
AGENDA ITEM # 9

TO: ALL COMMISSIONERS, ALTERNATES
FROM: BYRON DAMIANI, JR., EXECUTIVE OFFICER
SUBJECT: EXECUTIVE OFFICER'S REPORT AND RECOMMENDATION - AMADOR FIRE PROTECTION DISTRICT REORGANIZATION
LAFCO PROJECT #341; RESOLUTION #2024-3
DATE: MEETING OF SEPTEMBER 19, 2024

DESCRIPTION OF PROJECT

This proposal is for reorganization of the Lockwood Fire Protection District (LFPD) and the Amador Fire Protection District (AFPD) to annex LFPD into AFPD, to dissolve LFPD, and to designate AFPD as the successor agency to LFPD. LAFCO project #341 is the reorganization of LFPD including multiple changes. (Note that LAFCO Project #342 was the original number for the AFPD portion of the project, but state law allows multiple actions to be combined as a reorganization under one project number). Substantially similar resolutions have been adopted to initiate the project by the respective boards, and are essentially mirror images of each other – the LFPD project proposes that fire protection and emergency medical services cease being provide by LFPD and instead be provided by AFPD through extension of those services by AFPD into the LFPD jurisdiction (accomplished by annexation) , and the AFPD project proposes extension of fire protection and emergency medical services into LFPD territory and via annexation. Therefore, these projects are combined under Government Code §56073 into the current proposal under the original LFPD Project #341. All matters included in former project #342 (the AFPD proposal) are incorporated and included herein.

To summarize, this proposal for reorganization will annex the entire Lockwood Fire Protection District into the Amador Fire Protection District, dissolve LFPD, and designate AFPD as the successor agency. Associated Sphere of Influence (SOI) projects are shown elsewhere in this agenda. LAFCO Project #343 is an amendment to the AFPD SOI to extend the AFPD SOI into the LFPD SOI. That project was approved by the Commission September 19, 2024. LAFCO Project #344 is an amendment to the LFPD SOI to reduce that SOI to zero. That project was also approved by the Commission September 19, 2024.

PART 1 – LFPD ANALYSIS

LOCATION (ALSO SEE ATTACHED MAPS)

LFPD bounds cover unincorporated territory in north-central Amador County. The bounds encompass approximately 22 square miles along the central Amador-El Dorado County line. LFPD is located east of the unincorporated Fiddletown community and north of Volcano. LFPD does not include those two

unincorporated communities. The District's bounds generally follow Shake Ridge Road, extending from Quartz Mountain Road to the CalFire Fire Station at Dew Drop. LAFCO has no records of annexations or changes to the District's bounds since its formation. The boundaries have been verified based on recorded legal descriptions. The sphere of influence for LFPD was reaffirmed in 2020.

The LFPD Sphere of Influence (SOI) is not coterminous with the district boundaries. The LFPD SOI was reaffirmed by the commission February 20, 2020. It includes "all territory within the District's boundary, lands generally within the CalFire designated "Zone of Influence" for Lockwood Fire Protection District and other nearby lands which are currently receiving service or are likely to receive emergency services from Lockwood Fire Protection District" (LAFCO Resolution 2010-07). The SOI includes some areas that are within the AFPD boundaries where Lockwood has historically had more direct access for fire suppression.

The LFPD SOI was originally establish June 24, 2010 (Project #266, LAFCO Resolution 2010-07) and reviewed and reaffirmed without change by the commission February 20, 2020.

PURPOSE

The purpose of the annexation is to improve protect public safety, stabilize finances for the provision of services in the affected area, increase, stabilize, and ensure the long term viability of fire protection and emergency medical services to the area within LFPD boundaries, and to dissolve LFPD and designate AFPD as the successor agency.

CEQA

The reorganization is a change of local government organization that will result in no changes in the areas where previous powers were exercised. There is no possibility that the action taken by the Commission may have a significant effect on the environment. The Class 20 exemption is appropriate for the proposed reorganization, and enables local government reorganizations requiring no changes in the areas where previous powers were exercised to be exempt from the provisions of CEQA. The project is therefore exempt as a Class 20, Categorical Exemption under CEQA (Section Sec. 15320(b) of the Public Resources Code). A notice of exemption is attached.

DISCUSSION AND BACKGROUND: RECENT HISTORIES

RECENT FINANCIAL HISTORY

LFPD receives funds primarily from Measure M (sales taxes) and from an annual assessment imposed on constituents in the district of \$40 for unimproved real property and \$70 for improved real property. The assessment has not been increased since its inception in 2002.

LFPD has experienced significant financial shortfalls in recent years. Staff has reviewed annual budgets for LFPD from 2016 through the current budget (fiscal year 2024-25), as well as current fund balances maintained by the county auditor (as of May, 2024). Every budget reviewed projected a deficit. Those budgets have averaged anticipating approximately \$248,000 in income and have averaged anticipating

operating expenses of approximately \$270,000. These averages exclude strike force income which varies dramatically. Strike force income results from payments for staff loaned out to other fire protection entities and rental of equipment loaned out to other entities for fire protection outside of the district. Strike force income has varied from \$2,481 in Fiscal 2016-17 to \$380,725 in Fiscal 2021-22.

The volatility of the annual budgets makes it difficult predict future expenses and income, so the better measure of financial viability is review of actual account balances, as these are not entirely expended year to year and analysis is more likely to reveal overall financial status.

The balances of the general operating fund for the period Fiscal 2016-17 to current have fluctuated significantly, largely due to strike force income which has fluctuated significantly as cited above. However, the overall trend of the general fund is approximately holding even, despite significant spikes in income due to strike force income. For example, the general fund balance at the end of Fiscal 2016 was \$108,383. As of May 2024 it was \$104,151, despite reaching a high of \$452,731 in 2021. Significant money was spent to refurbish aging equipment in 2021 and 2022, enabled by large strike force revenues, but that history highlights the fact that ongoing equipment expenses still take priority over building reserves needed for long term viability of the district, and cannot be accomplished in normal years without relying on unusually large strike force income.

The Measure M funds balance, which may only be used for personnel expenses such as stipends, salaries, workers compensation insurance, and the like, was \$485,166 in 2016, and has generally trended downwards, to the May 2024 balance of \$246,083.

Budget report summaries, fund balances, revenues, and surplus/loss data is summarized below:

Budget report	Deficit	Surplus
Jun-16		33162
Jun-17	72896	
Jun-18		71351
Jun-19		86421
Jun-20	8856	
Jun-21		45733
Jun-22	184839	
Jun-23	190336	
Jun-24		54456
TOTAL	456927	291123

FUND BALANCES

General Fund, Capital Improvement Fund, and Measure M Balances for Lockwood Fire Protection District

End of Fiscal year each June	year 2016	year 2017	year 2018	year 2019	year 2020	year 2021	year 2022	year 2023	year 2024
General Fund	108282	60207	57771	136333	149512	452731	251125	108649	104151
Capital Improvement fund	24858	35890	70658	80877	89797	126795	1328	36773	72633
Measure M	485166	461647	491991	488556	464142	322181	332420	250004	264083
cash	2500	2500	4500	35399	46904	46904	270	3441	3441

Total		620806	560244	624920	741165	750355	948611	585143	398867	444308
Revenue	Jun-16	2017	2018	2019	2020	2021	2022	2023	May-24	
Assessments	72385	68538	70963	70566	70492	71525	69824	70618	68993	
Measure M	151265	138754	155734	158517	153964	144257	236089	190254	180857	
Strike force	2481	21647	20617	63769	74507	380725	87205	69302	14305	
Total	248966	239378	255331	303380	312625	607652	397899	339753	264155	
Less strike team	246485	217731	234714	239611	238118	226927	310694	270451	249850	

Average annual revenue \$248,247 Average total expenditures budgeted annually \$270,000

As of June each
year

	2016	2017	2018	2019	2020	2021	2022	2023	2023
Measure M surplus/loss	23826	-40730	30942	-9093	-65091	-142186	22805	-62083	
Total actual surplus/loss	33162	-72896	71351	86421	-8856	45733	-184839	-190336	

Total actual surplus/loss for each year, as distinct from budgeted surplus/loss, for the entire budget, including Measure M surplus or loss.

PAST MUNICIPAL SERVICE REVIEW FINDINGS AND RECOMMENDATIONS

The 2008 Municipal Service Review (MSR) found that the LFPD operates on a minimal budget, that it could not purchase another needed vehicle or personal protective equipment due to financing constraints, meaning that it cannot hire and equip any additional call firefighters, and that additional financing would be needed if the community wishes to increase the service level.

The 2014 MSR found that again, LFPD operates on a minimal budget, that additional funds are necessary to hire and equip any additional call firefighters and purchase major apparatus needed in the future, and that LFPD should consider updating its assessment and ensuring the assessment adjusts with inflation to recover costs.

The 2014 MSR also found that:

1. LFPD effectively supports 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 LFPD and other participant fire service providers to offer the highest level of services at the lowest possible cost to citizens.
2. 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.
3. There is 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.

The 2019 MSR again suggested that LFPD should consider updating its assessment and ensuring the assessment adjusts with inflation to recover costs. The MSR also found and the commission that 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, and that there is a close working relationship among the fire providers in Amador County. The 2019 MSR reiterated that 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.

Significantly, the 2019 MSR also included information from an interview with the LFPD Board President from January 2008, who stated that until stable funding in the estimated amount of \$800,000 is identified, the District cannot directly hire and equip fulltime career firefighters.

Thus, there has been a long history since at least 2008 of LFPD operating on a minimum budget and unstable funding which restricts the district's ability to increase service levels, hire full time staff and replace or obtain equipment and apparatus. These are serious challenges to adequate service delivery. Multiple MSRs have noted the need for an increase in the assessment and for consolidation or reorganization with other fire protection districts to resolve these issues.

RECENT PAST STAFFING HISTORY

Staffing levels for the district have varied considerably over the last decade or so. The 2008 MSR reported the district had 16 volunteers and a Fire Chief. In 2019 that level had shrunk to 4 volunteers. In 2022-23, under contract with AFPD, staffing levels again reached approximately 16volunteers until November of 2023. Until August, 2024, there were only four volunteers. Staffing was minimal with one person available for 8 hours a day staffing one station. That station was only open 1 to 2 days a week, and sometimes not even that many days. Service levels were compromised.

RECENT PAST COOPERATOIN AND FUNCTIONAL CONSOLIDATION

The 2014 MSR noted that LFPD had contracted with Cal Fire for shared services, which resulted in Cal Fire assisting with the staffing of LFPD fire stations and equipment. Similarly, in 2022, LFPD contracted with AFPD for a Fire Chief who served as Chief for LFPD as well as Fire Chief for AFPD. This latter arrangement continued until November of 2023. During the time Cal Fire and AFPD were contracted staffing levels for LFPD reached a total of 16 members. In the absence of these contracts, staffing fell to levels as low as 4 members, as noted in the 2019 MSR, and recent experience for LFPD since November 2023. Significant benefits became apparent when LFPD was functionally consolidated with Cal Fire or AFPD. For example, there was substantially more staff available, more training for that staff, higher levels of service in terms of hours that the fire stations were open and staff, greater ability to respond to mutual aid situations, and a greater ability to generate strike force income because there

was more staff available for those duties.

CURRENT SERVICES SITUATION

Limited staffing is not necessarily dependent only on finances, as the staff are generally volunteers, however, lower staffing levels have a domino effect that results in limited hours of operation, and inability to fully respond to district calls, mutual aid obligations , or to send staff out for strike force duty.

As of July 19, 2024, a new contract has been signed with AFPD to provide a Fire Chief again, similarly to the contract in 2022-23 and it is anticipated that staffing levels will improve. The contract anticipates annexation of LFPD into AFPD.

The overall picture of LFPD in its present state without the functional consolidation with AFPD is one of limited hours of operation, minimal reserves for any major maintenance, instability of funding, insufficient funding, aging equipment, general lack of resources, training, experience, and inability to fully respond to district calls, mutual aid obligations , or to send staff out for strike force duty. Thus, in the long term, without the functional assistance of AFPD, service provision is compromised.

ASSESSMENT INCREASE VERSUS ANNEXATION

The original assessment of \$40 for vacant land and \$70 for improved property has remained unchanged for over 20 years. The district recently surveyed its constituents regarding their views on increasing the assessment to approximately \$200 per year for improved properties. There was a response of approximately 33% of those surveyed, and approximately 22% of those surveyed indicated they would be favorable to such an increase. Proposition 218 requires the assessment be voted on in an election and be approved by a 2/3 vote, so it is not clear that there would be sufficient support for increasing the assessment by the needed amount. Further, it is questionable whether that increase would be sufficient to build long term reserves for the district, rather than just help eliminate budget shortfalls in the near term.

Moreover, what was not asked on the survey was whether constituents would rather remain in the district with the increased assessments or be annexed into AFPD. Considering that 80% of AFPD constituents pay assessments of \$100 or less annually, it is again questionable whether constituents would vote by 2/3 margin to essentially maintain the status quo of the district's service levels at a cost of approximately triple their current assessment rather than be annexed into AFPD and obtain increased service levels for approximately half the cost of what the new annual assessment is proposed by LFPD.

The board has decided not to pursue an assessment increase at this time, and to go forward with the annexation into AFPD. Staff concurs that is the best course of action and that the substantially higher proposed assessment is not a viable alternative, especially given the recent history of functional consolidation that resulted in higher service levels compared to the current situation.

ANTICIPATED BENEFITS OF REORGANIZATION

Perhaps the best argument for, and demonstration of, the anticipated benefits of reorganization is found

by examining the recent experience of AFDP providing services to LFPD pursuant to the contract that provided Robert Withrow as the Fire Chief for LFPD, while also working as a Chief in AFDP. Under that regimen, staffing levels were 16 volunteers or more, there was substantial training, both fire stations were open, at least one was staff 24 hours a day, 7 days a week. This was essentially an exercise in consolidation, with LFPD staff and AFDP staff working together to provide service to the district, with a Fire Chief who served both LFPD and AFDP. This model provided superior service levels, staffing levels, and training levels to the scenario where LFPD operates independently on its own. There are also the added benefits of additional stable funding, equipment, and other resources that are available compared to LFPD going it alone, as well as potential savings based on economies of scale for expenses such as liability insurance and workers compensation insurance.

Moreover, with annexation there is the potential that one of the fire stations could be converted to a mechanical station to service AFDP equipment. This could result in savings in mechanical repairs and maintenance of AFDP equipment. Currently equipment servicing is outsourced, often to the Stockton area. Mechanics costs for these services are in the \$175 an hour range and equipment can often be out of area for weeks at a time for servicing and repair. Substantial savings and greater availability of equipment for AFDP are potentially available if one of the fire stations is converted to this purpose. Staff is informed by both LFPD and AFDP that adequate and appropriate fire and emergency medical services for the district can be provided from one station, assuming sufficient hours of operation.

Further, as the recent experience and prior experience circa 2008 has demonstrated, functionally consolidated services as experienced recently in the fall of 2023 and previously circa 2008 demonstrated that AFDP can provide these enhanced services (compared to LFPD alone) without any detriment to the services it provides to the current AFDP territory and residents.

Financially, Measure M funds currently directed to LFPD would be redirected to AFDP. The general fund and any other miscellaneous funds would be transferred to AFDP. These funds could be earmarked for use specifically within the newly annexed territory. The assessment paid by AFDP residents would be extended to the residents in the annexed territory. Currently, approximately 80% of AFDP residents pay \$100 or less in annual assessments to AFDP, compared to the assessments imposed by LFPD, which are \$40 and \$70 annually for unimproved and improved parcels, respectively.

Examination of the status of LFPD recently during 2023, reveals that staffing levels, training levels, availability of equipment, and the overall level of service in terms of hours of staffing the two fire stations were all enhanced and substantially superior to the most recent situation, where LFPD is functioning as a solo entity exclusively under local control. LFPD has recently reengaged AFDP via contract to provide a Fire Chief for the district until annexation into AFDP if that occurs. This is basically the same arrangement that was in place in 2022 and 2023 until November 2023, which agreement resulted in the higher staffing and training levels described above.

POTENTIAL CONCERNS OF REORGANIZATION

The Executive Officer has attended several LFPD Board meetings in person and observed one via Zoom. The Executive Officer has also read letters to the Editor in the Ledger Dispatch voicing opposition to the proposed reorganization, as well as spoken to residents in person who voiced concerns. These concerns boil down to two primary objections. First, that “local control” of LFPD would be lost to

the detriment of the district if AFPD is in charge of emergency services and second, that AFPD will close LFPD fire stations and will take LFPD equipment and apparatus thereby reducing levels and quality of service.

Proponents of these objections have not provided factual support for either of these arguments, and the possibility that either or both of these scenarios comes to fruition is unlikely. AFPD has annexed other territories in the past and has maintained equal or higher levels of service. It has never left an annexed area without services by closing its fire stations and taking its equipment. There appears to be no reasonable argument to believe that the two objections cited above would occur in this instance. It should be noted that LFPD's territory lies within the districts of two of the five Amador County supervisors. The full board of supervisors is the governing body of AFPD, with two members specifically representing the interest of the citizens of LFPD. It is extremely unlikely that the two supervisors who represent LFPD's territory will suddenly abandon the service needs of the citizens in LFPD territory to the detriment of LFPD residents, by closing fire stations and disbursing equipment elsewhere for example. No rational argument has been presented to staff to support the idea that the other county supervisors on the AFPD board would be amendable to leaving 22 square miles of the county with compromised or inadequate fire protection and emergency medical services.

Although LFPD has recently completed significant refurbishing of their fire trucks, that equipment is approaching 30 years of age, and significant future maintenance requirements are expected, as well as consideration of the remaining functional life span of that equipment. While currently functional, it is debatable how advantageous it would be for AFPD to commandeer that equipment for exclusive use outside of LFPD territory.

Fears of loss of local control, degraded service levels in the LFPD territory, and fire stations closure, fire equipment removal for use outside of the LFPD territory are without historic precedent and are unlikely giving the continued representation of citizens of the reorganized district of the reorganized district by the board of AFPD.

The commission must exercise its own independent judgement and weigh the pros and cons of annexing LFPD into AFPD. Given the substantial potential benefits inherent in reorganization as described above, compared to the unlikely, if any, downsides to reorganization, staff recommends that the commission approve the reorganization of LFPD into AFPD and subsequent dissolution of LFPD.

PART 2 – AFPD ANALYSIS

LOCATION (ALSO SEE ATTACHED MAPS)

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) (22 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. The AFPD SOI was adopted in 2021 and will need to be amended to extend to the boundaries of the LFPD SOI.

AFPD BACKGROUND

AFPD was originally formed in 1990 and provides emergency fire protection, rescue, and medical aid services to the unincorporated areas of Amador County. Amador FPD is primarily staffed with full-time career firefighters and supplemented with volunteer firefighters. AFPD is a dependent special district, governed by the five-member Amador County Board of Supervisors. AFPD covers approximately 491 square miles and serves an approximate population of 23,000, supporting the total county population of 40,300. AFPD operates out of seven fire stations in rural Amador County. AFPD is an all risk agency, responding to over 3,000 service calls per year, including structure fires, vegetation fires, vehicle fires, traffic collisions, search and rescues, hazardous materials incidents and emergency medical calls. In addition, AFPD provides fire prevention, community education, emergency preparedness and other services relating to the protection of lives and property.

STAFFING AND TRAINING CONSIDERATIONS

AFPD Staffing

AFPD offers more than just stable financing for LFPD territory fire protection services. 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.

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.

AFPD 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.

AFPD 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.

AFPD Training and Accreditation

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 AFD is currently pursuing accreditation to provide Advanced Life Support (ALS) services, completing some preliminary steps. Furthermore, AFD 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 AFD, 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. AFD 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.

Fire Investigation Program

AFD participated in a first-ever statewide National Fire Investigation Academy in 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 enacted a defensible space ordinance based on Assembly Bill 38, Wildland Mitigation, and Title 14, State Minimum Fire Safe Regulations. AFD 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. AFD 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 AFD becoming a participant. AFD 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 AFD 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 AFD 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. AFD is listed under "Find a Tech" on the National Child Safety website. (NHTSA Certified – cert.safekids.org)

AFD 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>.)

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. AFD is proud to say they have helped three communities successfully accomplish the task of becoming Firewise.

These programs and service benefits would become available in LFPD territory upon annexation into AFD, and would be an obvious benefit to LFPD constituents.

Regional Collaboration

AFPD's goal is to fully participate in local and State mutual and automatic aid systems. 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. The parties to the agreement therefore agree to respond to emergencies outside their jurisdictional boundaries and within the jurisdictional boundaries of the other. The mutual aid agreement allows the best and fastest emergency response with the highest possible levels of service regardless of jurisdictional boundary.

AFPD 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 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 AFPD 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. AFPD participates in addition to maintaining proper staffing levels at the fire stations during fire season.

As previously mentioned, AFPD 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, AFPD 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.

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

AFPD 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.

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

SUMMARY OF 2019 AFPD MSR FINDINGS AND DETERMINATIONS

The following summary of findings and determinations is abstracted from the 2019 AFPD MSR update:

- ❖ 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.
- ❖ AFPD offices are open and staffed during all normal business hours in the County Administration Center.
- ❖ 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.

- ❖ 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.
- ❖ AFPD realizes significant staffing benefits through California Joint Apprentice 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.
- ❖ 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.

There are no significant changes to these findings.

AFPD REVENUES

AFPD revenues have been relatively stable and gradually increasing from Fiscal 2021-22 onwards, except for additional monies obtained for a new fire station in Pine Grove. Those funds from the state in the amount of \$8,100,000 are not counted in this analysis of the Fiscal 2022-23 and 2023-24 years in order to make the comparisons between these years more transparent. Thus, ignoring the \$8,100,000 impact for Fiscal 2022-23, and 2023-24, for revenue and expenditures, total revenues and total expenditures were:

FY 2021-22 : Revenue	\$4,343,306	Expenditures	\$4,023,274	Net	\$520,478
FY 2022-23 : Revenue	\$4,246,988	Expenditures	\$4,270,095	Net	\$497,371
budgeted					
FY 2023-24 : Revenue	\$4,534,667	Expenditures	\$4,534,667	Net	0

AFPD receives money from a variety of sources, including Measure M sales tax funds, property taxes, intergovernmental funds, fees and charges for services, development impact fees, contract services, and grants and other miscellaneous funds.

Significantly, AFPD restructured its assessment of properties within its jurisdiction in 2023 through a Proposition 218 ballot process. Fiscal Year assessments are as follows:

FY 2021-22	\$638,997	
FY 2022-23	\$662,747	
FY 2023-24	\$1,037,999	increase compared to FY2022-23: \$375,252
FY 2024-25	\$1,078,281 (budgeted)	increase compared to FY2022-23: \$415,534

The revised assessments have resulted in actual or budgeted revenue increases of \$375,252 and \$415,534 compared to FY 2022-23, the last year of the prior assessment schedule. The budgeted increase in the assessment of \$415,534 over FY 2022-23 for the FY2024-25 budget of \$4,534,667 equates to only 9% of the 2024-25 budget, yet this increment alone is more than enough to absorb anticipated additional costs of operating LFPD, as discussed in more detail below in “Anticipated Costs and Savings Upon Reorganization.”

The proposed assessment for FY2024-25 is set out in more detail below, abstracted from the Engineers Report for AFPD – Fire Protection and Emergency Response Services Assessment for FY 2024-25:

Property Type	Proposed Base		FY 23-24
	Rate	Unit	Assessment
Single Family	\$66.21	each	\$64.52
Multi-Family	\$30.08	res unit	\$29.32
Commercial/Industrial	\$398.82	acre	\$388.67
Office	\$173.96	acre	\$169.53
Parking Lot	\$2.31	each	\$2.25
Vacant	\$4.43	each	\$4.32
Agriculture	\$6.33	acre	\$6.17
Range Land & Open Space	\$0.01	acre	\$0.01

*NOTE: The proposed base assessment rates are adjusted by parcel-specific 1.) Relative Fire Hazard Zone Factor based on State of California Fire Hazard Severity Zones and 2.) Relative Emergency Response Travel Time Factor based on roadway network analysis performed in ESRI ArcGIS Geographical Information Systems to calculate the specific proposed assessment for each parcel. (Because much of the Fire District lies within elevated Fire Hazard Zones, typical final assessment rates are about 5% - 15% higher than shown in this table, with the average assessment being \$77 for a typical single family residence on less than or equal to one acre of land.) These factors are explained in more detail in the Method of Apportionment section of this report.

The Engineers Report is available for public review and downloading at <https://www.amadorfire.org/2024-06-18-board-meeting> as part of the agenda packet for the June 18, 2024 AFPD Board meeting.

These assessments would be extended to properties within the LFPD jurisdiction. As noted, the typical residential single family residence on land or one acre or less is \$77 annually, which compares favorably with the current LFPD assessment of \$70 for developed property.

RECENT PAST FUNCTIONAL CONSOLIDATION BETWEEN LFPD AND OTHERS

The 2014 MSR noted that LFPD had contracted with CAL FIRE for shared services, which resulted in CAL FIRE assisting with the staffing of LFPD fire stations and equipment. Similarly, in 2022, LFPD contracted with AFPD for a Fire Chief who served as Chief for LFPD as well as Fire Chief for AFPD. This latter arrangement continued until November of 2023. During the time CAL FIRE and AFPD were contracted staffing levels for LFPD reached a total of 16 members. In the absence of these contracts, staffing fell to levels as low as 4 members, as noted in the 2019 MSR, and recent experience for LFPD since November 2023. The lesson learned here is that when LFPD was functionally consolidated with CAL FIRE or AFPD, there was substantially more staff available, more training for that staff, higher levels of service in terms of hours that the fire stations were open and staff, greater ability to respond to mutual aid situations, and a greater ability to generate strike force income because there was more staff available for those duties.

ABILITY OF AFD TO ABSORB LFD AND EXTEND SERVICES

Current AFD Service Demand

The 2019 AFD MRS found, regarding AFD's current service demand and growth potential, that present land uses within the AFD'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. 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. The most profitable industries in the County include agriculture, retail, health care and social assistance, tourism, manufacturing and construction. 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. 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.

Service Adequacy

The 2019 MSR update for AFD addressed the District's service adequacy:

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. AFD 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. AFD has not adopted a response time standard. AFD'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. AFD has response time goals that are consistent with NFPA's rural goals and is conducting a fractile measurement of performance. The response goals that AFD 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. AFD'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. AFD plans to measure performance of this goal and report performance annually to our governing board. Furthermore, AFD hopes to 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).

AFD 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 AFD to consolidate local government fire services in Amador County into one agency. As such, AFD 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.

ANTICIPATED FISCAL IMPACT OF AFD REORGANIZATION – ANNEXING LFPD

Anticipated Costs and Savings Upon Reorganization

From FY 2016-17 to FY 2023-24, LFPD budgeted, on average, \$248,000 annually for overall revenue and \$270,000 annually for overall expenditures. The wildly fluctuating strike force income varied from a mere \$2,481 in FY 2016-17 to \$380,725 in FY 2021-22, and therefor averages for these extremes are not very useful. Further, large increases in the strike force income for two years have been used to refurbish equipment rather than being banked for reserves, so their impact is more of a one-time event rather than predictive of a reliable income opportunity for building future reserves, or constituting a reliably large source of income.

Measure M balances declined from \$485,166 in FY 2016-17 to \$246,083 in May of 2024. General Fund balances have also fluctuated significantly, again largely due to strike force income variations, from \$108,383 in FY 2016-17 to a high of \$452,731 in FY 2021-22, and was \$104,151 in May of 2024.

Measure M balances have varied significantly, making averaging not somewhat problematic, however, there are years of surplus Measure M funds, although the majority of years had deficits, meaning employment related costs for the fiscal year outstripped the Measure M income for the fiscal year, which is why the balance of the fund has been trending downwards generally. However, a rough average of the cumulative losses for Fiscal 2015 through 2023 shows an average shortfall of \$30,200 for employment related costs (against Measure M fund balances).

Similarly, although budgets varied widely primarily because of strike force income, excluding that variable results in average budgeted income of \$248,000 per year and average budgeted costs of \$270,000. Actual budget shortfalls and surplus vary widely, with average 27,500 losses from FY 2015 through 2022-23.

These combined losses are still well within the additional income that AFPD is generating with its new assessment schedule.

Additionally, there are other less specific opportunities for costs savings with reorganization. Insurance costs, workers compensation expenses, and audit expenses for example are likely to be reduced due to economies of scale with those costs already built into AFPD's cost structure.

Further, there is the potential to develop one of the fire stations as an equipment repair center for AFPD. Currently, equipment is sent to Stockton for repairs and maintenance, costing \$175 per hour and often resulting in equipment being out of service for weeks. Hiring an in house mechanic and conducting repairs in house has the potential to save AFPD money overall for repairs and keeps equipment close by.

LFPD relies primarily on two sources of income, Measure M funds and its annual assessment of \$70 for improved property, \$40 for vacant land, although as noted, strike force funds can be significant, but are unforeseeable. Nevertheless, LFPD does have fund balances for Measure M funds and its General Fund that would transfer to AFPD upon annexation. AFPD would also obtain LFPD's equipment and fire stations.

LFPD has been unable to maintain, let alone build, reserves for its general fund and for its Measure M fund. Recent large deficits have been the result of recent large expenditures for refurbishing equipment, which will not be an annual expense of that magnitude going forward. However, that only serves to highlight the predicament that LFPD faces regarding long term maintenance and repair expenses – those expenses are only covered by fortuitous increases in strike force income which is not foreseeable or reliable.

Although the average operating deficits and Measure M shortfalls, aside from the distorting occasional impacts of large strike force incomes and large repair expenditures, (average budgets assume income of \$240,000 and expenditures of \$270,000, or a \$30,000 deficit – budgeted, but not always realized) and average Measure M shortfalls – combining surpluses and losses for 2016-2023 - have averaged actual deficits of \$30,200 annually, AFPD is still well positioned financially to absorb these potential deficits and actual deficits and potentially reduce them. The increase in assessments (enacted to assist with employment expenses) since 2023 alone would cover the average Measure M losses if they continued and would still leave more than 90% of the assessment increase over 2023 levels available for AFPD to

use otherwise.

ANTICIPATED BENEFITS OF REORGANIZATION

The overall picture of LFPD in its present state is remains one of limited hours of operation, minimal reserves for any major maintenance, instability of funding, insufficient funding, aging equipment, general lack of resources, training, experience, and inability to fully respond to district calls, mutual aid obligations, or to send staff out for strike force duty, and an inability to recruit and retain sufficient numbers of personnel.

Perhaps the best argument for, and demonstration of, the anticipated benefits of reorganization is found by examining the recent experience of AFDP providing services to LFPD pursuant to the contract that provided Robert Withrow as the Fire Chief for LFPD, while also working as a Chief in AFDP. Under that regimen, staffing levels were 16 volunteers or more, there was substantial training, both fire stations were open, at least one was staff 24 hours a day, 7 days a week. This was essentially an exercise in consolidation, with LFPD staff and AFDP staff working together to provide service to the district, with a Fire Chief who served both LFPD and AFDP. This model provided superior service levels, staffing levels, and training levels to the scenario where LFPD operates independently on its own. There are also the added benefits of additional stable funding, equipment, and other resources that are available compared to LFPD going it alone, as well as potential savings based on economies of scale for expenses such as liability insurance and workers compensation insurance.

Moreover, with annexation there is the potential that one of the fire stations could be converted to a mechanical station to service AFDP equipment. This could result in savings in mechanical repairs and maintenance of AFDP equipment. Currently equipment servicing is outsourced, often to the Stockton area. Mechanics costs for these services are in the \$175 an hour range and equipment can often be out of area for weeks at a time for servicing and repair. Substantial savings and greater availability of equipment for AFDP are potentially available if one of the fire stations is converted to this purpose. Staff is informed by both LFPD and AFDP that adequate and appropriate fire and emergency medical services for the district can be provided from one station, assuming sufficient hours of operation.

Further, as the recent experience and prior experience circa 2008 has demonstrated, functionally consolidated services as experienced recently in the fall of 2023 and previously circa 2008 demonstrated that AFDP can provide these enhanced services (compared to LFPD alone) without any detriment to the services it provides to the current AFDP territory and residents.

Measure M funds currently directed to LFPD would be redirected to AFDP. Measure M funds are distributed on a percentage basis to fire districts based on call volume with a minimum of \$50,000 annually. The general fund and any other miscellaneous funds would be transferred to AFDP as successor agency.

The assessment paid by AFDP residents would be extended to the residents in the annexed territory. Currently, approximately 80% of AFDP residents pay \$100 or less in annual assessments to AFDP, compared to the assessments imposed by LFPD, which are \$40 and \$70 annually for unimproved and improved parcels, respectively. As noted in the table above detailing 2024-25 proposed assessments, the

average AFPD assessment for residential property of one acre or less is \$77 annually.

The recent functional consolidation in 2022 and 2023 between AFPD and LFPD not only demonstrated the benefits of increased service levels for LFPD territory, it also demonstrated that AFPD can operate in that consolidated mode without detriment to its service requirements in its current territory. This consolidation was accomplished successfully without the transfer of assets and monies from LFPD to AFPD. Full integration of LFPD assets into AFPD, including LFPD's share of Measure M funds, LFPD's existing fund balances, and extension of AFPD's assessment to LFPD territory will only enhance AFPD's ability to provide services at an appropriate level in LFPD territory.

Staff believes that the appropriate view of the future of LFPD under the auspices of AFPD is review of the situation when LFPD was functionally consolidated by contract with AFPD. Examination of the status of LFPD recently during 2023, reveals that staffing levels, training levels, availability of equipment, and the overall level of service in terms of hours of staffing the two fire stations were all enhanced and substantially superior to the most recent situation, where LFPD is functioning as a solo entity exclusively under local control. LFPD has recently reengaged AFPD via contract to provide a Fire Chief for the district until annexation into AFPD if that occurs. This is basically the same arrangement that was in place in 2022 and 2023 until November 2023, which agreement resulted in the higher staffing and training levels described above.

Ultimately, the primary reason for reorganization is to increase and stabilize fire protection and emergency medical services for the LFPD jurisdiction. Although financial insufficiency and instability are significant concerns, the most important concern is the inability of LFPD to adequately staff its fire protection and emergency services. As described above, current service levels (prior to implementing another contract with AFPD in July, 2024) have resulted in the primary fire station being closed more days than it is open during the week and being minimally staffed during daytime hours. Lack of staff obviously impacts the ability to respond to calls and has resulted in the preferred equipment not being dispatched at times because it requires two operators rather than one.

Reorganization to annex LFPD should enhance service levels and build recruitment and retention of staff

The functional consolidation experiences with LFPD and CAL FIRE previously, and with LFPD and AFPD recently, demonstrate that service levels are at their best when LFPD is operating with a larger partner. It is not merely a matter of more financial resources. When AFPD left the partnership in November of 2023, staffing at LFPD gradually dropped from 16 to 4 volunteers. It was not a matter of money – LFPD did not suddenly experience a shortfall in December 2023. Rather, it appears to be the overall ability of a larger entity, in this case AFPD, to provide training and experience resources and management expertise. Volunteers did not leave from lack of money, it appears they left because of lack of training, experience, and management expertise. This is not a criticism of current management at LFPD, it merely reflects the reality that when a larger entity, in this case AFPD, with its far more extensive depth of training and experience resources, is functionally consolidated recruitment and retention levels are substantially higher than when LFPD goes it alone.

This ultimate fact, that functional consolidation increases staffing and service levels, irrespective

of eliminating financial instability, is the core reason supporting reorganization – stabilization and expansion of fire protection and emergency services through adequate staffing and training – which AFPD has already proven it is able to do without detrimentally affecting existing service levels in its existing jurisdiction, and without significant financial detriment.

SUMMARY OF STATUTORY AND POLICY CONSIDERATIONS

Government Code §56668 and LAFCO Policies require that the review of a proposal shall consider the factors listed below. The review is presented below for the commission’s consideration.

<i>FACTOR TO CONSIDER</i>	<i>POLICY/STATUTE CONSISTENCY</i>	<i>COMMENT & ANALYSIS</i>
<i>1. NEED FOR SERVICES, FUTURE NEEDS</i>	Consistent	No change in services, rather extension of same services from AFPD to LFPD territory; LFPD serves parcels already within its jurisdiction; AFPD will extend those services to the LFPD jurisdictional area; no additional services are required; no development anticipated.
<i>2. ABILITY TO SERVE, TIMING, CONDITIONS</i>	Consistent	No change in services, no new service; Level of service and stability of financial ability to provide services enhanced by AFPD annexation.
<i>3. WATER SUPPLY</i>	Consistent	No change in water availability or service
<i>4. SERVICE ALTERNATIVES</i>	Consistent	No change in services, no feasible alternatives; LFPD’s ability to provide services is restricted by financial and staff restraints. As an alternate service provider, AFPD has significantly greater financial, staffing, and equipment resources; AFPD will extend those services to the LFPD jurisdictional area; No additional services are required; No development anticipated
<i>5. SERVICE IMPACTS</i>	Consistent	No negative impacts noted;

		Potential for improved service
<i>6. COORDINATION OF APPLICATIONS</i>	Consistent	LFPD and AFPD projects are combined into a single reorganization project; No other changes identified; After annexation to AFPD, LFPD will be dissolved and AFPD designated the successor agency.
<i>7. COST/ADEQUACY OF SERVICES, FACILITIES</i>	Consistent	No change in nature of services, no new service, existing facilities are adequate for provision of services if adequately staffed. Assessments may increase approximately \$7/year for former LFPD residential customers
<i>8. EFFECT IN AREA AND ADJACENT AREAS</i>	Consistent	No changes anticipated; no significant effects noted
<i>9. ALTERNATIVES, COST & ADEQUACY</i>	Consistent	No feasible alternatives, No change in services, No new service. Absent reorganization, service levels may deteriorate in LFPD
<i>10. SUFFICIENCY OF REVENUES, A. V.</i>	Consistent	LFPD funds will be transferred to AFPD; LFPD share of future Measure M funds will transfer to AFPD, AFPD assessment will be extended to parcels in LFPD jurisdiction; LFPD assessments of parcels within the jurisdiction will be terminated, See also MSR determinations.
<i>11. "BEST INTEREST"</i>	Consistent	Extends fire protection and EMT services to LFPD jurisdiction; Increased staffing of existing fire station; Increased ability to respond to calls within the jurisdiction, provide strike team personnel and respond to mutual aid calls; Increased training for

		staff and increased equipment availability; Potential development of mechanical servicing station in existing fire station; Increased financial resources and financial stability; Potential for economy of scale savings for insurance, workers compensation, facility and equipment maintenance
<i>12. BOUNDARIES: LOGICAL, CONTIGUOUS</i>	Consistent	Annexation of entire district
<i>13. TOPOGRAPHY</i>	Consistent	No significant or relevant topographic features that would suggest different boundaries
<i>14. SPHERES OF INFLUENCE</i>	Consistent	Recent SOI review and amendments to accommodate reorganization
<i>15. EFFECT ON ADJACENT AREAS, COMMUNITIES</i>	Consistent	No change anticipated; no significant untoward effects identified
<i>16. COMMENTS FROM LANDOWNER OR OWNERS</i>	Consistent	Any received are included in meeting record
<i>17. EFFECT ON OTHER COMMUNITY SERVICES</i>	Consistent	Dissolves local fire provider, agency name change
<i>18. OTHER AGENCY COMMENTS, OBJECTIONS</i>	Consistent	Any received are included in meeting record
<i>19. FAIR SHARE OF REGIONAL HOUSING</i>	Consistent	No change or effect anticipated
<i>20. LAND USE, ZONING DESIGNATIONS</i>	Consistent	No change; No development anticipated
<i>21. POPULATION</i>	Consistent	No change
<i>22. CONSISTENCY WITH GENERAL PLANS, SPECIFIC PLANS, ZONING</i>	Consistent	No change
<i>23. AGRICULTURE LANDS AND OPEN SPACE LANDS</i>	Consistent	No change; no effect on agriculture
<i>24. ENVIRONMENTAL JUSTICE</i>	Consistent	No effect noted; no change

DETERMINATIONS

The Commission should review the factors summarized above, then make its own determinations regarding the project. Staff recommends the following determinations based on project research, state law and local policies:

1. The project is exempt as a Class 20, Categorical Exemption under CEQA (Sec. 15320(b) of the Public Resources Code).
2. The subject territory is inhabited. Application for this reorganization is made subject to Government Code §56654 by substantially similar resolutions of the AFPD and LFPD Board of Directors.
3. The territory proposed for reorganization is consistent with the Sphere of Influence of LFPD (zero sphere of influence). The AFPD Sphere of Influence includes the LFPD Sphere of Influence.
4. The boundaries of the LFPD SOI and the LFPD territory are definite and certain and substantially conform to lines of ownership and parcel lines.
5. The reorganization will provide enhanced levels of service by providing additional staff for existing fire stations, stable financial resources and income to maintain appropriate level of services, enhanced training opportunities, and enhanced ability to respond to in district calls, mutual aid calls, and strike force participation.
6. The reorganization will not result in negative impacts to the cost and adequacy of service otherwise provided in the AFPD service area and is in the best interests of the affected LFPD area.
7. The reorganization will not result in negative impacts to the cost and adequacy of service provided in the AFPD territory existing prior to annexation.
8. The annexation will not have an adverse effect on agriculture and open space lands, will not have an adverse effect on environmental justice, and will not affect the county's ability to achieve its fair share of the regional housing needs.

The commission must exercise its own independent judgement and weigh the pros and cons of the reorganization of LFPD into AFPD.

RECOMMENDATIONS

Staff recommends that the Commission take the following actions:

1. Adopt Resolution #2024-3, making determinations, adding conditions and approving the reorganization of LFPD into AFPD, including the following changes of organization: dissolution of LFPD, annexation of the LFPD boundaries into AFPD and designation of AFPD as the successor agency.
2. Direct the Executive Officer to prepare a Notice of Exemption pursuant to Title 14, Article 20 of the California Code of Regulations (the CEQA Guidelines).
3. Direct the executive officer to complete the necessary filings and transmittals as required by

statute and policy.

Attachments:

Resolution #2024-03

Exhibit A – Descriptive Map of LFPD and AFPD

Notice of Exemption

Any comments received prior to the packet mailing deadline