

# ***AMADOR FIRE PROTECTION DISTRICT***

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Amador Fire Protection District (AFPD) provides fire prevention and protection, rescue and emergency medical services. Additionally, AFPD provides contract fire suppression and emergency medical services to the City of Plymouth.

## **AGENCY OVERVIEW**

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### **Background**

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AFPD was formed in 1990 as a dependent special district of Amador County. The District was formed to provide fire, rescue and emergency medical services. The district provides five essential public services, fire suppression, medical, hazard mitigation, technical rescue, and community risk reduction.

The principal act that governs the District is the Fire Protection District Law of 1987.<sup>1</sup> The principal act empowers fire districts to provide fire protection, rescue, emergency medical, hazardous material response, ambulance, and any other services relating to the protection of lives and property.<sup>2</sup> Districts must apply and obtain LAFCO approval to exercise services authorized by the principal act but not already provided (i.e., latent powers) by the district at the end of 2000.<sup>3</sup>

### **Boundary**

AFPD's boundary is entirely within Amador County. The bounds encompass approximately 491 square miles, constituting 85 percent of the unincorporated area in the County. The communities of Amador Pines, Fiddletown, Pioneer, Pine Grove, Volcano, Martell, Drytown, Willow Springs, and River Pines are within the AFPD bounds. Areas outside AFPD bounds include the five cities and territory within four other districts providing fire services: Jackson Valley Fire Protection District (JVFPD) (72 square miles), Lockwood Fire Protection District (LFPD) (19 square miles), Sutter Creek Fire Protection District (SCFPD) (3,179 square miles), and Kirkwood Meadows Public Utility District (KMPUD) (16 square miles). Jackson Rancheria is federal land, and therefore also outside of AFPD bounds. Other providers serve portions of the District's boundary area through an aid agreement that provides for dispatching of the closest resource regardless of jurisdictional authority.

The District's bounds were expanded in 1994, when AFPD absorbed fire services from Pine Acres Community Services District, Pine Grove Community Services District, Volcano Community Services District, and CSA 1.

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<sup>1</sup> Health and Safety Code §13800-13970.

<sup>2</sup> Health and Safety Code §13862.

<sup>3</sup> Government Code §56824.10.

### Sphere of influence

There is no record of LAFCO adopting a sphere of influence for AFPD. After adoption of this MSR, LAFCO will adopt an SOI for the District.

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## Local Accountability and Governance

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The Amador County Board of Supervisors (BOS) is AFPD's governing board pursuant to an organizational option in the principal act. District boards are to internally elect officers to the positions of president and vice-president of the board; the BOS has positions of chair and vice chair fulfill this requirement.

District information, including community outreach and meeting records, are accessible on the informative and easy to navigate website (<https://amadorfire.org>). Meetings are covered in the local press (Ledger-Dispatch) with additional meeting records available on the website. There is no separate district newsletter, but the District makes use of social media resources and news and notices are published on the website. The District occasionally has a column in the Ledger-Dispatch regarding safety issues. The District reported that it has had no known Brown Act violations in recent history.

With regard to customer service, the AFPD offices are open and staffed during all normal business hours in the County Administration Center. The Chief is the District's primary ombudsman, although complaints are forwarded to the Board if warranted. Complaints may be submitted to the Chief or Board through a call, a letter, or in person. While AFPD staff do not track total numbers of complaints, the District reported that there have been few, if any, citizen complaints reported since the last review. Support staff and the admin support team are available, knowledgeable, and enthusiastic in their willingness to help the public. Job descriptions and written internal task assignments for the admin staff are clearly defined, however, hours budgeted may be insufficient time allocations for the scope and difficulty of these tasks.

AFPD has taken to social media to offer safety and prevention tips to their social media followers. Social media allows the district to reach a large number of citizens, to communicate and educate the public regarding fire prevention, safety for home space heaters, smoke detector education, proper placement of generator(s) and their usage, and upcoming scheduled power outages. Social media is an effective means to reach out to the communities. Additionally, social media is the platform to keep the community in-the-know on upcoming events such as Fill the Boots for the Burn Institute, various promotions within the district, and employment/volunteer opportunities. The District demonstrated accountability in its disclosure of information and full cooperation with LAFCO. The agency promptly responded to LAFCO's requests for information and all document requests.

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## Management

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Daily operations are managed by the Chief, three paid Battalion Chiefs (shift A, B and C), and a Deputy Fire Marshal. The Chief evaluates district performance by tracking response times and conducting monthly reviews of service call volume. The Chief reports regularly to the Board at meetings.

Personnel are accountable to the Chief and the battalion chiefs. The paid battalion chiefs conduct performance reviews of paid and volunteer fire suppression personnel. Management and administrative procedures meet or exceed requirements and are subject to the checks and safeguards of Amador County.

The Amador Fire Protection District (AFPD) maintains policies, practices, protocols and procedures that are current, legally compliant, and represent industry best practices. AFPD uses an integrated management system provided through Lexipol LLC., a private company that provides comprehensive policy manual templates, training bulletins, etc., to numerous public safety departments and agencies throughout the country.

Lexipol materials used by AFPD provide fire service operations policies that are updated in response to new state and federal laws and court decisions. This service provides an online training platform that delivers courses and videos designed to meet fire and EMS training mandates, backed by tools to manage credential renewal, enhancing accountability, professionalism and safety. AFPD finds it to be a cost effective way to achieve or exceed all regulatory and statutory requirements for the district. Liability Insurance, Errors and Omissions insurance, excess liability for the district is provided within the master policies and insurance coverage of the county. Worker's Comp is provided through Fire Agencies Self Insurance System (FASIS). Legal counsel is provided through Amador County Counsel staff and contracted legal counsel as needed.

### Planning Documents

The mission statement of Amador Fire Protection District is "Committed to serving the needs of Amador County with professionalism, integrity and vision".

District near-term financial planning efforts are completed through the County's annual budgets and annual audited fiscal statements. The most recent audit was completed for FY 19. The District produces a five-year capital improvement plan (CIP) annually. The most recent CIP was completed in 2018. It includes standards for all apparatuses and facilities, an allocation plan for existing equipment, and agency objectives.

The District expects to conduct a future community-based strategic planning effort as part of its best practices program.

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## Service Demand and Growth

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Present land uses within the District's boundary area are primarily agricultural, with large areas of timber preserve zone and undeveloped, vacant land. Residential uses are concentrated in the central portion of the District, in developed areas and around Pine Grove and Buckhorn. Commercial land uses are located primarily in Martell, and also in the Buckhorn, Red Corral and Pine Grove communities within district bounds. Nearly all land in the easternmost portion of the district is vacant and within the Mokelumne wilderness.<sup>4</sup> It is a federal responsibility area.

Farming, ranching and mining are the area's primary industries. Major employers within district bounds are Amador County and Jackson Rancheria Casino in the Jackson vicinity.

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<sup>4</sup> Amador County, *General Plan (2016) Land Use Classification Map*.

The most profitable industries in the County include agriculture, retail, health care and social assistance, tourism, manufacturing and construction.<sup>5</sup> Significant employers include the Jackson Rancheria Hotel and Casino and various governmental services, including Amador County, school district offices, Caltrans, the Department of Motor Vehicles and CHP. A growing percentage of employment in the County is dependent upon tourism.<sup>6</sup> Although agriculture (particularly wineries) has increased employment in recent years, overall farmland acreage in the County still primarily consists of pasture and range lands. Major employers and industrial uses noted by the District as being within the District's primary service area are Sierra Ampine (lumber and fiberboard manufacturing) and Volcano Communications Group (utilities) in Pine Grove, and PG&E including sites at Silver Lake, Tiger Creek and elsewhere.

There are approximately 22,456 residents in the unincorporated county, with approximately 19,171 within the District's boundary area.<sup>7</sup> The District's overall population density is 35 per square mile, compared to the countywide density of 64. Existing residential structures in unincorporated Amador county total 10,129 one-unit dwellings, 73 two-unit dwellings, 57 three- or four-unit dwellings, 115 apartments (5 units or more), and 622 mobile homes.<sup>8</sup>

The District reports moderately increasing service demand due to development and growth. The population of unincorporated Amador County grew by 4.04 percent between 2010 and 2019. Approximately 48 percent of the land throughout the County is vacant based on information from Amador County Planning Department.

As of June 2021, there are 13 planned and proposed residential developments in unincorporated Amador County that have received tentative approval.<sup>9</sup> There are proposals and plans for 544 residential units on 661 acres (approximately one square mile), among the projects with available data. Developments with tentative approved proposals would house approximately 1,295 additional residents at build-out.<sup>10</sup>

Updated and additional information from Amador County Planning Department regarding potential growth was provided for this Final MSR.

The City of Plymouth reports one application for development at this time, with environmental review beginning soon. The subdivision consists of 234 single-family residential lots, with 156 of those lots 60-feet by 110-feet, and 77 lots 80-feet by 110-feet. The overall density is one lot per half acre. In addition to the residential lots, within the subdivision are: three open space parcels: a 5.2-acre park site; two stormwater retention basins; and landscaped corridors, greenways, and common areas. There are 214 new RV and vacation sites on approximately 44.9 acres of the Greilich Trust property.

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<sup>5</sup> Amador County General Plan, 2016, p. E-5, Table E-1.

<sup>6</sup> Amador County General Plan, 2016, p.E-4

<sup>7</sup> 2019 American Community Survey data, estimated for unincorporated area of Amador County, less population estimates for Lockwood FPD and Jackson Valley FPD. Sutter Creek FPD population is substantially within the city of Sutter Creek.

<sup>8</sup> Estimates provided by email, Chuck Beatty, Planning Director, Amador County.

<sup>9</sup> Information provided by Chuck Beatty, Amador County Planning Director.

<sup>10</sup> Population estimates are calculated by multiplying the total number of residential units by the average household size in Amador County (2.38) according to the Department of Finance, 2019.

The District is not a land use authority and does not hold primary responsibility for implementing growth strategies.

### Disadvantaged Unincorporated Communities

LAFCO is required to evaluate disadvantaged unincorporated communities (DUCs) as part of this service review, including the location and characteristics of any such communities. A disadvantaged unincorporated community is defined as any area with 12 or more registered voters, or as determined by commission policy, where the median household income is less than 80 percent of the statewide annual median.<sup>11</sup>

Any MSR conducted by LAFCO for a city or special district that provides public facilities or services related to sewers, municipal and industrial water, or structural fire protection, shall identify any DUCs within and contiguous to the sphere of influence of that city or special district, and describe the present and probable needs and deficiencies for the provision of those public facilities and services within such DUC.<sup>12</sup> The California Department of Water Resources (DWR) has developed a mapping tool to assist in determining which communities meet the disadvantaged communities' median household income definition.<sup>13</sup> DWR identified nine disadvantaged communities within Amador County—three of which are cities and are therefore not considered unincorporated.<sup>14</sup> Three of the identified disadvantaged communities are within AFPD bounds. The three disadvantaged communities include River Pines (population estimate 379), Drytown (population estimate 210), and Martell (population estimate 153). All are legacy communities under DWR standards. Current Median Household Income is \$48,120.

The District, along with other regional providers, does provide services for fire and emergency response on the same basis and at the same levels as those services provided within the cities and within the District boundaries. LAFCO Policy 7.6 is applicable in this case, however, providing that “Any area receiving wastewater, municipal and industrial water, or structural fire protection services which are determined by LAFCO to be adequate and equivalent to those services provided within city boundaries shall not be considered a disadvantaged unincorporated community.”

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## Financing

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Amador LAFCO anticipates preparing a detailed financial analysis of all fire service providers in 2021. AFPD accounting is reported within the County's financial statement and budget. The District practices fund accounting for each revenue source. Measure M, which was approved by Amador County voters in 2009, is accounted for in a separate fund. LAFCO plans to initiate a comprehensive financial review of fire service providers in 2021.

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<sup>11</sup> Government Code §56033.5.

<sup>12</sup> LAFCO Policy 7.3 adopted 2-16-17.

<sup>13</sup> Based on census data, the median household income in the State of California is 60,150, 80 percent of which is \$48,120.

<sup>14</sup> DWR maps and GIS files are derived from the US Census Bureau's American Community Survey (ACS) and are compiled for the five-year period 2006-2010. Updates may be available with the 2020 census.

## Revenues

The District's total revenues were \$3,900,662 in FY 20. Revenue sources include Measure M sales taxes (46 percent), a special tax collected through a community facilities district (22 percent), aid from the County (18 percent), fees for services (eight percent), and miscellaneous (four percent). Property taxes, impact fees and interest payments comprised the remaining revenue sources.

The District's benefit assessment varies by land use: vacant lands are charged a maximum annual assessment of \$28.08; residential units (single-family or multi-family units) are charged a maximum of \$42.22; and mobile home parks and commercial or industrial parcels are charged a base of \$103.62 plus a charge based on the number of mobile homes and a fee based on the square footage of any buildings and their use. Annual assessments may vary from these amounts due to square footage and, for commercial or industrial land uses, the level of risk assigned to the business type. The schedule is updated annually; the schedule increased, on average, 14.7 percent from the rates in 2014.

The Amador County general fund provides financial aid to AFPD through the County budget process. The County does not designate a specific purpose to its AFPD contribution.

Historically, other significant revenue included grant monies from the Volunteer Fire Assistance (VFA), SAFER Grants, etc.

AFPD collects development impact fees (DIF) to fund additional fire protection facilities and equipment to meet the increased demand inherent in new development.<sup>15</sup> These are one-time fees paid by new development projects in the District. The residential fee is \$250 per unit; the commercial fee is \$650 plus an additional cost of \$0.25 to \$0.60 per square foot, depending on risk categorization. Structures larger than 5,000 square feet or three stories in height are assessed individually to determine their impact fee amount, as large structures create unusual fire risk. The District will be conducting a Nexus Study in 2021 to determine the adequacy of development impact fees. The contract for this work was approved by the Board in April 2021.

Since formation of the district in 1990, Amador Fire Protection District (AFPD) has been authorized to collect \$250 per new home for DIF through the County's permitting process. While this amount of \$250 has not changed, on average, neighboring fire agencies within Amador County have DIF of approximately \$2,000. The additional funds could eventually assist in the construction of a new fire station within the jurisdiction where an engine company is needed to respond to medical and fire emergency calls.

Contracts for services provide additional revenue for the District. The contract between the City of Plymouth and AFPD was initially signed on July 13, 2005, and in 2010 a 20-year extension was signed under the same terms. AFPD agreed to provide all fire protection, fire suppression, and emergency response services for the City. The District leases the existing Plymouth fire station for a nominal amount. The City pays AFPD an amount equal to the total the District would collect were parcels within the city limits subject to the AFPD benefit assessment schedule. AFPD is negotiating an agreement to specify the collection, distribution and payment of funds from the Shenandoah-Zinfandel Ridge development's

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<sup>15</sup> Pursuant to Amador County BOS Resolution No. 91-401.



special public safety assessment which is part of the development agreement for that subdivision. The District performs annual audits of city parcels to update the service charge. Payments are made in two annual installments in December and April.<sup>16</sup>

AFPD additionally has a contractual agreement to provide fire and life protection services to the Jackson Rancheria (including hotel, casino, RV park and residential uses) at actual cost of service delivery. These charges are invoiced and paid monthly. The agreement was renewed in 2020 for an additional 3 years.

In May 2019, the AFPD Board passed an updated ordinance, a fee schedule for plan review, inspections, and providing reports.<sup>17</sup> Plan reviews for subdivisions with four lots or less are \$219; more than five lots is an additional \$18 per lot. Plan reviews and/or inspections for other structures such as new commercial buildings, automatic sprinkler systems, and water storage systems, among others, range from \$109 to \$547. Some reviews and inspections are charged hourly, others are a flat rate.<sup>18</sup> Fire reports are \$21. Penalty amounts for failure to secure required permits or approvals are charged twice the amount of the original fee.

### Expenditures

AFPD expenditures were \$3,992,865 in FY 20. Expenditures included salaries and benefits (81.3 percent), services and supplies (12.9 percent), and fixed asset spending such as building improvements and equipment purchase (5.9 percent).

Other AFPD expenditures include the cost-of-service provision and automatic aid agreement payments to Kirkwood Meadows Public Utility District (KMPUD). AFPD pays KMPUD \$2,200 annually plus \$72 per response to compensate the District for increased insurance costs for its primary response area, which includes land in AFPD bounds.

### Debt and Reserves

The principal act permits fire districts to incur general obligation-bonded indebtedness for the acquisition or construction of any real property or other capital expense or for funding or refunding of any outstanding indebtedness. At the close of FY 20 the District had no long-term debt.

The District does not have a formal policy on maintaining financial reserves. AFPD had \$2,425,435 in reserve funds at the close of FY 20. These reserves are considered adequate and represent at least six months of operating expense.

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<sup>16</sup> Contract between City of Plymouth and AFPD, signed 2010.

<sup>17</sup> Ordinance No. AFPD 007, 2019.

<sup>18</sup> Ibid.

## **FIRE AND EMS SERVICES**

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### **Nature and Extent**

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AFPD provides fire suppression, fire prevention, emergency medical, and rescue services. The District operates seven stations. For calls involving emergency medical services, AFPD provides basic life support (BLS) until American Legion Ambulance Service arrives to perform advanced life support and ambulance transport.

AFPD has secured the services of a medical director and are working toward ALS accreditation through our local emergency medical services, Mountain Valley EMS.

The District also provides plan review and inspection services for City of Plymouth and collects impact fees for JVFPD and LFPD.

On behalf of all the fire districts, AFPD participates in the County Planning Department's Technical Advisory Committee. AFPD staff explains that since the other fire districts within the unincorporated areas of Amador County are limited in staffing, AFPD staff usually represents all of them at the hearing (TAC meeting) in the board chambers. Among its responsibilities, the TAC assesses if a proposed project can be built within Amador County based on a technical review of the applicable codes and standards. The TAC may recommend conditions of approval. The applicant cannot proceed to the Planning Commission for formal approval until they have satisfied the TAC committee members. The TAC committee members consist of Building, Planning, Public Works, Environmental Health and AFPD.

The District's boundaries overlap with the CAL FIRE State Responsibility Area. CAL FIRE provides primary wildland fire response and AFPD provides primary structure fire response.<sup>19</sup> All of unincorporated Amador County is SRA jurisdiction. A portion of the District is within the national forest, which is a federal responsibility area.

Total service calls reported were 2,888 for 2020. Sixty percent were EMS and four percent were structural and wildland fires. Two percent were non-fire hazardous material fires. A total of 31% of calls were public assistance or other calls, a significant increase over prior reports. Two percent of calls were false alarms.

The majority of incidents occur between noon and 6:00 PM.

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### **AFPD Hiring, Staffing and Volunteer Practices**

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The Amador Fire Protection District (AFPD) is a combination department of both career and volunteer personnel and has the only organized labor workforce in Amador County among the local government fire agencies. AFPD has a volunteer firefighter program that consists of both qualified stipend volunteer firefighters augmenting staffing levels from a minimum of two career personnel per Engine Company. Additional volunteer firefighters respond from home and participate regularly in training to stay proficient on their job-related skills. Volunteers respond directly to emergency incidents or the fire stations to backfill behind responding personnel and they may bring additional apparatus to emergency scenes to support the district's operational needs.

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<sup>19</sup> Pursuant to Health and Safety Code §13811.



Volunteer personnel report directly to a company officer or incident commander on emergency responses and attend weekly training exercises facilitated by a career battalion chief program manager. Stipend volunteers at a minimum are licensed Emergency Medical Technicians who are actively working to demonstrate all of the Job Performance Requirements (JPR)s identified by California State Fire Training and are participating in a capstone testing process through an Accredited Local Academy (ALA) in order to achieve California State Firefighter 1 (FF1) certification.

Many current respond-from-home volunteer firefighters are already licensed EMTs with California State FF1 certification, while others are working towards that goal. Volunteer firefighters are provided full firefighting Personal Protective Equipment (PPE) and a uniform allowance. Furthermore, volunteers receive workers compensation insurance coverage and nominal compensation (stipend) to reimburse them for expenses associated with their volunteer service. The volunteer program adheres to Fair Labor Standard Act (FLSA) regulations and industry best practices.

AFPD career personnel candidates are required to be licensed EMTs and FF1 or equivalent at time of hire and required to complete a fully validated written general knowledge test with questions and examples tailored to the profession, designed to demonstrate their ability to process information and think critically. Additionally, they must pass a timed physical ability test with eight separate events designed to simulate the specific physical demands of firefighting. This assessment process is administered by the State of California, Firefighter Candidate Testing Center (FCTC), and is a prerequisite to be scheduled for an interview for hire. Successful candidates who receive conditional offers of employment must complete and pass both a medical exam and comprehensive background assessment prior to appointment.

### Personnel

District personnel include the fire chief, three battalion chiefs, and one deputy fire marshal. Staffing includes thirty full-time firefighters (57 percent), seventeen volunteers, and two admin staff. All firefighters are certified at the EMT-1 level or higher.

The District's engages with California Joint Apprentice Committee (CALJAC), a program of the California Professional Fire fighters Assn., the state union to enhance recruitment and hiring decisions. Open, continuous recruitment for pre-qualified district firefighters occurs through CALJAC, enabling AFPD to access the list of eligible candidates for local firefighter positions. All personnel on the CALJAC list have passed a written exam and a candidate physical ability test within the past year, minimizing the local recruitment and vetting process for the district. Job openings are distributed to all candidates on that list. All are EMT & FF-I qualified, actively pursuing careers in fire service. As a result of this program, AFPD received 45 qualified applicants for its most recent opening. AFPD is the only local agency in Amador County eligible to participate. Additional benefits of the CALJAC program are access to the eligibility list, training resources, student contact hours, etc.

The District reported that revenue from Measure M and the formation of a community facilities district which collects a special tax for fire protection services provided by AFPD has made it possible to hire paid fire suppression personnel and as such, the District began paying some personnel in October 2010.

Additional information related to staffing may be added to the final MSR.

### AFPD Training and Accreditation

The Amador Fire Protection District (AFPD) prides itself on maintaining training standards throughout the organization from the newest recruit to the Fire Chief. In 2020, the AFPD Fire Chief received International Accreditation as a Chief Fire Officer (CFO) through the Center of Public Safety Excellence (CPSE), placing the fire chief among only 1,546 fire service professionals to achieve and maintain this designation world-wide. CPSE helps high-performing fire department and emergency services professionals in their efforts to continuously improve. Accreditation demonstrates accountability through a rigorous third-party review, verification and validation process and a self-assessment. It is an international recognition of achievement, through peer review by the Commission on Fire Accreditation International (CFAI) by CFAI's experienced peer assessors.

This accreditation affirms AFPD as an organization that is community-focused, data-driven, outcome-focused, strategic-minded, well organized, properly equipped, and properly staffed and trained.

AFPD firefighting personnel at a minimum are California State Certified Firefighter 1, licensed Emergency Medical Technicians (EMT), capable of providing expanded scope care, including the use of airway adjuncts and the ability to administer epinephrine and naloxone. Some personnel are licensed paramedics and AFPD is currently pursuing accreditation to provide Advanced Life Support (ALS) services, completing some preliminary steps. Furthermore, AFPD operational personnel participate in an annual physical performance assessment.

Initial training for firefighting in the District is an 8-week basic recruit academy course (320 hours) on hiring. State-mandated training is provided by or through AFPD, including medical and hazardous materials training. The District provides emergency vehicle operation training in-house; drivers must take this course no less than once every two years. AFPD battalions each have scheduled training one day per week. Volunteer firefighters training is held weekly.

All personnel complete the majority of mandated training (i.e., Harassment Prevention, Drug and Alcohol-Free Workplace, HIPPA, etc., via the district's web-based training platform. Personnel also receive specialized training from both District-hosted and outside classes, such as Swiftwater Rescue technician courses, Confined Space technician courses, various wildland firefighting courses, and Incident Command courses.

The payment policy for call (volunteer) firefighters is a flat reimbursement of \$15 per response. These funds are a stipend intended for undocumented expenses and are paid twice annually.

Over the last four years, turnover has included 8 personnel, slightly more than 10% attrition. Four former staff have requested reinstatement the past year.

Recruitment of local volunteer call firefighters is accomplished through advertisement in the local newspaper, social media and local cable station. Most call firefighters are recruited by friends and personal contact. Many recruits are young people looking for a career that might result from their volunteer efforts.

### Fire Investigation Program

AFPD participated in a first-ever statewide National Fire Investigation Academy this past March 2021 in Fresno California. The training was four-weeks in length and taught mostly by certified master fire investigators. There were 30 participants from various fire departments throughout the State. The classes covered all aspects of fire investigations from structures to wildland fires. This academy taught the participants the role of and legal obligations to appropriately apply the 16 steps outlined in the National Fire Protection Association Standard 1033, Professional Qualifications for Fire Investigator, necessary to enforce the California Health and Safety Codes. Court procedures for charging an individual with arson were included in the curriculum.

### National Fire Marshal Officer Recognition

The Deputy Fire Marshal (DFM) has initiated the process to be recognized through the Commission of Professional Credentialing, an entity of the Center for Public Safety Excellence (CPSE). The Commission on Professional Credentialing (CPC) offers five distinct designations covering various levels and specialties of fire officers. The Fire Marshal designee is considered one of those designations. The District's DFM has started the documentation process for his portfolio based on his 26 years of experience and education and will submit his application to the Center of Public Safety Excellence.

### Defensible Space

The County has drafted a defensible space ordinance based on Assembly Bill 38, Wildland Mitigation, and Title 14, State Minimum Fire Safe Regulations. The ordinance is currently being considered by the Amador County Board of Supervisors, with adoption expected later this year (2021). AFPD is responsible for over 85% of the unincorporated area of Amador County and will play an important role in enforcing the proposed ordinance once adopted. The ordinance will require a fire inspection to be conducted in areas identified as high or very high fire hazard severity zones as part of the sale of properties to ensure the home is in compliance with the adopted vegetation management requirements. This ordinance will also apply to new construction to ensure a fire clearance around the structure prior to occupancy. AFPD has formed a committee to establish a policy and procedures for the implementation of the ordinance and will consider the possible need of additional staffing or increased workloads, training, and any fiscal impact of the ordinance.

### Community Risk Reduction Efforts

The Safe Surrender program began in 2006 and is operated through the California State Social Services Department. The program allows mothers to safely surrender a newborn without legal repercussions. Over 5,000 Fire Departments nationwide support and offer this program. Sutter Amador Hospital was the only Safe Surrender Baby site in Amador County prior to AFPD becoming a participant. AFPD is listed as a Safe Surrender site on the California Department of Social services website. Safe Surrender signs are posted on the exterior of all involved stations; 111, 114 and 122.

The National Child Passenger Safety Program is part of Safe Kids Worldwide offering events all over for free child car seat (child restraint systems) checks and installation. While there are 43,000 nationally certified technicians throughout the United States, there are only three CPST's (Child Passenger Safety Technicians) in Amador County. One of these is an

AFPD employee. This employee is in the process of getting certified to be an instructor and will be able to teach the intense 5-day course to AFPD staff and others to increase the number of certified technicians available within the county. A CPST is an advocate/resource in their communities for education and hands-on assistance with the proper use of a child restraint systems and seat belts. A majority of parents still misuse their child restraint and need help to get it legal and get it installed correctly. AFPD is listed under “Find a Tech” on the National Child Safety website. (NHTSA Certified – cert.safekids.org)

AFPD offers Firewise Community Education and Preparedness Presentations. “The national Firewise USA® recognition program provides a collaborative framework to help neighbors in a geographic area get organized, find direction, and take action to increase the ignition resistance of their homes and community and to reduce wildfire risks at the local level. Any community that meets a set of voluntary criteria on an annual basis and retains an “In Good Standing Status” may identify itself as being a Firewise® Site.” – ([https://www.nfpa.org/Public-Education/Fire-causes-and-risks/Wildfire/Firewise-USA.](https://www.nfpa.org/Public-Education/Fire-causes-and-risks/Wildfire/Firewise-USA))

Deputy Fire Marshall Pat Chew and Risk Reduction Specialist Kayla Dale have worked together by opening the door through education and enlightenment of the wildfire dangers and what one can do in their own home to better prepare themselves before the event of a fire. Additionally, they help encourage community members to form a Firewise board and meet monthly to get nationally registered. AFPD is proud to say they have helped three communities successfully accomplish the task of becoming Firewise.

### Regional Collaboration

The District’s goal is to fully participate in local and State mutual and automatic aid systems.<sup>20</sup> AFPD collaborates with other fire providers in the County through the Amador Fire Protection Authority and previously through the Amador Plan Agreement and had cooperative agreements for the staffing of district-owned apparatuses.

AFPD has a master Amador County Mutual Aid Agreement between AFPD, City of Ione, City of Jackson, JVFPD, LFPD, SCFPD, and CAL FIRE. The agreement states that it is of mutual benefit to each party in some circumstances, if mutually the services of the fire department of one party were extended to the aid of another party.<sup>21</sup> The parties to the agreement therefore agree to respond to emergencies outside their jurisdictional boundaries and within the jurisdictional boundaries of the other.<sup>22</sup> The mutual aid agreement allows the best and fastest emergency response with the highest possible levels of service regardless of jurisdictional boundary.

Amador Fire Protection District actively participates in mutual aid response to emergencies throughout the state of California. These emergencies elsewhere are predominantly catastrophic wildland fires, however in 2021, personnel were assigned to assist with COVID-19 surge staffing in Los Angeles County. Mutual aid responses to wildland fires often consist of engines and water tenders staffed with qualified personnel. Several of the District’s personnel also have overhead qualifications through the California Incident

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<sup>20</sup> AFPD, *Capital Improvement Plan: 2007-08*, 2007.

<sup>21</sup> Amador County Mutual Aid Agreement.

<sup>22</sup> Ibid.

Command Certification System and respond as mutual aid resources in that capacity. The District has two qualified and two trainee Engine Strike Team Leaders, one Division/Group Supervisor trainee, one Heavy Equipment Boss trainee and one qualified Equipment Time Recorder. In 2018-2021 the District had 21 equipment responses and 14 overhead responses to CAL OES requests.

In 2021 AFD became an Apparatus Assignee. The California Governor's Office of Emergency Services (Cal OES) manages a statewide fire and rescue program, providing apparatus on loan to local fire departments for use in their districts, while requiring those departments to staff the vehicles for the state when needed. Cal OES purchases the apparatus fully equipped, then assigns them to local governments and fire agencies on temporary-use agreements where the state never relinquishes control of the vehicles. The agencies agree to staff the vehicles anywhere and anytime that are needed, whether in state or across the nation.

The program has been in place since 1950, when it was run under the federal Civil Defense Program. California is the only state in the country still running this program and it is the cornerstone of California's fire and rescue mutual aid system. AFD participates in addition to maintaining proper staffing levels at the fire stations during fire season.

As previously mentioned, AFD also has an automatic aid agreement in the form of payments to Kirkwood Meadows Public Utility District and a contract with the Jackson Rancheria Casino Hotel and Resort. Additionally, AFD has a formal mutual aid agreement dating to 2019 with El Dorado Hills County Water District in El Dorado County and a Joint Operational Agreement (JOA) to share personnel, apparatus and resources with Pioneer FPD in El Dorado County.

AFD participates in two joint powers authorities, including Amador Fire Protection Authority and Fire Agencies Self Insurance System (FASIS). AFD now also provides staffing to the Amador Fire Protection Authority to improve transparency and accountability for that JPA.

AFD staff manages and oversees the assessment collection and administration program for the Community Facilities District fire fee revenue are correctly collected and allocated, including these assessments for the other fire providers.

The District is also a member of the Fire Districts Association of California, National Fire Protection Association, International Code Council, and Amador County Fire Chiefs Association.

### *Dispatch and Communications*

All 911 calls made from landlines in Amador County are automatically routed to the Amador County Sheriff's communication center in Jackson (the Public Safety Answering Point, PSAP). Cell phone 911 calls are answered by the California Highway Patrol in Stockton, and then are routed to the Sheriff. Fire and EMS calls are routed from the PSAP to CAL FIRE's Camino Interagency Command Center, which in turn dispatches appropriate responders. AFD is dispatched to all calls within its primary response area.

All fire providers in Amador County, including AFD, communicate through the same radio systems. Due to shared radio frequencies, AFD is able to communicate with other providers. When multiple service providers respond to an incident, the first unit to arrive



on scene is responsible for incident command. The incident commander will give the dispatch center a report on conditions at the scene and the personnel and equipment needed to mitigate the situation. The dispatch center then modifies the initial dispatch by cancelling resources en route or notifying additional providers to respond to the scene. For incidents such as vehicle accidents, law enforcement is responsible for incident coordination once it arrives on scene through universal command protocols; prior to law enforcement arriving on scene, the first fire provider responding remains responsible for incident command.

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## Location

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Amador Fire Protection District (AFPD) is responsible and obligated to provide services to all the unincorporated areas of Amador County with the exclusion of the Jackson Valley, Lockwood and Sutter Creek Fire Protection Districts. Furthermore, AFPD provides services to portions of the El Dorado National Forest by agreement with the United States Forest Service (USFS). Although there are significant shared responsibility areas with Cal Fire, which provides services to all of California's State Responsibility Area (SRA), SRA is defined as those lands designated by the State Board of Forestry where CAL FIRE has the primary responsibility for wildland fire protection. AFPD has the primary protection responsibility for all structures on private property within the unincorporated areas of their District, exclusively within Amador County, AFPD provides coverage of these responsibilities through a Countywide Mutual Aid Agreement and a Statewide Master Mutual Aid Agreement.

Portions of AFPD's boundaries are served by other fire providers through automatic aid and mutual aid agreements. AFPD is also the first responder in some areas within the boundaries of other fire providers.

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## Infrastructure

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AFPD operates seven fire stations across the County: two in Pioneer (Stations 111 and 112), one in Pine Grove (114), two in Plymouth (121 and 122), and one in Fiddletown (123). The District owns four of the seven stations, leases one (122) from the City of Plymouth as part of contractual services to the City, and occupies two others owned separately by Pine Grove Community Services District (114)). The District-owned station in Plymouth (Willow Springs area) and both stations in Pioneer are in good condition. The Fiddletown station was built in 2005 and is in excellent condition, currently under construction for an ADA bathroom and shower.

Stations 121, 123, and 112 are not regularly staffed and are used mainly by volunteers/call fire fighters.

A new station is planned in the Pine Grove area near the intersection of Mt. Zion Road and SR 88. The District owns land and has had design work done. Its construction date is dependent on identifying a financing source, as the estimated cost to build is \$3-4 million at this time. The District maintains an interest in having an additional station, which could be in the Martell area. The centrally located Martell station would also serve as a training center and emergency operations center.

In conjunction with the Nexus study, the District expects to develop an acquisition schedule to address their infrastructure needs. Opportunities for future shared facilities



at the planned station in Pine Grove include possible partnerships with American Legion Ambulance, Amador County Sheriff, and Pine Grove CSD.

AFPD relies primarily on fire hydrants and reservoirs to refill its water tenders during firefighting incidents. There are fire hydrants in Martell, Pine Grove, Pioneer, Plymouth, River Pines, Drytown, Volcano and Fiddletown. New wineries and other developments are required to install appropriately sized water tanks for fire flow purposes.

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## Service Adequacy

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There are two general indicators of service adequacy for municipal fire providers: ISO rating and response times. The Insurance Service Office (ISO), an advisory organization, classifies fire service in communities from 1 to 10, indicating the general adequacy of coverage, with ISO of 1 being the highest rating. Communities with the best systems for water distribution, fire department facilities, equipment and personnel, and fire alarms and communications receive a rating of 1. The District achieved a rating of 4/4 as of the last grading, significantly improved over the prior rating of 6/8.

Forty percent of the ISO rating criteria is related to water resources and water distribution systems. AFPD has un-watered areas within the district. Fifty percent is related to staffing, training, testing and equipment. The remaining 10% is related to dispatch and other factors not within an individual district's control.

Emergency response time standards vary by level of urbanization of an area: the more urban an area, the faster a response is required. The response time guideline established by the California EMS Agency is five minutes in urban areas, 15 minutes in suburban or rural areas, and as quickly as possible in wilderness areas. The District's primary response zone includes suburban, rural and wilderness classifications.<sup>23</sup> AFPD has not adopted a response time standard. AFPD's goal is to meet the NFPA's standards but average response times may not represent a meaningful estimate of effectiveness.

There are no nationally adopted Fire and Emergency Medical Services (EMS) response time standards. However, the National Fire Protection Association (NFPA) provides a consensus recommended standard for rural, urban, sub urban and wilderness response, NFPA Standard 1710 establishes benchmark time goals for 90% of dispatched calls by call type. Call types are divided into EMS and Fire. "Response time" consists of "turnout time" and "travel time" to the call. AFPD has response time goals that are consistent with NFPA's rural goals and is conducting a fractile measurement of performance. The response goals that AFPD has adopted is similar to NFPA and is as follows: Given a one minute call processing time at the dispatch center, a one minute turnout time and seven minute travel time. AFPD's goal is to arrive at EMS responses within 9 minutes of receipt of a call, 90% of the time. Given a one-minute call processing time at the dispatch center, a one minute turnout time and nine minute travel time that we arrive to fires within 11 minutes, and have as many as six firefighters on scene within 15 minutes of receipt of a call, 90% of the time, with a performance goal of containing structure fires to the building of origin and wildland fires to 5 acres or less 80% of the time. AFPD plans to measure performance of this goal and report performance annually to our governing board. Furthermore, AFPD hopes to

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<sup>23</sup> Mountain Valley EMS, *Amador County Ambulance Grid Map*.

ultimately adopt a District response time standard by board resolution. Response time standards are rare among California Fire Agencies, although a core competency requirement of fire agencies pursuing International Accreditation through the Center of Public Safety Excellence (CPSE).

AFPD has achieved greater efficiency in the provision of services through reorganization into three battalions. Battalion 20 has 3 stations, Battalion 10 operates three, and Battalion 30 (Rancheria) has two companies and one station.

The District reported that it is the expressed desire and goal of AFPD to consolidate local government fire services in Amador County into one agency. As such, AFPD has discussed the possibility of consolidation or contract for services with the City of Jackson, Lockwood FPD, Sutter Creek FPD, Pioneer FPD and Kirkwood Meadows PUD. The discussions have not resulted in any actions to date.

**Figure 9-1: AFD Fire Profile**

Fire Service				
<b>Service Configuration</b>			<b>Service Demand</b>	
Fire Suppression	Direct		Statistical Base Year	2020
EMS	Direct		Total Service Calls	2,888
Ambulance Transport	American Legion		% EMS	60%
Hazardous Materials	Calaveras and San Joaquin <sup>1</sup>		% Fire(structure&wildland)	4%
Air Rescue & Ambulance Helicopter	CHP, Private		% Hazardous Material (no fire)	2%
Fire Suppression Helicopter	CAL FIRE		% Other (Public Assist. etc)	31%
Public Safety Answering Point	Sheriff		% False Alarm	2%
Fire/EMS Dispatch	CAL FIRE		Calls per 1,000 people	not provided
<b>Service Adequacy</b>			<b>Resources</b>	
ISO Rating <sup>2</sup>		4/4y	Fire Stations in District	7
Median Response Time (min)		7:30	Fire Stations Serving District	7
90th Percentile Response Time (min)		11	Sq. Miles per Station <sup>3</sup>	53.4
Response Time Base Year		2020	Total Staff <sup>4</sup>	58
<b>Training</b>			Total Full-time Firefighters	30
<p>New career personnel attend an eight-week academy upon hiring. Newly hired career Firefighters are enrolled as apprentices in the California Firefighters Joint Apprenticeship Council. Initial training volunteer personnel consists of both the State Fire Marshal Firefighter 1 certification task book as well as an internal Firefighter task book. Continued training for career staff consists of an annually developed daily training schedule which consists of two hours of training to be completed each day. Volunteer personnel receive continued training via weekly drills. Two of these drills are hosted each week and personnel are welcome to attend either of these. All personnel complete the majority of mandated training (i.e. Harassment Prevention, Drug and Alcohol Free Workplace, HIPAA, etc.) via the Districts web-based training platform. Personnel also receive specialized training from both District-hosted and outside classes. These courses include but are not limited to Confined Space REscue Technician, Swiftwater Rescue Technician and various wildland firefighting and Incident Command Courses.</p>			Total Call/Volunteer Firefighters	47
			Total Sworn Staff per Station <sup>5</sup>	8
			Total Sworn Staff per 1,000	3.2
<b>Service Challenges</b>			Staffing Base Year	2021
Maintaining and recruiting a sufficient and diverse pool of volunteers is challenging.			Fire Flow Water Reserves <sup>6</sup>	NP
<b>Facilities</b>				
<b>Station</b>		<b>Condition</b>	<b>Staff per Shift- To be updated</b>	<b>Apparatus- to be updated</b>
Station 111	26517 Meadow Dr., Pioneer, CA 95666	Good	Staffed full-time, 2 per shift	Engine, Squad & WT
Station 112	23770 Van de Hei Ranch Rd., Pioneer, CA 95666	Good	Unstaffed	2 Engines, Water tender, Squad
Station 114	19840 Highway 88, Pine Grove, CA 95665	Fair	Staffed full-time, 2 per shift	2 Engines, 1 Squad
Station 116	Public Safety Building 15601 Dusty Lane Jackson, CA 95642	Good	Staffed full-time, 2 per shift	2 Engines
Station 121	16850 Demartini Rd. Plymouth, CA 95669	Good	Unstaffed	2 Engines, Water tender, Squad
Station 122	18534 Sherwood St., Plymouth, CA 95669	Fair	Staffed full-time, 2 per shift	2 Engines, Water tender
Station 123	14410 Jibboom St. Fiddletown, CA 95629	Good	Unstaffed	2 Engines, Water tender

## Fire Service, continued.

### ***Infrastructure Needs and Deficiencies***

New fire stations are scheduled to be built: one in Pine Grove in FY 15 if financing is secured and one in Martell in FY 17. Three new engines have been received since 2013.

### ***Facility Sharing***

**Current Practices:** Station 123 in Fiddletown is open to the community for polling and election events.

**Opportunities:** There are many opportunities associated with the planned stations in Pine Grove and Martell, including partnerships with American Legion Ambulance, Amador County Sheriff and PGCSO. AFPD is amenable to county-wide fire district consolidation.

### ***Mutual & Automatic Aid Agreements***

Master Amador County Mutual Aid Agreement with City of Ione, City of Jackson, JVFPD, LFPD and SCFPD. Automatic aid agreement with KMPUD consisting of payments to compensate the District for increased insurance costs for its primary response area. AFPD also has an informal mutual aid agreement with El Dorado County and Pioneer Fire Protection District.

Notes:

(1) Amador County has an MOU with Calaveras County and a secondary MOU with San Joaquin County for Hazmat services.

(2) AFPD has an ISO rating of 4 for areas within 1,000 feet of a hydrant and a rating of 4Y in areas without a hydrant.

(3) Primary service area (square miles) per station.

(4) Total staff includes sworn and no-sworn personnel, battalion chief, deputy fire marshal and administrative staff.

(5) Based on ratio of sworn full-time and call staff to the number of stations. Actual staffing levels of each station vary.

(6) Reserves include public and private water sources.

## SUMMARY OF FINDINGS & DETERMINATIONS

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### Growth and population projections

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- ❖ AFPD serves 85% of the unincorporated area in the County. Growth in AFPD's boundary area since 2010 was moderate at 4.04 percent.
  - ❖ Moderate growth is expected to continue, through proposed and approved residential applications, nearby community growth, and general tourism.
  - ❖ AFPD successfully serves a diverse range of uses, including urbanized areas, one city, unincorporated communities and town centers, undeveloped areas, and commercial and industrial uses. These areas include a number of high fire risks.
  - ❖ New residents and businesses may desire or expect higher levels of fire and emergency service than that historically provided throughout the county.
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### The Location and Characteristics of Disadvantaged Unincorporated Communities Within or Contiguous to the Agency's SOI

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- ❖ There are three disadvantaged unincorporated communities within the District's boundaries based upon mapping information provided by the State of California Department of Water Resources. The identified communities are River Pines, Drytown, and Martell.
  - ❖ All are legacy communities under DWR standards. The District, along with other regional providers, does provide services for fire and emergency response to disadvantaged communities on the same basis and at the same levels as those services provided within the cities and within the District boundaries.
  - ❖ With reference to LAFCO Policy 7.6, services provided by AFPD are adequate and equivalent to those services provided within city boundaries.
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### Present and planned capacity of public facilities and adequacy of public services, including infrastructure needs and deficiencies

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- ❖ AFPD offices are open and staffed during all normal business hours in the County Administration Center.
- ❖ Amador Fire Protection District (AFPD) has the only organized labor workforce in Amador County among the local government fire agencies. Volunteers are well trained, supervised and managed. Testing standards are extensive.
- ❖ AFPD plans to expand its capacity in Pine Grove to address current and anticipated growth. The locations of additional fire stations in the more

densely populated western part of the county should be coordinated among fire providers to maximize efficiencies and benefits to citizen within and outside AFPD.

- ❖ Proposed and current planning efforts by the district will help enable it to respond to future demand for services.
- ❖ Numerous state and national programs provided through AFPD significantly benefit all county citizens/residents, including those in other fire and emergency service agencies.
- ❖ The Amador Fire Protection District (AFPD) maintains policies, practices, protocols and procedures that are current, legally compliant, and represent industry best practices.
- ❖ Available new public services from AFPD include, or will soon include:
  - Child Passenger Safety Technicians (CPST) and a CPST instructor;
  - Promoting and assisting the formation/registration of Firewise Community organizations (three new Firewise Communities registered);
  - Establishing Safe Surrender Baby sites, in addition to Sutter Amador Hospital;
  - Deputy Fire Marshall and Fire Investigator; and
  - Accreditation to provide Advanced Life Support (ALS).

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### Financial ability of agencies to provide services

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- ❖ Financial information from the District is available, easily understood, and demonstrates accountability to the public. Reserves for six months of operating expenses are adequate.
- ❖ Amador LAFCO anticipates preparing a detailed financial analysis of all fire service providers in 2021. Determinations regarding financial matters for fire service providers will be made when that comparative information is known.
- ❖ AFPD utilizes a wide range of available revenue sources. It has the current capacity to serve its district constituents. However, available finances may not provide for desired staffing levels at all staffed stations.
- ❖ The structure and allocation of Measure M funding as currently administered does not enhance cooperation among fire agencies and may contribute to competition for funding. The failure of AFPA to fulfill its mission as detailed in the Grand Jury Report of 2019-20 further undermines collaboration and operational efficiencies.
- ❖ AFPD uses budget for near-term financial planning efforts; five-year capital improvement plan (CIP); and expects to conduct a future community-based strategic planning effort as part of its best practices program.



- ❖ AFPD realizes significant staffing benefits through California Joint Apprenticeship Committee (CALJAC). AFPD is the only local agency in Amador County eligible to participate. Open, continuous recruitment for pre-qualified district firefighters occurs through CALJAC. Additional benefits of the CALJAC program are access to the eligibility list, training resources, student contact hours, etc.
- ❖ The District effectively recruits, retains and relies on volunteers for some of the services it provides. While this is currently a cost-effective arrangement, the long-term availability of able volunteers can be uncertain and could affect the sustainability of service provision.
- ❖ AFPD effectively provides support services to other fire providers and also supports the services provided by other government agencies through contracts, agreements and cooperative efforts.
- ❖ Reorganization and/or consolidation of services with those agencies may further improve the financial ability of AFPD and all fire service providers to offer the highest level of services at the lowest possible cost to citizens.
- ❖ Revenue and funding for all Amador County fire protection providers is unlikely to be adequate in the long term and would not accommodate increases in service demand.

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### Status of, and opportunities for, shared facilities

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- ❖ AFPD absorbed fire services from Pine Acres Community Services District, Pine Grove Community Services District, Volcano Community Services District, and CSA 1.
- ❖ AFPD collaborates with other fire providers in the County through membership in Amador Fire Protection Authority, as well as extensive automatic aid and mutual aid agreements.
- ❖ Opportunities for sharing and cost efficiencies could be enhanced through an enhanced role of Amador Fire Protection Authority (AFPA).
- ❖ Cost efficiencies will result with greater cooperation and sharing among existing fire protection agencies. Reorganizations or functional consolidations could allow higher levels of service at lower total cost to citizens/residents throughout Amador County.
- ❖ The similarity of challenges faced by each fire protection agency, and the potential cost savings offered by consolidation or reorganization suggest that fire agencies will need to consider opportunities for reorganization of services and boundaries, including functional consolidation where possible.
- ❖ Consolidation/reorganization or further functional consolidation with other fire service providers will likely offer increased opportunities for shared resources, including facilities and vehicles, as well as pooled finances to hire full-time staff.

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## Accountability for community service needs, including governmental structure and operational efficiencies

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- ❖ AFD demonstrated accountability and transparency by promptly disclosing financial and service-related information in response to LAFCO requests.
- ❖ The District achieved an ISO rating of 4/4 as of the last grading, significantly improved over the prior rating of 6/8.
- ❖ AFD has achieved greater efficiency in the provision of services through internal reorganization into three battalions.
- ❖ AFD effectively uses its website and social media to reach a large number of citizens, to communicate and educate the public.
- ❖ Job descriptions and written internal task assignments for all admin staff are clearly defined, however, hours budgeted may be insufficient time allocations for the scope and difficulty of these tasks.
- ❖ Historically, volunteerism and the close cooperation among the agencies enhanced the level of service provided.
- ❖ There has historically been a close working relationship among the fire providers in Amador County. The similarity of challenges faced by each agency and potential cost savings offered by consolidation or reorganization suggests that fire agencies will need to review opportunities for reorganization in some form, including functional consolidation.
- ❖ AFD's network of services and service support functions with other fire and emergency providers affirm that reorganization and/or consolidation, including functional consolidation, is a feasible option.