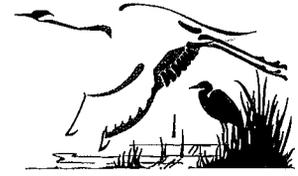


**Morongo Valley
Community Services District**

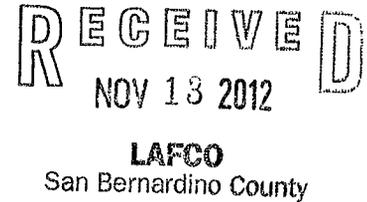
**Response from Commission's
Environmental Consultant**

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November 9, 2012

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



Dear Kathy:

LAFCO 3151 consists of a municipal service review for the Morongo Valley Community Services District pursuant to Government Code Section 56430 and Sphere of Influence Study pursuant to Government Code 56425. At the present time there appear to be two options for the sphere boundary of the District. The Commission can retain the existing Sphere of Influence, or, alternatively, the Commission can implement the Staff recommendation. Staff recommendation consists of the following:

1. Expand the sphere of influence for the Morongo Valley Community Services District (CSD) by approximately 8,130 acres to include the area westerly and northwesterly of the CSD's existing sphere (Sections 3, 4, 5, 6, 7, 8 and 9 of Township 01 South, Range 04 East, and Sections 1, 12, 13, 24, 25, and 36 of Township 01 South, Range 03 East;
2. Affirm the balance of the sphere of influence; and,
3. Modify the service description to the Fire Protection function by adding "suppression," "rescue," and "first aid" and removing "first aid" and Maintenance of emergency phone system" and affirm the remainder of the functions and service descriptions for the CSD.

As we have learned from previous sphere modifications, the designation of a sphere and service description modification, which comprise a planning boundary for the services, does not by itself cause any modifications to the physical environment. Only when the subsequent step is taken to physically revise the boundary of a service district (annexation/reorganization) does a potential for physical changes in the environment occur. Staff supports the establishment of the expanded Sphere based on the need for the CSD to plan and provide services within the expanded area.

Based on this information, it appears that LAFCO 3151 can be implemented with either of the two Sphere of Influence boundary options and service description modification without

causing any physical changes to the environment or any adverse environmental impacts. Therefore, I recommend that the Commission find that a Statutory Exemption (as defined in the California Environmental Quality Act, CEQA) applies to LAFCO 3151, regardless of which sphere boundary configuration is selected, 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 3151. In this case, assigning either of the two sphere boundary options and service description modification does not alter existing operations or obligations, it only indicates that the Commission has the opinion that in the future the CSD should consider serving the additional area identified in its application if the existing sphere is not retained.

Based on this review of LAFCO 3151 and the pertinent sections of CEQA and the State CEQA Guidelines, I conclude that LAFCO 3151 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 3151 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 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