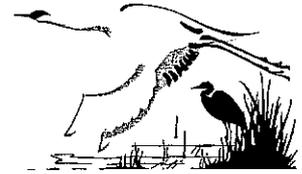


**Environmental Response from
Environmental Consultant,
Tom Dodson and Associates**

Attachment 6

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 1, 2010

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

RECEIVED
SEP 02 2010
LAFCO
San Bernardino County

Dear Kathy:

LAFCO 3161 consists of a joint request by the City of Barstow and Barstow Fire Protection District (District) to convert the District into a Subsidiary Department of the City of Barstow. There will be no change in jurisdictional boundaries but anticipates the replacement of the existing elected Board of Directors with the City Council of the City of Barstow as the ex-officio Board of Directors. The District would continue in existence and all responsibilities under Fire Protection District Law would also be continued.

Based on the above proposal, it appears that the proposed establishment of a Subsidiary District of the City can be implemented without causing any physical changes to the environment or any adverse environmental impacts. This finding is based on the continuation of the District and its responsibility to continue to provide fire protection service within its service area. The proposed establishment of the subsidiary District does not appear to have any potential to alter the existing physical environment in any manner different from the existing environmental circumstance; nor does it change the area in which service is and will be delivered.

Therefore, I recommend that the Commission find that a Statutory Exemption (as defined in the CEQA) applies to LAFCO3161 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 3161.

Based on this review of LAFCO 3161 and the pertinent sections of CEQA and the State CEQA Guidelines, I conclude that these LAFCO actions do 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 3161 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 hearing is completed.

A copy of this exemption recommendation 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".

Tom Dodson