

POTENTIAL FOR ACTIVATION OF FIRE PROTECTION/EMERGENCY MEDICAL RESPONSE AUTHORITIES FOR WRIGHTWOOD COMMUNITY SERVICES DISTRICT

At the request of the Wrightwood Community Services District (hereafter District) this study has been prepared to analyze the feasibility of expanding the range of services offered by the district to assume the responsibility for the provision of fire protection and emergency medical response services within its existing boundaries (map of District boundary and sphere included as Attachment #1). Pursuant to the principal act for Community Services Districts (Government Code Section 61000 et seq) this service is defined as follows:

Government Code Section 61100. *Within its boundaries, a district may do any of the following:*

...

...(d) Provide fire protection services, rescue services, hazardous material emergency response services, and ambulance services in the same manner as a fire protection district, formed pursuant to the Fire Protection District Law, Part 2.7 (commencing with Section 13800) of Division 12 of the Health and Safety Code.

To understand this undertaking, the range and scope of this service needs to be understood. One of the most critical services performed in a mountain community is the prevention and response to fire. However, this response is defined by the ownership of the lands – public lands are under the auspices of the federal or state fire providers; while private lands fall under the authority of the local entity within whose boundaries they are included. One thing to consider in this discussion is that fire protection is not required to be provided, it is a choice of a community for residential protection. The range of this service has evolved over the last century and the primary responsibility of a fire protection district today is emergency medical response.

LAFCO 3221, the Fire Protection/Emergency Medical Response/Ambulance Municipal Service Review conducted by the San Bernardino LAFCO, dated February 20, 2020, identifies the items it learned during the review process for fire and emergency services. These are also important understandings relevant to a discussion of the potential assumption of this service by the Wrightwood community for its environs:

- 1-7 *The reach of a fire department extends throughout the community. Fire departments provide for the health and safety of its constituents, improve the quality of life, secure economic vitality, provide business opportunity, protect the environment, promote social stability and increase resiliency. These efforts are accomplished by providing emergency and non-emergency services such as fire protection, EMS, hazmat, technical rescue, tactical response, community risk reduction, community engagement, public education, and emergency management programs etc...*
- 1-8 *There are no mandatory federal or state regulations directing the level of fire service staffing, response performance, or outcomes; though, there are industry guidelines. Thus, the level of fire protection services provided are a local policy decision, and communities have the level of services they desire or can afford. However, the body of regulations and guidelines on fire services provides that if services are provided at all, they must be done so with the safety of the firefighters and citizens in mind.*

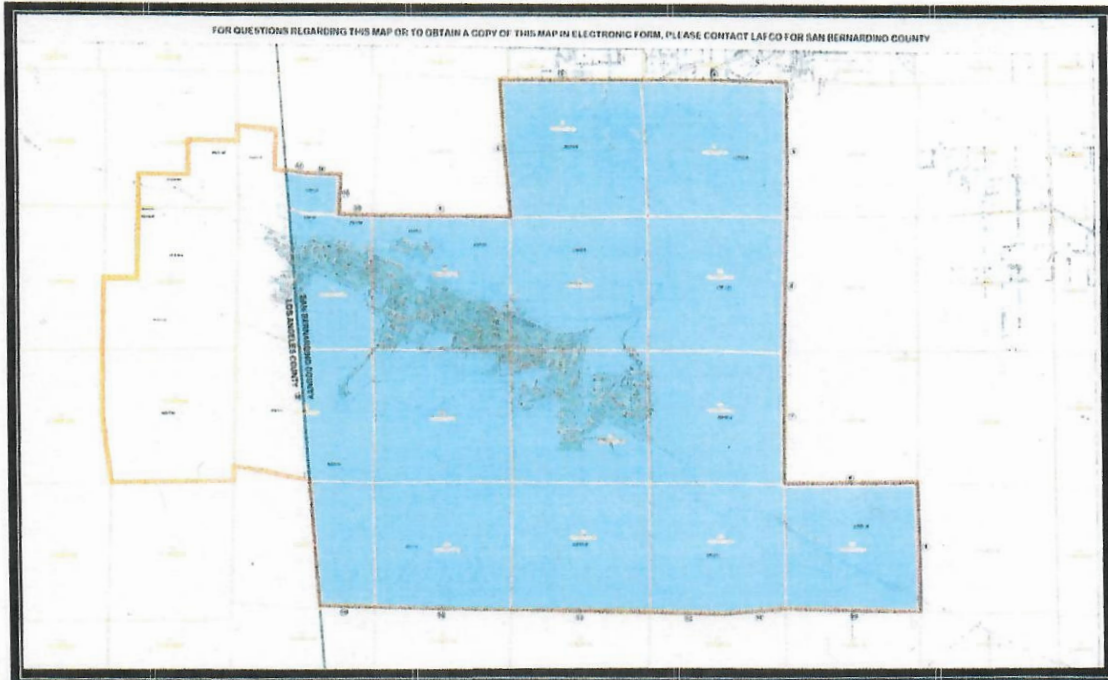
- 1-9 *All agencies that provide structural fire protection also provide basic medical service, and many provide advanced medical service, which is generally a paramedic. Following the initial medical response, a patient may require transportation to a hospital: some fire protection agencies are authorized to provide ambulance services while others are not.*
- 1-10 *The heaviest demand on the fire/emergency system is emergency medical calls. In 2016, fire departments in the United States responded to 35.3 million calls, with fire incidents being less than 4% and medical emergencies accounting for 68%. A sampling of fire agencies in San Bernardino County reveals similar percentages. Note that while medical calls account for most of the incidents, this does not reflect the amount of time a fire agency spends on these types of calls. A significant percentage of time is spent training, preparing to respond, preventing, responding, and mitigating fire incidents.*
- 1-11 *Fire departments are also the responder for homelessness, substance abuse, routine access to health care, and mental health.*
- 1-12 *The term "fire department" in reality has evolved to an "all-hazard" department. The workload of fire departments has grown substantially.*
- 1-13 *Fire agencies cannot be solely responsible for eliminating hazards and reducing risks to keep fire away from homes or keep homes from igniting. The job of the community is to keep itself safe and resilient. Risk reduction and prevention efforts led by the fire service that engages a broad range of government services and community stakeholders lessen the adverse impacts of disasters and emergencies. With available land lessening, the community needs to balance development and fire risk.*
- 1-14 *Fire agencies are modifying their service delivery depending on local needs and resources. For some, alternative service delivery methods such as rapid response vehicles meet the unique needs of that community.*

In addition, it is important to understand that local provision of fire protection is a policy decision of the responsible jurisdiction which is based upon what level of service the community desires or more importantly can afford. However, any such decision should be tempered by the knowledge that these services must be provided with the safety of the firefighters and citizens in mind.

Description of Service Area:

On July 1, 2017, the Wrightwood CSD came into existence following a vote of the residents of the community (San Bernardino and Los Angeles Counties). The request to authorize the expansion of the

services provided by the district would be for the entirety of the district (the boundaries are shown below). The identification of the division of territory within San Bernardino and Los Angeles County is important in the current service delivery pattern which includes an automatic aid agreement for San Bernardino County Fire to provide these services within Los Angeles County:



While a number of services were evaluated by the Wrightwood Feasibility committee and the Local Agency Formation Commission in its review of LAFCO 3202 the final determination was to limit the range of services to the following:

Streetlighting – Acquire, construct, improve, maintain, and operate streetlighting and landscaping on public property, public right-of-way, and public easements (§61100(g)).

Park and Recreation – Acquire, construct, improve, maintain, and operate recreation facilities, including, but not limited to, parks and open space, in the same manner as OLaw (commencing with Section 5780) of the Public Resources Code (§61100(f)).

Solid Waste and Recycling -- Collect, transfer, and dispose of solid waste and refuse and provide solid waste handling service, including, but not limited to, source reduction, recycling, composting activities, pursuant to Division 30 (commencing with Section 40000) and consistent with Section 41821.2 of the Public Resources Code (§61100c).

Wastewater – Planning and engineering for the potential development of a regional wastewater treatment system should such be required by the Lahontan Regional Water Quality Control Board in the same manner as a sanitary district, formed pursuant to Sanitary District Act of 1923 Division 6 (commencing with Section 6400) of the Health and Safety Code (§61100b).

CURRENT SERVICE:

The community of Wrightwood is located in Swarthout Canyon within the San Gabriel Mountains. It is surrounded by federal and state lands which receive their fire protection services from either CAL Fire, U.S. Forest Service, or the U.S. Bureau of Land Management. Residential and/or private lands fire protection and emergency medical response responsibility is currently assigned to the respective County Fire Protection District in each County. Ambulance provision is assigned through the EMS authority in each respective county (Los Angeles County is the Public Health Department; in San Bernardino County it is through the Inland Counties Emergency Medical Agency or ICEMA).

For the district's area within San Bernardino County, it is a part of the San Bernardino County Fire Protection District (hereafter SBCFPD). The area of the Wrightwood CSD is located within the North Desert Region of SBCFPD. This area is generally located on the northeastern flanks of the San Bernardino and San Gabriel Mountains extending northerly and northeasterly to the Kern County, Inyo County and State of Nevada boundaries. The Los Angeles County portion is within the Consolidated Fire Protection District of Los Angeles County (hereafter Fire District).

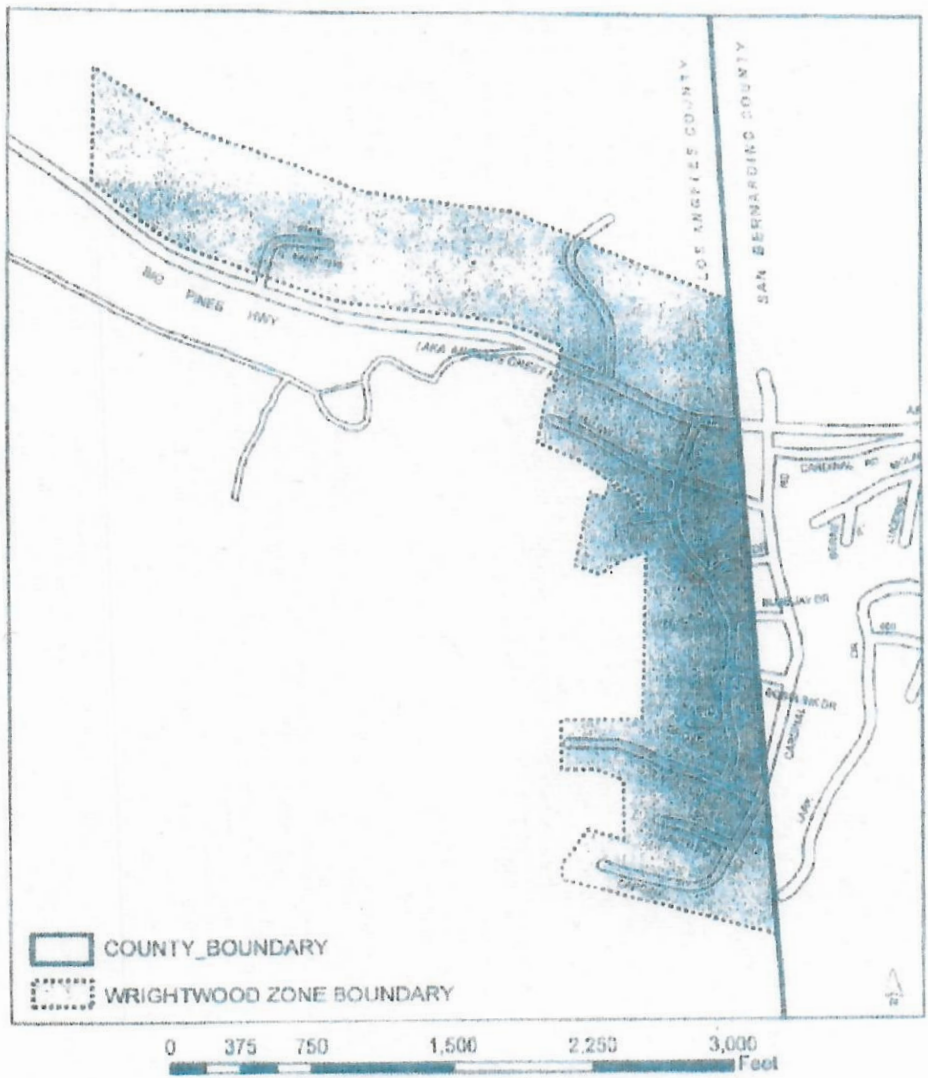
Due to the location and accessibility of the overall Wrightwood community (those areas along Highway 2 in both San Bernardino and Los Angeles counties) service delivery has been provided through a cooperative effort between the SBCFPD and the Fire District. The isolation from service providers in Los Angeles (by closure of Highway 2 into the area during the winters due to snow) and lengthy travel distances from stations in the Antelope Valley area has required this cooperation. The map excerpt below shows the location of Los Angeles County Fire stations.

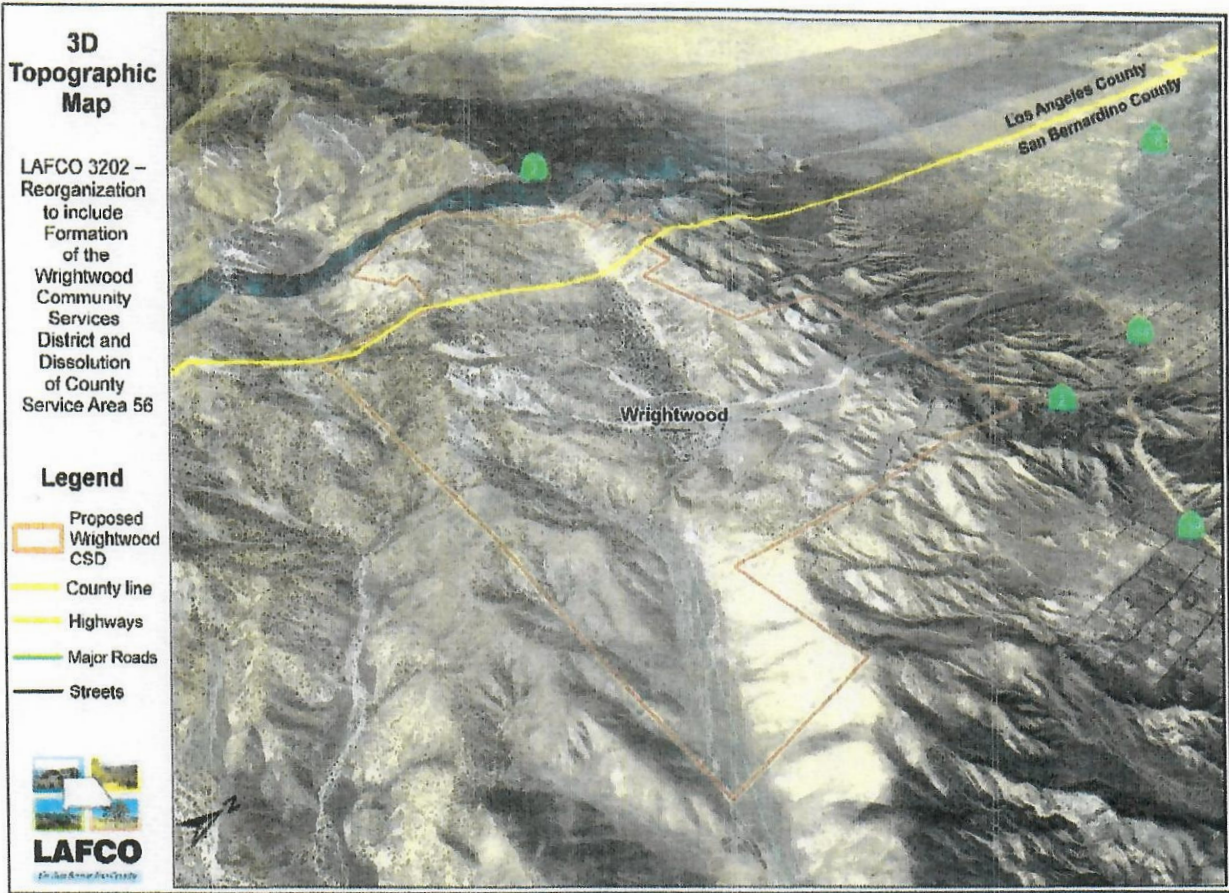


Since 1988, the Los Angeles County portion of the Wrightwood community, as well as a small portion westerly along Highway 2, has received its residential fire protection and emergency medical response services through an automatic aid agreement with SBCFPD. In 2015 a new agreement was entered into which provides for this ongoing service delivery pattern to rollover yearly unless terminated by one of the parties (evergreen contract). This agreement provides for the transfer of 90% of the fire protection revenues received by Los Angeles County Fire District (general ad valorem tax and special tax). The contract area is shown below. In addition, a topographic rendering of the area taken from the Wrightwood CSD formation report follows which shows the isolation of the area.

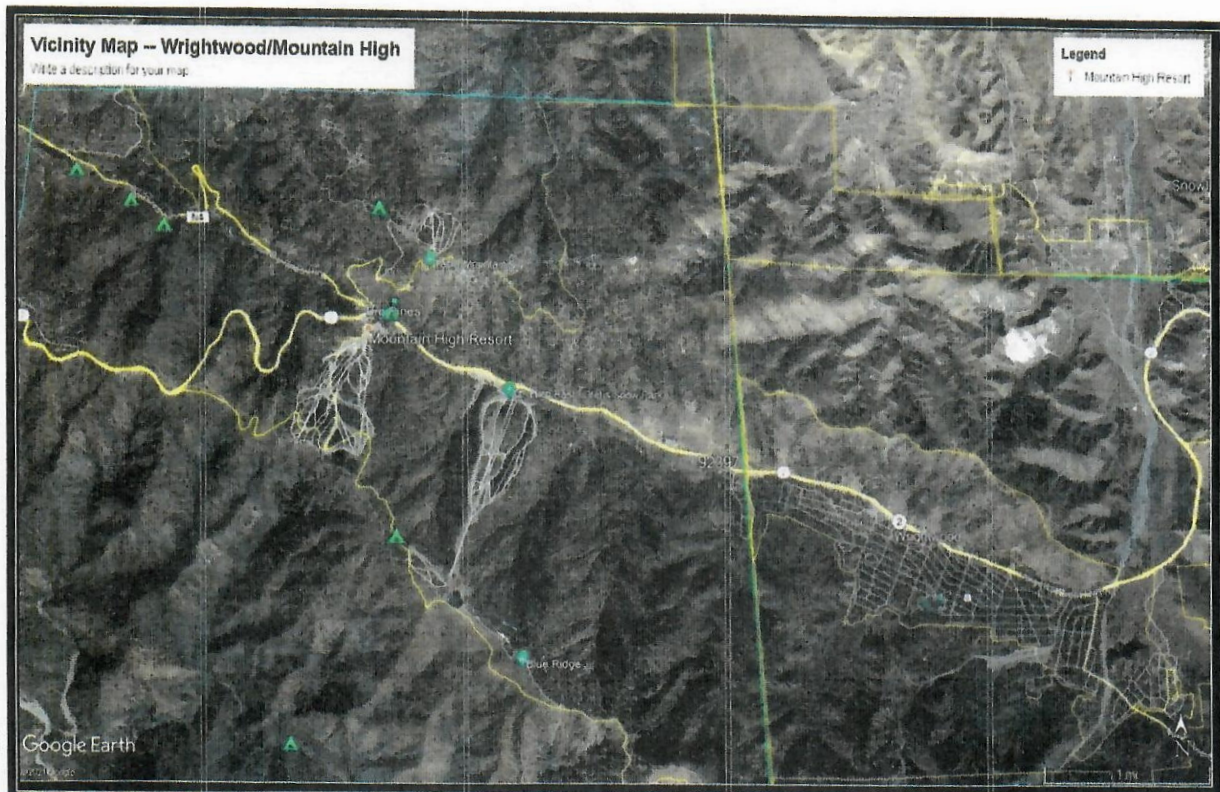
EXHIBIT A

Wrightwood Zone of Consolidated Fire Protection District of Los Angeles County





The automatic aid agreement does not include the transfer of fire protection funding for the delivery of these services to the Mountain High Ski Resort and surrounding areas along Highway 2. The following vicinity map identifies the Mountain High Ski Resort location in reference to the County line and primary community of Wrightwood.



The Mountain High Ski Resort operates three first aid rooms at the base of the resorts along with staging facilities at the top of the resorts where ski patrols are dispatched. Patrollers are dispatched for patient assessment and transportation to the base facilities. During the winter operations, Mountain High employs around sixty patrollers. Of these about 90% are estimated to be EMTs and the remainder would be “outdoor care” or in some cases doctors, nurses, and physician assistants. At the base facility, if further care is needed a call is made to the Fire authority.¹ Due to the location of these facilities, routinely the response is made by the SBCFPD.² The call logs, which follow, identify that approximately 20% of the calls for Station 14 are from the Mountain High area, far exceeding the number of calls to the contract area at approximately 11%. Thus, the service area is larger than that of the contract and revenues from this expanded area is limited to the direct charges for service to the individual and/or their insurance provider.

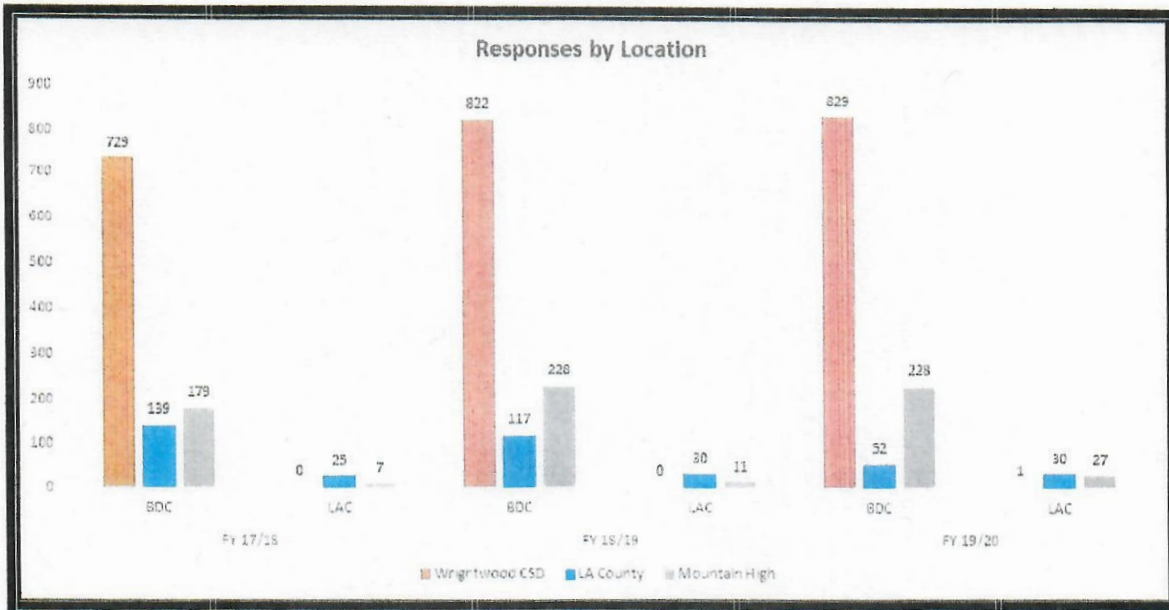
Mutual Aid	FY 17/18			FY 18/19			FY 19/20			Totals
	Station 14	Other BDC	LAC	Station 14	Other BDC	LAC	Station 14	Other BDC	LAC	
Wrightwood CSD	595	134	0	693	129	0	686	143	1	2,381
LA County	106	33	25	97	20	30	44	8	30	393
Mountain High	135	44	7	174	54	11	169	59	27	680
Totals	836	211	32	964	203	41	899	210	58	3,454
		1,079			1,208			1,167		

¹ Email from Ben Smith, VP of Resort Operations, Mountain High Resort, dated September 8, 2021

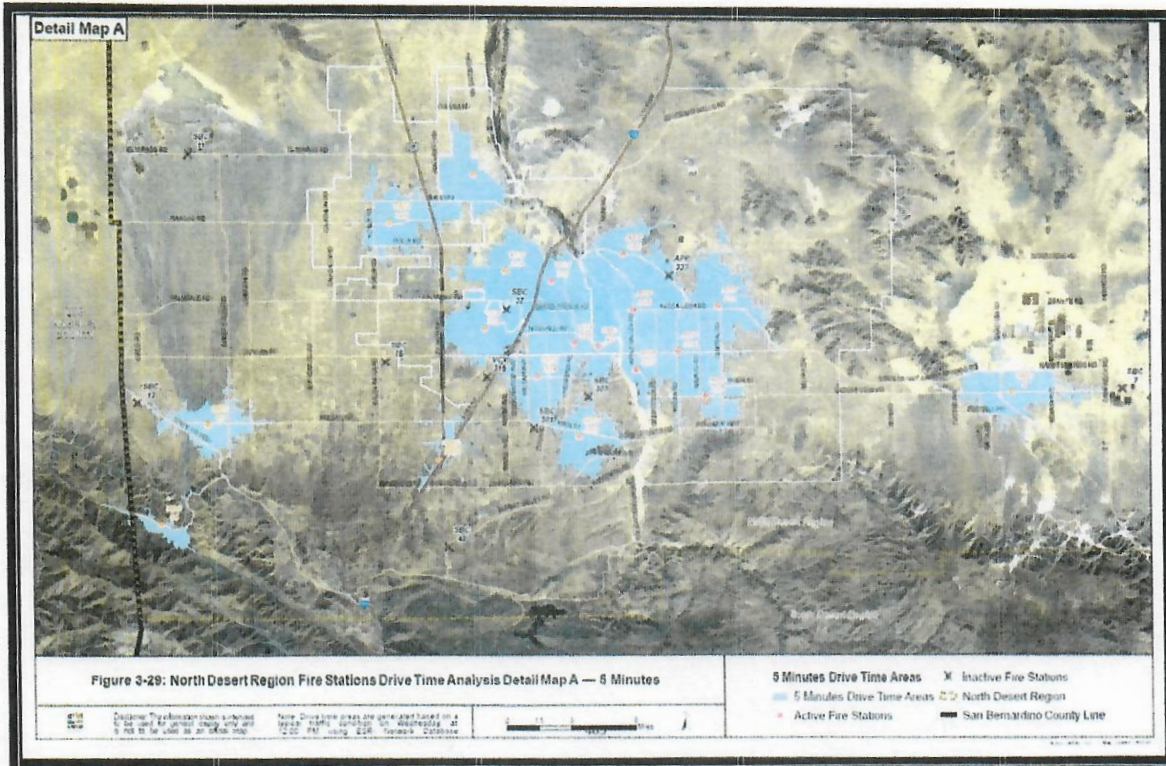
² San Bernardino County Fire Protection District Response to Public Records Request Dated June 21, 2021

Responses by Incident Type	FY 17/18		FY 18/19		FY 19/20		Totals
	BDC	LAC	BDC	LAC	BDC	LAC	
Medical	789	19	913	17	875	29	2,642
Structure Fire	36	1	47	0	36	0	120
Vegetation Fire	16	0	9	0	26	1	52
Vehicle Fire	9	0	2	1	5	2	19
Other Fire	12	0	7	0	12	1	32
Investigation/Alarm	29	0	28	0	29	0	86
Hazmat	5	0	20	1	18	0	44
Public Service	12	0	18	0	31	2	63
Rescue	24	0	12	3	9	4	52
Traffic Collision	93	12	86	17	61	18	287
Traffic Collision with Extrication	22	0	19	2	5	0	48
Other	0	0	6	0	2	1	9
Totals	1,047	32	1,167	41	1,109	58	3,454

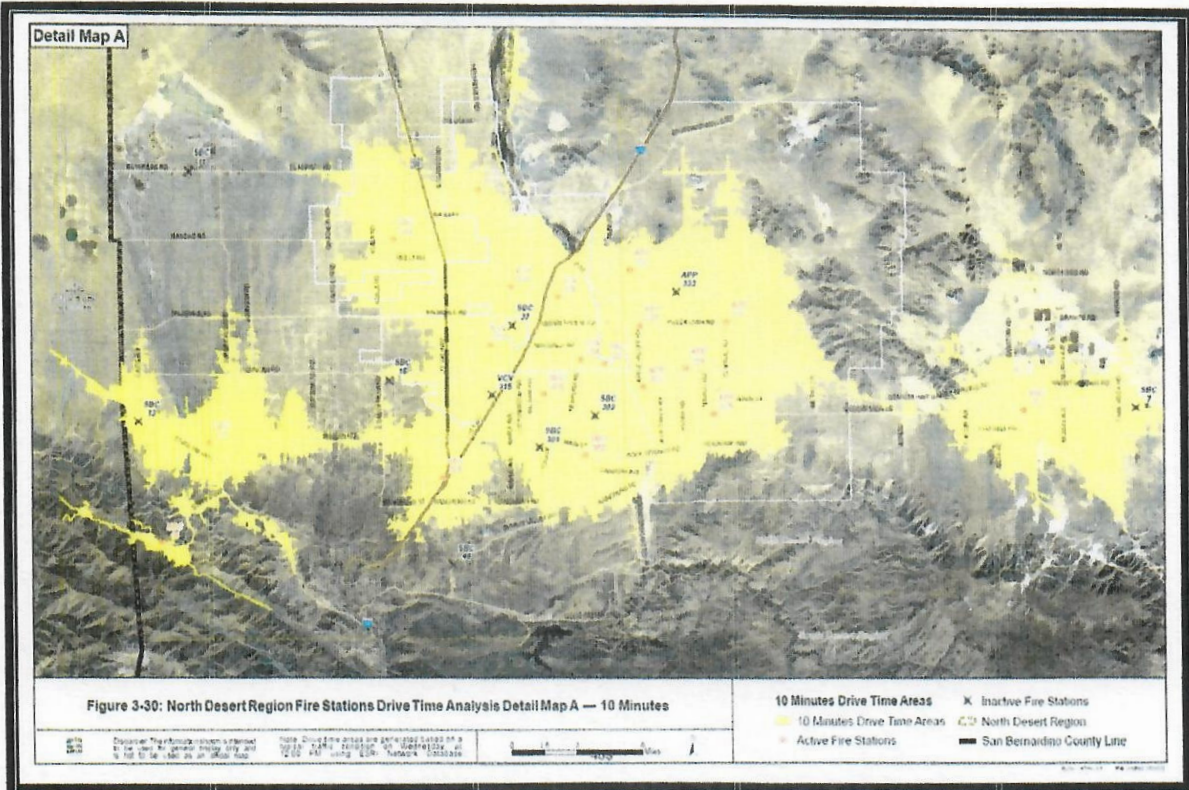
Responses by Location	FY 17/18		FY 18/19		FY 19/20		Totals
	BDC	LAC	BDC	LAC	BDC	LAC	
Wrightwood CSD	729	0	822	0	829	1	2,381
LA County	139	25	117	30	52	30	393
Mountain High	179	7	228	11	228	27	680
Totals	1,047	32	1,167	41	1,109	58	3,454



The following graphic displays have been taken from the San Bernardino LAFCO Municipal Service Review³ for fire protection/emergency medical response/ambulance. They provide an indication of the response times from Station 14 for five minutes and ten minutes – the golden time for medical response.

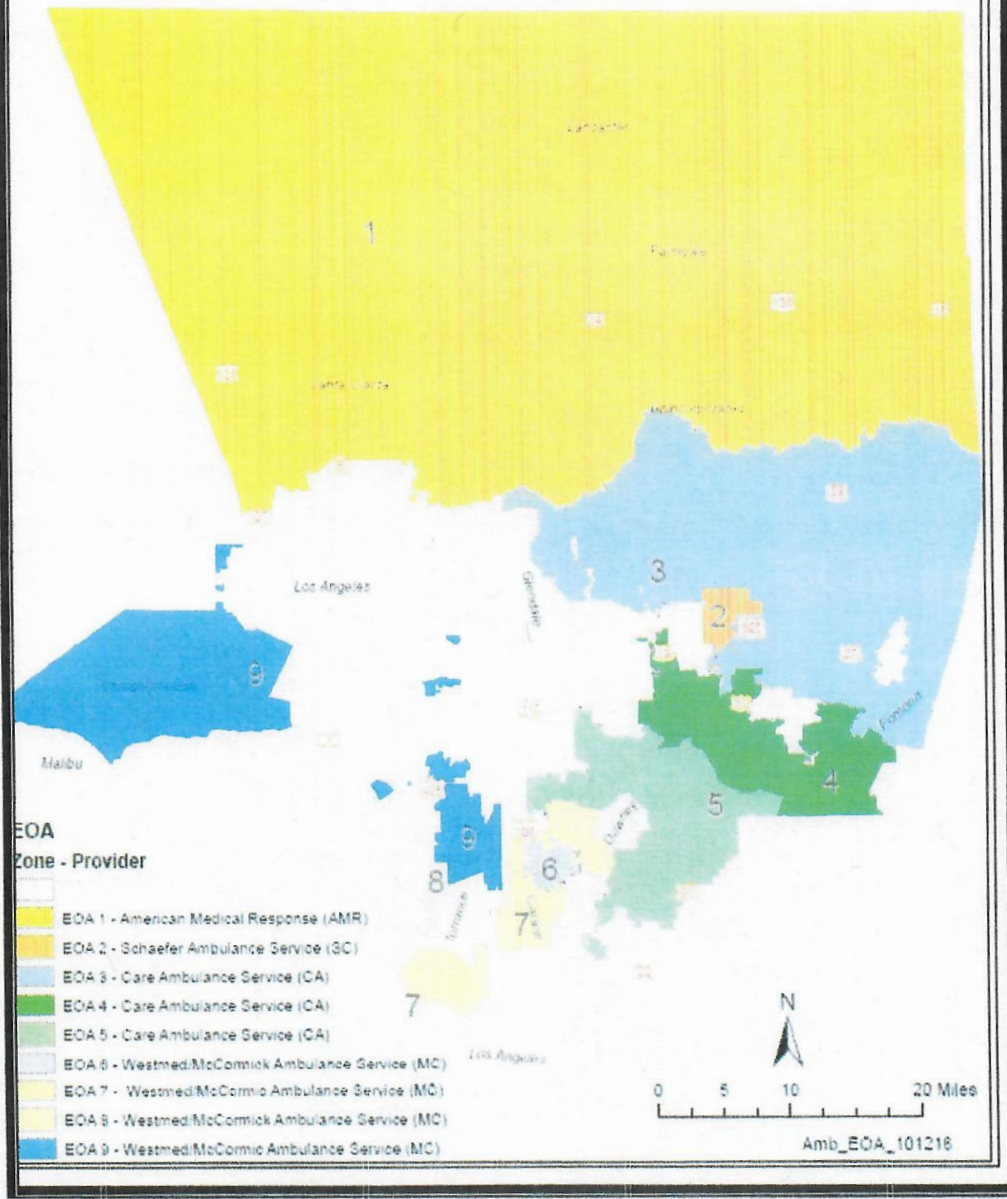


³ Excerpt from LAFCO 3231 – Municipal Service Review for Fire Protection/Emergency Medical Response/Ambulance Accepted by Commission February 19, 2020



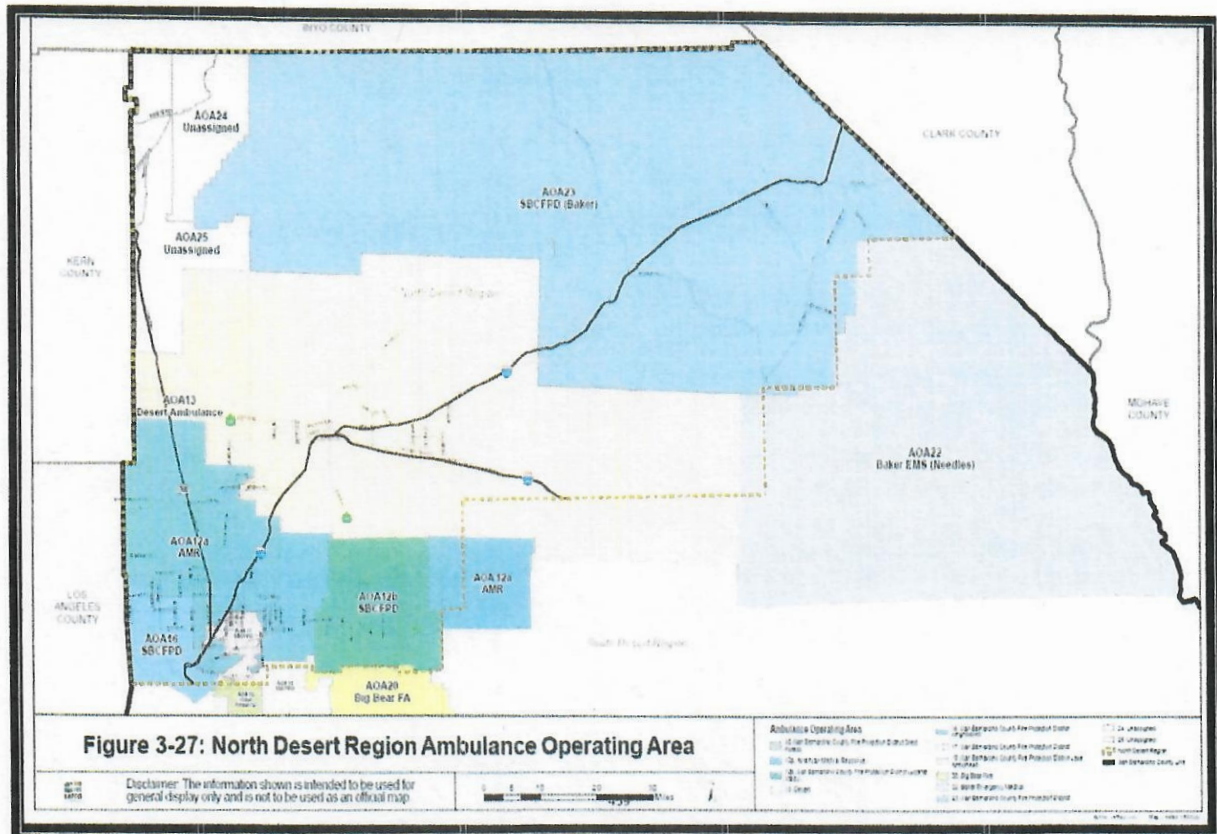
Fire protection and emergency medical response services and their delivery boundaries are under the purview of the LAFCOs in every county. However, ambulance delivery contracts are assigned through the local EMS authority. These entities administer State and local codes and regulations governing the provision of emergency medical care to the sick and injured at the local scene of an emergency or during transport to a hospital. In San Bernardino County these responsibilities are administered through the Inland Counties Emergency Medical Agency (ICEMA) and in Los Angeles County it is through the County Public Health Department. The ambulance contract service area in Los Angeles County is for the area north of the southerly flanks of the San Gabriel Mountains including the areas along Highway 2 and has been assigned to American Medical Response (AMR). See map below.

**LOS ANGELES COUNTY
9-1-1 AMBULANCE EXCLUSIVE OPERATING AREAS 2016**



In San Bernardino County ICEMA has assigned Operating Area 16 to the SBCFPD which includes Wrightwood, Phelan, Pinon Hills, and the communities along Highway 138 toward Lake Silverwood. In addition, SBCFPD provides ambulance/advanced life support services to the area westerly of the district up to Mountain High Resort along Highway 2 out of Station 14. In discussion with SBCFPD it was determined that there is no existing contract between AMR and SBCFPD to automatically provide ambulance service within Los Angeles County; however, based upon accessibility it is the only reasonable provider. It was identified by County staff that there has been an unwritten agreement to do so to provide the most efficient service and effective service to those in need. The existing automatic aid agreement specifically identifies that it does not address this service. The map which follows is an

excerpt from the San Bernardino LAFCO MSR identifying the ambulance Operating Areas in the North Desert Region of the SBCFPD.



Should the CSD chose to move forward with reviewing the possibility of an application to expand its authorized services for fire protection and emergency medical response and assumption of the responsibility through a jurisdictional change, it would be without the authorization of ambulance service. This determination is based upon the size of the contract area in comparison to the CSD boundaries and the need for support from ICEMA for the transfer. ICEMA’s evaluation of such a contractual change would review the current capabilities of SBCFPD to provide supplemental resources from Hesperia and Lucerne Valley against the limited operations of the CSD. This reality has serious financial concerns for such an application.

FINANCES:

The financial materials provided by SBCFPD in response to a public records request for the operation of Station 14 are outlined below. SBCFPD staff identified that the Federal Other – Intergovernmental Revenue (IGT) was described as follows: *The Intergovernmental Transfer (IGT) Program provides County Fire the opportunity to receive Federal matching funds to support emergency medical transport services for Medi-Cal managed care beneficiaries.*⁴

⁴ Email from Chief Dave Corbin dated September 16, 2021

Wrightwood Station 14

Commitment Items	2017-18 Actuals	2018-19 Actuals	2019-20 Actuals
Expenditures			
Station Salaries & Benefits(1) Engine and (1) Medic Ambulance 3 Captains/3 Engineers/3 Firefighter Paramedics/3 Ambulance Operator EMTs/3 Ambulance Operator Paramedics	1,749,304	1,872,808	1,940,254
North Desert Zone Allocations	148,592	155,485	150,390
Staffing Expenses	1,897,896	2,028,293	2,090,644
Services & Supplies	784,988	427,220	514,476
District Cost Allocations	275,062	462,463	547,675
Operating Costs	1,060,051	889,683	1,062,151
Capital Outlay - Improvements to Structures	-	-	-
Capital Outlay - Equipment	(1,360)	-	-
Capital Outlay	(1,360)	-	-
Mgmt Information Services Equip Replacement Reserve	10,455	10,455	10,455
Operating Transfers Out	10,455	10,455	10,455
Total Expenditures	2,967,042	2,928,431	3,163,250
Revenues			
San Bernardino County General Ad Valorem Property Taxes	1,099,114	1,151,105	1,218,592
Taxes	1,099,114	1,151,105	1,218,592
SBCFPD FP-5 Special Tax	-	-	509,994
Fee/Rate	-	-	509,994
Federal Other - Intergovernmental Revenue (IGT)	427,027	347,639	613,449
Federal	427,027	347,639	613,449
Ambulance Subscription Fees	8,970	22,700	26,520
Service Fees - Ground Emergency Medical Transport (GEMT)	609,898	371,900	-
Service Fees (Ambulance Transport Fees)	1,446,647	1,051,990	1,188,627
Current Services	2,065,514	1,446,591	1,215,147
Other Revenue - Los Angeles County Contract Payment	55,922	57,011	56,454
Other Revenue	55,922	57,011	56,454
Sale Of Fixed Assets	-	2,864	2,864
Sale of Fixed Assets	-	2,864	2,864
Total Revenue	3,647,578	3,005,210	3,616,501
NET	680,536	76,779	453,251

Expenditures Do Not include:

(1) The annual cost for replacement of the following Station Apparatus:	Cost	Annual
Engine Useful Life (15 years)	787,000	52,467
Medic Ambulance Useful Life (7 years)	235,000	33,571
Total	1,022,000	86,038
2) A contribution to Station replacement	Cost	Annual
Station Replacement (50 Years)	7,000,000	140,000
Total of Costs not included in Expenditures	226,038	

Provided by email from SBCFPD on August 17, 2021

This information shows that operations are sustainable and operate with a small annual reserve.

Throughout the State of California smaller fire protection districts are consolidating or transferring to other larger departments due to the constraint of funding. Those operations with volunteer services are finding they can no longer provide the services with that model and need a full-time paid staff. A case on this point is currently playing out in Solano County where the Grand Jury has issued a report indicating the need for consolidation of its smaller fire protection districts to maximize the limited financial resources.⁵ This is the arena that the district's consideration for assuming the future operation of fire responsibilities for fire protection and emergency medical response is operating within. Based upon this reality, the following discussion assumes that the district would provide these operations through a contract with the SBCFPD to reduce costs. In this way the district would not have to establish a public retirement account to provide those benefits to full-time paid firefighting personnel, would not have to set up contracts to bill for paramedic services, and would pay for the administrative/chief costs on a pro-rata share rather a separate portion of the district's administration. I have taken the financial information provided by the SBCFPD for Station 14 and modified the following:

1. Removed all the revenue streams associated with the ambulance operations,
2. Modified the expenses to remove ambulance operators, cut services and supplies in half, but retained the North Desert Zone Allocations as the administrative component for the contract. To isolate and remove the expenditures and revenues associated with the ambulance operations, SBCFPD was requested to provide the individual position costs included for Station 14. That information is shown below:

Wrightwood Station 14 Staffing				
Commitment Items	1718 Modified Bdg	1819 Modified Bdg	1920 Modified Bdg	Individual Position Cost 1920
Expenditures				
Station Salaries & Benefits(1) Engine and (1) Medic Ambulance 3C/3E/3FFPM's/3 AOE's/3 AOP's	1,749,304	1,872,808	1,940,254	
Average Cost - Captain (x3)	\$ 598,389	\$ 639,959	\$ 652,843	\$217,614
Average Cost - Engineer (x3)	\$ 520,691	\$ 544,757	\$ 563,880	\$187,960
Average Cost - FF-Paramedic (x3)	\$ 381,165	\$ 405,515	\$ 418,908	\$139,636
Average Cost - Amb Oper -EMT (x3)	\$ 114,462	\$ 129,597	\$ 145,674	\$48,558
Average Cost - Amb Oper -Paramedic (x3)	\$ 134,596	\$ 152,979	\$ 158,949	\$52,983
TOTAL STAFFING	\$ 1,749,303	\$ 1,872,807	\$ 1,940,254	

Provided by email from SBCFPD on September 29, 2021

3. Adjusted the property tax revenues to include the current Los Angeles County general ad valorem tax for each year; and
4. Adjusted the FP-5 allocation to include the estimated 181 private parcels within the Los Angeles County portion at \$157 per parcel (this would eliminate the existing \$66.06 existing tax on only the developed parcels).

⁵ 2020-2021 Solano County Grand Jury report, *Wildfires on the Horizon Solano Homes at Risk!*

Wrightwood Station 14			
Commitment Items	2017-18 Actuals	2018-19 Actuals	2019-20 Actuals
Expenditures			
Station Salaries & Benefits(1) Engine 3 Captains/3 Engineers/3 Firefighter Paramedics	1,500,245	1,590,231	1,635,631
North Desert Zone Allocations--Administration	148,592	155,485	150,390
Staffing Expenses	1,648,837	1,745,716	1,786,021
Services & Supplies	392,494	427,220	514,476
District Cost Allocations	137,531	137,531	137,531
Operating Costs	530,025	564,751	652,007
Capital Outlay - Improvements to Structures	-	-	-
Capital Outlay - Equipment	(1,360)	-	-
Capital Outlay	(1,360)	-	-
Mgmt Information Services Equip Replacement Reserve	10,455	10,455	10,455
Operating Transfers Out	10,455	10,455	10,455
Total Expenditures	2,187,957	2,320,922	2,448,483
Revenues			
San Bernardino County Ad Valorem Property Taxes	1,150,250	1,204,188	1,272,788
SBCFPD FP-5 Special Tax	-	-	538,411
Total Tax Revenue	1,150,250	1,204,188	1,811,199
Other Revenue - Los Angeles County Ad Valorem Contract	27,961	28,506	28,227
Sale Of Fixed Assets	-	2,864	2,864
Sale of Fixed Assets	-	2,864	2,864
Total Revenue	1,178,211	1,235,558	1,842,290
NET	-1,009,746	-1,085,365	-606,193
Expenditures Do Not Include:			
(1) The annual cost for replacement of the following Station Apparatus:		Cost	Annual
Engine Useful Life (15 years)		787,000	52,467
2) A contribution to Station replacement		Cost	Annual
Station Replacement (50 Years)		7,000,000	140,000
Total of Costs not included in Expenditures		<u>192,467</u>	

The provision of this service under the district utilizing the current operation pattern to guarantee reciprocity of service would operate at a significant deficit each year. In addition, this results in a higher cost than under the existing service pattern as there would need to be Captains in each operational model to maintain the required three-man teams to respond to emergencies. This deficit does not take into consideration the need for reserves for equipment replacement and station replacement/repair which are shown above to be \$192,467 a year.

The retention of the ambulance services by SBCFPD would result in an estimated operational cost/revenue pattern shown as follows:

Wrightwood Station 14

Commitment Items	2017-18 Actuals	2018-19 Actuals	2019-20 Actuals
Expenditures			
Station Salaries & Benefits (1) Medic Ambulance/3 Captains/3 Ambulance Operator EMTs/3 Ambulance Operator Paramedics	847,447	922,535	957,496
North Desert Zone Allocations	148,592	155,485	150,390
Staffing Expenses	996,039	1,078,020	1,107,886
Services & Supplies	392,494	213,610	257,238
District Cost Allocations	137,531	231,232	273,838
Operating Costs	530,025	444,842	531,076
Capital Outlay - Improvements to Structures	-	-	-
Capital Outlay - Equipment	(1,360)	-	-
Capital Outlay	(1,360)	-	-
Mgmt Information Services Equip Replacement Reserve	10,455	10,455	10,455
Operating Transfers Out	10,455	10,455	10,455
Total Expenditures	1,535,159	1,533,317	1,649,417
Revenues			
Federal Other - Intergovernmental Revenue (IGT)	427,027	347,639	613,449
Federal	427,027	347,639	613,449
Ambulance Subscription Fees	8,970	22,700	26,520
Service Fees - Ground Emergency Medical Transport (GEMT)	609,898	371,900	-
Service Fees (Ambulance Transport Fees)	1,446,647	1,051,990	1,188,627
Current Services	2,065,514	1,446,591	1,215,147
Other Revenue	27,961	28,506	28,227
Other Revenue	27,961	28,506	28,227
Total Revenue	2,520,502	1,822,736	1,856,823
NET	985,343	289,420	207,407

Expenditures Do Not Include:

(1) The annual cost for replacement of the following Station Apparatus:	Cost	Annual
Medic Ambulance Useful Life (7 years)	235,000	33,571
Total	235,000	33,571
2) A contribution to Station replacement	Cost	Annual
Station Replacement (50 Years)	7,000,000	140,000
Total of Costs not included in Expenditures	173,571	

The continuing ambulance responsibility would incur an expense for Captain position to provide for the administrative oversight of the medical operations but would be sustainable.

Evaluation of different service provider models such as CAL FIRE as the contractor has not been reviewed in this report. An evaluation of the commensurate position types in CAL Fire shows that they are only slightly less than existing SBCFPD pay scales so cost savings would not be sufficient to overcome the operational deficits. A model using a combination paid firefighters/paid call/volunteers has not been evaluated as it could not be recommended for a residential mountain locale. Throughout the state such combination operations are failing under the pressures of a year-round fire season, lack of volunteers due to employment issues, and maintenance of reciprocity with full-service neighboring fire agencies.

FIRE PROTECTION/EMERGENCY MEDICAL RESPONSE SERVICE CONSIDERATIONS FOR WRIGHTWOOD CSD:

In making the determination on whether to move forward with an application to activate fire protection/emergency medical response authorities (and concomitant proposal processing costs), the district must determine the efficiency and sustainability of such a change. In doing this, it is the author's view the district would need to answer the standard service delivery questions. However, the author's review indicates that outside the question of local voice on the level of service delivered, none of these questions can be answered in the affirmative.

- a. ***Does the transfer of this service provide for an efficient and effective way to provide the service to the residents of the community? Does it sustain the current level of service?***

The consolidation of a community's services under single umbrella academically would point toward a more efficient mechanism for service delivery. However, in this case that does not appear to be the case based on the community's unique circumstances:

1. Both counties would need to agree to the transfer of service and would also need to address the changes necessitated by retaining ambulance service under a separate authority in both counties—to the author this does not represent a more efficient or effective delivery of service pattern;
2. The community would lose direct access to those specialized resources such as bulldozers, hand crews, and other specialty apparatus on a routine basis. However, in the case of a wildland fire, these would be retained under a mutual aid arrangement. To the author these are serious issues for a mountain locale;
3. Mutual aid only applies to "like services" or "equivalent service" so the staffing of engines and equipment would need to mirror those of the surrounding agencies to receive these services. In other parts of the State mutual aid has been denied since reciprocal service in a like manner is not available; and
4. There would need to be a renegotiation of the existing automatic aid agreement for providing service into the Los Angeles County. The new area would be a small area along Highway 2 immediately west of the district boundary. In the author's opinion such an agreement would need to address the service delivery to the Mountain High Resort areas contractually. A cursory review of the possessory interest property tax information for the affected Tax Rate Area (Los Angeles TRA 04673) using the existing contract terms would

yield approximately \$45,771.30. The author believes that the Los Angeles County special tax would be applied to the resorts based upon square footage of buildings plus a flat rate; but this would need to be verified as they operate as leases on public lands. The distribution of the special tax revenue is not estimated here.

The transfer of service would introduce multiple layers to the process, when the contractual agreement between the two Counties entered in October 2015 in an evergreen contract would provide for a consolidated service to the community from a single entity with the equipment and funding resources necessary. In addition, such a change does not represent the actual service delivery boundary for this service – it excludes the areas of the Mountain High Ski Resort westerly of the district which receive their services from SBCFPD. In the author's view such a change would not be efficient or effective and due to the financial issues outlined above would not be able to sustain the current level of service. Therefore, the author cannot provide an affirmative determination to this finding.

b. *Are the revenues to be received from the Counties of Los Angeles and San Bernardino sufficient to provide the service into the future without drain on other District resources?*

The current service delivery pattern – the automatic aid agreement for SBCFPD to provide service in both county areas – provides for a sustainable delivery pattern. The change anticipated by the district assuming fire protection and emergency medical response is not sustainable or financially viable as it would result in the need for supplemental funding from the district's limited revenues. Approval of this type of proposal by the San Bernardino LAFCO could not be made under statutory directives of LAFCO law and local Commission policies.

c. *Are there alternatives to improve services without a change in service provider?*

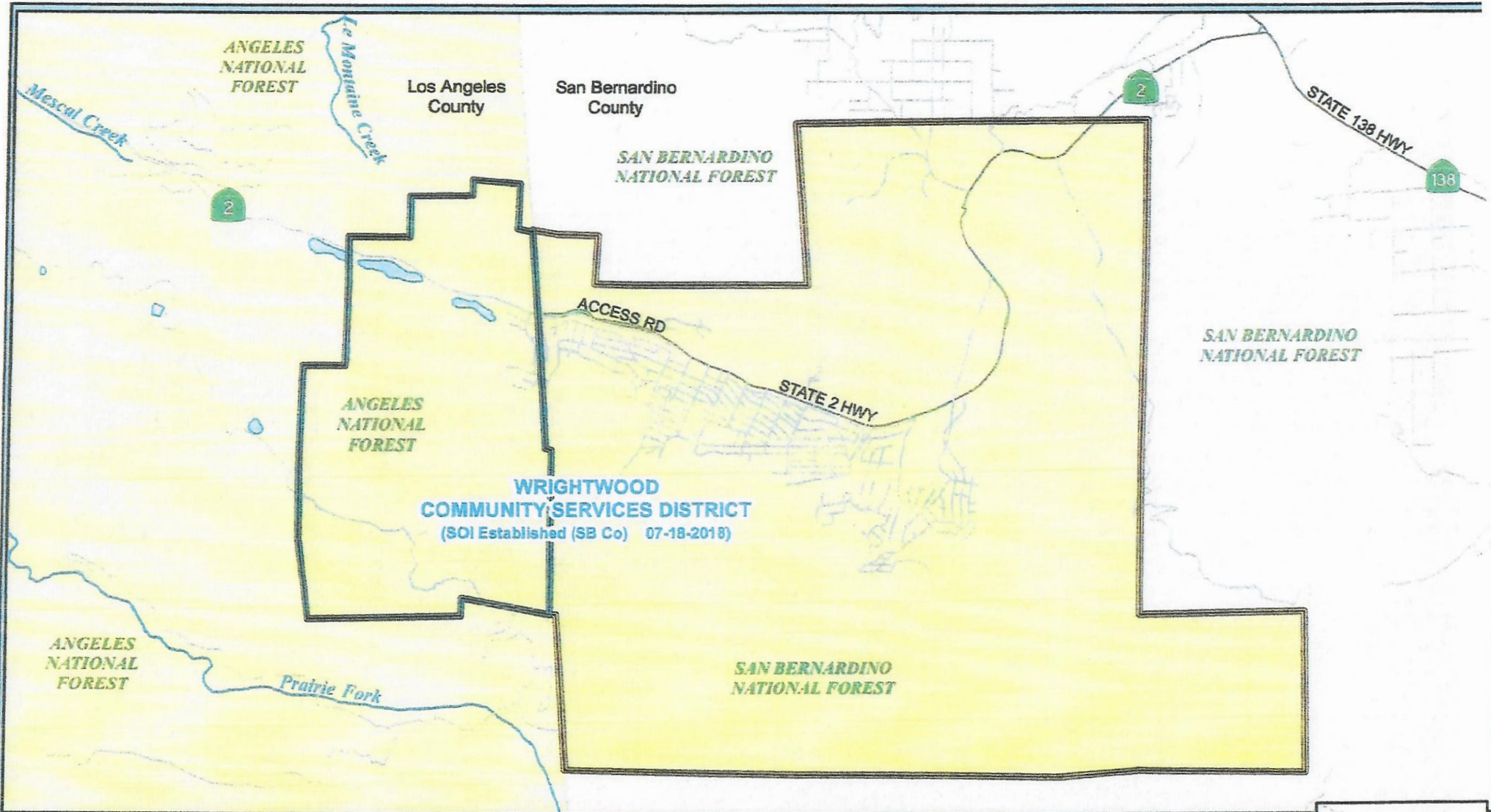
It has been noted that the district is intended to be the vehicle to allow for the community's perspective to be conveyed to its various service providers. Concerns related to problems that occur during the snow season for SBCFPD to respond to calls should be addressed for the entire larger community including Mountain High Ski Resort – with the district as a participant. It is understood that these issues are addressed annually prior to snow season and the district should be an active participant in the discussion.

In conclusion, it is not recommended that the district pursue the activation of fire protection/emergency medical response as it appears to the author that the district's resources cannot sustain the current level of service provided by the San Bernardino County Fire Protection District through its boundaries and automatic aid agreements. Submission of such a proposal would in all probability result in a denial by the San Bernardino LAFCO based upon its policy directives and state law at a significant expense to the district.




LIST OF ATTACHMENTS:

- 1. Map of District and its sphere of influence**
- 2. Excerpt from LAFCO 3021 Describing Fire Protection /Emergency Medical Response/Ambulance/Dispatch services**

- 3. Los Angeles County Board of Supervisors May 19, 2015, Agenda Item for Fire Protection and Emergency Medical Services Agreement between the Consolidated Fire Protection District of Los Angeles County and the San Bernardino County Fire Protection District for the larger Wrightwood area**
- 4. San Bernardino County Fire Protection District Response to Public Records Request**
- 5. Consolidated Fire Protection District Response to Public Records Request**
- 6. Email Response from Mountain High Resort on First Aid Response**
- 7. Part III – Regional Updates Section 4 North Desert Region of LAFCO 3021 Municipal Service Review for Fire Protection/Emergency Medical Response/Ambulance Services**

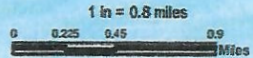


Legend

-  Wrightwood Community Services District, Sphere of Influence (SOI), Los Angeles County
-  Wrightwood Community Services District, Sphere of Influence (SOI), San Bernardino County
-  Wrightwood Community Services District

Sphere of Influence History Action		Effective Date
Established (LA Co. only)		08-08-2018

Wrightwood Community Services District (Los Angeles portion)



LAFCO



Revised February 28, 2012

B. Fire Protection

There are no mandatory federal or state regulations directing the level of fire service staffing, response performance, or outcomes; though, there are industry guidelines.¹ Thus, the level of fire protection services provided are a local policy decision, and communities have the level of fire services that they desire or can afford, which is not always the level they may desire. However, the body of regulations and guidelines on fire services provides that if services are provided at all, they must be done so with the safety of the firefighters and citizens in mind.

A service review conducts a review of municipal services, and fire protection is a municipal service. However, LAFCO only has direct purview over the county, cities, and special districts. Therefore, for this service review, the organization of fire protection is broken down by responsibility area: local, state, and federal.

- **Local Responsibility:** Area not within a state or federal responsibility area is of local responsibility. These agencies primarily include the county, cities, and special districts. Additionally:
 - One volunteer fire department has an affiliation with County Fire (Mt. Baldy), and the other is based out of Nevada (Sandy Valley).
 - Institutions also may have their own fire teams. These include, but are not limited to: airports and railway facilities.
- **State and Federal Responsibility:** State and Federal responsibility areas deal with fire prevention and suppression in their respective responsibility areas. For wildland fires, these agencies include CAL FIRE, U.S. Forest Service, and U.S. Bureau of Land Management. Military institutions and some Indian tribes have their own fire departments. LAFCO does not have purview over these agencies. Should a structure fire occur in a state or federal responsibility area, then the suppression is the primary responsibility of an overlying local agency.

Table 1-1 below lists each fire agency and department in San Bernardino County, grouped by region, with identifiers of type of suppression and LAFCO purview. Regional maps of each agency's boundary, sphere of influence, and station locations are included in Part III.

The general public may not know the nuances between these types of fire agencies. A description of each agency type is included in Appendix C. These agencies include: cities, special districts, joint power authorities, volunteer fire departments-non government, CAL FIRE, U.S. Forest Service, and Bureau of Land Management.

¹ National Fire Protection Association ("NFPA") 1710 is a standard that sets minimum criteria for the effectiveness and efficiency of emergency operations to protect the safety of the Public and Fire Department employees.
<https://www.nfpa.org/codes-and-standards/all-codes-and-standards/list-of-codes-and-standards/detail?code=1710>

**Table 1-1:
Fire Protection Providers in San Bernardino County by Region**

Region	Agency	Primary Purview	LAFCO Purview
Valley	Chino Valley Independent Fire District	Structure	Yes
	City of Colton	Structure	Yes
	City of Highland (contract with CAL FIRE)	Structure	Yes
	City of Loma Linda	Structure	Yes
	City of Montclair	Structure	Yes
	City of Ontario	Structure	Yes
	City of Redlands	Structure	Yes
	City of Rialto	Structure	Yes
	City of Yucaipa (contract with CAL FIRE)	Structure	Yes
	Fontana Fire Protection District (contract with County Fire)	Structure	Yes
	Mt. Baldy Fire Department (volunteer)	Structure	Yes
	Ontario International Airport Fire Department	Institution	No
	Patton State Hospital (mostly volunteer)	Institution	No
	Rancho Cucamonga Fire Protection District	Structure	Yes
	San Bernardino County Fire Protection District – Valley Region	Structure	Yes
	San Manuel Indian Tribe	Institution	No
San Bernardino International Airport	Institution	No	
Mountain	Arrowbear Park County Water District	Structure	Yes
	Big Bear Fire Authority (Big Bear Community Services District and Big Bear Lake Fire Protection District)	Structure	Yes
	Big Bear Municipal Water District (lake patrol, EMS)	Lake	Yes
	Running Springs Water District	Structure	Yes
	San Bernardino County Fire Protection District – Mountain Region	Structure	Yes
North Desert	Apple Valley Fire Protection District	Structure	Yes
	Baker Community Services District	Structure	Yes
	Barstow Fire Protection District	Structure	Yes
	City of Adelanto (contract with County Fire)	Structure	Yes
	City of Victorville	Structure	Yes
	Daggett Community Services District	Structure	Yes
	Fort Irwin National Training Center	Institution	No
	Marine Corp Logistics Base - Barstow	Institution	No
	Newberry Community Services District	Structure	Yes
	San Bern. County Fire Protection District – North Desert Region	Structure	Yes
	Sandy Valley Volunteer Fire Department (based in Nevada)	Structure	Yes
Yermo Community Services District	Structure	Yes	
South Desert	Chemehuevi Indian Tribe	Institution	No
	Colorado River Indian Tribes	Institution	No
	Fort Mojave Indian Tribe	Institution	No
	Marine Corps Air Ground Combat Center – 29 Palms	Institution	No
	Morongo Valley Community Services District	Structure	Yes
	San Bern. County Fire Protection District – South Desert Region	Structure	Yes
	Searles Valley Minerals Fire Department (mostly volunteer)	Institution	No
All Regions State/Federal	CAL FIRE (state responsibility area)	Wildland	No
	U.S. Forest Service (federal responsibility area)	Wildland	No
	U.S. Bureau of Land Management (federal responsibility area)	Wildland	No

C. Emergency Medical Services

Agencies that provide structural fire protection also provide emergency medical services as an integral part of their response efforts. Emergency medical services generally refer to life support services and ambulance transport. The heaviest demand on the fire/emergency system is emergency medical calls. In 2016, fire departments in the United States responded to 35.3 million calls, with fire incidents being less than four percent and medical emergencies accounting for 68 percent.² A sampling of fire agencies in San Bernardino County reveals similar percentages.

EMS Act

In 1980, California's Emergency Medical Services System and Prehospital Emergency Care Personnel Act ("EMS Act") created the state's Emergency Medical Services Authority and added Division 2.5 to the California Health and Safety Code. Emergency Medical Services generally refer to life support services and ambulance transport. Division 2.5 requires each county to develop an emergency medical services program and to designate a Local Emergency Medical Services Agency ("LEMSA").

Local Emergency Medical Services Agency ("LEMSA")

Inland Counties Emergency Medical Agency ("ICEMA") was originally established under a Joint Powers Agreement ("JPA") between the Counties of Inyo, Mono, Riverside, and San Bernardino in 1975. In 1988, Riverside County withdrew from ICEMA. The result is a tri-county JPA (Inyo, Mono, and San Bernardino) with the San Bernardino County Board of Supervisors serving as the ICEMA Board of Directors.

As the local EMS agency, ICEMA administers State and local codes and regulations governing the provision of emergency medical care to the sick and injured at the scene of an emergency and during transport to an acute care hospital. In more detail, ICEMA:

- Plans, implements, and evaluates EMS, including the provision of EMS policies, procedures, and protocols within its region.
- Is responsible for the accreditation and certification of EMS field personnel.
- Provides medical resource management.
- Arranges for the evacuation of the injured to hospitals and alternative care sites.
- Manages the Hospital Preparedness Program Grant.
- Sponsors a local healthcare coalition.
- Tests disaster medical response plans through periodic drills and exercises.

Operating Areas

One of ICEMA's core responsibilities is the designation and management of Operating Areas ("OAs") for ambulance providers. These areas were created, in part, to avert the free-for-all ambulance responses that existed prior to 1980 in some parts of the state.

² Governing Magazine, "Fire Departments Struggle to Meet New Demands," September 21, 2018

The lack of coordination meant multiple ambulances might arrive on scene. In addition, ambulance providers might “cherry pick” areas to serve, sometimes resulting in inferior service for low-income or difficult to access areas.

Within San Bernardino County, ICEMA has established 26 OAs for ambulance services designated as urban, rural, or wilderness areas as shown in Table 1-2 below. By granting ambulance providers the exclusive right to operate in specific zones, ICEMA can better manage emergency responses and ensure service to all.³ OAs 24, 25 and 26 are unassigned, which can create confusion and typically result in long delays in service.

Regional maps of the OAs are included in Part III.

**Table 1-2:
Ambulance Operating Areas in San Bernardino County**

Operating Area	Ambulance Provider
1	American Medical Response
2	American Medical Response
3	American Medical Response
4	American Medical Response
5a	Rialto Fire Department
5b	American Medical Response
6	American Medical Response
7	American Medical Response
8	American Medical Response
9	American Medical Response
10	SB County Fire Protection District (Crest Forest)
11	American Medical Response
12	American Medical Response SB County Fire Protection District (Lucerne Valley)
13	Desert Ambulance
14	Morongo Basin Ambulance
15	Morongo Basin Ambulance
16	SB County Fire Protection District (Wrightwood)
17	SB County Fire Protection District (Hesperia)
18	SB County Fire Protection District (Lake Arrowhead)
19	Running Springs Fire Department
20	Big Bear Fire Authority
21	SB County Fire Protection District (Yucca Valley)
22	Baker Emergency Medical Services (Needles)
23	SB County Fire Protection District (Baker)
24	Unassigned
25	Unassigned
26	Unassigned

³ The issue of “201 rights” is up to interpretation and is not a matter for review in this service review.

D. Dispatch

Within San Bernardino County, dispatch service is provided by one of many fire and medical aid dispatch centers. Within San Bernardino County, all 9-1-1 calls, both cell and landline, rout to a law enforcement agency. If the caller is requesting medical assistance, the law enforcement call center transfers the call to one of several fire and medical aid dispatch centers based on the location of the incident. In San Bernardino County, there are four structural fire/medical service related dispatch centers: Barstow, CAL FIRE, CONFIRE, and Ontario.

Barstow and Ontario handle dispatching for their communities through their respective police departments. CAL FIRE's dispatch center is located in San Bernardino. This center provides dispatch services to itself as well as six contracting agencies. CONFIRE is a joint powers authority ("JPA") composed of member and contracting agencies, and its dispatch center is located in Rialto.

The table below identifies the agencies that are members of each structural fire/medical service dispatch center:

**Table 1-3:
Structural Fire/Medical Service Centers and Members**

CONFIRE	CAL FIRE
Apple Valley FPD	Arrowbear Park CWD
Baker Ambulance	CAL FIRE – Highland
Big Bear Fire Authority	CAL FIRE – Yucaipa
Chino Valley IFD	Daggett CSD
City of Colton	Morongo Valley CSD
City of Loma Linda	Newberry CSD
City of Montclair	Yermo CSD
City of Redlands	
City of Rialto	
City of Victorville	
Rancho Cucamonga FPD	Barstow
Running Springs Water District	Barstow FPD
SB County FPD	
San Manuel Fire	Ontario
County Roads (after hours)	City of Ontario