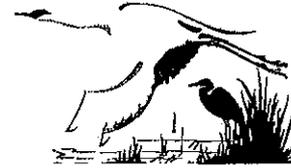
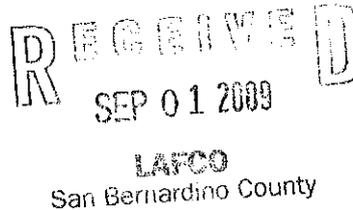


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September 1, 2009

Ms. Kathleen Rollings-McDonald
Local Agency Formation Commission
215 North "D" Street, Suite 204
San Bernardino, CA 92415-0490



Dear Kathy:

LAFCO 3080 consists of a service review for the City of Adelanto (City) pursuant to Government Code Section 56430 and Sphere of Influence Update pursuant to Government Code 56425. The City's existing Sphere encompasses approximately 71 +/- square miles in the western portion of the Victor Valley, located between Interstate 15 and the San Bernardino/Los Angeles County line. At the present time there appear to be two options for the City of Adelanto sphere of influence update: 1) retain the City's existing Sphere boundary; or a sphere reduction to exclude an area overlaid by the Phelan-Pinon Hills Community Services District (located at the southern boundary of the City's Sphere) and a sphere reduction to exclude non-contiguous City-owned land (the land located to the east of the City in the Mojave River flood plain). The City would retain all existing service responsibilities within its incorporated area. As we have learned from previous sphere modifications, the designation of a sphere, which is a planning boundary, does not by itself cause any modifications to the physical environment. Only when the subsequent step is taken to physically revise the jurisdictional boundary of a service or jurisdictional boundary does a potential for physical change in the environment occur.

The effects of the sphere review and selection of either of the two alternatives do not appear to have any potential to alter the existing physical environment in any manner. Verification of the current City sphere does not have any potential for causing physical changes in the environment. Any reductions in the City's Sphere also do not appear to have any potential for causing physical changes in the environment. Therefore, I recommend that the Commission find that a Statutory Exemption (as defined in the California Environmental Quality Act, CEQA) applies to LAFCO 3080 under Section 15061 (b) (3) of the State CEQA Guidelines, which states: "A project is exempt from CEQA if the activity is covered by the general rule that CEQA applies only to projects which have the potential for causing significant effect on the environment. Where it can be seen with certainty that there is no possibility that the activity in question may have a significant effect on the environment, the activity is not subject to CEQA." It is my opinion, and recommendation to the Commission, that this circumstance applies to LAFCO 3080.

In this case, adopting either of the two Sphere review options does not substantially alter the existing operations or obligations of the City of Adelanto and does not adversely affect any existing physical facilities. Based on this review of LAFCO 3080 and the pertinent sections of CEQA and the State CEQA Guidelines, I conclude that LAFCO 3080 does not constitute a project under CEQA and adoption of the Statutory Exemption and filing of a Notice of Exemption is the most appropriate determination to comply with CEQA for this action. The Commission can approve the review and findings for this action and I recommend that you notice LAFCO 3080 as statutorily exempt from CEQA for the reasons outlined in the State CEQA Guideline sections cited above. The Commission

needs to file a Notice of Exemption with the County Clerk to the Board for this action once the action is completed.

A copy of this exemption should be retained in LAFCO's project file to serve as verification of this evaluation and as the CEQA environmental determination record. If you have any questions, please feel free to give me a call.

Sincerely,

A handwritten signature in cursive script that reads "Tom Dodson". The signature is written in black ink and is positioned below the word "Sincerely,".

Tom Dodson