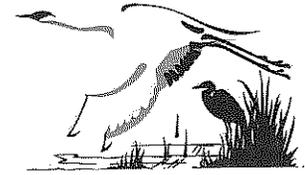


**Letter from Tom Dodson of
Tom Dodson and Associates, LAFCO
Environmental Consultant, Recommending
Adoption of Statutory Exemption for
LAFCO 3186**

Attachment 6

TOM DODSON & ASSOCIATES
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LAFCO
San Bernardino County

February 19, 2015

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

Dear Kathy:

LAFCO applications 3185 and 3186 request a Sphere of Influence Expansion and a Reorganization that affect the Crest Forest Fire Protection District (CFFPD) and the San Bernardino County Fire Protection District (SBCFPD). Specifically, LAFCO 3185 consists of an expansion of the SBCFPD Sphere of Influence to encompass the Crest Forest community located in the San Bernardino Mountains. LAFCO 3186 consists of a reorganization to include annexations to the SBCFPD, its Mountain and PM-1 Service Zones, dissolution of the CFFPD and its Service Zone PM-A, Formation of Service Zone FP-7 and PM-4. The sphere expansion encompasses approximately 11,300 which encompasses the entire CFFPD. This area generally includes Lake Gregory and the unincorporated areas known as Skyland, Crestline, Valley of Enchantment, Valley View Park, Cedarpines Park, Arrowhead Highlands, Twin Peaks, Crest Park, Rimforest and Blue Jay.

The objective of this expansion and reorganization is to provide a fire protection entity that will be able to provide sustainable fire protection service into the future. In this case, it is the SBCFPD that will assume the fire protection responsibilities of the CFFPD in order to meet this objective. The two LAFCO actions are designed to provide a seamless transition to continued fire protection service for the residents and businesses located within the CFFPD's service area. The effects of the sphere expansion and reorganization does not appear to have any potential to alter the existing physical environment in any manner.

Therefore, I recommend that the Commission find that a Statutory Exemption (as defined in the California Environmental Quality Act, CEQA) applies to LAFCOs 3185 and 3186 under Section 15061 (b) (3) of the State CEQA Guideline. This General Rule Statutory Exemption 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 the General Rule exemption applies to LAFCOs 3185 and 3186.

Based on this review of LAFCOs 3185 and 3186 and the pertinent sections of CEQA and the State CEQA Guidelines, I conclude that these actions do not constitute a project under CEQA and adoption of the General Rule Statutory Exemption and filing of Notices of Exemption is the most appropriate determination to comply with CEQA for these actions. The Commission can approve this review and findings for these actions and I recommend that you notice LAFCOs 3185 and 3186 as statutorily exempt from CEQA for the reasons outlined in the State CEQA Guideline section cited above. The Commission needs to file the Notices of Exemption (NOE) with the County Clerk to the Board for these actions once the action is completed.

A copy of this memorandum and the NOEs 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,



Tom Dodson