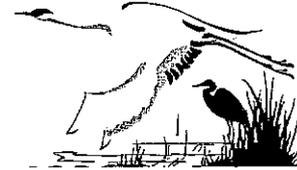


**TOM DODSON & ASSOCIATES**

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March 20, 2010

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

RECEIVED  
MAR 26 2010

LAFCO  
San Bernardino County

Dear Kathy:

LAFCO 3155 is a reorganization to annex the unincorporated Coad Road island to the City of Victorville encompassing a total of approximately 88 acres. A portion of the City's annexation area is also being annexed into the Victorville Water District (approximately 81.5 acres), and a portion is being detached from the San Bernardino County Fire Protection District and its North Desert Service Zone (approximately 8 acres) encompassing the railroad right-of-way areas between Coad Road and Terra Linda Drive. The specific action being considered under LAFCO 3155 is "Reorganization to include Annexations to the City of Victorville and Victorville Water District and Detachments from San Bernardino County Fire Protection District, its North Desert Service Area, and County Service Area 70 (Coad Road Island).

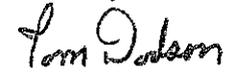
Island Annexations are allowed to proceed as ministerial actions because the originating statute indicates that the Commission has no discretion over their approval. However, an environmental determination for compliance with the California Environmental Quality Act (CEQA) is still required for such project.

Based on my understanding of the proposed action, a ministerial decision is automatically exempt (Statutorily Exempt) for the CEQA. Therefore, I recommend that the Commission find that a Statutory Exemption applies to LAFCO 3155 under the Section 15268 of the State CEQA Guidelines which states: "Ministerial projects are exempt from the requirements of CEQA." It is my opinion, and recommendation to the Commission, that, under the current application for LAFCO 3155, the Commission action in this matter is ministerial only and not subject to CEQA, i.e., statutorily exempt.

Based on a review of LAFCO 3155 and the pertinent sections of CEQA and the State CEQA Guidelines, I conclude that this action 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 the CEQA Statute for this action. The Commission can approve the identified actions proposed under this application as statutorily exempt from CEQA for the reasons outlined above and in the State CEQA Guideline section cited above. The Commission needs to file a Notice of Exemption with the County Clerk to the Board for this action once the hearing 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 black ink that reads "Tom Dodson". The signature is written in a cursive, slightly slanted style.

Tom Dodson