

Amendments to Sphere of Influence Criteria For Fire and Emergency Medical Service Agencies

In September 2019 the Commission considered a listing of six criteria for evaluating the spheres of influence for fire and emergency medical service agencies.

The criteria are outlined in the document attending this report, which includes amendments described in the following three sections:

Operational Fit

The criterion for “operational fit” was solely focused on direct operational support – provision of resources, in the form of staffed crews, to respond to calls within a given area. Under this interpretation, it would not make sense to establish spheres of influence that featured discontinuous territories.

In simple terms, this criterion supports sphere amendments that recognize how one agency may provide mutual aid (“backup”) resources to another, or one that provides direct response in the form of advanced life support/ambulance coverage.

For the case of the remaining volunteer fire companies serving territory within County Service Area 40, the Gold Ridge Fire Protection District, which is managing the North Bay Fire Inc. contract to support the remaining volunteer companies, notes that the provision of direct funding support, administrative services, and training, even in the absence of direct operational support as described above, should be recognized within the operational fit criterion.

Staff believes it is appropriate to recognize that the service model proposed by Gold Ridge Fire Protection District can represent an operational fit, though believes it is a lesser case than a situation where direct operational support in the form of mutual aid or direct engine company or ambulance response takes place.

Advanced Life Support/Ambulance Territory

Staff believes that the criterion regarding evaluation of existing advanced life support (ALS) and ambulance transport territories should retain prominence amongst the six criteria for evaluating SOIs.

In this view, territories receiving ALS/ambulance services would naturally be included in the SOI of the provider agency.

However, staff recognizes that an SOI proposal that features transfers of financial resources from an agency that is within an ALS/ambulance provider territory to the provider could be considered. Simply stated, an agency could propose a sphere

amendment and eventual reorganization that featured financial payments to the agency providing the ALS/ambulance service.

Additional Amendment

Staff has updated this criterion to reflect recent reorganizations which notably subsumed two ALS agency providers into Sonoma County Fire District.

**Fire and EMS Agency
Sphere of Influence Amendment Criteria**

Sonoma Local Agency Formation Commission

September 16, 2019

Updated: October 5, 2022

The Sonoma Local Agency Formation Commission (LAFCO) has indicated a strong desire for fire and emergency medical service agencies in the County to reorganize into larger regional units as a means of sustaining and potentially improving service levels to communities.

The Commission recognizes that agencies are facing a series of challenges, including:

- Insufficient funding to begin transitions to a career paid workforce to offset the reduced availability of volunteer firefighters.
- A lack of sufficient funding to maintain and replace infrastructure, including vehicle fleets, equipment, and in particular, fire stations.
- The County's program to cede all territory in County Service Area 40 (along with territories designated as Incident Response Areas) to fire districts, effectively ending direct oversight of fire services in the "remainder" areas of the County.
- A need to maintain and in some cases extend the provision of Advanced Life Support ("paramedic") services, whether ambulance- or engine-based.

The Commission has also identified potential benefits of regional consolidation efforts, including:

- Improved operations due to improved resource deployment practices, consistent employee training, and other best practices.
- Somewhat lower costs due to sharing of leadership and administration duties.
- Potential reductions in vehicle fleets, leading to lower maintenance and capital (replacement) costs.
- Broader career pathways for paid staff.

LAFCO Authority

There are three fundamental ways that LAFCO can influence a transition to regional fire and EMS agencies in Sonoma County:

- Adopt Municipal Service Reviews (MSRs) of fire and EMS agencies that conform to the requirements listed in the Cortese-Knox-Hertzberg Local Government Act, including, but not limited to, evaluations of service levels, financial ability to provide services, and opportunities for shared services with other agencies.
- Amend Spheres of Influence (SOIs), for agencies, indicating an expectation of eventual boundaries within a five- to ten-year timeframe.

As part of this process, the Commission is likely to establish a “lead agency” for a region, establishing an SOI for the agency that includes the entire region. This allows the lead agency to file for reorganizations that include annexing the territories of the other agencies in the SOI. The other agencies within the region would have their SOIs amended as “zero” spheres, indicating that they would eventually be expected to annex to the lead agency.

- Evaluate and consider agency reorganizations. Reorganization proposals, generally consisting of the dissolution or detachment from one agency and annexation to another (the “lead agency” per above), can be filed with LAFCO by agencies (by resolution), by the public (by petition), or by the County of Sonoma (by resolution).

Criteria for Amending SOIs to Support Regional Reorganizations

The Commission has asked staff to prepare a set of criteria for evaluation of sphere of influence amendments involving fire and emergency medical service agencies. These are the criteria that staff considers when evaluating proposed sphere of influence amendments:

Operational Fit

Perhaps the most important criterion is whether agencies within a proposed regional organization make a good operational fit.

Operational fit includes an evaluation of geography and travel times. A proposed regional consolidation should include agencies that can realistically provide service coverage using existing facilities and combined staffing.

One way to consider this criterion is to evaluate the prevalence of mutual aid support. For example, if two neighboring agencies are the principal mutual aid partners for each other, it is a good indication that they should be part of the same sphere of influence.

A secondary set of operational fit criteria might include whether agencies have similar staffing models, or whether they currently provide similar services (i.e. whether agencies are providing advanced or basic life support services).

Financial Sustainability

Reorganizations that could include the extension of special taxes (almost always in the form of parcel taxes) can be a vital component of enhancement of the financial sustainability of the provision of services, and therefore should be reflected in sphere of influence amendment evaluations. Similarly, any opportunity to reduce costs, however modest, should be evaluated.

For County Service Area 40 – Fire Services territory, the willingness of the County of Sonoma to provide suitable long-term financial support for Volunteer Fire Companies to join regional consolidations should also be considered.

Regardless of these considerations, the Commission has shown a willingness to consider sphere of influence amendments that do not have a clear pathway that would result in long-term financial sustainability for the affected agencies but would likely be skeptical of actual reorganizations that don't show at least near-term financial sustainability.

(Staff believes that financial sustainability should be evaluated for staffing and equipment/vehicles, but not for cases where facilities are insufficient. Facility replacements or improvements can perhaps be best addressed through a combination of grant programs and Mello-Roos tax assessments.)

Advanced Life Support/Ambulance Territory

There are two Fire Protection Districts, two Health Care Districts and one City in Sonoma County that provide ambulance-based Advanced Life Support (ALS) service:

- Sonoma County Fire District
- Sonoma Valley Fire District
- Coast Life Support
- Cloverdale Health Care District
- The City of Petaluma

The two Fire Protection Districts and the City of Petaluma provide ALS and ambulance transport services well beyond their respective district boundaries. The agencies receive per-call revenue when responding to calls outside their boundaries, but do not receive any tax revenue from these areas.

The districts and Petaluma are finding it increasingly difficult to sustainably provide ALS/ambulance transport services. If the communities that are outside the respective district boundaries wish to continue to receive ALS/ambulance transport services from these agencies, it would be equitable to have tax revenues from those areas supporting the service.

Agency Request/Preference

Agencies are free to request sphere of influence amendments at any time, with the understanding that a Municipal Service Review and Sphere of Influence Study must be conducted to evaluate any proposals. Without precluding the Commission from appropriate deliberations regarding any proposals, agencies that cooperatively support sphere of influence amendments are perhaps best-positioned to secure SOI amendments.

Elimination of CSA 40 Territory

The County of Sonoma has entered into a contract with North Bay Fire, Inc., which represents the remaining Volunteer Fire Companies who are providing service to most of County Service Area 40 – Fire Services, for continued service provision. The County also has responsibility for Integrated Response Plan (IRP) areas, which are generally provided services by neighboring Fire Protection Districts under contract.

The contract with North Bay Fire is intended to cease at the close of 2023, with the County intent on seeing all CSA 40 and IRP areas reorganized into regional agencies.

Given this timeframe, staff believes it incumbent upon LAFCO to facilitate reorganizations involving the remaining CSA 40 and IRP areas by including these territories into Fire Protection District spheres of influence, and to adjudicate reorganization proposals as appropriate.

Preservation of Further Consolidation Opportunities

A proposed sphere of influence amendment should not preclude further amendments that could include additional agencies, or a broader, regional consolidation. Although there is some advantage to seeking one-time “solutions” for sphere of influence amendments in support of regional consolidations, the Commission has the authority to amend SOIs as long as there has been a study performed that conforms to the requirements of the Cortese-Knox-Hertzberg Act.

Criteria Evaluation Table

Staff has prepared a table that can be used as part of staff reports and/or MSR/SOI studies to evaluate proposed sphere amendments using the proposed criteria:

**Sphere of Influence Amendment
Criteria Evaluation Table**

Criteria		
<p align="center">Operational Fit</p> <p>Does the proposed SOI make sense from an operational perspective?</p>		
<p align="center">Financial Sustainability</p> <p>Will a future reorganization offer opportunities to increase revenues or decrease costs?</p>		
<p align="center">Advanced Life Support/Ambulance Service Territory</p> <p>Is the SOI amendment consistent with existing ambulance service territories, if applicable?</p>		
<p align="center">Agency Request/Preference</p> <p>Do the subject agencies support the sphere amendment, with the understanding that it predicts eventual reorganizations?</p>		

<p>Elimination of CSA 40 Territory</p> <p>Does the sphere amendment address remaining CSA 40 and IRP territory in the region?</p>		
<p>Preservation of Further Consolidation Opportunities</p> <p>Does the sphere amendment preclude other options for future reorganizations?</p>		