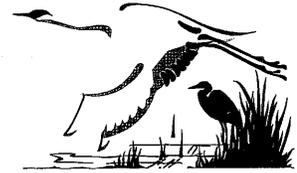


**Response from Tom Dodson  
and Associates**

**Attachment 4**

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



October 31, 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 3191 consists of a request by a landowner (Boral Roofing) to annex a single parcel of land, approximately 19 acres, to the City of Rialto in order to place all of its property and operations under one jurisdiction. The actual title of the proposed action is "Reorganization to include Annexation to the City of Rialto and the West Valley Water District and Detachment from San Bernardino County Fire Protection District, its Valley Service Zone, and County Service Area 70." The property proposed for annexation is generally located northeast of Riverside Avenue between Locust and Linden Avenues (APN 0239-121-20). Boral Roofing owns two adjacent parcels at this location, with one in the City and the other in unincorporated County territory. If LAFCO 3191 is approved by the Commission the property would be annexed into the incorporated City of Rialto.

Based on the above proposal, it appears that the proposed reorganization would allow the City to assume land use and planning responsibilities and the existing connection to West Valley Water District could be extended to the parcel proposed for annexation. Boral Roofing currently manufactures roofing materials and will continue its existing operations. Any future changes in operations would require a separate review and approval by the City, including full compliance with the California Environmental Quality Act. The approval of LAFCO 3191 does not appear to have any potential to significantly alter the existing physical environment in any manner different from the existing environmental circumstance.

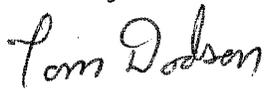
Therefore, I recommend that the Commission find that a Statutory Exemption (General Rule), as defined in CEQA under Section 15061 (b) (3) of the State CEQA Guidelines, applies to LAFCO 3178. This Section states: "*A project is exempt from CEQA if the activity is covered by the general rule that CEQA 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 3191.

Based on this review of LAFCO 3191 and the pertinent sections of CEQA and the State CEQA Guidelines, I conclude that the proposed LAFCO action does not constitute a project

under CEQA and adoption of the Statutory Exemption and filing of a Notice of Exemption is the most appropriate environmental 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 3191 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 and assuming LAFCO 3191 is approved.

A copy of this exemption recommendation 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