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## Lake County Fire Protection Districts MSR/SOI Draft - Public Comments

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**Betsy Cawn** <epi-center@sbcglobal.net>

Fri, Sep 6, 2024 at 12:50 PM

To: Larkyn Feiler <lake.lafco@gmail.com>

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Dear Ms. Feiler,

Reference: Draft Municipal Service Review and Sphere of Influence [report] for the Lake County Fire Protection Districts, dated July 2024.

The importance of our local Fire Protection Districts cannot be overstated, and the importance of LAFCo's Municipal Service Review cannot be overlooked in its potential for informing the public, local government agencies, and the Community Development Department's General Plan staff and Advisory Committees.

The opportunity presented by this review, to create a report that is designed to identify capacities and needs for each of the independent Fire Protection Districts in a more effective format, is the subject of reviewer comments below. [And see Footnote 1]

Included in some of the individual District descriptions are statements of broader impact to the entire population and to the development of our next General Plan. [Footnote 2] These descriptions could lead to a higher level of "analysis" in which the Findings and Recommendations provide policy guidance for decision makers (i.e., the Board of Supervisors and the District boards of directors), and educate the beneficiaries of critical public services — fire suppression, medical care, and emergency management.

However, the method of assembling the report contents is reflective of "traditional" LAFCo reports, making the important points difficult to locate. Editorial improvements to the structure itself would help reviewers and decision-makers to weigh the significance of key issues that are buried in the lists of facts and numerically confusing sections and subparagraphs.

Details about the assets of each District, revealing the extreme age of some apparatus and the staffing levels of personnel categories, are "inputs" to be evaluated by Commissioners and the public but lack interpretation that is necessary to understand the overall conditions in which our FPDs manage their increasingly limited resources.

Recommendations for editorial changes and evaluation of District capacities are listed below. We appreciate the opportunity to contribute to the modernization and functionality of LAFCo's documentation practices, and to call attention to the missing connection between MSR contents and County/City planning projects.

Cordially yours,

Betsy Cawn  
*The Essential Public Information Center*  
Upper Lake, CA

Member: Lake County 2050 General Plan Advisory Committee, Upper Lake - Nice Local Area Plan Committee

[1] LAFCo policies and procedures for soliciting input from District staff, created in 2007 or 2008, were developed in response to source content that the LAFCo staff lacks capacity to verify. The necessity to accept without question the veracity of received content, due to LAFCo staffing limitations, does not alter the ability to introduce content management options, for which the LAFCo budget includes funding for contracted editorial services.

The numerical system for sections, subsections, and MSR or SOI finding numbers is confusing to the reader. In this example: "3.4.6, B, MSR 1-1" could be simplified by numbering each finding by a unique, sequential number — MSR 1, in that section, MSR 2 in the next, et cetera.

The consumption of seven pages for the explanation of LAFCo's history, roles, and responsibilities is gratuitous. With the exception of content provided in Section 1.2 (Preparation of the MSR) with a reference to the rest of the material as an adjunct to the primary content, the remaining content should be an appendix.

[2] The "Lake County 2050" General Plan Advisory Committee members identified top priorities for countywide capacity gaps in law enforcement, emergency services, medical care, and fire suppression or prevention.

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Editorial recommendations and content comments:

1. Provide summary analysis of the combined District services (Section 2 in the draft) that includes a map of each jurisdiction's boundaries within "spheres of influence" (consider the Lakeport FPD territorial distinctions, for example) where expansion of district jurisdictional SOI boundaries (circa late 1990s) increased the responsibility for services in areas lacking adequate roads and fire suppression water supplies, communication impairments, very high risk fire severity zones (according to the state Department of Forestry and Fire Protection mapping completed in 2023).

See especially the content provided by the Lake County Fire Protection District on pages 34 through 37.

District operational areas centered in "Community Growth Boundaries" identified in the County General Plan, and the necessity to provide urban-level services in rural areas, are important issues for new County General Plan and Local Area Plan considerations of Health & Safety issues.

2. Include county-wide management issues such as state-required pre-planning for ambulance services allocated to evacuation of medically-frail residents and the Emergency Medical Care Committee findings regarding ambulance service capacities and Operational Area Council coordination of multiple agency response systems.

3. The ISO rating system report does not explain the importance of availability within distances from District facilities that affect homeowner insurance ratings (and real estate values), or how the ratings are used by District management.

4. Explain the reasons for the consistently low ratings (leading to Findings and Recommendations that include development of additional funding from County tax revenues, prioritized in accordance with the state Constitution's Article XIII, Section 35) in the summary of county-wide capacities (Section 2).

5. Provide separate evaluations for the incorporated city of Lakeport (not a "disadvantaged community") and the unincorporated area within the Lakeport FPD jurisdiction (which is economically disadvantaged), since the determination that the entire district does not have the burden of a disadvantaged population does not support the district's need for additional funding sources or explain capacity management issues.

As stated in Section 5.4.2(A), the "City of Lakeport General Plan governs growth within the City and the County of Lake General Plan governs land uses within the unincorporated area." However, the County's "Lakeport Area Plan" excludes the city itself, which provides most of the unincorporated area's public safety services, and the territory in the unincorporated area surrounding the city served by the Lakeport FPD, is defined in three "special study areas" associated with the City's General Plan. Updating of the Local Area Plan, under way as part of the County's General Plan update, needs to include the combined responsibilities of the FPD.

6. The description of Upper Lake (Section 6.1.1) is not credible. Please provide source documentation supporting the statement of population reduction of "-47.36%" and the claim that the "average household income in Upper Lake is \$102,501." I believe that such an extreme loss of population or extreme rise in average household income would have caused a considerable amount of local attention if it were true (and I live there), (Footnote 73, <https://worldpopulationreview.com/>, describes populations of countries around the world.) Does the Northshore FPD have jurisdictional maps of each of the communities included in the area description? Sources of credible population and income data include the Upper Lake County Water District and the Lake County Sanitation District.

7. Explain how the anticipated expenses, compared with identified revenue expectations (and shortfalls), are managed by the Districts — services not provided, impacts on hiring and retention of personnel, injury or disability losses — since all District services must comply with state-regulated requirements.

8. Ensure that all agencies affected by FPD services and the evaluation of same by LAFCo's review process are recipients of the draft and are encouraged to participate in the collective evaluation of the agency capacities. The Essential Public Information Center will support that effort, and deploy its local resources to provide public education and outreach for the communities served by the County's Fire Protection Districts.

Thank you for your consideration of these comments and recommendations.