



**RUNNING SPRINGS WATER DISTRICT**  
**A MULTI-SERVICE INDEPENDENT SPECIAL DISTRICT**

31242 Hilltop Boulevard • P.O. Box 2206  
Running Springs, CA 92382

November 15, 2012

**BY EMAIL ONLY**

Ms. Leslie Edwards  
Waters, Kraus & Paul  
222 N. Sepulveda Blvd., Suite 1900  
El Segundo, CA 90245  
[LEdwards@waterskraus.com](mailto:LEdwards@waterskraus.com)

Re: Public Records Act Request Dated November 9, 2012

Dear Ms. Edwards:

This letter is in response to your Public Records Act Request Dated November 9, 2012 a copy of which is attached. The Running Springs Water District (District) has a small staff, your request is for documents that are more than 40 years old which we will have to locate, search through and examine a voluminous amount of separate and distinct records in order to know if the District has any records that fall within the description in your request. At this time it will take District staff an undetermined amount of time to conduct that search.

You are welcome to come to our office next Tuesday, November 20, 2012 to review documents. At this time we have not been able to locate or organize much but will do our best to assist you while you are here. We will have meeting minutes, mapping files and some contract documents for you to review.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ryan Gross".

Ryan Gross, P.E., BCEE  
General Manager  
Running Springs Water District  
31242 Hilltop Blvd.  
P.O. Box 2206  
Running Springs, CA 92382  
<http://www.runningspringswaterdistrict.com/>

Phone: 909-867-2766 x104  
Fax: 909-867-2828  
[rgross@runningspringswd.com](mailto:rgross@runningspringswd.com)



**RUNNING SPRINGS WATER DISTRICT**  
 A Multi-Service, Independent Special District  
 31242 Hilltop Blvd \* Post Office Box 2206  
 Running Springs, CA 92382  
 (909) 867-2766

**PUBLIC RECORDS REQUEST FORM**

Date: 11/9/12

I, Leslie Edwards, representing Waters, Kraus & Paul  
 (Name) (Company/Self/Etc.)

hereby request certain public records pursuant to the California Public Records Act, Government Code sections 6250-6268:

PLEASE DESCRIBE THE DOCUMENT(S)/INFORMATION THAT YOU WOULD LIKE COPIES OF, INCLUDING THE APPROPRIATE DATE/TIME FRAME AS NECESSARY. ALSO, PLEASE INDICATE THE NUMBER OF COPIES. AN AGENCY HAS 10 DAYS TO DECIDE IF COPIES WILL BE PROVIDED. THE AGENCY MAY UPON WRITTEN NOTICE TO THE REQUESTERS, GIVE ITSELF AN ADDITIONAL 14 DAYS TO RESPOND.

|              |
|--------------|
| See Attached |
|              |
|              |

I understand that for each page I request, I will be charged \$0.15 per copy. I agree to pay for those copies before receiving the material. I also understand that my public information request form and information may be posted on the District's website.

Signature: Leslie Edwards

Name: Leslie Edwards  
 (Please Print)

Telephone: (310) 414-8146

Address: 222 N. Sepulveda Blvd, Suite 1900, El Segundo, CA 90245

Email Address: ledwards@waterskraus.com

NOTE: Legal public records (subject to attorney-client privilege and any other applicable provisions of law) should be requested directly from the District's legal counsel: BEST BEST & KRIEGER LLP (Mike Riddell), 3750 University Ave, Riverside, CA 92501 - (951) 686-1450. The District reserves the right to delete any portion of the material requested that is exempt by applicable provisions of law, but will provide the remainder of the information requested.

**FOR DISTRICT USE ONLY**

No. of pages @ \$0.15 per page: \_\_\_\_\_  
 Other Costs (e.g. maps, blueprints, DVDs, etc): \_\_\_\_\_  
 Total Amount Due: \_\_\_\_\_ Date Notified: \_\_\_\_\_  
 Actual Staff Time: \_\_\_\_\_ Staff Signature: \_\_\_\_\_

November 9, 2012

**VIA EMAIL ONLY**

Ryan Gross, General Manager  
Running Springs Water District  
31242 Hilltop Blvd.  
Running Springs, California 92382  
Email: [rgross@runningspringswd.com](mailto:rgross@runningspringswd.com)

Re: Public Records Act Request

Dear Mr. Gross,

This Letter will serve as a Public Records Act Request. Please provide us with any and all records regarding the following:

1. All DOCUMENTS in YOUR possession, custody or control that evidence, reference or set forth YOUR purchase of asbestos-cement water, sewer and/or irrigation pipe (hereinafter "A/C Pipe") between 1970 and 1973 for use in the RUNNING SPRINGS WATER DISTRICT (hereinafter "RSWD"). These DOCUMENTS include but are not be limited to those which evidence, reference or set forth the following:

- a. the manufacturer(s) of the A/C Pipe purchased by YOU between 1970 and 1973 (including but not limited to CertainTeed, Johns-Manville, J-M Manufacturing, J-M A/C Pipe, and/or Kubota); and
- b. the supplier(s) or distributor(s) of the A/C Pipe purchased by YOU between 1970 and 1973; and the quantities of A/C Pipe purchased by YOU between 1970 and 1973.

2. All DOCUMENTS in YOUR possession, custody or control that evidence, reference or set forth YOUR purchase, installation, repair, and/or replacement of A/C Pipe between 1970 and 1973 for use in the RSWD. These DOCUMENTS include but are not limited to those which evidence, reference or set forth the following:

- a. the manufacturer(s) of the A/C Pipe installed, repaired, and/or replaced by YOU between 1970 and 1973 (including but not limited to CertainTeed, Johns-Manville, J-M Manufacturing, J-M A/C Pipe, and/or Kubota);

**PARTNERS**

C. Andrew Waters es, ps, ms, ts  
Peter A. Kraus es, tl, vs  
Charles S. Singal es, ts  
Troyce G. Wolf es, ms, ts  
Michael L. Amftage es, us  
B. Scott Krueger es, ts  
Leslie C. MacLean es, ts  
Paul C. Cook es  
Gary M. Paul es  
Nyla Gail Cole es, ts  
John S. Janofsky es, os  
Michael B. Ourlin es  
Scott L. Frost es, es, ex, sr, ts  
Greg W. Lisenby es  
Loren Jacobson es, ts  
Jonathan A. George es, es, tl, vs  
Kevin M. Loew es  
Clisbe C. Henderson es

**ASSOCIATES**

Joy Sparling es  
Dimitri N. Nichols es  
Demetrios T. Zacharopoulos es  
Susannah B. Chester-Schindler es, ts  
Jillian Rice-Loew es  
Tao Kim es  
Corrie B. Waters es  
Laurel Halberg es  
Mark A. Linder es, ts  
Jennifer L. McIntosh es  
Andrew Seitz es  
Elizabeth A. Davis es  
Peter Klausner es  
Louisa O. Kirshoaten es  
Thomas Nleest es  
Kevin W. Paul es  
Caitlyn Silken es  
Erin M. Wood es  
Shawna Forbes-King es  
Katherine M. Littlefield es  
Inna Zaslavskaya es  
Peter C. Balme es  
R. Walker Humphrey, II es  
Anne N.izzo es  
Lina S. Chagoya es, es  
Oscar Andres Bustos es

**OF COUNSEL**

William Galveston es, ts  
Randall L. Iola es, es, ts  
George G. Tenkard, III es, es, ms, ps, ts  
Wm. Paul Lawrence, II es, es, vs, vs  
David Bricker es  
Dan Haggrove es

WATERS, KRAUS & PAUL ATTORNEYS AND COUNSELORS

LOS ANGELES: 222 NORTH SEPULVEDA BOULEVARD SUITE 1900 EL SEGUNDO, CALIFORNIA 90245 TEL 310 414 8146 FAX 310 414 8156

SAN FRANCISCO: 711 VAN NESS AVENUE SUITE 220 SAN FRANCISCO, CALIFORNIA 94102 TEL 800 226 9880 FAX 214 777 0470

BALTIMORE: 315 NORTH CHARLES STREET BALTIMORE, MARYLAND 21201 TEL 410 528 1153 FAX 410 528 1008

DALLAS: 3219 McKINNEY AVENUE DALLAS, TEXAS 75204 TEL 214 357 6244 FAX 214 357 7252

- b. the **supplier(s) or distributor(s)** of the A/C Pipe installed, repaired, and/or replaced by YOU between 1970 and 1973;
- c. the **quantities** of AC Pipe installed, repaired, and/or replaced by YOU between 1970 and 1973;
- d. the **location** of any work done on A/C Pipe installed, repaired, and/or replaced by YOU between 1970 and 1973; and
- e. **locations and jobs** where RSWD employees worked on, installed, repaired, and/or replaced A/C Pipe at any location between 1970 and 1973.

3. Any and all DOCUMENTS in YOUR possession, custody or control that evidence, reference or set forth where YOU used the A/C Pipe YOU purchased at any time during the 1970-1973 time period.

4. All DOCUMENTS relating to any plans, installation, construction, schematics, engineering drawings, and/or blueprints for the State Water Project completed in 1972.

5. All DOCUMENTS relating to any plans, installation, construction, schematics, engineering drawings, and/or blueprints for the construction of the RSWD Wastewater Department's collection system and treatment plant spanning the seven-year period of approximately 1968-1975.

6. All DOCUMENTS relating to any plans, installation, construction, schematics, engineering drawings, and/or blueprints for the three year water system improvement and replacement program initiated by the RSWD, in which approximately 80 miles of undersized and deteriorated water mains were replaced from 1984-1987.

7. All DOCUMENTS relating to any plans, installation, construction, schematics, engineering drawings, and/or blueprints for the underground water pipes and sewer systems located in the RSWD between 1970 and 1973.

8. All DOCUMENTS relating to the type of pipe used for the underground water pipes and sewer system for the RSWD between 1970 and 1973.

9. All DOCUMENTS relating to the type of pipe used for underground water pipes and sewer systems for the RSWD before 1965.

10. All DOCUMENTS relating to the removal and repair/maintenance of A/C pipes in RSWD between 1970 and 1973, including but not limited to the three year water system improvement and replacement program initiated by the RSWD in 1984, in which approximately 80 miles of undersized and deteriorated water mains were replaced.

11. Any and all tangible things in YOUR possession, custody or control which evidence, reference or set forth YOUR installation, repair, and/or replacement of AC Pipe between 1970 and 1973; including, but not limited to: any tools, gas powered saws, milling machines, tapping machines, blades or other devices/machines used in the installation, repair or replacement of the A/C Pipe installed, repaired, and/or replaced by YOU between 1970 and 1973.

12. Any photos, maps, records, logs or other information or other DOCUMENTS concerning where A/C Pipe is currently buried, disposed of or stored or in any way in YOUR custody, possession and control.

13. Any photos, maps, records, logs or other information or other DOCUMENTS concerning where A/C Pipe was located in RSWD at any time between 1970 and 1973.

14. All DOCUMENTS in YOUR possession, custody or control that evidence, reference or set forth any policy YOU may have implemented related to dust suppression methods between 1970 and 1973.

15. All DOCUMENTS in YOUR possession, custody or control that evidence, reference or set forth any policy YOU may have implemented related to the dangers of asbestos dust, including hazards in working with A/C pipe and other asbestos-containing products between 1970 and 1973.

16. Any and all employment records related to John Bohm's employment with YOU between the years of approximately 1966 to 1977.

17. For each of the DOCUMENTS produced pursuant to this notice to produce writing and other tangible items, all DOCUMENTS in YOUR possession, custody or control setting forth and/or referring to or supporting the CREATION, storage, retention, business record nature, authenticity and admissibility of all such DOCUMENTS, as well as the identity of the person(s) responsible for the custody of same.

### DEFINITIONS

1. "DOCUMENTS" shall refer to all manually, mechanically or electronically written or recorded audio or visual materials and computer files known to defendant, including but not limited to databases, electronic mail messages, financial data, spreadsheets, accounting system information, indices of computer records, correspondence, memoranda, telegrams, notations, records, receipts, invoices, bills, purchase orders, sales records, delivery records, shipping manifests, bids, contracts, contract logs, catalogs, specifications, approved material submittals and change orders, as-built specifications, applications, specifications, blueprints, plans, maps, diagrams, indexes, computer-stored records, computer record indexes, microfilms, microfiche, warranties, guarantees, calendars, diaries, videotapes, photographs, tape recordings, asbestos surveys, asbestos sample testing reports, abatement reports, books, brochures, safety manuals, union regulations, company regulations, depositions, trial testimony, trial exhibits, and statements.

2. "YOU", "YOUR" and/or "RSWD" shall refer to the RUNNING SPRINGS WATER DISTRICT, Running Springs, California, specifically the Water Division, Wastewater Division, and Collection Division, and its alternate names, former names, parent municipalities, predecessors, subsidiaries, divisions and sub-divisions.

3. As used in this request, the term "CREATION" means knowledge of whether the DOCUMENTS, or any of them, are a record kept in the ordinary course of YOUR business, with knowledge of the act, event, condition and/or opinion recorded on the DOCUMENT to make the record, or to transmit information thereof to be included in such record; whether the record was made at or near the time of such act, event, condition, opinion or reasonably soon thereafter; and whether the sources of information and method and time of preparation of the DOCUMENT were such as to indicate its trustworthiness.

Thank you very much for your assistance. If you have any questions, please feel free to contact me at (310) 414-8146.

Sincerely,



Leslie M. Edwards  
Research Paralegal