-14/2004/CUP01
Staff: J.P. McGuckian, AICP
Rep: Christopher Compton

USGS QUAD: Harrison Mountain (7.5 minute)

T, R, SECTION: T2N, R2E, Section 30, S1/2

THOMAS BROS.: p. 518/grid H-5

PLANNING AREA: Hilltop (Running Springs)

OLUD: HT/RC

IMPROVEMENT LEVEL: IL-5

PROJECT DESCRIPTION:

1. **Project title:** O-Ongo, Inc. [Camp Pali]
2. **Lead agency name and address:** The County of San Bernardino, 385 N. Arrowhead Avenue, San Bernardino, CA 92415
3. **Contact person and phone number:** John P. McGuckian, AICP, Project Planner, (909) 387-4115
4. **Project location:** State Highway 18, East Side and west terminus of Nob Hill Drive
5. **Project sponsor's name and address:** Pali Mountain/Camp O-Ongo, Inc. P.O. Box 2237, Running Springs, Ca 92382
6. **Consultant:** Christopher Compton 1026 East Tujunga Street, Burbank, CA 91502

Description of project: Approximately 2% of the site will be occupied with structures and over 60% will remain in natural open space. The subject site is located east of State Highway 18 The project is within the Hilltop Planning Area of the County General Plan and is designated Resource Conservation (RC) on the Official Land Use Map of the General Plan and is within Infrastructure Improvement Level Five (IL-5), and the site is regulated by the following Overlay Districts Fire Safety – Area One (FS-1) and Geologic Hazard [GH] low to moderate.

ENVIRONMENTAL/EXISTING SITE CONDITIONS:

The project site is located on the front ridge of the San Bernardino Mountains. It is situated on the East Side of State Highway 18, a designated scenic route in the County's General Plan Open Space Element. This particular stretch of Highway 18 is undeveloped along both sides of the road west of the site. East of the site the community of Running Springs begins with the Nob Hill development. The site slopes gradually from the west to the east. Elevations on site range from a high of 6,475 feet (southwest corner) to a low of 6,075 feet above mean sea level on the East Side. The proposed buildings are located in previously disturbed areas.

ENVIRONMENTAL/EXISTING SITE CONDITIONS:

AREA	EXISTING LAND USE	OFFICIAL LAND USE DISTRICT	IL
SITE	Oraganizational Camp	HT/RC	IL-5
North	Oraganizational Camp	HT/RC	IL-5
South	Vacant and Single Residential	HT/RS	IL-5
East	Vacant (USFS)	HT/RC	IL-5
West	Vacant	HT/RC	IL-5

Other public agencies whose approval is required (e.g., permits, financing approval, or participation agreement):

Federal: None; State of California: Regional Water Quality Control Board, Fish and Game; County of San Bernardino: Land Use Services - Code Enforcement: Building and Safety, Public Health-Environmental Health Services, Special Districts, Public Works. County Fire and Local: Running Springs CSD Fire.

Evaluation Format

This initial study is prepared in compliance with the California Environmental Quality Act (CEQA) Guidelines. This format of the study is presented as follows. The project is evaluated based upon its effect on seventeen (17) major categories of environmental factors. Each factor is reviewed by responding to a series of questions regarding the impact of the project on each element of the overall factor. The Initial Study Checklist provides a formatted analysis that provides a determination of the effect of the project on the factor and its elements. The effect of the project is categorized into one of the following four categories of possible determinations:

Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant	No Impact

Substantiation is then provided to justify each determination. One of the four following conclusions is then provided as a summary of the analysis for each of the major environmental factors.

1. Therefore, no impacts are identified or anticipated and no mitigation measures are required.
2. Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.
3. Possible significant adverse impacts have been identified or anticipated and the following mitigation measures are required as a condition of project approval to reduce these impacts to a level below significant. The required mitigation measures are: (List mitigation measures)
4. Significant adverse impacts have been identified or anticipated. An Environmental Impact Report (EIR) is required to evaluate these impacts, which are: (List the impacts requiring analysis within the EIR.)

At the end of the analysis the required mitigation measures are restated and categorized as being either self- monitoring or as requiring a Mitigation Monitoring and Reporting Program.

1. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED:

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact" as indicated by the checklist on the following pages.

- ☐ Aesthetics
- ☐ Biological Resources
- ☐ Hazards & Hazardous Materials
- ☐ Mineral Resources
- ☐ Public Services
- ☐ Utilities / Service Systems
- ☐ Agriculture Resources
- ☐ Cultural Resources
- ☐ Hydrology / Water Quality
- ☐ Noise
- ☐ Recreation
- ☐ Mandatory Findings of Significance
- ☐ Air Quality
- ☐ Geology /Soils
- ☐ Land Use/ Planning
- ☐ Population / Housing
- ☐ Transportation/Traffic

DETERMINATION: (To be completed by the Lead Agency)

On the basis of this initial evaluation, the following finding is made:

☐ The proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ Although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ The proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ The proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect 1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and 2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ Although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Signature (prepared by) John P. Planner, AICP, Senior Associate Planner — 11/15/2004 Date

Signature Judy Tatman, AICP, Division Chief –Current Planning Division
For Land Use Services Director — 11/15/2004 Date

I. **AESTHETICS** — Would the project:	**Potentially Significant Impact**	**Less than Significant with Mitigation**	**Less than Significant Impact**	**No Impact**
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway?	☐	☐	☒	☐
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

SUBSTANTIATION (check X, if project is located within the viewshed of any Scenic Route listed in the General Plan):

I a) The site is within the viewshed of State Highway 18, a County-designated Scenic Route. In addition, SR-18 is designated as a Scenic Byway by the U. S. Forest Service. The site is currently occupied with the camp and is well buffered from views by large setbacks from the highway. The proposed project will not have a substantial adverse effect on a scenic vista, as the natural vegetative cover provided by a montane coniferous forest plant community provides a dense visual barrier between the road and the camp. The County's General Plan considers the first 200 feet of a site, adjacent to a scenic highway, to be within the Scenic Corridor. There are no proposed or existing structures within 200 feet of the roadway with the exception of the existing entry gate and barn.

I b) The proposed project will not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a state scenic highway, because there is no proposed structures within the cooridor. Also dense tree stands block views of a majority of the site from the highway.

I c) The proposed project will not substantially degrade the existing visual character or quality of the site and its surroundings, because the project areas are set back from the roadway and other visual vantage points from adjacent properties. In addition the project will be required to utilize construction materials that blend with the forest.

I d) The proposed project will not create a new source of substantial light or glare which would adversely affect day or nighttime views in the area, because this site is already developed and is adjacent to similarly developed projects and additional mitigation has been required. Lighting proposed on site will be hooded and downshielded to protect surrounding properties from any resultant glare.

Possible significant adverse impacts have been identified or anticipated and the following mitigation measures are required as a condition of project approval to reduce these impacts to a level below significant. The required mitigation measures are:

I-1) *Additional trees shall be planted along the State Highway 18 frontage and around proposed structures, where needed to preserve the forest like character. The type, placement, and spacing of any proposed trees shall be done with the guidance of a Registered Professional Forester [RPF].*

I-2) *The proposed buildings shall be constructed of natural materials using colors that blend with the forest cover.*

I-3) *Exterior lighting shall be kept to the minimum required for safety. The applicant shall submit a lighting plan to the County for review and approval. This lighting plan shall, at a minimum, meet the following performance standards:*

- *No onsite lighting or glare from such lighting shall create any safety hazards for traffic on SR-18.*
- *Lighting shall be hooded, shielded, or directional in nature so that it does not extend beyond the property boundary or be directed into the forest where it might affect wildlife.*
- *The type of lighting utilized shall minimize interference with the night time sky and adjacent open and forested areas.*

I-4) *To minimize the number of freestanding light fixtures, wall-mounted lighting shall be utilized where consistent with building architecture. Shields provided for building mounted lighting shall be painted to match the surface to which the fixture is attached. These fixtures shall not protrude above the fascia or rooflines of adjacent buildings.*

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
II. AGRICULTURE RESOURCES – In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Dept. of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use?	☐	☐	☐	☒

SUBSTANTIATION (check __ if project is located in the Important Farmlands Overlay):

II a) The subject property is not identified or designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency.

II b) The Official Land Use District on the site is Resource Conservation. Although agricultural uses are allowed within this district and every other district, agriculture was not the focus of this land use district. Development of a non-agricultural use would not be considered a conflict with this District. No agricultural uses exist on the site and the site is not under a Williamson Act contract.

II c) The proposed development does not involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to a non-agricultural use, because agricultural uses do not exist in the vicinity of the project site. Surrounding properties consist of either vacant land or residential development.

Therefore, no impacts are identified or anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less than Significant with Mitigation	Less than Significant Impact	No Impact
III. AIR QUALITY — Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☐	☒	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non attainment under an applicable federal or state ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐

SUBSTANTIATION (discuss conformity with the South Coast Air Quality Management Plan, if applicable):

III a) The project will not conflict with or obstruct implementation of the South Coast air quality plan, because the proposed uses do not exceed the thresholds established for air quality concerns as established by the CEQA Air Quality Handbook developed by the South Coast Air Quality Management District. The proposed project is the expansion and/or replacement of structures at an existing conference center and youth camp. The primary transportation mode is weekly buses and they arrive and leave to the site during non-peak hours. The traffic increase is not significant based on the handbook criteria and will not contribute in any substantial way to the degradation of local region air quality.

III b) The project will not violate any air quality standard or contribute substantially to an existing or projected air quality violation, because the proposed use(s) do not exceed established thresholds of concern as established by the District. A dust control plan will be required as mitigation measure to regulate construction activities that could create wind blown dust. Construction painting activities will be restricted as a mitigation measure and additional design considerations are required where applicable to further reduce impacts.

III b-d) Chapter 6 of the CEQA Handbook provides screening tables to assist in determining the significance of impacts associated with proposed projects. Table 6-3 identifies grading operations that disturb less than 177 acres per quarter year or 3 acres per day as not potentially causing significant air quality impacts. The developable portion of the -acre site is 6.23 acres. Of this, 45.9% (2.9 acres) will remain in open space, 20.7% (1.29 acres) will be landscaped, leaving approximately 3 acres remaining for construction. Based on the data provided in Table 6-3, this project has no potential to result in significant air quality impacts from site preparation or construction. The construction-related emissions are below the threshold for significance; however, a potential does exist to expose local residents to potentially significant fugitive dust emissions.

III e) The only odors generated by this project will be from construction equipment. These odors will be associated with exhaust emissions from the consumption of petroleum products. Due to the few pieces of equipment required, the short duration of the construction period, and the few numbers of potential receptors in the project area, this project will not result in a significant impact from objectionable odors.

Possible significant adverse impacts have been identified or anticipated and the following mitigation measures are required as conditions of project approval to reduce these impacts to a level below significant.

III-1) The grading contractor(s) shall apply water to disturbed portions of the project site if dust is observed migrating from the site during construction.

III-2) The contract with the construction contractor(s) shall require the contractor(s) to provide verification that all equipment is in proper tune per the manufacturer's recommendations.

III-3) Tires of vehicles be washed before a vehicle leaves the construction site and enters a paved road. These revisions also require that dirt on paved surfaces be removed daily, during construction, to minimize generation of fugitive dust.

IV. **BIOLOGICAL RESOURCES** — Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorp.	Less than Significant Impact	No Impact
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	☐	☐	☐	☒
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☒	☐
f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☒

SUBSTANTIATION (check if project is located in the Biological Resources Overlay X or contains habitat for any species listed in the California Natural Diversity Database X):

IV a) The site is covered by a montane coniferous forest plant community, consisting mainly of Coulter pines and California Black Oaks. It has a relatively dense multi-layered canopy with a scattered understory of sapling trees, shrubs, and herbs, including incense cedar, deerbrush, bracken fern, and buck lotus. The forest provides habitat for wildlife including reptiles, small mammals and a variety of perching birds. Large mammals (black bear, mule deer, and mountain lion) occur in the area, but likely has little value to them because of the proposed project sites have been occupied with an active youth camp for many years and the site is relatively close to the highway.

Four special status raptors may occur in the area. The Bald Eagle is not likely to use the site for foraging, or roosting. The sharp-shinned hawk and Cooper's hawk would likely use the site for foraging, especially during winter, and Cooper's hawks could nest on site or nearby. Both of these hawks are considered Species of Special Concern by the California Department of Fish and Game and were formerly considered "Category 2" candidates for listing by the U.S. Fish and Wildlife Service, but are not listed or proposed for listing as "threatened" or "endangered". The site is near California Spotted Owl territory, located approximately one mile to the south. The property is suitable for foraging, roosting, and nesting habitat, but its proximity to the highway limits its habitat value, especially for nesting. The California Spotted Owl is not listed as "threatened" or "endangered", but its numbers are in serious decline locally and a case can be made, per the report, that it warrants treatment as a listed species.

The white-eared pocket mouse historically occurred in the general area and in similar habitat but is now presumed extinct. Other species, including the San Bernardino Mountain flying squirrel, mountain lion, American badger, and several bat species are likely to use the project site, at least occasionally. Several special status reptiles and amphibians are likely to occur on the site, per the report. Among them are the Large-blotched or yellow-blotched salamander, sagebrush lizard, San Diego horned toad, coastal western whiptail, and San Bernardino Mountain king snake. These are considered "species of special concern" by the California Department of Fish and Game, and were formerly considered "category 2" candidates for listing by the U. S. Fish and Wildlife Service. They are not currently listed, nor proposed for listing as "threatened" or endangered".

The impacts to the small amount of habitat that would be disturbed at this site is not considered significant for vegetation and habitat, or for special status plants and animals. However night lighting may cause an impact and therefore mitigation measure have been proposed to address this concern. The second exception pertains to the Southern Rubber Boa. The site is within the range of the Southern Rubber Boa, a species that is listed as "threatened" under the California Endangered Species Act. The proposed uses are in fill development within previously disturbed areas of the camp either replacing existing buildings or occupying previous well disturbed activity areas. No potential habitat areas will be disturbed by the proposed construction activities.

IV b) This project will not have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service because no such biological resources riparian habitat or sensitive natural community is identified on site.

IV c) This project will not have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means, because the project is not within an identified protected wetland.

IV d) The site is within the Open Space Element Resources Map for Area #22 "Wildlife Diffusion Corridor". This area connects the northern and southern slopes of the San Bernardino Mountains. The General Plan defines this area as "located generally between the urbanized areas of Lake Arrowhead and Running Springs. This area is important as the last major undeveloped portion of the mountain rim, and provides crucial habitat and dispersion for animals moving between the northern and southern exposures of the National Forest. Because of the small size of the project site relative to this Corridor, and the projects close proximity to Highway 18, the implementation of this project will result in a less than significant impact to the wildlife corridor.

IV-e) submitted. Implementation of these plans will help to ensure that the project can be developed in full conformance with local policies and ordinances regarding management of trees on the property. The measures recommended in the updated Forester's Report are incorporated as mitigation in the conditions of project approval.

IV f) This project will not conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan, because no such plan

Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required has been adopted in the area of the project site.

	Potentially Significant Impact	Less than Significant with Mitigation Incorp.	Less than Significant Impact	No Impact
V. CULTURAL RESOURCES — Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☐	☒	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☐	☒	☐

SUBSTANTIATION (check if the project is located in the Cultural _ or Paleontologic _ Resources overlays or cite results of cultural resource review):

V a) This project will not cause a substantial adverse change in the significance of a historical resource, because there are no such resources identified on the site. To further reduce the potential for impacts, a condition shall be added to the project, which requires the developer to contact the County Museum for determination of appropriate mitigation measures, if any finds are made during project construction.

V b) This project will not cause a substantial adverse change to an archaeological resource, because there are no such resources identified on the site. To further reduce the potential for impacts, a condition shall be added to the project which requires the developer to contact the County Museum for determination of appropriate mitigation measures, if any finds are made during project construction.

V c) This project will not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature, because no such resources have been identified on the site. To further reduce the potential for impacts, a condition shall be added to the project which requires the developer to contact the County Museum for determination of appropriate mitigation measures, if any finds are made during project construction.

V d) - This project will not disturb any human remains, including those interred outside of formal cemeteries, because no such burials grounds are identified on this project site. If any human remains are discovered, during construction of this project, the developer is required to contact the County Coroner, County Museum for determination of appropriate mitigation measures and a Native American representative, if the remains are determined to be of Native American origin.

Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required. As a precautionary measure to further reduce any potential for impacts, the following requirement will apply:

V-1 -<u>Archaeological, Paleontological and Historical Resources</u>. If archaeological, paleontological and/or historical resources are uncovered during ground disturbing activities, all work in that area shall cease. A qualified expert (e.g. archaeologist or paleontologist), as determined by County Planning in consultation with the County Museum shall be hired to record the find and recommend any further mitigation. The County museum shall be contacted within 24 hours of the find and all work shall halt until clearance is received.

	Potentially Significant Impact	Less than Significant with Mitigation Incorp.	Less than Significant Impact	No Impact
VI. GEOLOGY AND SOILS — Would the project:				
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18 1-B of the Uniform Building Code (1994), creating substantial risks to life or property?	☐	☐	☐	☒
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	☐	☐	☒	☐

SUBSTANTIATION (check _X_ if project is located in the Geologic Hazards Overlay District):

VI a) (i-iv) The project will not expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving; i) rupture of a known earthquake fault, ii) strong seismic ground shaking, iii) Seismic-related ground failure, including liquefaction or iv) Landslides, because there are no such geologic hazards identified in the immediate vicinity of the project site. The project will be reviewed and approved by County Building and Safety with appropriate seismic standards. The site is located in an area of southern California that is tectonically active and subject to moderate to severe ground shaking. The project site is not located within a State-designated Alquist-Priolo Earthquake Fault Zone. However, the site could be subject to severe groundshaking in the event of a major earthquake as the San Andreas Fault, which is capable of a 8.5+ magnitude earthquake, is located approximately 6 miles to the southwest of the project site. Construction will be required to conform to the standards set forth in the Uniform Building Code.

VI b) – The project will not result in substantial soil erosion or the loss of topsoil, because the site will be paved and landscaped. Erosion control plans will be required to be submitted, approved and implemented. The project site is located at the top of the frontal ridge of the San Bernardino Mountains. The site is a mix of shallow slopes Due to the high rainfall that occurs on the front of the San Bernardino Mountains, a high potential exists for erosion to

occur on this site during construction and initial site occupancy until a vegetation or hardscape cover is completed over all disturbed areas on the site. County grading standards, and an erosion control plan will be required.

VI c) – The project is not identified as being located on a geologic unit or soil that has been identified as being unstable or having the potential to result in on or off site landslide, lateral spreading, subsidence, liquefaction or collapse. Where a potential for these is identified a geology report is required to be reviewed and approved by the County Building and Safety Geologist, who will require implementation of appropriate mitigation measures, if any are required

VI d) The project site is not located in an area which has been identified by the County Building and Safety Geologist as having the potential for expansive soils., as determined by a required soils report. Given the coarse alluvium that exists on the project site, the potential for expansive soils to exist on the property is negligible. No mitigation is required.

VI e)The project has soils capable of supporting septic tanks

Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

VII. HAZARDS AND HAZARDOUS MATERIALS — Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorp.	Less than Significant Impact	No Impact
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☐	☒
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☐	☒
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☐	☒
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
h) Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands are adjacent to urbanized areas or where residences are intermixed with wildlands?	☐	☒	☐	☐

SUBSTANTIATION:

VII a) The project will not create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials, because the only hazardous materials anticipated to be used are petroleum products for construction equipment. Any use or activity that might use other hazardous materials will be subject to further discretionary permitting. Such permit would require its own environmental review to address potential effects, and would be subject to review by the Hazardous Materials Division of the San Bernardino County Fire Department.

VII-b) The project will not create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment, because no such hazards are anticipated to be located on the project site.

VII-c) The project uses will not emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school, because the project does not propose the use of hazardous materials.

VII d) The project site is not included on a list of hazardous materials sites.

VII e) The project site is not within the vicinity of an approach/departure flight path of a public airport.

VII f) The project site is not within the vicinity of an approach/departure flight path of a private airstrip.

VII g) Highway 18 is one of the major routes that would be used if this portion of the mountain needed to be evacuated. If a major fire were to erupt while services were being conducted, the campers would also use Highway 18 to evacuate the site. This would add incrementally to the number of vehicles using this highway and would create additional congestion, delaying the evacuation of the mountain. However, there is no formal evacuation or emergency response plan adopted for this area. Thus, there can be no identified impact to such a plan.

VII h) The site is located in the Fire Safety Overlay (FS 1) at the top of a very substantial south-facing mountain slope. There is a history of fires occurring annually along various sections of this south-facing slope, often with catastrophic results involving the loss of life, structures and property. These areas are susceptible to wildland fires in the spring through the fall as the natural vegetation dries out from low precipitation rates during arid months, especially following wet seasons that produce increased growth of wild vegetative fuel materials.

Possible significant adverse impacts have been identified or anticipated and the following mitigation measures are required as conditions of project approval to reduce these impacts to a level below significant.

Mitigation Measures:

VII-1) A fuel break is to be built around the property to reduce the fuel load immediately adjacent to the camp. There will be a reduced number of trees per acre with little or no brush or small trees. Most brush species plants will be removed from this area, with an occasional plant, such as the California Lilac remaining for aesthetic values. Thickets of trees would be thinned, and spacing between "leave trees" measured from drip line to drip line shall be no less than 12 feet. Dead wood would be removed, and ladder fuels would be eliminated. The assistance of a professional forester is required for all mitigation measure which pertain to the fuel modification plan.

VII-2) All the area within 150 of the exterior of each building shall be treated to further fuel reduction. Most low woody vegetation shall be removed.

VII-3 All vegetation within paved portions of parking spaces and driveways will be removed as permitted in Title 14 of the California Code of Regulations.

VII-4) Dead limbs on all retained trees and bushes, which are 16 feet from the ground, or lower will be removed. This requirement pertains to the entire parcel.

VII-5 Green limbs need to be pruned in order to reduce the fire ladder aspect of trees with low crowns. No more than the bottom 1/3 of the living crown shall be removed at any time.

VII-6) All dry vegetation shall be removed to bare ground for a distance of 30 feet from the exterior walls of the structure. This shall be done annually.

VII-7) Any new plantings shall include more than 50% native fire-resistant species.

VIII. HYDROLOGY AND WATER QUALITY	Potentially Significant Impact	Less than Significant with Mitigation Incorp.	Less than Significant Impact	No Impact
Would the project:				
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
f) Otherwise substantially degrade water quality?	☐	☐	☐	☒
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map?	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures which would impede or redirect flood flows?	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒
j) Inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒

SUBSTANTIATION:

VIII a) The proposed project does have the potential to degrade surface or groundwater quality. Degradation of surface water may occur during the construction phase of the project due to erosion after grading, and the accidental spillage of petroleum products. Surface water may also be impacted in the occupancy phase by the release of motor oils, fertilizers, etc found in parking lots and planters. Standard conditions of approval will be incorporated into the project, which will required an erosion and sediment control plan and permit to be obtained by the

applicant prior to any land disturbance. Upon completion of grading the applicant will be required to install erosion control planting and landscaping to prevent erosion.

VIII b) The project will be served by on-site wells pumping groundwater. The camp will utilize this water for irrigation, drinking, cooking, restroom facilities and fire fighting if necessary. There is a 55,000 gallon storage tank on site and there are two large storage tanks on immediately adjacent property that are owned by the water company that can be used for fire suppression. Although the volume of water consumed is difficult to quantify based on the mix of uses that will occur at the camp, the existing wells should be sufficient for the proposed camping and conference population.

VIII c) The project will not substantially alter the existing drainage pattern of the site or area, including the alteration of the course of a stream or river, in a manner which would result in substantial erosion or siltation on- or off-site, because the project does not propose any substantial alteration to a drainage pattern, stream or river and the project is required to submit and implement an erosion control plan. County Public Works has reviewed the proposed project drainage and all necessary drainage improvements both on and off site will be required as conditions of the construction of the project.

VIII d) The project will not substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site, because the project does not propose any substantial alteration to a drainage pattern, stream or river.

VIII e) The project will not create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff, because County Public Works has reviewed the proposed project drainage and has determined that the proposed systems are adequate to handle anticipated flows. All necessary drainage improvements both on and off site will be required as conditions of the construction of the project. There will be adequate capacity in the local and regional drainage systems so that downstream properties are not negatively impacted by any increases or changes in volume, velocity or direction of stormwater flows originating from or altered by the project.

VIII f) The project will not otherwise substantially degrade water quality, because appropriate measures relating to water quality protection, including erosion control measures have been required.

VIII g) The project will not place unprotected housing within a 100 year flood hazard area as mapped on a Federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map, because the project is not within identified flood hazard areas.

VIII h) The project will not place within a 100 year flood hazard area structures which would impede or redirect flood flows, because any area identified as being potentially affected by a 100-year storm the structures will be subject to a flood hazard review and will be required to be elevated a minimum of one foot above the base flood elevation. The project however, is not within a 100 year flood hazard area.

VIII i) The project will not expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam, because the project site is not within any identified path of a potential inundation flow that might result in the event of a dam or levee failure or that might occur from a river, stream, lake or sheet flow situation.

VIII j) The project will not be impacted by inundation by seiche, tsunami, or mudflow, because the project is not adjacent to any body of water that has the potential of seiche or tsunami nor is the project site in the path of any potential mudflow.

Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

IX. LAND USE AND PLANNING — Would the project:	Potentially Significant Impact	Less than Significant with Mitigation Incorp.	Less than Significant Impact	No Impact
a) Physically divide an established community?	☐	☐	☐	☒
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐
c) Conflict with any applicable habitat conservation plan or natural community conservation plan?	☐	☐	☐	☒

SUBSTANTIATION:

IX a) The project will not physically divide an established community, because the project is a logical and orderly extension of the planned land uses and development that are established within the surrounding area. The existing camp is currently constructed on an isolated parcel of land just west of the urban portion of the Community of Running Springs and the proposed expansion buildings are in-fill and/or replacement buildings in existing disturbed areas. Due to the size and sparse development in the area, the project is not anticipated to have the potential to divide an existing community.

IX b) The project will not conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect, because the project is consistent with all applicable land use policies and regulations of the County Code and General Plan. The project complies with all hazard protection, resource preservation and landuse modifying Overlay District regulations. The official land use district for this site is Resource Conservation (RC). One of the purposes of the RC designation is set forth in the General Plan as "To encourage limited rural development that maximizes preservation of open space, watershed and wildlife habitat areas". The youth camp maintains and preserves many acres in natural open space so that the campers can experience a natural setting. The proposed project does further the goals and policies of the General Plan with regard to preservation of scenic values or open space wildlife corridors by a) keeping development away from the highway b) by keeping the proposed development within previously disturbed areas of the existing camp facilities and c) by maintaining the open space that exists. The Additional Uses Section of the Development Code lists campgrounds among the uses that can be located in any land use district, subject to the review and approval of a Conditional Use Permit. In this section, it is noted that at least one or more of the following criteria must be met in order to approve such a project. The criteria listed includes:
1)The location of the land use is determined by other land uses that are directly supported by the proposed use and 2)The land use is deemed essential or desirable to the public convenience or welfare. The proposed camp satisfies these requirements by replenishing, renewing and expanding the facilities of an existing and aging campground making it more convenient and safe for the current camping population that visits this camp.

IX c) Based on a review of the County's General Plan and the National Forest Land Use Plan, no habitat conservation or natural community conservation plans apply to this project site.

Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorp.	Less than Significant Impact	No Impact
X. MINERAL RESOURCES — Would the project:				
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒

SUBSTANTIATION (check _ if project is located within the Mineral Resource Zone Overlay):

X a) The project is not expected to result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state. The project site is not within a Mineral Resource Zone Overlay and there are no identified mineral resources on the project site.

X b) The project will not result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan, because there are no identified locally important mineral resources on the project site.

Therefore, no impacts are identified or anticipated and no mitigation measures are required.

XI. NOISE — Would the project result in:	Potentially Significant Impact	Less than Significant with Mitigation Incorp.	Less than Significant Impact	No Impact
a) Exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) A substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
d) A substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

SUBSTANTIATION (check if the project is located in the Noise Hazard Overlay District ___ or is subject to severe noise levels according to the General Plan Noise Element _):

XI-a) The project will not result in the exposure of persons to or generation of noise levels in excess of standards established by San Bernardino County. The project site is exposed to existing traffic noise from State Highway 18, north of and adjacent to the project site, however all structures are located at least 300 feet away from the highway. The nearest residential unit is 800 feet away and the nearest camping cabin is 1200 feet away from the Highway. A traffic study completed for an adjacent project indicated that 6,900 vehicles use this section of State Highway 18 per day. Because the proposed structures will be located away from the highway, the noise levels will not exceed the standards in the General Plan. The allowed exterior noise level for residential structures is **65** dB. Data on page 30 of the Appendix B of the Noise Element of the General Plan, indicates that noise levels on Highway 18, north of its intersection with Highway 330, was 60 dB at 170 feet. Therefore, road noise is not significant. A preliminary acoustical study has been required as a condition of approval.

XI-b) The project will not create exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels during the occupancy phase of the project. The project use does not create vibration or substantial noise levels.

XI-c) No significant permanent source of noise will be located at the proposed site based on the type of use and the anticipated hours of operation.

XI-d) The project will generate a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project because of the construction process. Mitigation measures will be incorporated into he conditions of approval to make this impact less than significant.

XI e) The project is not located within an airport land use plan area or within 2 miles of a public/public use airport.

XI f) The project is not within the vicinity of a private airstrip.

Possible significant adverse impacts have been identified or anticipated and the following mitigation measures are required as conditions of project approval to reduce these impacts to a level below significant.

Mitigation Measure:

XI-1 All construction equipment shall be muffled in accordance with manufacturer's specifications.

XI-2 All construction activities shall be limited to weekdays and Saturday between 7 a.m. and 7 p.m. No construction, other than interior finish work shall be conducted any time on Sundays.

XI-3 All construction staging shall be performed as far as possible from occupied dwellings.

XII. POPULATION AND HOUSING — Would the project:	**Potentially Significant Impact**	**Less than Significant with Mitigation Incorp.**	**Less than Significant Impact**	**No Impact**
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

SUBSTANTIATION:

XII a) The project will not induce substantial population growth in an area either directly or indirectly. The project will generate several new jobs and employment opportunities. This may generate a need for housing for new employees. However considering the unemployment rate for the area and the type of jobs generated by the project it is probable that the new jobs would be absorbed by the employment needs of the existing residents in the area.

XII b) The proposed use will not displace substantial numbers of existing housing units, necessitating the construction of replacement housing, because no housing units are proposed to be demolished as a result of this proposal.

XII c) The proposed use will not displace substantial numbers of people necessitating the construction of replacement housing elsewhere, because the project will not displace any existing housing or existing residents.

Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

XIII. PUBLIC SERVICES —	Potentially Significant Impact	Less than Significant with Mitigation Incorp.	Less than Significant Impact	No Impact
a) Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services:				
Fire protection?	☐	☐	☒	☐
Police protection?	☐	☐	☒	☐
Schools?	☐	☐	☐	☒
Parks?	☐	☐	☐	☒
Other public facilities?	☐	☐	☐	☒

SUBSTANTIATION:

XIII-a) The proposed project will be constructed in accordance with current fire protection standards for public gathering places within the Fire Safety Overlay (Fire Review Area One FS-1) which indicates a significant wildland fire hazard potential. Mitigation is discussed under Section VII for wildland fire hazard protection measures for the project site. No additional mitigation will be required to ensure that future fire hazards on this site will be reduced to a level below significance.

The proposed project will not likely attract criminal activity or increase the need for law enforcement services. The design of the access to the site from State Highway 18 will conform to the County and State ingress and egress requirements. The proposed project would not have a negative impact on local schools or the school district since it will not alter demand for such services. The project will not have negative impacts on nearby parks since it will not alter demand for such services.

Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

XIV. RECREATION	Potentially Significant Impact	Less than Significant with Mitigation Incorp.	Less than Significant Impact	No Impact
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☐	☒
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	☐	☐	☐	☒

SUBSTANTIATION:

XIV a) The proposed project poses no increase in population and will have no significant impact to existing recreational facilities, as it is itself a recreational facility and it adds to the resources of the community.

XIV b) This project does not include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. The existing recreational facilities within the project will be maintained and enhanced.

Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorp.	Less than Significant Impact	No Impact
XV. TRANSPORTATION/TRAFFIC — Would the project:				
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume to capacity ratio on roads, or congestion at intersections)?	☐	☐	☒	☐
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways?	☐	☐	☒	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks?	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
e) Result in inadequate emergency access?	☐	☐	☒	☐
f) Result in inadequate parking capacity?	☐	☐	☒	☐
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks)?	☐	☐	☒	☐

SUBSTANTIATION:

XV a) The project will not cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system, because the increase in the number of vehicle trips, the volume to capacity ratio on roads, and the congestion level at intersections remains below the planned thresholds for those facilities. The project site takes direct access from State Highway 18. SR-18 is a two-lane undivided mountain highway generally running east/west in the vicinity of the project site. It runs closer to north/south along the edge of the site. It extends west to Lake Arrowhead and San Bernardino and east to central Running Springs, Big Bear Lake and Apple Valley. It is a designated State route and under the permit jurisdiction of Caltrans, as is State Highway 330. SR-330 is a two-lane mountain highway running north/south and located approximately three miles southeast of the project site. The subject portion of SR-18 does not provide direct access to winter skiing areas; however, it experiences heavy ski-related traffic east of Running Springs on the weekends and holidays. SR-18 also provides access to the commercial portion of Running Springs. SR-330 begins at SR-18 in central running Springs and extends south to the City of Highland. It is the most direct access route from the site to the developed areas south of the San Bernardino Mountains.

There is not a significant amount of residential development in the area around the project site. There is a turn-out directly in front of the project site entrance. This turn-out is used for access to a nearby underground gas main and as a chain-inspection area during winter storms.

XV b) The project will not exceed, either individually or cumulatively, a level of service [LOS] standard established by the county congestion management agency for designated roads or highways, because County Public Works – Traffic Division has reviewed the traffic generation of the proposed project and anticipates that traffic service will be remain at an LOS of "C" or better, as required by the County General Plan.

XV c) The project will not result in a change in air traffic patterns, including either an increase in traffic levels or a change in location that results in substantial safety risks, because there are no airports in the vicinity of the

project and there is no anticipated notable impact on air traffic volumes by passengers or freight generated by the proposed uses and no new air traffic facilities are proposed.

XV d) The project will not substantially increase hazards due to a design feature or incompatible uses, because the project site is adjacent to an established road that is accessed at points with good site distance and properly controlled intersections. There are no incompatible uses proposed by the project that will impact surrounding land uses. The driveway will intersect State Route 18 at a relatively straight section of highway that has an abundance of curves. Vision to the north is limited by pine trees growing on the inside of a curve on SR-18, while vision to the south is limited by an embankment.

XV e) The project will not result in inadequate emergency access, because there are a minimum of two access points. The project design includes direct access to a State Highway which is considered adequate for emergency purposes. Implementation of this project will not adversely affect emergency access to any other locations since no operation activities will occur within the State Highway right-of-way.. Should an emergency situation develop during operation of this facility and evacuation is required, there will be cross-traffic entering the highway, that would result in a limited, and temporary (170 vehicle maximum) slow down in the evacuation of the area.

XV f) The project will not result in inadequate parking capacity, because the project meets the parking standards established by the County Development Code. Parking will not be allowed on the State Highway.

XV g) The construction and operation of the proposed project will not conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., bus turnouts, bicycle racks), because these have been required to be installed as conditions of approval.

Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

XVI. UTILITIES AND SERVICE SYSTEMS	Potentially Significant Impact	Less than Significant with Mitigation Incorp.	Less than Significant Impact	No Impact
Would the project:				
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control Board?	☐	☐	☒	☐
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐
d) Have sufficient water supplies available to serve the project from existing entitlements and resources, or are new or expanded entitlements needed?	☐	☐	☐	☒
e) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
f) Be served by a landfill(s) with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐

SUBSTANTIATION:

XVI a) The proposed project does not exceed wastewater treatment requirements of the Regional Water Quality Control Board, Santa Ana Region, as determined by County Public Health – Environmental Health Services. The project currently utilizes septic systems for wastewater disposal.

XVI b) The proposed project will not require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, as there is sufficient capacity in the existing system for the proposed use. The project currently utilizes septic systems for wastewater disposal.

XVI c) The proposed project will not require or result in the construction of new storm water drainage facilities or expansion of existing facilities that cause significant environmental effects, as County Public Works has determined that either there is sufficient capacity in the existing storm water system to absorb any additional stormwater drainage caused by the project or has required facilities to be constructed as a part of this project. Any drainage facility construction that is required is included in this environmental review and this review has required appropriate mitigation measures if necessary.

XVI d) The proposed project will have sufficient water supplies available to serve the project from existing entitlements and resources, as the local water purveyor has given assurance of such water service. The proposed project is currently served with on-site wells and a storage tank. Also the camp has an agreement from the local water purveyor to served with a backup water supply from a 12" water

main under the jurisdiction of the Running Springs Water District. The water main runs along Highway 18 and the District has notified Planning that there will be no problem serving the site. The District has adequate supplies to meet the anticipated demand of between 1,000 to 1,500 gallons per week on the average. No new water supply or water entitlements will be required to meet this additional demand.

XVI e) The proposed project has a determination from County EHS that the existing and proposed septic leach fields are adequate to serve the proposed use.

XVI f) There are no landfills in the mountain region. However, waste is taken to the Heaps Peak transfer station. The San Timeteo Sanitary Landfills in Redlands and the Mid-Valley in Rialto, which have room to accommodate this additional waste flow. Adequate capacity has been identified in the valley landfills to meet growth with the County service areas for the next ten or more years.

XVI g) The proposed project is required to comply with federal, state, and local statutes and regulations related to solid waste.

Therefore, no significant adverse impacts are identified or anticipated and no mitigation measures are required.

	Potentially Significant Impact	Less than Significant with Mitigation Incorp.	Less than Significant Impact	No Impact
	Potentially Significant Impact	Less than Significant with Mitigation Incorp.	Less than Significant Impact	No Impact
XVII. MANDATORY FINDINGS OF SIGNIFICANCE—				
a) Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?	☐	☐	☒	☐
c) Does the project have environmental effects which will cause Substantial adverse effects on human beings, either directly Or indirectly?	☐	☒	☐	☐

SUBSTANTIATION:

XVII a) The project does not appear to have the potential to significantly degrade the overall quality of the regions's environment, or substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population or drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory. There are no rare or endangered species or other species of plants or animals or habitat identified as being significantly and negatively impacted by this project. There are no identified historic or prehistoric resources identified on this site. If any aarcheological or paleontological resources are identified during construction the project, the project is conditioned to stop and identify appropriate authorities, who properly record and/or remove for classification any such finds. In addition it is also noted that the site is within the General Plan Open Space Element Resources Map as Wildlife Dispersion Corridor #22. Development in this area could slightly restrict the range of migratory animals. However, because of the large size of this Corridor in relation to the project, summed together with the sites close proximity to the SR-18 this impact is also not considered significant.

XVII b) The project does not have impacts that are individually limited, but cumulatively considerable. The sites of projects in the area to which this project would add cumulative impacts have either existing or planned infrastructure that is sufficient for all planned uses. These sites either are occupied or are capable of absorbing such uses without generating any cumulatively significant impacts.

XVII c) The project has the potential to have environmental effects, which will cause adverse effects on humans directly. The analysis presented above indicates effects on the environment in the following areas: air quality, water quality, noise, and aesthetics. Mitigation Measures have been identified to deal with these issues. Implementation of these measures can reduce the potential environmental impacts to a non-significant level.

Possible significant adverse impacts have been identified or anticipated and the following mitigation measures are required as conditions of project approval to reduce these impacts to a level below significant.

XVIII. MITIGATION MEASURES
(Any mitigation measures which are not 'self-monitoring' shall have a Mitigation Monitoring and Reporting Program prepared and adopted at time of project approval)

I-1) *Additional trees shall be planted along the State Highway 18 frontage and around proposed structures, where needed to preserve the forest like character. The type, placement, and spacing of any proposed trees shall be done with the guidance of a Registered Professional Forester [RPF].*

I-2) *The proposed buildings shall be constructed of natural materials using colors that blend with the forest cover.*

I-3) *Exterior lighting shall be kept to the minimum required for safety. The applicant shall submit a lighting plan to the County for review and approval. This lighting plan shall, at a minimum, meet the following performance standards:*

- *No onsite lighting or glare from such lighting shall create any safety hazards for traffic on SR-18.*
- *Lighting shall be hooded, shielded, or directional in nature so that it does not extend beyond the property boundary or be directed into the forest where it might affect wildlife.*
- *The type of lighting utilized shall minimize interference with the night time sky and adjacent open and forested areas.*

I-4) *To minimize the number of freestanding light fixtures, wall-mounted lighting shall be utilized where consistent with building architecture. Shields provided for building mounted lighting shall be painted to match the surface to which the fixture is attached. These fixtures shall not protrude above the fascia or rooflines of adjacent buildings.*

III-1) *The grading contractor(s) shall apply water to disturbed portions of the project site if dust is observed migrating from the site during construction.*

III-2) *The contract with the construction contractor(s) shall require the contractor(s) to provide verification that all equipment is in proper tune per the manufacturer's recommendations.*

III-3) *Tires of vehicles be washed before a vehicle leaves the construction site and enters a paved road. These revisions also require that dirt on paved surfaces be removed daily, during construction, to minimize generation of fugitive dust.*

V-1 *<u>Archaeological, Paleontological and Historical Resources</u>. If archaeological, paleontological and/or historical resources are uncovered during ground disturbing activities, all work in that area shall cease. A qualified expert (e.g. archaeologist or paleontologist), as determined by County Planning in consultation with the County Museum shall be hired to record the find and recommend any further mitigation. The County museum shall be contacted within 24 hours of the find and all work shall halt until clearance is received.*

VII-1) *A fuel break is to be built around the property to reduce the fuel load immediately adjacent to the camp. There will be a reduced number of trees per acre with little or no brush or small trees. Most brush species plants will be removed from this area, with an occasional plant, such as the California Lilac remaining for aesthetic values. Thickets of trees would be thinned, and spacing between "leave trees" measured from drip line to drip line shall be no less than 12 feet. Dead wood would be removed, and ladder fuels would be eliminated. The assistance of a professional forester is required for all mitigation measure which pertain to the fuel modification plan.*

VII-2) *All the area within 150 of the exterior of each building shall be treated to further fuel reduction. Most low woody vegetation shall be removed.*

VII-3 *All vegetation within paved portions of parking spaces and driveways will be removed as permitted in Title 14 of the California Code of Regulations.*

VII-4) Dead limbs on all retained trees and bushes, which are 16 feet from the ground, or lower will be removed. This requirement pertains to the entire parcel.

VII-5 Green limbs need to be pruned in order to reduce the fire ladder aspect of trees with low crowns. No more than the bottom 1/3 of the living crown shall be removed at any time.

VII-6) All dry vegetation shall be removed to bare ground for a distance of 30 feet from the exterior walls of the structure. This shall be done annually.

VII-7) Any new plantings shall include more than 50% native fire-resistant species.

XI-1) All construction equipment shall be muffled in accordance with manufacturer's specifications.

XI-2) All construction activities shall be limited to weekdays and Saturday between 7 a.m. and 7 p.m. No construction, other than interior finish work shall be conducted any time on Sundays.

XI-3) All construction staging shall be performed as far as possible from occupied dwellings.

REFERENCES (List author or agency, date, title)

Alquist-Priolo Special Studies Zone Act Map Series (PRC 27500)
California Department of Water Resources, Bulletin #118 (Critical Regional Aquifers), 1975.
CEQA Guidelines, Appendix
California Standard Specifications, July 1992
County Museum Archaeological Information Center
County of San Bernardino, Countywide Integrated Waste Management Plan, March 1995
County of San Bernardino Development Code, Revised 2003
County of San Bernardino General Plan, adopted 1989, revised 2003
County of San Bernardino Hazard Overlay Maps
County of San Bernardino Identified Hazardous Materials Waste Sites List, April 1998
County Road Planning and Design Standards
County of San Bernardino Solid Waste Management Plan, 1995
Environmental Impact Report, San Bernardino County General Plan, 1989
Federal Emergency Management Agency Flood Insurance Rate Map and Flood Boundary Map
Coast Air Quality Management District, CEQA Air Quality Handbook, November 1993

APPENDIX 2

ENGINEERING RESOURCES
OF SOUTHERN CALIFORNIA, INC.

ERSC Job No. 59050.158 (Revised)

January 24, 2012

Mr. Sam Massey, General Manager
Running Springs Water District
P.O. Box 2206
Running Springs CA 92382

SUBJECT: FEASIBILITY STUDY FOR 30778 HIGHWAY 18 – PALI MOUNTAIN (Revised)

Dear Sam:

The previous reports issued contained information based on outdated Resolutions and unclear plans. This report supersedes all previous reports heretofore issued by this office in an effort to rectify these issues and provide a clear and concise report to both the District and the Developer as to the types of fees that would be assessed for this project development.

Based on the plans submitted, subsequent meetings and discussions, and a review of current District Resolutions, the costs have been revised and based on 439 drainage fixture units (DFUs) or 21.95 equivalent dwelling units (EDUs) pursuant to District Resolution 09-11 which establishes the rates for fiscal year 2010-2011.

At your direction, we have reviewed the request from Mr. Tony Lees, the Project Manager for the Pali Mountain improvement project to determine the viability and the impact of the camp's connection to the District sewer system.

Our analyses covered five (5) separate connection points instead of the three (3) previously stipulated. Please note that the analysis was completed only for connection of the new or proposed facilities to the District Sewer System. If the owner of the camp or the Regional Board dictates that the entire camp must be connected to the sewer system in the future, additional analysis will be required in the form of an additional or supplemental feasibility study; this would likely result in a secondary sewer line being installed to accommodate flows from the balance of the site, and may also require the size of the sewer main to be increased at the camp's expense.

This project lies outside of the District Service Area and requires annexation to the District, the execution of an outside service agreement, or the property would be required to be brought into the District Service Area through the consolidation process; as the consolidation process will be lengthy, this may not be a viable option for Pali Mountain.

1820 Commercenter Circle, San Bernardino, CA 92408
909.890.1255 voice 909.890.0995 fax

This study did not address water needs or usage as we understand the site to contain its own well and distribution system on-site. This study has been prepared to determine sewer flows for proposed improvements for the Pali Mountain Camp/Adult Conference Center (referred to hereafter as Development or Camp) located at 30778 Highway 18 in the Running Springs California area, as well as annexation fees, in-lieu of tax charges, fire protection charges, and capital facility charges, and is not suitable for use by others. The study is based upon architectural plans submitted by Jonathan L. Zane Architecture dated June 12, 2011. The following are our findings and recommendations for providing services to the proposed development.

PROJECT
Pali Mountain Camp/Adult Conference Center
APNs 0328-042-15, 16 & 17 73.2 ± Acres

ZONE
Resource Conservation (RC)
Camp – Vacant

PROJECT INFORMATION
The overall proposed improvements will cover a dining/conference center (29,005 square feet), 10 cabins 18,720 square feet total), a restroom (440 square feet), and an office (1,118 square feet). Existing facilities cover 38 buildings for a total of 46,899 square feet, as well as miscellaneous recreational outdoor amenities. Upon completion of the proposed improvements, the site will provide for a maximum of 520 campers and 55 staff in 55 buildings (95,064 square feet) on 73.2 ± acres of land. The proposed project improvements to be connected include the dining/conference center and six (6) of the ten proposed cabin clusters.

WATER DEMAND
Domestic water service has not been reviewed or analyzed as a part of this study.

FIRE FLOW/FIRE PROTECTION
Fire Flow has not been included with this study, but the cost for District provided Fire Protection Services has been included as a necessary part of the annexation/outside service agreement requirements.

SEWAGE DISPOSAL
Two questions have been asked by Mr. Lees; 1) can the sewer connection occur anywhere along the system (yes, but with caveats); and 2) can the effluent be pumped from only the new buildings to the top of Nob Hill with a client estimated peak flow of 20,533 gallons per day and an average flow of 15,533 gallons per day (again, yes, but with caveats).

Connecting to the District's sewer collection system is possible but would require considerable construction costs by the Developer. The nearest sewer main is along the east

side of Highway 18; however the elevation of the sewer is too high to service the development by gravity. The District has sufficient capacity in their sewage collection systems to convey and treat wastewater from the Development.

Before connecting to any point on the system, we needed to assess what the actual flow would be based on construction per the plans submitted to the County for approval. Based on the California Plumbing Code standards, we determined the actual average daily flow to be 34,900 gallons per day (gpd). The elevation of the proposed cabin cluster site is approximately 6,250 feet mean sea level (MSL), and the elevation of proposed dinning center site is 6,175 feet MSL. A review of the District's Sewer Master Plan indicated the nearest manhole to be located to the north end of the District sewer main; the manhole has a rim elevation of 6,327 ft and an invert elevation of 6,321 ft, which is 152 ft higher than the proposed development site. The portion of Highway 18 that fronts the camp site has elevations ranging from 6,270 ft to 6,330 ft, which are still higher than the proposed dining hall or cabins. The first manhole that would accommodate a gravity sewer connection lies in close proximity to Lift Station No. 5, some 2,200 linear feet from the north end of the District sewer main; please refer to Figure 1 in Appendix A-1 attached.

Based on our analysis, a lift station is required. The sewage pumps would need to be sized correctly to accommodate the required flow; this would need to be performed by an engineer selected by the camp, preferably the engineer that assists with the collection system on-site. The District would need to specify to the camp that the lift station and collection system would be part of a private system and not a part of the District system; the camp would be required to comply with regularly scheduled maintenance and operation of their system in order to keep sewer gases and odor impacts on the surrounding neighborhoods to a minimum. The selected engineer will need to address and incorporate hydrogen sulfide gas build-up safe guards, odor elimination safe guards, etc. It is recommended that the design engineer and operation staff consult with the Collections Supervisor on the best settings and run time adjustments for the lift station.

It should be also noted that the District will need to have access to the site of the lift station to monitor the wet well on a periodic basis in order to prevent nuisance complaints from the surrounding neighborhood. The lift station will require the installation of a flow meter and recorder; the Developer will be required to verify flows to the District on a monthly basis. The flow meter and recorder will need to be calibrated on an annual basis by a licensed flow meter company.

As lift station odor control is a major concern for the nearby residents, the design engineer will need to establish a method for controlling the odor. Periodic adjustments to the lift station's operations and operational procedures will be needed to ensure that fats, oils and grease (FOG) do not accumulate within the system and to keep the system from becoming septic.

As Figure 1 shows five (5) separate connection points, a few items must be considered during the design before a final alignment has been selected. CLAWA has a water connection along Stage Coach Road; any parallel sewer line would need to meet California Public Health Standards for water/sewer line separation which may not be feasible depending on prior rights of other utilities within this roadway. In addition, Lift Station No. 5 discharges into a gravity manhole utilized by the County to inject 5,000 to 6,000 gallons of leachate into the sewage system on a fairly regular basis which may impact Lift Station No. 5's pumping efficiency on a periodic basis. As such, the proposed lift station for the camp will need to be designed around these considerations.

In addition to the points listed above, the District will need to consider the chosen connection point from the following perspective:

1. How much and what type of flow will actually be introduced into the system
2. What is the accessibility of the chosen point of connection

The quantity and type of flow will have an impact not only on the downstream lift stations and manholes, but the treatment plant as well. An overly septic discharge into the sewage system may require different operational procedures to be utilized at the treatment plant since the plant is not a conventional activated sludge treatment plant, but rather a Membrane Bio-Reactor system instead. With respect to item no. 2, a few of the listed alternatives have steep hill sides, or difficult to access back lot easements for maintenance which would create problems in an emergency or line break. As with all steep slopes, some alternatives may increase the velocity of the sewage to an extent that would create air pressure that may escape through the roof vents of the connected residential units thereby creating the need for the District to install backflow devices at the house connections at its expense to alleviate the issues and problems that would arise from such odors.

The camp would also need to comply with the District SSMP and FOG program pertaining to the operation of the proposed kitchen; a grease trap interceptor has been included on the plans.

District Resolution No. 2-87 provides that annexation to the District is required prior to providing services. Resolution 2-87 further provides that if it is not practical to annex to the District, the Board of Directors may find that services can be provided to the Development upon execution of an Outside Services Agreement. As stated above, the Development is outside the Running Springs Water District boundary. It is, however, within the District's Sphere of Influence as approved by the Local Agency Formation Commission (LAFCO).

District Resolution No. 2-87 stipulates that a single family residential unit equates to 20 plumbing fixture units as defined in the California Plumbing Code and developments not assigned units of benefit shall be calculated by using 20 plumbing fixture units per equivalent dwelling unit (EDU). The plans for this Development list 187 plumbing fixture

units for the kitchen area and 42 plumbing fixture units for each cabin. Accounting for the dining/conference center and six (6) of the 10 cabin clusters, this equates to a total of 439 plumbing fixture units or 21.95 EDUs:

$$439 \div 20 = 21.95 \text{ EDUs}$$

Resolution 2-87 – paraphrased for brevity

Section 3 – Sewer Service

The District may provide sewer to areas outside but adjacent to the District's boundaries on the terms and conditions contained in Part 3 of this resolution. The District shall provide sewer service if there is sufficient excess capacity in the system to provide such service without jeopardizing the District's ability to provide adequate service to the users within the District Boundaries. The outside user shall, at its own cost, install a sewer system which shall be connected to the District's system in accordance with District Standards in effect at the time the request to provide services has been made. The outside user shall, at its own cost and expense, obtain all easements necessary across real property belonging to other parties in order to connect to the District's system.

Prior to the connection of the on-site system, the District will conduct an assessment of the outside user's system in order to determine the number of units which will be assigned for fee assessment. Twenty (20) drainage fixture units (DFUs) will equate to one dwelling unit (EDU) for the purposes of fee calculation.

The outside user will pay to the District the following fees and charges:

Unit of Benefit Charge (Section 3.5.1) – Prior to connection to the District system, the outside user shall pay to the District the then prevailing "unit of benefit charge" for each separate connection made to the District's system for each parcel of land to be served by the on-site collection system, where a separate parcel of land is defined as a lot or parcel that is separately delineated or described in the official subdivision or parcel maps in the official records in the office of the County Recorder of San Bernardino County. Until revised by subsequent ordinance or resolution by the District's Board of Directors, the "unit of benefit charge" shall be $1,250.00 for each separate connection for each separate parcel of land.

Connection Fee (Section 3.5.2) – Prior to connecting to the District system, the outside user shall pay to the District the current prevailing connection fee in force at the time the request to connect to the system has been made.

Annual In-Lieu-of-Taxes (Section 3.5.4) – The outside user shall pay to the District during each fiscal year (July 1 through June 30) an in-lieu-of-taxes charge. This charge is determined by the District's current total property value, current property taxes allocated

by San Bernardino County, percentage of District Department tax allocation, and the full property of each unit served.

Resolution 6-00 – paraphrased for brevity

As a precondition to annexation, et al, property to be included shall be charged a Capital Facilities Fee of $1,555 per EDU which shall be used by the District only for construction, replacement and repair of District facilities and equipment.

Resolution 7-00 – paraphrased for brevity

As a precondition to annexation, et al, property to be included shall be charged a Fire Protection Fee of $735 per EDU which shall be used by the District only for continued provision of fire protection, rescue, emergency medical treatment, paramedic and other directly related emergency services, for the purchase, maintenance and repair of equipment necessary therefore.

Resolution 09-11 – paraphrased for brevity

Section 14 – Sewer Facilities Capacity Charge

The base fee for connecting to the District's sewer system shall be $5,331.00 for each EDU or portion thereof, based on the current DFU table in the currently adopted County/State Plumbing Code. The Sewer Facilities Capacity Charge shall apply both inside and outside the District Boundary.

If the connection to the District's system does not occur within one (1) year after issuance of the sewer connection permit, the permittee may pay the increase in the Sewer Facilities Capacity Charge which will renew the permit for an additional year, or the fees paid shall be returned to the permittee, less a $50.00 administration fee which the District shall retain. Thereafter, the customer shall reapply for a sewer connection permit upon payment of the Sewer Facilities Capacity Charge in effect at the time of reapplication.

Section 16 – Sewer Service Outside the District

Customers receiving sewer service outside the District Boundaries will be charged for such service in accordance with the District's Policy for Sewer and Water Service outside the District as established by resolution as ordered by the Board of Directors. Currently, sewer bills are based on a percentage of the water consumed pursuant to other District Resolutions. As the Developer will be using on-site well water, the District cannot establish a percentage as the base rate for the monthly sewer charge. As a separate Resolution as defined by this section does not currently exist, a modified interim stop-gap measure can be found in Section 18 of this same resolution until the Board of Directors can pass a supplemental Resolution to address this particular item.

Section 18 – Service Charge for Pre-Treated Groundwater Discharge into the District's Sewage Collection System – MODIFIED

Provisions shall be provided for the District to measure via a flow meter and recorder that shall be calibrated annually at the outside user's expense. The applicant shall pay a monthly service charge to the District based on the following formula:

80 gpcd([1]) x 2.6 (persons per dwelling) = 208 gallons per day([2])
208 x 30.4 days = 6,323 gallons per month
Current Monthly Sewer Charge as set by current Resolution ÷ 6,323 = $ per gallon
Wastewater Pollution Control Plant Loan Repayment Fee = $3.00/month([3])

([1]) gpcd = gallons per capita per day
([2]) As set forth in the District's design criteria
([3]) May be adjusted with other District fees on an annual basis in accordance with Prop. 218

The reduction cited in the Resolution shall not apply in this case since the reduction is for treated groundwater, not domestic waste. This is a fair measure for calculation of the monthly service charge since the Developer will be utilizing on-site well water for the source of producing sewage flows.

1. Unit of Benefit Charge

Resolution 2-87 establishes a "unit of benefit charge" in the amount of $1,250.00 per connection for each parcel served. While there are three (3) parcels being served with this Development, only one (1) connection has been considered. to provide services outside the current District Boundary. The total Unit of Benefit Charge for this Development would be:

1 connection point x $1,250 = $1,250.00

2. Capital Facilities Charge

Resolution 6-00 establishes a total charge of $1,555.00 per EDU to provide services outside the current District Boundary. The charge is the developer's fair share to pay for capital improvement costs already incurred by District taxpayers. The total Capital Facilities Charge for this Development would be:

21.95 (EDUs) x $1,555 = $34,132.25

3. Fire Protection Charge

Resolutions 7-00 establishes a total charge of $735.00 per EDU to provide for a fire protection annexation charge for property not within the current District Boundary. The charge is the developers fair share to pay for capital improvement costs already incurred by District taxpayers. The total Fire Protection Charge for the Development would be:

21.95 (EDUs) x $735 = $16,133.25

4. Sewer Facilities Capacity Charge

Resolution 9-11 establishes a total charge of $5,331.00 per EDU for connection to the District's sewer system. The Total Sewer Facilities Capacity Charge would be:

21.95 (EDUs) x $5,331 = $117,015.45

5. Monthly Sewer Fees

A modification to Section 18 of Resolution 9-11 would set the monthly service charge to the District based on the following formula:

80 gpcd x 2.6 (persons per dwelling) = 208 gallons per day
208 x 30.4 days = 6,323 gallons per month
$27.45 ÷ 6,323 = $0.0043 per gallon based on meter/recorder readings
Wastewater Pollution Control Plant Loan Repayment Fee = $3.00/month

Based on the estimated flow of 34,900 gallons per day the monthly service fee would be:

(365 ÷ 12 days) x 34,900 (gal/day) x $0.0043 (per gal) + $3.00 = $4,565.13

6. In Lieu of Taxes Charge

Resolution 2-87 contains a formula to establish an annual in-lieu of taxes charge which would be applicable to this Development. The formula for the in-lieu charge is (the County Tax Allocation ÷ District's Full Property Land Value) x Developer's Land Value x the Percentage of Property Tax allocated to each Department, or:

1. ($ County Tax Allocation / $ RSWD Land Value for whole District) = Tax Ratio

2. Tax Ratio x $ Pali Mountain Land Value x % Allocated by Department = In-lieu Charge

County tax allocation (2010/11)	$ 1,760,981.92
RSWD full property value (2010/11)	$ 489,115,993.00
Development land value (2010/11)	$ 343,617.00
Fire Department tax allocation	100%
Water Department tax allocation	0%
Sewer Department tax allocation	0%

The estimated in-lieu of taxes for providing fire protection to the Development would be:

$$\frac{1,760,981.92}{489,115,993.00} = 0.0036$$

In Lieu of Tax Charge = 0.0036 x 343,617 x 1.00 = $1,237.14 / year

The estimated in-lieu of taxes for providing water service to the Development would be:

$$\frac{1,760,981.92}{489,115,993.00} = 0.0036$$

In Lieu of Tax Charge = 0.0036 x 343,617 x 0.00 = $0 / year

The estimated in-lieu of taxes for providing sewer service to the Development would be:

$$\frac{1,760,981.92}{489,115,993.00} = 0.0036$$

In Lieu of Tax Charge = 0.0036 x 343,617 x 0.00 = $0 / year

RECOMMENDATIONS

Annexation or an Outside Service Agreement will require LAFCO concurrence as well as payment of the appropriate fees to the Agency. Pali Mountain will need to determine which process will be less expensive to pursue. Consolidation between the District and CSA 79, Green Valley Lake would bring Pali Mountain into the District Boundaries and would eliminate a number of the required fees, but consolidation at this point is not within the proposed construction time frame for the project. As such, if Pali Mountain chooses to continue with the project improvements as noted within the immediate future, the above fees will need to be considered in the overall planning budget.

However, if the improvements could be deferred until after consolidation has been completed, it would be more economically feasible.

A private on-site sewage collection system would be required to be constructed by Pali Mountain in accordance with one of the methods outlined in Appendix A-1. It is our belief that Alternate No. 5 is the most economically viable method for connection to the District Collection System. However, Pali Mountain's Engineer of Record may utilize any of the five (5) analyzed methods for connection to the system based on the Engineer's own judgment and the overall usage and desire of the Camp/Adult Conference Center. In addition, the design engineer needs to review the alternatives a described previously as well as include a flow meter and recorder for the wet well.

All off-site improvements shall be constructed at the Developer's expense in accordance with the District's Rules, Regulations, Policies, Procedures, Resolutions and Standards.

If the above conditions are met, it is my opinion that the District has capacity to provide sewer service for the proposed improvements; a will serve letter will need to be issued once an agreement has been reached between the District and Pali Mountain before the County will issue final approval of the proposed improvements.

Should you have any questions, please contact me at 909.890.1255.

Very truly yours,

Brian K. Thomas, P.E.
District Engineer

Appendix A-1
Pali Mountain Camp/Adult Conference Center
Sewer Connection Analysis Synopsis

EXECUTIVE SUMMARY

Engineering Resources of Southern California, Inc., (***ERSC***) was requested to review the viability of connecting proposed improvements to the sewer collection system operated by the Running Springs Water District (RSWD or District). The study is based upon architectural plans submitted to the County Building Department by Jonathan L. Zane Architecture which were dated June 12, 2011; plans have not been approved by the County, but are not anticipated to change. Changes to the plans in fixture units, sizes or quantities will render the analysis invalid; small/minor decreases will not adversely affect the analysis, but large decreases or any increase will have negative affects on the completed analysis which will need to be revised at additional cost.

An additional 4 sets of two-story cabins (Buildings #78 to 81, 96 guest beds), a public restroom (Building #77) and an office building (Building #82) have been planned for as future improvements but have not been included in the analysis at this time. While Table 1, herein contained, includes flow data for these new improvements as well as the ultimate flow based on contribution from the entire camp/adult conference center, our hydraulic models were based on the flow contributed by the considered improvements only at the request of the owners of Pali Mountain and direction of the District. In the event they are constructed at a future date, additional analysis will be required to determine the impact of the new facilities on the installed system; it is anticipated that a separate lateral and connection point will be required to accommodate these future improvements.

A meeting was held January 19, 2012 to discuss the actual number of cabins versus how the cabins were viewed and treated for analysis. The EDU/DFU numbers have been revised to reflect the results of this meeting and are shown in orange bold italic font. The higher EDU count resulted in over calculation of fees charged to the Developer.

Domestic Water and Fire Flow Demands were not a part of our analysis and have not been included in this synopsis.

As part of our investigation and analysis, ***ERSC*** reviewed sewer flows and terrain conditions for five (5) sewer connection alternatives to the District's sewer system. Analysis included two gravity line connections and three force main connections. ***ERSC*** used H2OMap Sewer Pro modeling software to complete hydraulic analysis for each potential connection in order to determine the impact on the District's sewer system. ***ERSC*** has concluded that the preferred connection is Alternate No. 5 which includes the construction of a sewer lift station and installing an approximately 2,100 linear feet of 6-inch force main connected to the District's 8-inch sewer main on Highway 18; a manhole will be required for the transition between the proposed force main and the existing sewer main. A flow meter and recorder will need to be installed on the lift

station wet well regardless of the alternative chosen. Alternative No's 2, 3 and 4 are the least favorable due to steep slope of proposed sewers and difficulty in accessing the sewer lines in the event of failure or emergency.

INTRODUCTION

The Pali Mountain Project is a Camp/Adult Conference Center located at 30778 Highway 18, Running Springs, California 92382, along the northerly boundary of the Running Springs Water District. The property has an area of approximately 73 acres and includes 38 existing buildings with a total area of 46,899 square feet (sf), a proposed dining/conference center with an area of 29,005 sf, 10 proposed cabin buildings with a total area of 1,872 sf each, a proposed public restroom with an area of 440 sf, and a proposed office building with a total area of 1,118 sf. Existing and proposed facilities, 55 buildings with a total area of 95,064 square feet (sf) will be available to provide services to a total maximum number of 520 campers and 55 staff.

A meeting was held January 19, 2012 to discuss the actual number of cabins versus how the cabins were viewed and treated for analysis. The EDU/DFU numbers have been revised to reflect the results of this meeting and are shown in orange bold italic font. The higher EDU count resulted in over calculation of fees charged to the Developer. The original EDU/DFU numbers have been struck through and replaced as noted.

Based on a review of the submitted plans, each cabin contains 12 showers, 12 lavatory sinks and 12 water closets (toilets). Pursuant to the California Plumbing code, each fixture is to be assigned a drainage fixture unit (DFU) number which can be converted into an Equivalent Dwelling Unit (EDU) for fee structure usage. Each water closet has been assigned a DFU of 4, each lavatory sink has been assigned a DFU of 1 and each shower has been assigned a DFU of 2. As such, each cabin has been assigned a total DFU of 42. Combined with the kitchen components, we have determined the Total DFU for the proposed improvements to be 439. RSWD Resolution 2-87 has stipulated that 20 DFUs are equivalent to 1 EDU. As such, the proposed project improvements would equate to 21.95 EDUs for fee calculations.

Sewage from the existing 38 on-site buildings, which include 19 sets of cabins or 342 guest beds, is treated on site with an existing leach field. Proposed improvements include a new dinning center (Building #70 as noted on the plans provided for review) and 6 sets of two-story cabins (Buildings #71 to 76, which include 144 guest beds). The sewage from these new improvements will be conveyed to RSWD's sewer system pursuant to subsequent agreement with or annexation to RSWD.

The property is located at a relatively low elevation and is surrounded by relatively high elevations to the north, west and south of the property. Ground elevations of the

property range from 6,100 to 6,450 feet mean sea level (MSL). The ground elevation of the proposed dinning center is approximately 6,175 MSL while the ground elevation of the proposed cluster of cabin buildings is approximately 6,250 MSL. The ground elevations of the future developments including the proposed restroom, office and 4 sets of cabin buildings range from 6,150 to 6,220 MSL. The locations and elevation information of the new developments can be found in Figure 1. Highway 18 to the west ranges in elevations from 6,270 to 6,350 MSL; as District sewer collection facilities and reasonable connection points are located within Highway 18, they are subsequently higher than the proposed improvements.

FLOW RATE ANALYSIS

ERSC examined Pali Mountain Project's plumbing plans in order to determine the sewer flow rates based on California Plumbing Code (Table K-3, Estimated Waste Sewage Flow Rates), as well as Running Springs Water District Sewer Master Plan (for residence flow rate estimate). The results are presented in Table 1.

Table 1 differentiates three flows: New, Future New and Ultimate. New indicates the sewer flow of the proposed improvements (i.e., the new dinning center and 6 sets of cabin buildings). This is the flow that Pali Mountain is planning to convey to RSWD's sewer collection system at this time and under this project.

Future New indicates sewer flow from the proposed future improvements, i.e., the additional 4 sets of cabin buildings, a public restroom and an office building as noted on the submitted plan.

Ultimate indicates combined sewer flow for the existing facilities as well as new and future improvements located at the site. Ultimate flow is not a simple summation of the existing facility flow and future facility flow since the existing Lodge/Dining Facility (Building #22) will no longer serve in its current capacity once the new dinning center is completed.

Table 1. Pali Mountain Project Flow Rate.

Facility Type	Unit	Unit Flow Rate (gal/unit day)	Quantity			Flow Rate (gal/day)		
			New	Future New	Ultimate	New	Future New	Ultimate
Cabin	Bed	60	144	96	575	8,640	5,760	34,500
Dinning Center	Employee	20	11	0	11	220	0	220
--Toilet	Customer	7	1,860	0	1,860	13,020	0	13,020
--Kitchen Waste	Meal	7	1,860	0	1,860	13,020	0	13,020

Public Restroom	Sq Ft	0.1	0	440	1,016	0	44	102
Office*	Employee	20	0	13*	100	0	260	2,000
Residence	Residence	105**	0	0	1	0	0	105
Average Daily Flow In Total						34,900	6,064	62,967

* The number of employees working in the new office is assumed proportional to the office floor area.

** Based on 2008 Running Springs Water District Sewer Master Plan.

CONNECTION ALTERNATIVE ANALYSIS

H2OMap Sewer Modeling was used for hydraulic analysis to determine the proper piping and subsequent impact of Pali Mountain's sewer load on RSWD's current and future (Year 2018 and Year 2028) sewer systems. Each modeling scenario includes dry weather (from June to November) conditions and wet weather (from December to May) conditions for Years 2011, 2018 and 2028. The five (5) connection alternatives are shown on Figure 1 at the end of the Appendix.

This study presents five connection alternatives. Alternatives No. 1 and No. 2 are gravity line connections, in which sewage from the new dinning center and the 6 sets of cabins are assumed to be collected in a new manhole (rim elevation 6,175 feet, invert elevation 6,170 feet) at a low point in Pali Mountain. The sewage would then be conveyed by gravity to one of RSWD's nearby sewer mains. The Computer Models allocated gravity flow as peakable flow, which means the flow can vary from hour to hour with a day pattern. Our models used a peaking factor of 2.4. Alternative No's 3, 4 and 5 are force main connections, in which the sewage is assumed to be collected in a sewer lift station/wet well (rim elevation 6,175 feet, invert elevation 6,160 feet) and then pumped to a connection point as noted on Figure 1.

Design considerations to be considered by Pali Mountain's Engineer include a four (4) to six (6) hour maximum detention time for any wet well/lift station considered; one pump with a back up pump is required. The minimum force main size is 4-inch, but a 6-inch force main is highly recommended to reduce head and friction losses in the pipe. In addition, the use of a grinder pump that would limit masses to 3-inch maximum diameter spheres is highly encouraged and recommended. The design engineer is also cautioned that Lift Station No. 5 located downstream of any one of the proposed connection points has a maximum capacity pumping limit of 350 gallons per minute (gpm). In addition, at various times during any given week, approximately 6,000 gallons of leachate are introduced at an injection point in a gravity manhole to which Lift Station No. 5 discharges; this may affect the pumping efficiency of the Lift Station with the additional camp load, but not to any significant detriment. These limitations must be considered and included as part of Pali Mountain's overall design scheme.

ALTERNATIVE No. 1 - GRAVITY LINE EAST

In Alternative No. 1, sewage is collected at a manhole (rim elevation 6,175 feet, invert elevation 6,170 feet) at a site within the Pali Mountain Improvement area and drained by gravity through approximately 6,520 feet 8-inch gravity line to RSWD's Manhole No. 165 (invert elevation 6,139 feet). The gravity line goes east and south generally along the contour lines and an unpaved road. For this length of pipe, 22 manholes would be required for maintenance and cleaning; this does not include any easements from private property owners along the suggested route.

Modeling results indicate that piping of Alternative No. 1 is hydraulically feasible, and that the sewer load impact to RSWD's system is acceptable under all modeling scenarios. However, due to the length of piping, the number of manholes required, and the difficulty of gravity pipe installation within this area, this alternative is not economically feasible. Based on our prior experience in the District, we have used a unit cost of 8-inch sewer pipe installed of $300 per linear foot (plf), and a unit cost of $5,000 per manhole; the estimated cost of Alternative No. 1 is $1,956, 000 for the pipe and $110,000 for the manhole construction for a total cost of $2,066,000 and does not include the cost of any needed easements. For budgeting, we would use a figure of $2.1 Million.

ALTERNATIVE No. 2- GRAVITY LINE WEST

In Alternative No. 2, sewage is collected at a manhole at a site within the Pali Mountain Improvement area (invert elevation 6,170 feet) and drained by gravity through approximately 4,620 feet 8-inch gravity line to RSWD's Manhole No. 210 (invert elevation 6,120 feet). For this length of pipe, 16 manholes would be required for maintenance and cleaning; this does not include any easements from private property owners along the suggested route.

Modeling indicates that piping of Alternative No. 2 is hydraulically feasible, and that the sewer load impact to RSWD's system is acceptable under all modeling scenarios. While Alternative No. 2 is shorter in length compared to Alternative No. 1, terrain conditions are more severe and steep; maximum flow rates may be exceeded and maintenance will be difficult and dangerous and is not an ideal consideration or option. Based on our prior experience in the District, for this area we have used a unit cost of 8-inch sewer pipe installed of $375 per linear foot (plf) to cover the costs of a carrier pipe and jacking, and a unit cost of $5,000 per manhole; the estimated cost of Alternative No. 2 is $1,732, 500 for the pipe and $80,000 for the manhole construction for a total cost of $1,812,500 and does not include the cost of any needed easements. For budgeting, we would use a figure of $1.9 Million.

ALTERNATIVE No. 3 - FORCE MAIN EAST

In Alternative No. 3, sewage is collected at a sewer lift station/wet well (invert elevation 6,160 feet) at a site located within the Pali Mountain Improvement area and pumped approximately 1,413 linear feet via a 6-inch force main to a new manhole at the current location of RSWD's Clean Out No. 43 (invert elevation 6,432 feet).

Modeling results indicates that the Alternative No. 3 sewer load impact on the system is acceptable under all modeling scenarios. A typical lift station will require two pumps; one for the primary system and one to provide back up service.

Piping of Alternative No. 3 has to bypass the location of two water tanks (owned by Crestline-Lake Arrowhead Water Agency and RSWD, respectively). In addition, CLAWA has a water connection along Stage Coach Road; any parallel sewer line would need to meet California Public Health Standards for water/sewer line separation which may not be feasible depending on prior rights of other utilities within this roadway.

Our estimated cost of the lift station, including the required electrical and back up systems, is $325,000. Our estimated cost for the 6-inch force main is $275 plf for an estimated cost of $388,575. The replacement cost of Clean Out No. 43 with a new manhole is $5,000. The total estimated cost for Alternate No. 3 is $718,575 and does not include the cost of any needed easements. For budgeting, we would use a figure of $725,000.

ALTERNATIVE No. 4 - FORCE MAIN MIDDLE

In Alternative No. 4, which is similar to Alternative No. 3, sewage is collected at a sewer lift station wet well (invert elevation 6,160 feet) at a site located within the Pali Mountain Improvement area and pumped approximately 1,583 linear feet via a 6-inch force main to a new manhole at the current location of RSWD Clean Out No. 40 (invert elevation 6,429 feet).

Modeling results indicates that the Alternative No. 4 is hydraulically acceptable under all modeling scenarios. As stipulated in Alternative No. 3, a typical lift station will require two pumps; one for the primary system and one to provide back up service.

Our estimated cost of the lift station, including the required electrical and back up systems, is $325,000. Our estimated cost for the 6-inch force main is $275 plf for an estimated cost of $435,325. The replacement cost of Clean Out No. 40 with a new manhole is $5,000. The total estimated cost for Alternate No. 3 is $765,325 and does not include the cost of any needed easements. For budgeting, we would use a figure of $775,000.

ALTERNATIVE No. 5 - FORCE MAIN WEST

In Alternative No. 5, sewage is collected at a sewer lift station wet well (invert elevation 6,160 feet at a site located within the Pali Mountain Improvement area and pumped approximately 2,122 linear feet via a 6-inch force main to a new manhole at the current location of RSWD Clean Out No. 2 (invert elevation 6,321 feet).

Modeling results indicates that the Alternative No. 5 is hydraulically acceptable under all modeling scenarios. As stipulated in Alternative No. 3, a typical lift station will require two pumps; one for the primary system and one to provide back up service.

Our estimated cost of the lift station, including the required electrical and back up systems, is $325,000. Our estimated cost for the 6-inch force main is $275 plf for an estimated cost of $583,550. The replacement cost of Clean Out No. 2 with a new manhole is $5,000. The total estimated cost for Alternate No. 3 is $913,550 and does not include the cost of any needed easements. For budgeting, we would use a figure of $925,000.

Compared to Alternative No's 3 and 4, Alternative No. 5 has a little longer piping but would result in a lower pumping head and lower operating cost. Alternative No. 5 also has an advantage of shorter router to sewage to Lift Station No. 5 as well as the least impact to RSWD's collection system.

SUMMARY

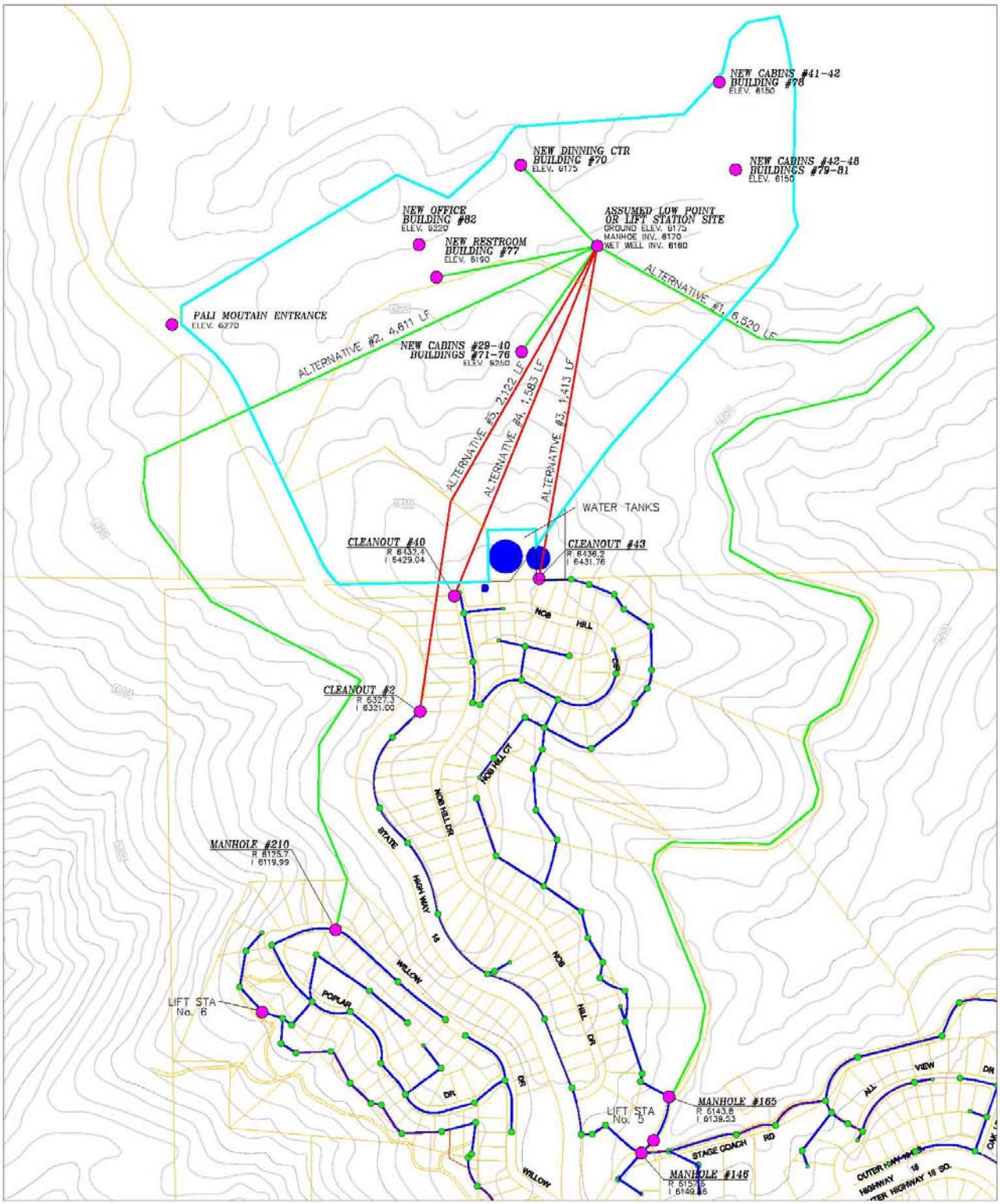
H2OMap Sewer modeling results indicated that all alternatives are hydraulically capable of handling anticipated sewer loads on the District's system under the imposed modeling scenarios (dry weather condition and wet weather condition of Years 2011, 2018 and 2028) if Pali Mountain Improvements are designed correctly.

The gravity line connections as outlined in Alternative No's 1 and 2 are neither economically feasible ($1.9 Million to $2.2 Million) and are not feasible from an engineering or construction point of view. The lift station/wet well and force main alternatives (Alternative No's 3, 4 and 5) appear to be the more economical options. ***ERSC*** recommends **Alternative #5** as the preferred connection to the District's sewer system. This alternative includes building a sewer lift station and installing an approximately 2,100 linear feet of 6-inch force line drained to the RSWD's 8-inch sewer main on Highway 18, and the replacement of a clean out with a new manhole.

It should be noted that the cost estimates presented herein are preliminary and only for the purpose of cost comparison among alternatives and to provide a basis for project budgeting; they have been developed based on costs to the District and may be lower to the Developer based on actual costs not associated with prevailing wage laws.

DISCLAIMER

The findings presented herein are based on limited information from Pali Mountain and are for the sole use of Running Springs Water District and Pali Mountain in their evaluation of the connecting to Running Springs Water District Sewer System. The findings are not intended for use by other parties, and may not contain sufficient information for purpose of other parties or other use. Use of this information by others is expressly prohibited unless authorized in writing by Engineering Resources of Southern California, Inc., and may constitute copy right and intellectual property right infringements.



LEGEND

- EXIST. SEWER GRAVITY MAIN
- EXIST. SEWER FORCE MAIN
- PROPOSED SEWER GRAVITY LINE
- PROPOSED SEWER FORCE LINE
- PROPERTY LINE/STREET LINE
- SITE BOUNDARY
- HIGHLIGHTED POINT
- MANHOLE, CLEAN OUT
- WATER TANK

FIGURE 1. PALI MOUNTAIN SEWER CONNECTION ALTERNATIVES

APPENDIX 3

CRESTLINE-LAKE ARROWHEAD WATER AGENCY

A Public Agency
P.O. BOX 3880 PHONE (909) 338-1779
24116 CREST FOREST DRIVE
CRESTLINE, CALIFORNIA 92325

Directors
STEPHEN L. PLEASANT, President
BRUCE D. RISHER
THOMAS L. SUTTON
KENNETH A. EATON
STEVEN D. WOOD

General Manager
ROXANNE M. HOLMES

Assistant General Manager/Board Secretary
JENNIFER A. SPINDLER

September 10, 2013

Kathleen Rollings-McDonald, Executive Officer
Local Agency Formation Commission
215 North 'D' Street, Suite 204
San Bernardino, CA 92415

RE: Pali Mountain Camp/Camp O'Ongo – APN 0328-042-14-0000

Ms. Rollings-McDonald,

This will confirm receipt of a FAXed letter from Andrew Wexler, owner of Pali Mountain Camp, dated September 9, 2013. Their letter indicated they agree and are committed to resolving the Agency's issues regarding the proposed water and sewer pipelines. In accordance with your request and pursuant to Mr. Wexler's letter, the Agency is satisfied that Pali Mountain will comply with all of the Agency's requirements.

If you have any questions, please let me know.

Yours very truly,

Roxanne M. Holmes

Roxanne M. Holmes,
General Manager

Cc: Pali Mountain Camp

Roxanne Holmes
General Manager
Crestline-Lake Arrowhead Water Agency
24116 Crest Forest Drive
Crestline, CA 92325

(909) 338-1779 (phone)
(909) 338-3686 (fax)

9/9/13

Dear Ms Holmes:

We agree and are committed to resolving all issues per page two of CLAWA's list of issues regarding Pali Mountain's proposed water and sewer pipelines:

1. Submit completed plan-profile drawings, along with sections/details, for Pali Mountain's new water and gravity sewer pipelines within CLAWA's easement (crossing under CLAWA's existing 14" pipeline) including for new tank inflow-outflow, new tank overflow-drain pipelines and for new gravity sewer pipeline; including specifying pipe material and pressure class, type and location of joints, elbows, fittings, concrete-encasements, casings, sand-cement batch plant slurry (1-½ sack/cy) permanent backfill-support under CLAWA's pipeline, etc along with applicable construction and testing specifications.
2. Prepare and submit a revised plan for "H2S Control" at Pali Mountain's proposed M.H. (1+37N, 13+135-FM), including at manhole lid; to prevent any sewage (and/or H_2S) from ever over-flowing southerly towards CLAWA's 14" water pipeline (in the unlikely event of an accidental over-flow at this proposed M.H.); along with written approval of said revised plans by Ryan Gross, G.M. of Running Springs Water/Sewer/Fire District, since we understand that they may in the future O&M Pali's on-site sewer facilities.
3. Obtain written approval for Pali Mountain's proposed crossings of CLAWA's existing 14" water pipeline directly from Brenda Romero, Sanitary Engineering at CDPH (ph 909-383-6029) San Bernardino, CA 92401, for protection of CLAWA's 14" water pipeline.
4. Four (4) or more days in advance of any excavation by Pali Mountain and/or any of their Contractors, on each of these above Pg. 1 & 2 items (or on any other portion of Pali Mountain's subject proposed Project) located closer than 300 feet from any of CLAWA's existing facilities and/or CLAWA's easements or in-fee land; Pali Mountain and/or their Contractors shall initiate USA Underground Alert Tickets, in accordance with Law, providing advance notifications accordingly.

We found nothing insurmountable to the engineering issues presented by CLAWA.

Sincerely,

Andrew Wexler
President/Owner
O-Ongo, Inc. / Pali Mountain

APPENDIX 4

July 22, 2013

Local Agency Formation Commission
215 north D Street, Suite 204
San Bernardino, CA 92415-0490

An Initial Study (IS), Notice of Determination (NOD) and fee receipt was prepared for APN 0328-042-02 Camp Pali (O-Ongo) CUP File Number 10604CU/M243-14/2004/CUP01 by Pat McGuckian of the San Bernardino County Land Use Services Department on November 16, 2004. The original 74-acre camp facility was created in 1939. The facility today has 44 buildings (581,182 square feet) and various recreational amenities such as an open air amphitheater go cart track, horse riding, soccer field and other facilities. The expansion includes the following components:

Construction and use of the 29,005 sq. ft. dining facility, 10 cabins each with a floor area of 1,872 sq. ft., a suspended slide at the existing Lake, a new 150,000 gallon water tank that will replace the existing 50,000 gallon tank, and a 1,118 sq. ft. office for an existing organizational camp and adult conference center for a maximum of 520 guests and 55 staff members on 73.2 acres. In support of the expansion, this project also includes installing water and sewer lines, with two lift stations, and natural gas lines to the new water tank and buildings. The development of this project has accounted for the Fire Marshall's requirement to increase the fire suppression capabilities on site by widening the existing roads to 26 feet wide and by increasing the water line and water storage capacities.

The location of the project is within known habitat for the state listed as threatened southern rubber boa (*Charina umbratica*). To address potential impacts to this species the project proponent corrdinated with the California Department of Fish and Wildlife (CDFW). Prior to the issuance of CDFW Operation of Law Letter for the Pali Mountain Upgrades Streambed Alteration Agreement 1600-2012-0041-R6, the permittee had already committed to several measures designed to avoid impacts to the SRB. The measures include:

1. A qualified biologist will conduct a survey on the project area prior to any ground disturbance (including installing exclusionary fencing).
2. The project will utilize standard silt fencing as a non-porous barrier that will enclose the work zones to exclude SRB from entering into the work area.
3. The silt fence will be buried at least six inches below the ground to prevent a snake intent on getting under the fence from doing so.
4. The integrity of the silt fence will be checked every morning and the fence will be repaired as needed.
5. Prior to construction, a biologist familiar with SRB will provide all construction personnel with an environmental awareness class that will outline the natural history of the SRB, the laws concerning this species, the biologists responsibilities and the contractors responsibilities as well as consequences of injuring or killing a SRB.
6. During the initial ground disturbance (brushing, grubbing and grading) a biologist will be on site to monitor.
7. The biologist will then inspect the site on a spot check basis for the remainder of the project. If, in the unlikely event, a SRB wanders into the work area, work will halt until a biologist holding a valid Scientific Collecting Permit to handle SRB can come to the site and move the snake out of harm's way.

In addition to the commitments outlined above the project proponent also commits to visually delineating the entire sewer line and waterline work zone between the new cabins and the water tank and sewer system above, at Knob Hill, so that the leaf litter can be hand raked (with the guidance of a qualified SRB biologist). The alignment will be cleared of leaf litter to bare ground before trenching so the biologist can monitor and ensure no SRB enter the work zone of the sewer alignment.

Sincerely,

Andrew Wexler
President/Owner

30778 Hwy 18 • PO Box 2237 • Running Springs CA 92382 • Tel 909.867.5743 • Fax 909.867.9295