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**To:** LAFCo

**From:** Christine Crawford

**Re:** Supplemental Correspondence

**Date:** July 22, 2022

Attached is the correspondence received since the packet was distributed Tuesday, July 19, 2022. In addition, correspondence was received just after the June 30<sup>th</sup> meeting that should have been included in Tuesday's packet.

List of Attached Correspondence:

<u>Author</u>	<u>Subject FPD</u>	<u>Dated</u>
Elkhorn FPD Board of Directors	Elkhorn FPD	July 21, 2022
Bill Weisgerber	East Davis FPD	July 21, 2022
Elkhorn FPD Board of Directors	Elkhorn FPD	July 14, 2022
Sonoma Hyer	Elkhorn FPD	July 1, 2022
Ricardo Garcia	Elkhorn FPD	June 30, 2022
Juan Jose Garcia	Elkhorn FPD	June 30, 2022
Mike Webb	East Davis FPD	June 29, 2022 <sup>1</sup>

<sup>1</sup> The City of Davis letter was provided to the Commission via email on June 29, 2022 but was inadvertently not included in either the June 29 or June 30 supplemental packet. Therefore, its included again here.

**Elkhorn Fire Protection District  
19396 County Road 124  
West Sacramento, CA 95691**

July 21, 2022

VIA ELECTRONIC MAIL ONLY

Yolo County LAFCo  
Board of Commissioners  
E-Mail: lafco@yolocounty.org

Re: Elkhorn Fire Protection District Alternative Proposal to the June 2022 Draft Municipal Services Report.

Honorable Commissioners:

We greatly appreciate the opportunity to recommend an alternative proposal to the dissolution of Elkhorn Fire Protection District (“District” or “Elkhorn FPD”). We understand that Yolo County Local Agency Formation Commission (“Commission”) staff have worked diligently to come to a solution that provides efficient coverage of fire response services in the County without sacrificing the quality of service or response time. We offer the following comments and additional recommendations, which we believe will improve upon the Report and enhance the efficiency and efficacy of services for District residents and all of Yolo County.

**Governance & Administration Recommendations**

Commission set out a number of recommendations related to the efficient governance and administration of the District (recommendations #2, 3, 4, 6, and 7). The District appreciates staff’s efforts in preparing these recommendations, and offers the following additional comments:

- **Recommendation #2 (Regular review of financial data):** The District concurs that regular review of financial data will be crucial to the continued successful management of the District. The District has engaged an accountant to review District income and billings, and expects to receive and review financial statements at its regular meetings on an ongoing basis.
- **Recommendation #3 (Preparation of CIP):** The District has already begun informal discussions regarding the need for a CIP, and has directed its general counsel and accountant (both newly engaged) to prepare forms of reserve policy and similar guidance documents to assist in this long-range sustainability planning.
- **Recommendation #4 (Increase of Special Assessment):** The District appreciates staff’s concerns regarding the need to increase the District’s income to account for potential

increased service costs into the future. At this stage, the District's position is that any such increase would be premature, pending the resolution of the recommendations in this MSR and the completion of the financing study currently on-going County-wide. As staff notes, However, raising assessments for District landowners may not be reasonable considering much of the increased demand is being generated outside the FPD.

- **Recommendation #6 (Adoption of Standardized Policies)**: The District engaged a new general counsel in June 2022, to assist it both in responding to the MSR recommendations and in performing a general review and "clean up" of existing District administrative practices. Implementing standardized policies for record retention, payroll, financial management, conduct of meetings, and other best practices in public agency governance is a high priority for the District, and the Board expects to review and adopt a number of items identified in this recommendation in the coming months. Simultaneously, the District understands that Commission staff will be preparing standard forms of similar policies for general use. The District appreciates that effort and looks forward to incorporating those policies as appropriate.
- **Recommendation #7 (Records Storage and Retention)**: See recommendation #6, above. The District expects to identify a primary point of contact and storage location for District records, and will address this recommendation in connection with the records retention policy discussed above.

The District appreciates staff's time and attention to these recommendations, which are in line with the general direction of its Board of Commissioners, and looks forward to successfully implementing many of these items in the coming months and year. The District notes that the draft County-wide Recommendation #2 suggests that the County continue to review process toward implementing the recommendations identified therein, and looks forward to coordinating with the County in moving that process forward.

### **Proposed District Dissolution**

However, as the District has already highlighted in prior communications to the Commission, the District and its residents adamantly oppose a full-scale dissolution of the District. The draft MSR raises concerns about the District's response times and sufficiency of staffing and funding. But, these recommendations do not differentiate between major commuter incidents on the freeways and incidents involving Elkhorn residents; nor do they acknowledge a continuing trend of improvement in response time and service. Staffed by a long-standing and closely affiliated group of community members, with equipment specifically suited to the agricultural areas and flood-prone areas it serves, there is no department better suited to provide emergency response within this unique community.

The draft MSR highlights concerns from the Cities that under the mutual aid agreement alone, the larger City departments incur costs in providing services to the District service areas that are disproportionate to the mutual aid provided by the District to City service areas. As an alternative to dissolution, Elkhorn Fire Protection District Board of Commissioners respectfully requests that the Commission consider annexing the high-traffic commuter corridors of I-5 and Old River Road to the service areas identified in the Draft MSR, leaving the rural areas with the

District. The existing mutual aid agreement would continue, with the District providing supporting aid services on these thoroughfares as necessary. But, in order to alleviate financial burden shifted to the Cities of Woodland and West Sacramento (collectively, “Cities”), the District would be prepared to enter into a negotiated agreement with the Cities to provide additional financial and/or equipment assistance in connection with their assumption of services on these portions of I-5 and Old River Road.

Under the District’s proposal, the District would continue to provide service on calls in the de-annexed areas, but the burden of those calls would be more properly shifted urban areas from which the commuters are coming and going, and not rest solely on Elkhorn residents, who are involved in disproportionately fewer of the incidents on these two roadways. This arrangement would alleviate the existing burden on the Cities (which do not currently receive compensation for the mutual aid provided on these roadways) without requiring them to take on the more locally specialized responsibilities and expenses associated with providing services to these rural areas. The District also recognizes the challenges faced by *all* service providers in funding emergency response services on freeways and other commuter corridors, which are not traditionally a source of assessment income. The District looks forward to good faith negotiations identify an allocation of costs that appropriately and fairly compensates each service provider, for the benefit of the County and its residents as a whole.

Finally, we note Yolo County has engaged SCI to evaluate service costs and funding mechanisms among the fire service entities. That study is still forthcoming, but it will provide important data points to inform the structure of coverage and efficient distribution of response costs. The District is certain that the data will assist it in continuing and further strengthening its financial stability, and should provide additional information about the cost of services in this particular region. Furthermore, the data will indicate whether and to what extent compensation is appropriate between the Cities and the District for services provided in the existing and modified service areas. For that reason, if the Commission is not inclined to include the District’s alternative proposal in its recommendations, the District respectfully requests that it extend its review to accommodate that important data gathering effort.

### Recommendations

Consistent with this reasoning, the District proposes the following modifications to the Elkhorn FPD-specific recommendations. Text proposed to be deleted is identified in ~~strike through~~ format, new text is identified **in bold**.

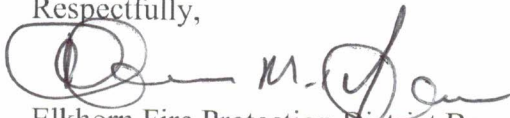
- *Elkhorn FPD Recommendation #1:* Elkhorn FPD’s facilities and services **to I-5 and Old River Road** should be provided by the cities of West Sacramento and Woodland, divided geographically to minimize response times. **Elkhorn FPD, West Sacramento and Woodland should negotiate an appropriate division of financial responsibility for these mutually beneficial services.**
- *Elkhorn FPD Recommendation #5:* Elkhorn FPD **territory on 1-5 and Old River Road** should be ~~dissolved,~~ and its territory annexed into the Springlake FPD (for the City of Woodland service area) and ~~CSA 9~~ (for the City of West Sacramento service area), dividing up the territory geographically to minimize response times.<sup>1</sup> **Elkhorn FPD,**

**West Sacramento and Woodland should negotiate an appropriate division of financial responsibility for these mutually beneficial services.**

- *Yolo County Recommendation #1:* Yolo County should initiate a LAFCo application process to analyze and reorganize the Elkhorn, East Davis, No Man's Land, and Springlake FPD's and CSA 9 to align **their service boundaries consistent with the recommendations of this report** ~~one district to each city service territory~~. The Winters FPD is already aligned to its city service territory, so no boundary changes are needed.

We thank you for your consideration of the District's comments and alternative proposal. The District will work diligently and in good faith with the Cities—and their respective fire districts—to come to an agreement that appropriately meets not only the needs of the commuters but the unique needs of Elkhorn FPD's residents as well.

Respectfully,



Elkhorn Fire Protection District Board of Commissioners

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<sup>1</sup> The draft MSR recommends consolidation with CSA 9. District suggests that the city of West Sacramento should be affiliated with portions of this de-annexed area, but has no position as to whether CSA 9 or another local Fire Protection District would be most appropriate to absorb this area in the MSR's recommended reorganization.

# **East Davis County Fire Protection District**

C/O DAVIS FIRE DEPARTMENT, STATION 33  
425 MACE BOULEVARD  
DAVIS, CA 95618

*SERVING EL MACERO, WILLOWBANK, AND YOLO COUNTY*

July 21, 2022

Christine Crawford, Director  
Yolo Local Area Formation Commission  
625 Court Street  
Woodland, CA 95695

Director Crawford,

Please find attached the East Davis Fire Board's counterpoint comments to your MSR response memo dated May 31, 2022. For your convenience the Board's counterpoints are below your responses in bold **red** typeface. Please include these remarks for the Commission's consideration, during the continued hearing scheduled for July 28, 2022.

Respectfully submitted,

***BW***

Bill Weisgerber, Chair  
EDCFPD  
408-910-8044

## 1. Page 2

### LAFCo Response to East Davis FPD Comments East Davis FPD Administrative Draft MSR/SOI dated May 31, 2022

*The subject agency has potentially significant determinations and staff recommends that a comprehensive MSR IS NECESSARY and has been conducted via this checklist.*

**Comment:** The Board thinks it is inappropriate for East Davis to be included in the MSR reorganization.

**Response:** Government Code Section 56425 requires MSR/SOIs every five years, as necessary. According to Yolo LAFCo Project Policy 6.2 “Although MSRs are technically required only when updating agency SOIs, per Government Code § 56430, Yolo LAFCo will typically conduct MSRs on local special districts even if an SOI Update is not needed because, unlike cities, Yolo County’s special districts tend to be rural in nature and staffed by limited professional staff or entirely volunteer-run, meaning there is less oversight to ensure operational adequacy and fiscal sustainability.” Yolo LAFCo adopted its Annual Work Plan on March 25, 2021, which included an MSR/SOI review of all the 15 FPDs and amended it on June 24, 2021 to prioritize the 15 FPDs at the request of Yolo County. Therefore, LAFCo’s action is to include the East Davis FPD in this MSR/SOI.

**Counterpoint: Winters FPD was excused from the consolidation process, after initial MSR drafts, with a simple offline request.**

## 2. Page 4

### *Capacity and Adequacy of Public Facilities and Services MSR Recommendation(s)*

*The East Davis FPD Chief should provide a written evaluation of the level of service, deployment, and response time objectives as an agenda item at an East Davis FPD meeting on an annual basis per NFPA 1720. The city service provider should report NFIRS data in a manner that allows it to be separated from city incidents and reported for each FPD served.*

**Comment:** East Davis contracts for services with the City of Davis FD, a paid City FD which falls under NFPA 1710 and not the referenced 1720. In either case, NFPA Standards are voluntary, not mandatory.

**Response:** The MSR is a recommendation, and hence, is voluntary. The NFPA notes indicate it is a combination of codes, standards, recommended practices, and guides (“NFPA Standards”). NFPA 1710 5.3.4.1 also states a fire department “shall institute a quality management program to ensure that the service has met the performance objectives”. Regardless of the applicable standard, East Davis FPD should receive an annual report from its service provider.

**Counterpoint: NFPA 1710 was established in 2001 and is not mandatory. If mandatory, every engine company in the county would be staffed with 4-personnel, (the cornerstone of NFPA 1710); and 10-years ago the Davis City Council couldn’t have reduced engine company staffing to 3-personnel.**

**In the 21 years since NFPA 1710 was established there have been four MSR cycles for FPDs. And, only now has this become an issue for LAFCo, with East Davis. The District and the Fire Department have a very robust communication model (the Chief and/or staff attend every meeting and are readily available to the Board anytime--by text, email, or cell). There is no question of performance objectives being met.**

### 3. Page 5

*d) Does the agency board need to receive regular financial reports (quarterly or mid-year at a minimum) that provide a clear and complete picture of the agency's assets and liabilities, fully disclosing both positive and negative financial information to the public and financial institutions?*

**Comment:** As the District's fiscal agent, the Yolo County DFS should be providing these reports automatically to the Board. And, as stated in the MSR, East Davis has no employees and typically only has 5 transactions annually. One major invoice for Davis Fire Service; and up to four minor invoices of no more than \$500/each: YCPARMIA Insurance; CPA SCO-prep/filing; CPA Budget prep; Public Notice reimbursement. As such, why would we need quarterly reports?

**Response:** This is a standard question asked of all special districts during the LAFCo reviews. LAFCo agrees that mid-year reports would be appropriate for the East Davis FPD since it has few transactions and will change the recommendation from quarterly to midyear. **Agreed**

### 4. Page 6

*District representatives have indicated that the reserves are required by the agreement with the City. However, Section 8 of the agreement provides that the reserves can be established at the District's "sole discretion"*

**Comment:** This is an incorrect interpretation of Section 8 of the agreement with the City.

The reserve fund is not what is at the "sole discretion" of the District. The repository of reserve funds in a separate account with the City is what is at the "sole discretion" of the District. Alternatively, the District has elected to maintain those funds with Yolo County DFS.

The contract requires the District to maintain this reserve. Reducing it would potentially breach the contract while exposing the District to risk if there were to be an issue with collecting funds or providing service, for a given year.

**Response:** The February 10, 2009 staff report from the Davis Fire Chief to the Davis City Council states this provision is a new one, requested by the District, as "an opportunity for the District to establish a fiscal reserve held by the City for the benefit of the District. This provides flexibility for the District should they choose this path during these unsettling and unpredictable economic times." Section 8 of the contract states, the "District *may*, in its sole discretion, provide funds to the City for the establishment of a fiscal reserve by the City for the benefit of the District" (emphasis added).

To LAFCo staff, the use of the word "may" indicates this reserve is not required and the purpose of this provision is to provide the East Davis FPD the opportunity to maintain a reserve with the City, at the District's discretion. In any event, the District does not maintain such a reserve with the City. However, even if the contract requires a one-year's reserve, whether maintained by the City or not, no other FPD contracts have such a provision. There is very little risk that the District will not collect a year's worth of revenue. Further, given the past half-century of experience, the City has proven itself a reliable partner, meaning there is little risk that it will simply stop providing the contracted services. Therefore, the reserve is not necessary and the District should approach the City to amend the contract if the District feels that such a large reserve is mandated by the contract. The District is holding reserve funds collected via landowner assessments that exceed what is necessary, and LAFCo is suggesting those funds be spent down.

**Counterpoint:** **As stated before, the word "may" (as written by those who drafted the contract language) is in reference to the District's option to utilize the City as a fiscal repository for the**



**Reserve Account funds...NOT in reference to the Reserve Funds themselves being discretionary.**  
**This is a local policy decision. LAFCo does not have authority to establish policy for the District.**

## 5. Page 7, Paragraph 2

*The 2021 payment increased 16.5% from fiscal year 2020, due to a delay of the City of Davis receiving strike team reimbursements from CAL FIRE. Other expenditures include accounting fees, special assessment enrollment fee, liability insurance, and weed abatement legal notices. The District is in the process of discussing alternative billing methods with the City of Davis to reduce unexpected changes in the annual contract billing.*

**Comment:** At the recommendation of the District's independent CPA, the District is pursuing an amendment to the formula for invoicing from the City; in which the District would budget and pay the actual amount from the year preceding the immediate prior year. In the current budget cycle case, the amount owed for fiscal year 2023 would be the "actuals" from fiscal year 2021. This would allow the District to budget a known amount and not have an unexpected higher invoice from the City.

**Response:** LAFCo is supportive of this change to the formula, among other contract changes. **Agreed.**

## 6. Page 7, Paragraph 4

*The District maintains all funds in the County Treasury and uses the County's financial system to maintain its accounting records. Since the District is a dependent district, it is subject to the same accounting and financial policies as the County. Accounting and budget data including all cash receipts and disbursements are reviewed by County finance staff before they are posted.*

**Comment:** This item affirms the District's accounting records are under the County financial system, subject to the same accounting and financial policies as the County. "...Accounting and budget data including all cash receipts and disbursements are reviewed by the County finance staff before they are posted..." It then should be incumbent upon County DFS to provide the financial reports to the District board automatically-- just as they would any other County department.

**Response:** Special districts and County departments are expected to download financial reports themselves. However, the DFS director indicated it will send reports to districts that request it (so East Davis FPD can request that from the County if desired). One of the key functions of a special district board member (which the BOS has delegated to the fire commission) is fiscal responsibility, so these reports should be checked, and corrections made if needed. DFS staff cannot be expected to be 100% accurate, as human error sometimes occurs.

**Counterpoint: By LAFCo account (above), every County department should be specifically requesting their regular financial reports from DFS. If not, then as a dependent District, why would the District need to specifically request this same information? This information should be provided in the regular course of business.**

## 7. Page 7, Paragraph 6

*In 2019, District commissioners did not detect that in-lieu taxes from State Fish and Wildlife was not posted to the District's fund. The error was found and corrected in the subsequent year. Due to delay on the part of the City of Davis providing information, the District experienced a net loss in fiscal year 2021 that was not anticipated.*

**Comment:** Inaccurate. This was not undetected. State Fish and Wildlife has not paid their assessments in 17 years, a years-long effort to remedy the situation has been in vain, as the situation remains

unchanged. This past March, Davis FD administration *once again* invoiced the following delinquent State properties having compounded delinquent taxes as far back as FY 2004/2005: Sacto/Yolo Port; Reclamation District #9; and CA State Fish and Game. *County DFS does not make the District whole on delinquent State Agencies, as they do with private parcel owners.*

There was not a net loss. The invoice overage due to lag-time in State reimbursement to the City was covered by the District Reserve fund. Moreover, this would have been budgeted for had City of Davis Financial Services made the proper calculations and invoiced with an accurate figure, in a timely manner.

**Response:** LAFCo agrees the State will not pay the assessments on the lands it acquired for the Bypass and this issue affects several districts. What this statement is saying is that the in-lieu fees received by the FPD were posted to the wrong fund by DFS and the District did not notice the error.

**Counterpoint:** *If in receipt of a financial report, the detail may not necessarily be evident to Board members not versed in the forensic nuances and formatting of a County line-item ledger. The District will continue to rely on its CPA to analyze and interpret...just as any other board would rely on their financial experts.*

Regarding net loss, the 5-year trend in the report, which compares the budget to expenditures, shows a \$71,392 net loss in FY 2021. LAFCo agrees there was ample fund balance to cover it, but its factually correct to state it was a net loss for the fiscal year (i.e., expenses exceeded revenues).

**Counterpoint:** *This is framed in the most brief and disparaging language to place blame on the District for an error in DFS. The error was noted and corrected in an audit (as an entry error would ordinarily be) and is not the fatal error it is being portrayed to be.*

#### **8. Page 7, Paragraph 8**

*Even though the District has very few expenditures (on average 5 invoices per year) the commissioners should review financial reports more frequent than the current practice to discuss whether transactions are accurately posted to the District's ledgers and to perform a current year budget to actual comparison.*

**Comment:** Again, it should be incumbent upon County DFS to provide the financial reports to the District board automatically--just as they would any other County department. The District Board annually confirms with the County DFS Property Tax Supervisor, proper posting of Direct Charge revenue. The District Board confirms with County DFS accounting staff the posting of the five annual invoices paid.

**Response:** As noted above, DFS indicated it will provide reports if requested. LAFCo notes the fire commission confirms direct charge revenue and posting of invoices. **Agreed.**

#### **9. Page 8, Paragraph 4**

*The District does not have equipment or facilities to maintain or replace. The District's policy is to retain a total reserve of at least one year's expenditures plus 10%, which is in excess of recommended government standards.*

**Comment:** The added text is noted in the excerpt above.

**Response:** Thanks for the clarification. The public draft will reflect this change. **Agreed.**

## 10. Page 8, Paragraph 7

*The District's share of property taxes within its boundaries is approximately 9.6%, while the average for all rural FPDs in the county is 6.2%.*

**Comment:** This is irrelevant.

**Response:** LAFCo disagrees this is irrelevant as property taxes provide a significant portion of the District's core revenue. This fact is provided for informational purposes only and is included in the reports for all the FPDs.

**Counterpoint: The District's 9.6% share of property taxes does not cover annual fire service expenses. Hence, the District's successful execution of a Prop 218 election to properly support fire services—a sustainable solution which the financially troubled FPDs couldn't manage to accomplish. (The 6.2% share average of other FPDs--and an inability to successfully pass a Prop 218--is why they are in financial trouble).**

## 11. Page 8, Paragraph 8

*The District's policy is to retain at least 110% of one year's expenditures in reserve, which is in excess of recommended government standards*

**Comment:** This needs to have a citation.

The District Reserves Fiscal Policy is set at the 110% of one year's budget, as contingency against catastrophic hardship (financial or otherwise) that may cause City services to be significantly curtailed (e.g., brown-out or blackout of Fire Station 33); or cancelled, altogether, due to inability to provide services. If this were to happen, the District's 110% contingency would be able to fund a bridging effort to sustain fire services from Station 33 for at least one year's time, providing opportunity for alternative solutions to be arranged. If reserves are reduced or eliminated (as is being recommended,) the District would be unable to pay for fire service in such a catastrophe.

East Davis has been previously held up as an example of sustainability. Now the ability to maintain that sustainability is a point of critical contention as the suggested reorganization may threaten the stability of the District.

While there is a government recommended standard for reserves, there does not appear to be a rule to follow, and the Board believes this is just a guideline rather than an actual rule against excess reserve funds that fails to account for the unique aspects of the District.

**Response:**

The City of Davis has served the East Davis FPD continuously since 1966, and there is no indication the City will not be able to meet its contractual obligations or close/reduce service levels at Station 33. Two years prior to the expiration of the contract, the parties will conduct a joint review to determine whether to renew the contract and any necessary changes to the arrangement. This gives the East Davis FPD sufficient time to prepare for any significant changes to its responsibilities if the City decides to end its relationship with the District. While there are no hard-and-fast rules about the amount of reserves, LAFCo strongly recommends the District re-evaluate the need for its disproportionately-large reserve so that the District is not collecting more in special assessments than necessary to provide its services. Concerns about the closure of Station 33 can be addressed in other ways, including contract provisions that would make the station available to the FPD and give infrastructure/apparatus to the District if the City reduces its operational capacity (as is done in the Winters FPD agreement).

**Counterpoint:** LAFCo cannot credibly forecast the City of Davis' fiscal future, nor guarantee there won't be a fiscal crisis resulting in a black-out of Fire Station 33. **Moreover, "...contract provisions that would make the station available to the FPD and give infrastructure/apparatus to the District..." is a specious concept if the Reserve Funds to finance the O&M have been spent down. This is a preposterous contradictory statement on the part of LAFCo.**

## 12. Page 8, Paragraph 8

*If the contract with the City of Davis were amended and streamlined such that the East Davis FPD operated as a pass-through agency (similar to Springlake FPD's contract with the City of Davis), this fund balance could potentially be eliminated altogether and drawn down to reduce constituent costs*

**Comment:** Any other district would like to enjoy a fund balance that has been carefully planned.

**Response:** Comment noted.

**Counterpoint:** East Davis is one of the only sustainable FPDs (and possibly the only sustainable FPD) in Yolo County. This sustainability was accomplished through the hard work of good people, over a decades-long effort. Now, LAFCo recommends a revision that exposes the District to the same deficit spending curve as the financially troubled FPDs--racing the District to the bottom, on the lowest common denominator.

## 13. Page 8, Last paragraph

*East Davis FPD should amend its reserve policy reducing the current 110% of one year's expenditures to, at a minimum, align with government standards (SCO and GFOA). The District should also consider amending its contract with the City of Davis to simply pass-through revenues (similar to Springlake FPD's contract with the City of Davis), which would allow the fund balance to be eliminated altogether and drawn down over time to reduce constituent costs.*

**Comment:** Is this a good example? It is understood they have significant issues (e.g., dwindling funding, inability to fill board positions).

**Response:** This statement is referring specifically to contract payment terms being a pass through of property taxes and assessments collected.

**Counterpoint:** Prior to the District's Prop 218 effort, a financial analysis was performed (in cooperation with the County, City, and District), demonstrating that without a Prop 218, the District would be "broke" within a few years.

**This LAFCO statement only serves to dismantle the successful, sustainable system that has been built over the past 25 years. To reverse this successful process is irresponsible.**

## 14. Page 9, Paragraph 1

*East Davis FPD should review the County ledgers at least quarterly to ensure transactions are accurately posted to the District's fund. The review should at least include a comparison to prior year actuals and a current year budget to actual.*

**Comment:** We get one significant invoice per year. Why is it necessary to review quarterly? Per comments from Page 8, the District has only 5 transactions per year. Moreover, as County DFS is the District's fiscal agent and fiduciary, it should be incumbent upon County DFS to provide reports to the District on a regular basis.

**Response:** As previously noted, staff will amend the recommendation for the commission to review financial reports biannually, not quarterly. The commission has been delegated fiduciary responsibility of the FPD and the County acts as the treasury. It is important for the Commission to review the transactions, however minimal, to ensure accuracy. Missing funds were found by LAFCo and had corrections posted.

**Counterpoint:** Per County Tax Accounting, they are the fiduciary agent for the District.

#### 15. Page 9, Question d)

*d) Does the agency need adequate policies (as applicable) relating to personnel/payroll, general and administrative, board member and meetings, and segregating financial and accounting duties among staff and/or board to minimize risk of error or misconduct (see suggested policies list)?*

**Comment:** This should be a “No.”

**Response:** Staff agrees this is a typo and will correct it, thank you. **Agreed.**

#### 16. Page 10, 6a paragraph 1

*East Davis FPD receives contract services from the City of Davis, as does the neighboring No Man’s Land and Springlake FPDs. However, the East Davis FPD appears to be paying more for the same service and its contract provisions are the only one of the three FPDs that do not contain any cost containment measures that would give the East Davis FPD more certainty for its annual budgets. The East Davis FPD was unaware of the more advantageous contract provisions negotiated between the City of Davis and the other FPDs, and the existing governmental structure contributes to this issue.*

**Comment:** The District pays a pro rata fair-share for fire service based on ad valorem (AV) taxes, as demonstrated in the bona fide engineering report and associated ballot language for the Prop 218. Springlake and No Man’s Land *do not* pay a proportionate rate for the services that they enjoy and have no financial sustainability recourse (however, East Davis does). Both Springlake and No Man’s Land do not generate enough income to cover the cost of service provided. Therefore, this is not a case of East Davis paying too much--but rather a case of the other two districts not paying enough (or *their pro rata fair share*).

There are built-in cost containment measures in both the East Davis Prop 218 and contract agreement. The formula is very specific and will be further refined as stated in the comments for Page 7. The contract inflation clause is also specifically set at 3%, or CPI, whichever *IS LESSER*. This inflation clause has not been exercised in at least the past 7 years and is not likely to be exercised in the foreseeable future. Moreover, the absence of a sustainable revenue mechanism *without* an inflation clause is a direct cause of the financial instability of some Yolo Rural FPDs as costs are outrunning the revenue to support them. The revenue mechanism the District has in place is why East Davis is successful. *Any further assumptions on this matter should be held in abeyance until after SCI Consultants have completed their comprehensive, countywide Rural FPD Prop 218 study.*

MSR statements associated with residents being confused as to what fire district they live in, what fire department serves them, and which fire commission represents them are *specious, contrived, and unfounded*.

The “advantage” of underpaying for service is detrimental to the entire system.

**Response:** As noted in the comment, the District pays a pro rata share for fire service based on the assessed value of its real property compared to that of the City. The East Davis FPD has no control over the budget for fire services adopted by the City of Davis. The FPD is merely allocated its share based on

assessed valuation. The report's reference to no cost containment refers to the cost of the contract only, not the Prop 218 assessment.

**Counterpoint:** Cost containment provisions reside in the contractual formula for paying a pro-rata fair-share. The absence of this formula (and the requisite Prop 218), are why the failing FPDs are in financial trouble.

To have the District do as LAFCo suggests is the pathway to insolvency. It is natural for annual costs to go up over time. Moreover, to not keep pace with inflation is irresponsible, and the root-cause of the plight for the financially troubled FPDs.

#### 17. Page 10, 6a paragraph 2

*No Man's Land FPD was formed in 1974, and the during formation process annexation to the East Davis FPD was considered, but "the City of Davis has refused to annex the territory to the East Davis Fire District at this time, and the East Davis Fire Protection District has therefore stated they do not desire to annex the territory*

**Comment:** Because board members are volunteers from our own district and community.

**Response:** No response needed.

**Counterpoint:** This is a change simply for the sake of change. There is no benefit to either District.

#### 18. Page 10, 6a paragraph 3

*All three FPDs are dependent to Yolo County and serve as funding and service mechanisms of the County, and it would enhance efficiency, increase accountability for community service needs, and be less confusing to the public if all the territory served by City of Davis were combined under one district*

**Comment:** Disagree. East Davis district has voted to tax themselves to keep from falling behind. Whereas other districts have voted down any measures that might mean an increase in taxes. This is why East Davis is successful while others are not.

**Response:** The Board of Supervisors, as the ultimate governing body of the three districts around Davis, has funded a Proposition 218 study and will consider the district funding mechanisms and governance to provide services to all the unincorporated Davis area constituents in evaluating the MSR's recommendations.

**Counterpoint:** Any decisions should be held in abeyance until the Countywide Prop 218 study has been completed by SCI Consultants. LAFCo has repeatedly said, "...we should let the process finish."

#### 19. Page 10, 6a paragraph 4

Reorganization would benefit the East Davis FPD in the following ways:

**Comment:** The people within East Davis borders who care, know who their board is.

**Response:** Comment noted.

**Counterpoint:** This is unsupported by any data.

## 20. Page 11, Paragraph 2

*For example, the East Davis FPD's rates are higher than No Man's Land and Springlake FPDs and do not include any cost containment provisions, even though they receive the same level of service from the same fire department.*

**Comment:** False. Discussed at length re: items on previous page (10).

**Response:** Staff will clarify this sentence to make it clearer it is referring to contract costs, not the level of the Prop. 218 assessments.

**Counterpoint:** See District comments to #16 (page 10, 6a, paragraph 1).

## 21. Page 11, Paragraph 2

*It appears the contract gives the discretion to the District of whether to maintain the reserve, but East Davis FPD has maintained the reserves at levels greater than other districts.*

**Comment:** Because other districts couldn't pass a Prop 218 (what is causing this situation) they are unsustainable, while East Davis is sustainable.

**Response:** See response to #18 above.

**Counterpoint:** See District comments to #18.

## 22. Page 11, Paragraph 3

*Expanding the territory of the district will also expand the pool of individuals who might be willing to serve as commissioners, which could ease the burden on those who have served long terms. It also might allow the commission to expand its membership from five to seven, which would spread out any administrative workload handled by the commissioners.*

**Comment:** See previous comments re: contract costs, cost containment measures, and reserve fund balances (from Pages 6, 7, 8, and 10 above). The MSR/SOI Study statements regarding a partial solution of adding commissioners to the District Board, is completely out of touch with real world conditions in these Districts. Springlake struggles to maintain a quorum and No Man's Land has never produced a single volunteer commissioner. Is the public to believe that volunteers will now inexplicably appear and be seamlessly galvanized into this board configuration? These are three different communities with different issues, interests, and intricacies. The reorganization being suggested is a dismantling of a successful district that has operated continuously since 1966 with no significant issues. The East Davis Board believes this reorganization will result in the ultimate failure of the District when undue financial and administrative burdens are imposed by adding two other Districts— absent an in-kind benefit assessment from the additional Districts/parcels or any administrative support from the County. The residents in the District are sure to react negatively when they learn that they now must subsidize service in two other areas—which will be the case as both of those Districts are currently *underfunded* and have no Proposition 218 levies. Any perceived savings or efficiencies will be overshadowed by the cost and effort of responding to the outcry by residents and property owners that voted for the East Davis District in its current form.

**Response:** The MSR recommendations are not suggesting a dismantling of the East Davis FPD. Loco's goal is obviously not the ultimate failure of the District. No financial and little administrative burdens are being imposed by annexing the territory of the two other districts that receive the same services, and there are potential solutions to address any administrative burdens (e.g. County staff assistance). The County is studying a Prop 218 increase to address the funding needs of FPDs, including the areas served by the City of Davis, so each area of the District will be paying its fair share and areas some areas will not be "subsidizing" others in the District. It is anticipated the Board of Supervisors, as the ultimate governing body of the three districts around Davis, will weigh the community benefits with the potential burdens to the districts in evaluating the MSR's recommendations.

**Counterpoint:** LAFCo does not have the authority to commit County resources to provide staff support to the District.

### 23. Page 12, item h

*Maybe. Dependent districts are not legally required to maintain a website. However, East Davis FPD maintains a website and received a 25% transparency score for best practices in 2021. Please see the report posted on the LAFCo website for where improvements are recommended.*

**Comment:** This should be NO. We are not required to have a website but because we do have one are being criticized by LAFCO.

**Response:** Websites are an important tool in promoting transparency in government, especially for small districts. The Website Transparency Scorecard process began at the expressed request via resolution of all the cities and Yolo County. Best practices are recommended, but the report is clear that none of its recommendations are legally required. **Agreed.**

### 24. Page 12, Paragraph 7

Accountability, Structure and Efficiencies MSR Determination

*East Davis FPD receives contract services from the City of Davis, as does the neighboring No Man's Land and half of Springlake FPDs. However, the East Davis FPD appears to be paying more for the same service and its contract provisions are the only one of the three FPDs that do not contain any cost control/containment measures that would give the East Davis FPD more certainty for its annual budgets. The existing governmental structure contributed to this issue.*

**Comment:** Text edit noted above.

False. See comments on page 10, "Discussion re: Accountability, Structure, and Efficiencies."

**Response:** Instead of "half of" staff will state "a portion of". See response to Comment #16.

**Counterpoint:** Davis contracts for service to approximately 1/3 of Springlake Fire District (from CR29 south)

### 25. Page 13, paragraph 2

Accountability, Structure and Efficiencies MSR Recommendation(s)

*The East Davis FPD sphere of influence should be updated to include the No Man's Land FPD territory and the portion of Springlake FPD territory south of County Road 29. Those areas should then be annexed into the East Davis FPD as part of a reorganization of the Elkhorn, No Man's Land, and Springlake FPDs.*



**Comment:** False. The MSR implies that the City of Davis has a problem because of multiple fire contracts for the three districts. However, the MSR reorganization will result in both Woodland and Elkhorn having multiple contracts to manage which seems contrary to the goal of contract reduction.

**Response:** The MSR is not intending to imply the City of Davis has a problem. Rather, staff is suggesting multiple fire contracts is inefficient and not resulting in the most advantageous contract provisions for the FPDs. The recommended reorganization would not result in the City of Woodland and Elkhorn FPD having multiple contracts to manage.

**Counterpoint:** According to the LAFCo MSR/SOI map Woodland will have 2/3 of Springlake and 1/2 of Elkhorn (2 contracts); Elkhorn will have contracts with Woodland and West Sacramento (2 contracts).

#### 26. Page 13, paragraph 4

*Dependent districts are not legally required to maintain a website. However, East Davis FPD maintains a website and received a 25% transparency score for best practices in 2021. Please see the report at <https://www.yololaftco.org/yolo-local-government-website-transparency-scorecards> for where improvements are needed.*

**Comment:** This should be NO. We are not required to have a website but because we do have one are being criticized by LAFCo. The District has no record of being informed of the website transparency score short-comings and can either remedy those issues or take the site down completely—since it is not required.

**Response:** See the response to Comment #23. The District has been on the distribution list regarding Website Transparency effort, which LAFCo has undertaken at the request of the County and the cities. LAFCo is happy to update the contact information if the District wishes to have someone else receive notifications in the future.

**Counterpoint:** The District updates its contact information with the County annually.

#### 27. Page 13, Item 7a

*Most of the East Davis FPD populated territory is served, however some rural portions are unserved. In the urbanized portions of the East Davis FPD, El Macero and Willowbank have access to 987 Mbps (or nearly 1 Gbps/"Gig") speeds while the Davis Creek Mobile Home Park only has access to 10 Mbps download and 1 Mbps upload speeds from AT&T (even though 1 Gig speeds are available from Comcast immediately surrounding the Park and were likely excluded for economic reasons). Most of the rural areas in the FPD surrounding these communities are only served by wireless service and far less than the 25/3Mbps broadband threshold.*

*Davis Creek Mobile Home Park is eligible to receive California Advanced Services Fund (CASF) Infrastructure grants as shown in the map below. Yolo County should explore grants to upgrade infrastructure with either the existing provider, AT&T, or Comcast which provides high speed broadband service in the immediate surrounding vicinity.*

**Comment:** This seems irrelevant with regard to discussions of FPD coverage and oversight. No FPDs have control over internet infrastructure.

**Response:** Lack of broadband service and access is a significant problem in some portions of the unincorporated County. Per Yolo LAFCo Project Policy 6.2, the MSR will provide information and recommendations on the following, among other relevant considerations:

- a) Availability of high-performance broadband (i.e. greater than 25Mbps downloads and 3 Mbps upload) at home, schools, libraries and businesses;
- b) Accessibility to affordable broadband (e.g. providers offering low-income programs); and
- c) Accessibility to training and support to enable digital inclusion.

The MSR does not state that the FPD is responsible for internet infrastructure. Rather, this information is intended to promote digital access countywide and ensure public safety organizations have the information and communication access needed to perform the service. **Agreed.**

## 28. Page 15, Item 8a

*There were no recommendations from the 2016 MSR specific to the East Davis FPD.*

**Comment:** Nothing has changed since 2016. Begging the question as to why such intrusive recommendations now?

**Response:** The MSR provides an opportunity to re-evaluate the efficiency and sensible organization of local government.

**Counterpoint:** All District systems have functioned well for decades. Prior MSRs have found no significant issues with these same systems. Only now, in the wake of the financially troubled FPDs asking for Prop 172 funding, is East Davis swept into the fray and suddenly under critical dissection.

## 29. Page 16, paragraph 1

*Staff has reviewed the agency's Sphere of Influence and recommends that a SOI Update is NOT NECESSARY in accordance with Government Code Section 56425(g). Therefore, NO CHANGE to the agency's SOI is recommended and SOI determinations HAVE NOT been made.*

*Staff has reviewed the agency's Sphere of Influence and recommends that a SOI Update IS NECESSARY in accordance with Government Code Section 56425(g). Therefore, A CHANGE to the agency's SOI is recommended and SOI determinations HAVE been made and are included in this MSR/SOI study.*

**Comment:** Check this box and uncheck the other.

**Response:** The Commissioners' position is noted. LAFCo's direction to staff on March 31, 2022 is to reorganize the contract districts such that its results in one district for each city.

**Counterpoint:** One size does not fit all. What analysis led to LAFCO's direction to staff ("...one district for each city..."). There is no regard for the fact that this makes no practical sense and provides no benefit for East Davis.

## 30. Page 18, item 2b

*The SOI would not expand services; rather it better reflects and aligns with the services already provided by the City of Davis. The City of Davis is best suited to provide services more directly via the East Davis FPD. Please see MSR item 6a.*

**Comment:** This would place more work on the volunteer Board.

**Response:** The FPD has the financial resources to contract with the City or the County to perform whatever minimal services the fire commission is unable or unwilling to perform. Even with the expanded service territory, the demands on the volunteer commissioners would not be disproportionately greater than for other districts.

**Counterpoint:** It is not within LAFCo's authority to make policy decisions or assign duties for the District.

**31. Page 19, item 3a**

*The City of Davis already provides fire protection and emergency response services in the SOI territory, has capacity, and provides adequate services.*

**Comment:** The volunteer board will be impacted. More work thrust upon them for no gain. And the carefully planned EDCFPD reserves fund will be unnecessarily spent down.

**Response:** Please see the responses to #11 and #30.

**Counterpoint:** See District's comments to #11 and #30.

**Elkhorn Fire Protection District  
19396 County Road 124  
West Sacramento, CA 95691**

July 14, 2022 *Hard copy provided at the July 20, 2022 meeting.*

**VIA ELECTRONIC MAIL ONLY**

Ms. Christine Crawford  
Yolo County LAFCo  
Board of Commissioners  
E-Mail: [lafco@yolocounty.org](mailto:lafco@yolocounty.org)

Re: Elkhorn Fire Protection District Alternative Proposal to the June 2022 Draft Municipal Services Report.

Dear Ms. Crawford:

We greatly appreciate the opportunity to recommend an alternative proposal to the dissolution of Elkhorn Fire Protection District ("District" or "Elkhorn FPD"). We understand that Yolo County Local Agency Formation Commission ("Commission") Staff have worked diligently to come to a solution that it deemed in the best interest of the public. However, as has been exemplified by the multiple letters sent to the Commission, the District's residents know that their interests will be irrevocably harmed by the annexation of their lands into other fire protection districts in the county. For this reason, Elkhorn Fire Protection District Board of Commissioners respectfully requests that the Commission consider annexing the high-traffic commuter corridors of I-5 and Old River Road to the service areas identified in the Draft MSR, leaving the rural areas with the District. In so doing, the District would enter into a new mutual aid agreement with the Cities of Woodland and West Sacramento (collectively, "Cities").

Under a new mutual aid agreement, the District would continue to provide service on calls in these annexed areas, but the burden of those calls would be more properly shifted to the two urban areas from which the commuters are coming and going, and not to the Elkhorn residents, who are currently subsidizing these services. In reaching a new mutual aid agreement, the District intends to determine whether reasonable compensation to the Cities is appropriate. We would utilize our past mutual aid agreement as a starting point for our conversations with the Cities and the development of a more beneficial collaboration for all Districts and their residents.

The County has engaged SCI to evaluate service costs and funding mechanisms among the fire service entities. That study is still forthcoming, but it will provide important data points to inform the structure of coverage and efficient distribution of response costs. The District is certain that the data will assist the District in continuing and further strengthening its financial stability. Furthermore, the data will indicate whether and to what extent compensation is appropriate between the Cities and the District. For that reason, if the Commission is not inclined to include the District's alternative proposal in its recommendations, the District

respectfully requests that it extend its review to accommodate that important data gathering effort.

Although more work must be done to finalize a proposal of this sort and to work out any of the Cities' concerns that we have not accounted for, the District will work diligently and in good faith with the Cities—and their respective fire districts—to come to an agreement that appropriately meets not only the needs of the commuters, but the unique needs of Elkhorn FPD's residents as well.

We thank you for your consideration and look forward to continuing to develop and collaborate on this new proposal.

Respectfully,

Elkhorn Fire Protection District Board of Commissioners

Dear Commissioners:

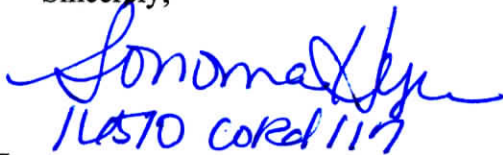
My name is Sonoma Hyer, and I am a resident of Yolo County. I submit this letter to voice my opposition to the Commission Staff's recommendation regarding the Elkhorn Fire Protection District ("District"). As a resident of the District, the recommendation to dissolve the District concerns me for many reasons.

Along with many of my neighbors, my property in the District is rural. As such, it is difficult to access. The District's volunteers are my neighbors or my neighbors' sons; they have intimate knowledge of the area, how to access my property in case of emergencies, and the particularities of my residence. When neighbors in the community have an emergency, often times we do not call 911—rather, we call the District volunteers. If the Commission approves the Staff's recommendation, it will eliminate the individuals with the requisite knowledge and resources to access and assist my property. Particularly concerning to me, if the District is dissolved, I know that my community will be de-prioritized. The District's residents are removed from the cities and will very likely take a back seat to the emergencies arising in the cities.

Moreover, notwithstanding the cities of West Sacramento's and Woodland's priorities, they will be unable to access or respond to emergencies when the bypass inevitably floods. I-5 will become grid-locked, and the firefighters will be unable to save my family or my property if an emergency should arise. Similarly, I do not want to subsidize the emergency response costs for commuters traveling on I-5. I believe it is unfair to my community to expect as much. In short, without the expertise of the District's volunteers, the District's residents and landowners will suffer significantly increased response times at a much higher cost. For these reasons, I greatly oppose dissolving the District.

Thank you for your consideration and your engagement in the community.

Sincerely,

  
11570 Cordell

District Landowner and Resident

**From:** Sonoma Hyer <rschyer1600@gmail.com>  
**Sent:** Friday, July 1, 2022 8:18 AM  
**To:** LAFCO <LAFCO@yolocounty.org>  
**Subject:** Elkhorn Fire Protection District

Local Agency Formation Commission

Please find attached my letter in regards with your desire to shut down our local emergency response from Elkhorn Fire Protection District. We personally need them just last week. It was great to have friendly faces there to help us who knew how to locate us and knew how to access our property. Especially when the 911 auto name came up wrong on our 911 call and sent him searching instead I only had to tell dispatch one name our fire chief was here in seconds. That would have never happened if we were getting responses from Woodland or West Sac. Now I need to find out why dispatch under my address is tied to a commercial business nowhere close to our home. My husband is a patient at risk currently due to a recent medical situation and this concerns us greatly. Please note the response would have to come from WDL. We are more than 15 miles from West Sacramento as we are tied to an old mail route instead of our daily community.

Please attach my email to the following letter

Sincerely,  
Sonoma Hyer  
16510 County Road 117  
West Sacramento, CA

**RECEIVED**

By ttuck at 2:58 pm, Jun 30, 2022

Dear Commissioners:

My name is **Juan Jose Garcia**, and I am a resident of Yolo County. I submit this letter to voice my opposition to the Commission Staff's recommendation regarding the Elkhorn Fire Protection District ("District"). As a resident of the District, the recommendation to dissolve the District concerns me for many reasons.

Along with many of my neighbors, my property in the District is rural. As such, it is difficult to access. The District's volunteers are my neighbors or my neighbors' sons; they have intimate knowledge of the area, how to access my property in case of emergencies, and the particularities of my residence. When neighbors in the community have an emergency, often times we do not call 911—rather, we call the District volunteers. If the Commission approves the Staff's recommendation, it will eliminate the individuals with the requisite knowledge and resources to access and assist my property. Particularly concerning to me, if the District is dissolved, I know that my community will be de-prioritized. The District's residents are removed from the cities and will very likely take a back seat to the emergencies arising in the cities.

Moreover, notwithstanding the cities of West Sacramento's and Woodland's priorities, they will be unable to access or respond to emergencies when the bypass inevitably floods. I-5 will become grid-locked, and the firefighters will be unable to save my family or my property if an emergency should arise. Similarly, I do not want to subsidize the emergency response costs for commuters traveling on I-5. I believe it is unfair to my community to expect as much. In short, without the expertise of the District's volunteers, the District's residents and landowners will suffer significantly increased response times at a much higher cost. For these reasons, I greatly oppose dissolving the District.

Thank you for your consideration and your engagement in the community.

Sincerely,



District Landowner and Resident



**RECEIVED**

By ttuck at 2:58 pm, Jun 30, 2022

Dear Commissioners:

My name is **Ricardo Garcia**, and I am a resident of Yolo County. I submit this letter to voice my opposition to the Commission Staff's recommendation regarding the Elkhorn Fire Protection District ("District"). As a resident of the District, the recommendation to dissolve the District concerns me for many reasons.

Along with many of my neighbors, my property in the District is rural. As such, it is difficult to access. The District's volunteers are my neighbors or my neighbors' sons; they have intimate knowledge of the area, how to access my property in case of emergencies, and the particularities of my residence. When neighbors in the community have an emergency, often times we do not call 911—rather, we call the District volunteers. If the Commission approves the Staff's recommendation, it will eliminate the individuals with the requisite knowledge and resources to access and assist my property. Particularly concerning to me, if the District is dissolved, I know that my community will be de-prioritized. The District's residents are removed from the cities and will very likely take a back seat to the emergencies arising in the cities.

Moreover, notwithstanding the cities of West Sacramento's and Woodland's priorities, they will be unable to access or respond to emergencies when the bypass inevitably floods. I-5 will become grid-locked, and the firefighters will be unable to save my family or my property if an emergency should arise. Similarly, I do not want to subsidize the emergency response costs for commuters traveling on I-5. I believe it is unfair to my community to expect as much. In short, without the expertise of the District's volunteers, the District's residents and landowners will suffer significantly increased response times at a much higher cost. For these reasons, I greatly oppose dissolving the District.

Thank you for your consideration and your engagement in the community.

Sincerely,



District Landowner and Resident



June 29, 2022

Yolo Local Area Formation Commission  
625 Court Street, Suite 107  
Woodland, CA 95695  
(Transmitted via email to [Christine.Crawford@yolocounty.org](mailto:Christine.Crawford@yolocounty.org))

RE: MSR for Yolo Fire Districts




Dear Chair Woods and LAFCo Board:

On behalf of the City of Davis, I want to thank LAFCo for its thorough and thoughtful analysis of the fire protection districts in Yolo County. The LAFCo Municipal Service Review (MSR) is an important first step in the consideration of how Yolo fire districts may be organized in the future to serve the needs of our agricultural, open space, and rural communities. City of Davis staff have reviewed the report and would like to offer the following observations:

- We believe the main focus for all parties involved should be for continued excellence for fire service protection throughout Yolo County.
- The City encourages fiscal prudence and stability for involved jurisdictions. Changes that would reduce current funding levels to the City of Davis Fire Department would be difficult to absorb.
- The City of Davis wants to ensure there is no degradation in service or protection to districts, Davis or the other cities in Yolo County. Any efforts to reorganize should be with the fundamental objective of service improvements, and not to the fiscal or operational detriment of other districts or jurisdictions.
- Any changes to funding mechanisms should be properly considered by all affected parties.

In addition, the City would like to note the following suggestions related to the body of the LAFCo report:

- *Pg. 5-7, c) “ Due to delay on the part of the City of Davis providing information, the District experienced a net loss in fiscal year 2021 that was not anticipated.” – The City has not delayed any information to the district but continues to work closely with the district to provide accurate and timely information.*
- *Pg. 5-10 Discussion a) “However, the East Davis FPD appears to be paying more for the same service (on a per dispatch basis) and its contract provisions*

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are the only one of the three FPDs that do not contain any cost containment measures that would give the East Davis FPD more certainty for its annual budgets.”

*The City contract does not charge on a formula or a per dispatch basis and notes that the cost and provision of service is complex. The City encourages LAFCo, and ultimately the County to consider a broad range of metrics when evaluating cost-effectiveness, fiscal resiliency, and reserve policies, including such factors as geography, incident types and complexity, duration, distance, risk factors, constituent service level expectations, etc. in its recommendations regarding any potential changes to the current district configuration.*

The City of Davis, which currently provides service to three districts, is vested in this process and will continue to be engaged as it proceeds through LAFCo and ultimately to the Yolo County Board of Supervisors. We appreciate the work of all involved thus far, and we look forward to additional engagement on this matter.

Sincerely,



Mike Webb  
City Manager

cc: Davis City Council  
Yolo County Board of Supervisors  
Gerardo Pinedo, Yolo County CAO  
Joseph Tenney, Davis Fire Chief