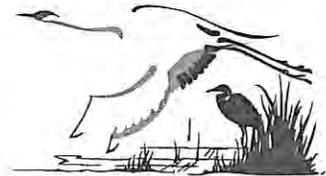


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October 8, 2014

Ms. Kathleen Rollings-McDonald
Local Agency Formation Commission
215 North "D" Street, Suite 205
San Bernardino, CA 92415-0490

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LAFCO
San Bernardino County

Dear Kathy:

LAFCO 3180 consists of a proposed reorganization to include annexations to County Service Area 54; detachment from County Service Area SL-1; and dissolution of County Service Area 73 and Zone A of County Service Area 53 (Streetlight reorganization for the Mountain Region). The intent of this reorganization is to establish a single agency to oversee all street lighting services in the San Bernardino mountains, excluding the City of Big Bear Lake and Big Bear City Community Services District. The territory proposed for reorganization includes eight (8) individual areas encompassing a total of approximately 8,462 acres located in the San Bernardino mountain region. The eight areas are:

- Area 1: Detachment from County Service Areas SL-1 and Annexation to County Service Area 54
Area 1 encompasses approximately 8.46 acres generally located north and south of Hook Creek Road west of State Highway 173, within the unincorporated community of Lake Arrowhead.
- Areas 2: Dissolution of County Service Area 73 and Annexation to County Service Area 54
Area 2 encompasses approximately 429 acres and is generally located south of Green Valley Lake, east of Running Springs. The area includes the unincorporated community of Arrowbear Lake.
- Areas 3,
4 & 5: Dissolution of County Service Area 53 Zone A and Annexation to County Service Area 54
Area 3: Encompasses approximately 5,925 acres is generally located north and west of the City of Big Bear Lake. The area is bordered by a combination of parcel lines and the City of Big Bear Lake on the east and south, and a combination of section lines along the National Forest on the west and north. The area includes the unincorporated community of Fawnskin and portions of the lake and National Forest.
Area 4: Encompasses approximately 1,776.4 acres is generally located south of the City of Big Bear Lake. The area is bordered by a combination of parcel lines and the City of Big Bear Lake on the north, and a combination of section lines on the west, south, and east. The area includes a portion of the National Forest and Bear Mountain Ski Area.
Area 5: Includes a single parcel, APN 0310-251-01 encompassing approximately 157 acres, and is generally located adjacent to the City of Big Bear Lake's southern boundary.
- Area 6,
7 & 8: The following territories are proposed to be annexed to County Service Area 54 as part of LAFCO 3180
Area 6: Includes 7 parcels encompassing approximately 0.9 acre which is generally located at the intersection of Seeley Way and Lands End Trail in the Crestline Area.

**Response from the Commission's
Environmental Consultant,
Tom Dodson & Associates, on
Environmental Determination**

Attachment 3

Area 7: Encompasses approximately 159 acres that include parcels east and west of State Highway 189 between Lake Gregory Drive and Strawberry Lodge in Crest Forest.

Area 8: Includes 4 parcels encompassing approximately 6.65 acres and is generally located at the intersection of State Highway 189 and North Bay Road in the Blue Jay area of Lake Arrowhead.

Based on the data contained in the reorganization application for LAFCO 3180, the proposed annexation does not appear to have any potential for causing physical changes in the environment. The reorganization will support existing street light systems and consolidate within one agency to oversee long-term management of existing and future street lights. Therefore, I recommend that the Commission find that a General Rule Statutory Exemption (as defined in the California Environmental Quality Act, CEQA) applies to LAFCO 3180 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 3180.

Based on a review of LAFCO 3180 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 General Rule Statutory Exemption and filing of a Notice of Exemption is the most appropriate determination to comply with the CEQA process for this action. The Commission can approve the identified action 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 cursive script that reads "Tom Dodson".

Tom Dodson