



January 16, 2009

Ms. Kathleen Rollings-McDonald
Executive Director
Local Agency Formation Commission
215 North "D" Street, Suite 204
San Bernardino, CA 92373

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City Council

Mayor
Penny Lilburn

Mayor Pro-Tem
Ross B. Jones

Larry McCallon
Jody Scott
John P. Timmer

City Manager
Joseph A. Hughes

Subject: Response to Comments on Draft Environmental Impact Report
(SCH No. 2007091035) for the consolidation of the San
Bernardino Valley Water Conservation District and the San
Bernardino Valley Municipal Water District (LAFCO 3076)

Dear Ms. Rollings-McDonald:

The City of Highland has reviewed the Response to Comments prepared in
response to the comments made by the City of Highland on the above
referenced Environmental Impact Report. The letter dated July 18, 2008 was
referred to as Comment Letter # 5 in the Final Environmental Impact Report
(Volume II).

After reviewing LAFCO's responses to the comments made by the City of
Highland, we believe that the responses to comments do not adequately
address our concerns particularly, for example, Comments 5.2, 5.7, 5.8, 5.9,
5.10, and 5.11. We believe that the responses to our comments minimize
and do not adequately answer the issues raised. The issue of the manner
in the way that the EIR addresses our comments on the required Alternatives
analysis is but one area where the EIR needs significantly more detailed
review. The No Project Alternative has not been adequately described or
evaluated to give the LAFCO Board sufficient information upon which to
base an informed decision.

1.

The City of Highland believes that substantive additional work needs to be
completed in these areas before the Environmental Impact Report can be
deemed adequate and therefore used by LAFCO as a basis for a decision
on the merits of the proposed merger of the two districts. The LAFCO Board
needs to send the EIR back to staff and LAFCO's consultants to complete
a more thorough analysis and evaluation on the City of Highland's
comments. We look forward to continue to work with LAFCO staff and its
consultants to complete this needed additional effort.

2.

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Thank you for the opportunity to review the Final Environmental Impact Report as completed to date and offer our input for your consideration. We will continue to participate in this important issue as it moves forward for consideration in your process.

Sincerely,


Penny Lilburn
Mayor