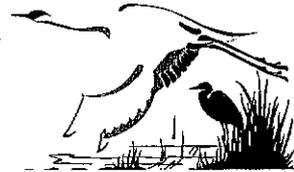
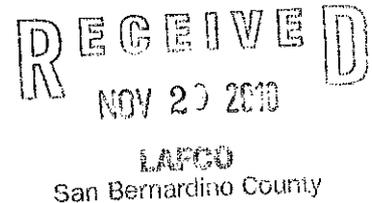


**TOM DODSON & ASSOCIATES**  
2150 N. ARROWHEAD AVENUE  
SAN BERNARDINO, CA 92405  
TEL (909) 882-3612 • FAX (909) 882-7015  
E-MAIL tda@tdaenv.com



November 26, 2010

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



Dear Kathy:

LAFCO 3127 consists of a service review for the Crest Forest Fire Protection District (District) pursuant to Government Code Section 56430 and Sphere of Influence Update pursuant to Government Code 56425. The District encompasses approximately 10,560 acres bordered by section lines along Crest Summit and the community of Blue Jay on the east; a combination of parcel lines generally along Rim of the World Highway (Highway 18) and the community of Rimforest on the south; a combination of Section lines and parcel lines generally along Playground Drive, Ridge Drive, and Sawpit Canyon Trail on the west; and a combination of section lines and parcel lines south of Silverwood Lake, Miller Canyon, and Pilot Rock on the north. The District provides fire protection services within the area identified above. The Commission staff is recommending that the existing Sphere and services of the District be expanded and reduced as shown on the attached map. This would include expanding the Sphere area to encompass the Crest Forest community and adjust the sphere along the northeastern portion of the District's sphere are in Lake Arrowhead to match the actual parcel delineation between the District and the San Bernardino County Fire Protection District Service Zone PM-1. This proposal also includes modification of the service description for the District to include its ambulance and paramedic services.

As we have learned from previous sphere and service reviews, the designation of a sphere and clarification of existing services, which focuses on 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 or range of services of a service agency does a potential for physical change in the environment occur.

The effects of the sphere and service review for the District, expansion and reduction of the Sphere and service modifications, does not appear to have any potential to alter the existing physical environment in any manner. Expansion and reduction of the current Sphere does not have any potential for causing physical changes in the environment because it is solely a planning boundary. Therefore, I recommend that the Commission find that a Statutory Exemption (as defined in the California Environmental Quality Act, CEQA) applies to LAFCO 3127 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 3127.

In this case, adopting the expanded Sphere and modifications of service scope of CSA 54 does not alter the existing operations or obligations of the area and does not adversely affect any existing physical facilities. It modifies a planning boundary only and modifies its service description under its authorized fire function. Based on this review of LAFCO 3118 and the pertinent sections of CEQA and the State CEQA Guidelines, I conclude that LAFCO 3118 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 this review and finding for this action and I recommend that you notice LAFCO 3118 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 (NOE) with the County Clerk to the Board for this action once the action is completed.

A copy of this memorandum and the NOE 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