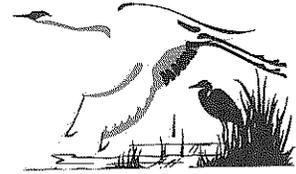


**Environmental Recommendation  
from Tom Dodson**

**Attachment 3**

**TOM DODSON & ASSOCIATES**  
2150 N. ARROWHEAD AVENUE  
SAN BERNARDINO, CA 92405  
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February 28, 2015

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

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**LAFCO**  
San Bernardino County

Dear Kathy:

LAFCO 3174 consists of a Service Review for Water Conservation in the Valley Region. The primary agencies encompassed by the service review would include:

- San Bernardino Valley Water Conservation District
- Chino Basin Water Conservation District
- Inland Empire Utilities Agency
- San Bernardino Valley Municipal Water District
- San Bernardino County Flood Control District, and
- Other Agencies considered but of lesser importance include: City of Chino, City of Chino Hills, City of Redlands, City of San Bernardino (Municipal Water Department, City of Upland, Cucamonga Valley Water District, East Valley Water District, Monte Vista Water District, Riverside Highland Mutual Water Company, West Valley Water District and Yucaipa Valley Water District.

This Service Review will be received and filed by the Commission without taking any action that could change the environment. As we have learned from previous service reviews, only when the subsequent step is taken to physically revise the jurisdictional boundary or to provide new services does a potential for physical change in the environment occur. Thus, the proposed action presented above is not judged to pose any identifiable adverse changes to the physical environment.

Therefore, I recommend that the Commission find that a Statutory Exemption (as defined in the California Environmental Quality Act, CEQA) applies to LAFCO 3174 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 3174.

In this case, adopting the proposed action does not alter the existing operations or obligations of the affected agencies and does not adversely affect any existing physical facilities. Based on this review of LAFCO 3174 and the pertinent sections of CEQA and the State CEQA Guidelines, I conclude that LAFCO 3174 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 3174 as statutorily exempt from CEQA for the reasons outlined in the State CEQA Guideline section cited above. The Commission needs to file a Notice of Exemption (NOE) with the County Clerk of the Board for this action once it is completed.

A copy of this memorandum and the NOE should be retained in the LAFCO 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