

Log of Comments**Placer West County Fire Municipal Service Review Public Review Draft Comments**

Comment #	Commenter/Agency	Page /Section	Comment	Response
1	Sue Stack, Newcastle Resident (see attachment)	SOI Options	Supports inclusive SOI, preferably with the Cities included, but if not then #4 option for Newcastle is recommended.	Thank you for your comment.
2		SOI Options	Double check Newcastle ISO rating in executive summary	Corrected.
3		SOI Options	Concerns about high turn over rate of board members and lack of adequate board member training in Newcastle FPD	Added content on p. 262, ethics training was reportedly completed as required for board members.
4		SOI Options	There is a need for long-term planning for financial sustainability.	Concerns about lack of long term financial planning are on p. 264
5		SOI Options	Open to consolidation if it means better training, more professional operation of the units delivering services, even if it means paying more than other in a consolidated district	Thank you for your comment.
6	Michael Garabedian, Friends of the North Fork (see attachment)	General	Our group has seen fire districts lose their Fire Marshal personnel. We find fire districts performing fire marshal and fire prevention roles without applying fire prevention factors.	Added text to document on p. 43 to address this concern.
7		General	There is what appears to be significant confusion and absence of coordination that may contribute to the limited nature or absence of these and related fire services between Placer County, fire districts, and Cal Fire.	Added text to document on p. 43 to address this concern.

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8		General	The Fire Prevention inquiry and use in the MSR requires expansion to address these needs and questions. This is an initial effort to identify these needs for MSR review and we would be pleased to answer questions or work on this further. Friends of the North Fork believes that the following types of inquiry or their equivalent are needed as part of fire service MSR review in Placer County.	Thank you for your interest. Given the legally required determinations that LAFCO must come to, further detail regarding this very specific aspect of operations is outside of the role of this report. Some content regarding your concerns and the need for coordination were added on p. 43
9		General	Commenter suggests questions to define personnel roles, including fire protection personnel, fire marshal, fire prevention, fire engineering, development review,	This level of detail is not within the purview of the MSR, but is certainly essential to ensuring standardization of these services. The type of prevention activities offered by each agency are shown on p. 31. No changes made.
10		General	The commenter would like to know what standards are reviewed for proposed developments in SRA.	Content added on p. 43.
11	Ed Snider, Chairman of Board of Directors AFD (see attachment)	p. 108	Do not agree with SOI Options #1 and #2 as AFD is geographically distant with economic and population disparities. It may be a prudent model of streamlining governance to achieve governing results, but would also effectively reduce service values already in place by each district. Basically, the concept expands and exploits the existing inadequate funding and public service demands of each district and transfers them to the larger, newly created SOI.	Added content regarding the District's view on these options on p. 110

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12		p. 108	Commenter noted differences between AFPD and other fire districts, including urbanization level, response times, staffing type and level that make it not feasible to be a fully active member of a consolidated district.	Added content regarding the District's view on these options on p. 110
13		p. 108	An annexable SOI for AFPD that includes the District's bounds and the community of Dutch Flat is perhaps feasible given that the potential volunteer pool would not be competed but rather would be trained and retained for the single consolidated district. Given an area-wide cadres of trained volunteers, responsible for a single district, they would be able to respond to any given station throughout the agency's service area with no one station staffed 24/7. This model is through happenstance currently in place with two or three volunteers responding to both the Alta and Dutch Flat stations.	Added content on p. 111.
14		p. 98	The district has experienced change in its intern and volunteer levels since the data for the MSR was collected. Virtually all of the interns and volunteers the District enjoyed during the initial stages of this study have transitioned out of the district. The district has 4 new volunteers but they will take 6 months to 1 year to be trained. The intern program was unable to get funding and has been abandoned.	Updated the report to show that the intern program was abandoned. Given that the comparison portion of the report relies on data from a certain time period from multiple agencies, the staffing numbers shown have not been updated in the report.

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15		p. 101	The District has considerably strengthened and enhanced its service capabilities during the same time period. The District was awarded a grant from the California Department of Fish and Wildlife Office of Spill Prevention and Recovery for an Oil Spill Recovery Trailer. The trailer fills the gap in the Placer County Hazmat/Oil Spill mitigation service area between Rocklin and Truckee. This 80 mile gap, along I-80 and the North Fork of the American River, is considered to be the most likely area for a catastrophic oil spill to occur within Placer County. As part of the AFPD apparatus inventory it is stored and maintained at the Alta fire station but is available to other jurisdictions in the area. Members of the CERT team that have been trained and certified as Hazmat FRO Level II responders, will deploy with the trailer as needed.	Added content on p. 103
16		p. 91	Other changes include retention of a new auditor which has improved the District's auditing process, made changes in personnel, new board members are in place, and board policy and Bylaws have been thoroughly reviewed and updated.	Added content p. 92

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17		p. 91	Alta CERT under the supervision of the fire department continues to grow and enhance its capabilities to respond to local emergencies. Team members are trained in a variety of skills. The CERT has been utilized in several ways to assist the local communities such as search teams for missing persons, developing the local evacuation shelter, providing information and guidance to the local population during wildfires and conducting community disaster preparedness events.	The CERT program is mentioned on p. 92. No change made.
18		p. 108	Making government larger doesn't work. The larger the governmental agency, the further from the people and the less responsive they are to their citizens. Clearly, as a smaller governmental agency, the AFD can be most effective and responsive to our community. With extremely limited resources, no debt, and a modest reserve for long term planning, we have been providing a volunteer governance team, volunteer firefighters, a large volunteer CERT team, equipment and a fire station for the Alta community.	Added content regarding the District's view on the SOI options on p. 110

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19	Eric Walder, South Placer and Loomis FPD, Fire Chief	p. 1	When preparing these comments for review and creating a comment summary. The documents created were automatically titled Eastern Plumas Municipal Services Review Draft Admin. When Googling Eastern Plumas Municipal Services Review the West Placer Report is exhibited with about 6-7 other LAFCO reports. This report appears to be drafted using that document. Consultant should look at their base document and consider revising or starting from scratch.	Addressed.
20		p. 1	The data for this review is close to 2.5 years old there has been significant change within the Counties Fire Service Agencies, South Placer Fire Protection District and the Loomis Fire Protection District since this data was compiled. There should be a note as to the accuracy and timelessness of data within these pages at the beginning of the document.	Changes in data are expected to occur almost immediately after it has been gathered. MSRs are a snapshot in time to give a general picture of the issues facing agencies and are not assumed to remain unchanged in the future. The information within the report continues to be informative for LAFCO's SOI update process, which is the intent of the law. The data for the most part will not be updated prior to adoption; however, the consultant has updated descriptions of service structure where significant changes have occurred or are proposed to occur. A caveat explaining that changes will have occurred affecting the accuracy of the data since the time of solicitation of information has been added to beginning of

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21		p. 10	Areas under PCF were previously independent fire districts within the County and dissolved by LAFCO in 2006.	This information is already included in the PCF chapter. No change made.
22		p. 11	All sphere of influence discussions regarding the Livoti track which remains in SPFPD should be noticed to the residents of the unincorporated areas of the County covered by SPFD and Cities alike. More research on the specifics of the Livoti track and response exchanges made between agencies should be investigated. Consultant did not interview District for comments on this topic. The city of Roseville water treatment plant is within the SPFD'S boundary incorporated into the City of Roseville in 1971 through Placer LAFCO without notice to the District. . Roseville provides response into the Livoti track in exchange for a response to the Water Treatment Plant.	Content regarding this information has been added to the SOI discussion in the SPFPD chapter on p. 476

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23		p. 11	<p>Additionally the area not contiguous to SPFD on the Sacramento County line along Sierra College and Old Auburn Road including the Woodbridge Ranch Subdivision should remain in the SOI of the SPFD. SPFD Station 15 is the closest fire house to this area and will serve this area through the CRA even if this is annexed into the City of Roseville. Past annexations from the 1950's have dramatically reduced the area of the SPFPD which originally was the South Roseville Fire Protection District and included the area of South Roseville west of the railroad tracks where Denio's Auction is today. We have records of annexations of the South Placer Fire District from the 1950's that include the entire area south of Douglas Blvd (formerly Rocky Ridge Drive) west of Sierra College minus the small area's that remain on the Sacramento County line west of Sierra College. While these areas are small they do include homes that bring in revenue that we desperately rely on to provide the high level of response . The continued urban sprawl has eroded the Districts tax base. This is one of the reasons that</p>	<p>Content regarding this information has been added to the SOI discussion in the SPFPD chapter on p. 476</p>
24		p. 12	<p>Alta Fire Protection District is dispatched by CAL FIRE. Omitted from the MSR.</p>	<p>Corrected.</p>
25		p. 12	<p>Rocklin and Lincoln are now working together to integrate their dispatch.</p>	<p>Added content to respective agency chapters.</p>

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26		p. 12	In Placer County funding for Dispatch services is catered to Law Enforcement overall including the cities.	Noted. References to challenges posed by differing needs between fire and law enforcement dispatch are throughout the document, in addition to the perceived lack of cooperation on the part of law enforcement to move toward a more centralized dispatch system. No change.
27		p. 12	The economy is returning and has surpassed the lows of the recession.	Added content on p. 12
28		p. 12	Financial challenges are not as critical for all agencies as it was during the downturn	Added content on p. 12
29		p. 12	This is an overall statement which would not represent the position of South Placer Fire District or the Loomis Fire District presently or during the recession. Although, during the recession revenue streams were reduced overall minimum service levels remained in tact. This can be attributed to the Boards budgeting principles, policies and the employees desire to continue to deliver a great service to the community.	This statement is applicable to almost all public agencies during the economic downturn, and is not a criticism of the agencies, but an observation of the climate faced by service providers. SPFPD was not immune to the need to reduce its service levels during the recession, as it closed a fire station in response to 20 percent lower revenues. No change.

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30		p. 12	Considering this report info was collected in 2014 and all the original Districts are still maintaining their then level of service or are recovering this was a expectation that did not become a realization. Penryn is the only known Fire District at this time that is in immediate danger of running out of funds. They most likely have a year left before they are no longer able to support their limited operation. Although Newcastle is not admitting to the same issue it is likely that they are in the same financial situation. Although not under LAFCO's preview CSA 28, Ophir and North Auburn Stations are significantly underfunded and if they closed would effect service delivery under the Closest Resource Agreement(CRA).	According to this information, the statement continues to hold true. Content updated in Financial Section of the overview.
31		p. 13	Overall statement that is misleading "dismal shape" is a distracting statement. Better stated would be due to the lack of funding the local departments work together through the CRA to provide a level of service that is greater than the funding provided to each individual agency.	The intent here is to shed light on those agencies that are struggling to stay afloat. The CRA is irrelevant to whether an agency is sufficiently financially stable to sustain itself. In the case of Placer County, there continues to be several agencies that suffer from a tenuous financial position. No change.

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32		p. 13	Will comment more in specific agency chapters but comparison of certification levels is a terrible way to compare agencies without lining out the differences in staffing. If an agency uses interns that are not certified as Firefighter I then it looks like a negative when in fact all their full-time personnel are certified FFI or higher. Same with EMT status. Interns have the training of a FFI just are getting the experience before receiving certification.	This is a summary of the findings, which is not an appropriate place for significant detail. The service structure of each of the agencies is outlined thoroughly throughout the report in order to give context to the data provided. No change.
33		p. 13	Overall generalization. ISO ratings in rural areas are all about distance to the fire stations and water supply provided. To say a generalization of most of the Districts have a eight or a nine while there are many that have 3's in rural areas is concerning.	Reworded section for clarity.
34		p. 14	The only thing missing from this statement is where the funding will come from for these consolidations. Without revenue neutral mergers citizens of agencies that are funded properly should not have to decrease their level of service to increase another's. Also local control over fire services is a benefit properly run fire districts provide to the citizens of their Districts.	As stated in the following paragraph "The outcome of these consolidation efforts will greatly depend on the motivation and proactive efforts of the agencies' governing bodies and managing staff." Meaning these efforts will be up to the agencies to desire, seek out, negotiate, and fund (or find a funding source).
35		p. 14	Bad comment: This study was never published by the County. Although the work has now been taken over by the County Staff and is focusing on the Districts that are severely distressed.	Reference deleted.

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36		p. 14	Should also mention these consolidation efforts will depend on the ability of agencies to receive proper funding and the cooperation of the County, LAFCO and the citizens.	Added content.
37		p. 17	In retrospect the Senate Local Government Committee published the What's So Special About Special Districts? in June of 1991. The third addition published in 2002 can be found at http://www.napa.lafco.ca.gov/uploads/documents/specdist.pdf . There are many different viewpoints on Special Districts within the State and California's political landscape. This publication gives the other side of the argument in favor of greater local control.	This is a great reference tool; however, the reports discussed here speak to the evolution of LAFCO. No change made.
38		p. 17	Many small Districts underfunded once consolidated would make one large underfunded agency	However, certain efficiencies in service could lead to cost reduction and better leveraging of resources which would benefit any underfunded agency.
39		p. 19	Please see remarks from page #13 REPORT PAGE #11 regarding the proposed sphere of influence changes.	Content regarding this information has been added to the SOI discussion in the SPFPD chapter on p. 476
40		p. 24	Outdated information: Development has returned to SPFD since information was obtained for this report.	The information shown here is through the end of 2015, and is only 1.5 years old. The statement holds true that the housing market is rebounding but hasn't yet reached growth levels seen before the housing market crash as shown by the number of permits issued. No change.

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41		p. 24	The Town of Loomis does not have their own Fire Department. The Town was incorporated in 1984 and three independent Special Fire Districts provide service to the Town of Loomis; Loomis Fire Protection District, South Placer Fire Protection District and the Penryn Fire Protection District.	The fire service structure in the County is clearly stated throughout the report. The number of permits issued is broken down by land use authority - cities and the County. This is the only format that the data is available, thus the reason it is shown this way in Figure 3-2. No change.
42		p. 25	Where did this information come from? South Placer has not turned in any information to the consultant since the original request for information in 2014.	County Planning Services website. Reference added to Table 3-3.
43		p. 25	Is there a more current forecast?	No, this forecast was adopted in 2016. SACOG generally updates its projections every few years.
44		p. 30	This is the Western Placer County Fire Chiefs - Closest Resource Agreement.	Added.
45		p. 31	Copter and hand crews are now in contract through SMFD for LFPD and SPFPD.	Added to Figure 3-7 and chapter service descriptions
46		p. 33	Would like to see map.	Map added to report.

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47		p. 33	Who determined that the sphere of influence for the fire protection districts were out of date and when were these determinations made. Fire Districts must have input into these decisions as making them uninformed can continue to erode the Fire Districts within the County.	This statement simply means that there have been several instances where boundary changes and SOI changes have not been completed simultaneously for a number of reasons, additionally LAFCO records are hard to follow making the SOIs extremely out of date and not relevant to the special districts' existing boundaries. It is easier for all parties to start from the beginning, as opposed to trying to clean up the historical mistakes. The District will have a chance to provide input during the SOI update process. No change made.
48		p. 35	LFPD has converted two of the Apprentice positions to Firefighter Paramedic Full-Time Positions	Updated
49		p. 36	This contract has been dissolved. Placer Hills Chief is now in charge of Newcastle Fire District under an administrative contract.	Updated throughout report.
50		p. 36	RocFD info is outdated.	See response to comment #20.
51		p. 37	This is revenue neutral as the fees charged to the customer are pass through fees. Additionally, SPFPD now has a full-time Prevention Chief and the reliance on Roseville Fire for prevention duties has diminished significantly.	Added.
52		p. 37	SPFPD provides emergency medical at the Basic and Advanced level of care.	Added.

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53		p. 37	LFPD administration fee is now \$115,000 with an additional \$20,000 to administer ALS oversight for the paramedic program that is starting up at Loomis Fire District. Total \$135,000 nearing the end of the three year contract. Information is outdated.	Added.
54		p. 37	A year and a half ago SPFPD hired a full-time fire prevention officer the work sent to Roseville has been reduced by half if not more.	Updated.
55		p. 38	Review Omitted our 3 full time Battalion Chiefs (Shift Work). We also have hired a prevention officer from inside who is a response capable suppression employee. Additionally, our full-time fleet maintenance division is not mentioned we provide 2 full-time fire mechanics that service all of our apparatus, all of Loomis Fire Districts apparatus, and does side work for other agencies.	See response to comment #20.

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56		p. 42	Many areas within SPFPD that are LRA are bordered by SRA and there is no real difference in many of these areas as to the wildland threat either in topography our fuels. In most cases the only difference is that the area has a greater population. SPFPD considers most areas of it's LRA even if not so designated by the State as having a significant wildland urban interface threat has a significant threat. Due to the classification of LRA we have entered into agreements with Sac Metro for their firefighting helicopters and dozers. Additionally, Cal Fire through the CRA will treat areas within our LRA as a mutual threat zone as most of our LRA is bordered by SRA on the Eastern BORDER of our District.	Added.
57		p. 42	The more information that is shared on this topic the better as information and history on boundary changes need to shared and considered before what looks like a good change is considered without all the facts and chance for concerned citizen input especially in the SPFD and LFPD.	Agreed. Where possible this information is shared for transparency and to ensure education of the district and residents prior to any significant changes.
58		p. 42	Hard to recommend changes in SPFD without recommending changes in RSV as stated before these discussion need to be early and time for citizens and the agencies to be heard and those findings considered.	Content regarding this information has been added to the SOI discussion in the SPFPD chapter on p. 476
59		p. 42	South Placer Fire District also has 201 rights along with the grandfathered EOA agreement that were not relinquished under EOA contracting.	Noted. No change made.
60		p. 44	Old data It is now 2017.	See response to comment #20.

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61		p. 44	These stats are misleading. As an agency that provides ALS transport service for every one call EMS related we have two responses. The appropriate engine and the ambulance. For every fire call since we have more than one station we can have up to five apparatus responses for every one fire service call. How do these agencies report out their run stats? South Placer counts the call as one even if we send five units to the one service call some may call the same service call, 5 calls for service.	The data shown here is as solicited from the District's with clear instructions. A service call represents an event not each vehicle dispatched. No change.
62		p. 44	Data regarding Loomis's call ratios is incorrect.	The information is as provided by the district and confirmed by the previous Chief. Data for more recent calls added.
63		p. 45	Old data It is now almost 2017.	See response to comment #20.
64		p. 45	This is due to our automatic aid agreement with AMR to cover transport services East of Interstate 80 in Loomis, Newcastle, and Penryn. Additionally, under the CRA we assist all neighboring agencies including Sac County Agencies with their fire and EMS calls for service when requested or under agreement.	Added.
65		Figure 3-11	Old data	See response to comment #20.
66		Figure 3-11	Doing our part to keep the Counties citizens safe!!!	Agreed!
67		Figure 3-12	Old data	See response to comment #20.

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68		p. 46	The population of Alta is around 610 in 2010. This graph is confusing and how is a service call defined. I could argue one medical aid is 2 service calls for SPFD since we are responding 2 apparatus.	Alta's population was taken into consideration when calculating the ratio used in the graph. The ratio per 1,000 population is used to make the data for each district comparable. A service call represents an event not each vehicle dispatched, as defined in the request for information and the report. No change.
69		p. 46	Same concern here we have at least two responses for every service call in SPFPD. One ALS Ambulance and one ALS Engine or Truck. This could be doubled depending on how you report the statistic.	A service call represents an event not each vehicle dispatched, as defined in the request for information and the report. No change.
70		p. 47	Completed two years ago the Station 20 projects.	Updated.
71		p. 48	Font choice is poor really hard to read. FYI	Font in the tables and figures has been corrected.
72		p. 51	AMR the Counties largest ambulance provider has their own Dispatch as well further complicating dispatch procedures within the county.	Added.
73		p. 52	Old data	Updated.
74		p. 53	Deccan is not happening	Updated.
75		p. 54	South Placer provides these personnel under an administrative contract. More than just Duty Officer Coverage these positions are Shift Work Battalion Commanders. The Districts Chief Officers including the Chief and Deputy Chief back up the Battalion Chief when there is a large incident or a need.	Clarified.

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76		p. 54	Consolidation effort is in full swing. Both boards, and labor support consolidating, community meetings have been held with zero opposition from citizens.	Updated throughout report.
77		p. 54	The Newcastle, Penryn Contract is no more.	Updated.
78		p. 55	AFPD using the County's water tender is Old data a lot has changed in three years within the Counties fire service.	The statement refers to sharing that has happened in the past, and which could be capitalized upon again. If not exactly the same, then some other similar set up. No change.
79		p. 56	Phasing out of volunteer firefighter certification is old data	Volunteer firefighter certification is to be retired 12/31/17, so it is still relevant. No change.
80		p. 56	The experience factor is why some agencies including SPFPD show lower certification rates at FFI due to the intern program. The volunteer firefighter needs one - year of experience per the SFMO. ALL full-time employees are FFI certified within six months	Added clarification on p. 58
81		Figure 3-14	Should be a date on this chart as well as it is just a snapshot in time of certification levels.	Added.
82		Figure 3-14	Old Data and service adequacy is hard to measure with this statistic. These numbers look different at every snap shot in time and this was three years ago. Not to mention Firefighter I certification requires 6 months to a year of experience if you have an intern program these numbers are lower but do not negatively effect service adequacy.	Added clarification on p. 58

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83		p. 57	Full-time employees are either Paramedics are EMT-I's. Volunteers could be first responders. The fact that Newcastle has the highest rate of EMT-1 certification is not an indication of service adequacy. This paragraph is useless information.	Added clarification on p. 58
84		p. 58	NFPA 1710 states response times as well as minimum staffing standards. No agency in Placer County fully meets 1710 especially in the staffing model of 4-0 on engine companies.	Noted. No change made.
85		Figure 3-15	Poor font choice	Font in the tables and figures has been corrected.
86		Figure 3-15	Would argue that in areas of the District that are heavily populated the County standard is met. While in the more rural northern part of our District times are longer. These averages are for the whole District which covers a wide range of service areas. I do not believe the consultant omitted calls from outside our service area, strike teams, auto/mutual aid, state parks or Sacramento County calls. The whole year response times were provided it was never made clear how the consultant came to these response time breakdowns.	I agree that it is likely that the District comes closer to meeting the standard in the more urban areas. Also an average response time is generally not a good measure of response times as they can become skewed by outliers. The other standards are more accurate measures. Added this content. When response time information was collected it was made clear that it was only for those calls within agency boundaries. No change.
87		p. 60	Placer County Encourages but does not fund fire services. In SPFD and Loomis for the geography and population the response times are always an indicator of our response. The mix of suburban and rural is the challenge.	Added content regarding average response times making poor standards for service delivery.

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88		p. 60	With six different Dispatch centers including AMR, one standard system is not a reality.	Noted. No change made.
89		p. 60	A percentage here would be a better indicator or descriptor than most have an eight or nine.	Clarified.
90		p. 61	Old data and misleading there are less than 1000 people in Alta Fire District.	Alta's population was taken into consideration when calculating the ratio used in the graph. The ratio per 1,000 population is used to make the data for each agency comparable. No change.
91		Figure 3-19	Poor font choice	Font in the tables and figures has been corrected.
92		Figure 3-21	Old data we are halfway through 16/17 budget year.	See response to comment #20.
93		Figure 3-22	Data doesn't match the title: the data for this figure was updated. The title wasn't. If you are updating just a few Figures or charts with new data and leaving other Figures or charts with 3 year old data throughout the review it is hard for a reader that is not informed to get a clear picture of the current conditions of the fire services in Western Placer County.	Title updated to match figure. Some information is more recent as it is readily available online in a central source. That information that relies on fire agency response is not feasible to be updated at this time.
94		Figure 3-23	Poor font choice	Font in the tables and figures has been corrected.
95		p. 68	Parcel tax amounts have all changed if they have a method of adjusting the amount written into the tax or benefit assessment.	See response to comment #20.
96		p. 68	Old data, many agencies working with the County to go back out for increased special taxes.	Added content regarding efforts for new special taxes.
97		Figure 3-24	South Placer has always charged for plans review and permits. Bad Data	Updated.

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98		p. 70	Placer County has made it clear that Fire Districts will not receive Prop 172 funding.	This information is provided so that all can be informed about typical Prop 172 sharing practices and the impact they have the agencies.
99		p. 71	Old data not comparing the same product. Data is only as good as the information that is behind it. This data is not backed up with the service that the per capita is receiving.	Level of services provided are discussed throughout the service description in the chapter. The comparison of expenditures is not intended to be read out of context of all other information provided. No change.

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100		Figure 3-25	<p>Cannot compare SPFPD level of service provided to any other agency in Placer County. ALS Transport, ALS truck company, multiple ALS Engine companies, shift work battalion chiefs, fire investigation team in house, full time fire mechanic shop facility.</p> <p>This Figure 3-25 is misleading. What does that per Capita get for the expenditure. We respond an Ambulance and an Engine to every medical aid. So when others send three personnel or two we send five personnel, expenditures alone are not an indicator of service provided. Add the cost of an ambulance response to the per capita of other agencies to get a truer picture. The consultant is looking at apples and oranges and doesn't know it. Many cities do not include costs for facilities, apparatus, IT, legal, consulting and many other services within their budgets. Other city departments are charged with this expense but fire Districts have all these expenses wrapped into their expenditure per capita and service call.</p>	<p>Level of services provided are discussed throughout the service description in the chapter. The comparison of expenditures is not intended to be read out of context of all other information provided. It is apparent that those that offer less services and rely more heavily on volunteers have lower expenditures, while those that offer a higher level of services, such as ALS, and have full-time paid personnel will have higher expenditures. Clarified in text.</p>
101		Figure 3-26	<p>Old data, not comparing like products.</p>	<p>See response to #2. Level of services provided are discussed throughout the service description in the chapter. The comparison of expenditures is not intended to be read out of context of all other information provided. No change.</p>

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Comment #	Commenter/Agency	Page /Section	Comment	Response
102		p. 71	" Figure 3-25, reflect the level of service for fire providers." Confusing sentence. Disappointing that the consultant doesn't understand the subject matter of the review.	As stated by the Chief, SPFPD is exceptional as it provides "ALS Transport, ALS truck company, multiple ALS Engine companies, shift work battalion chiefs, fire investigation team in house, full time fire mechanic shop facility," which is a higher level of service than many other fire providers covered in the review. So, the higher expenditures shown in the Figure are indicative of the higher level of services being provided by the District. No change.

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Comment #	Commenter/Agency	Page /Section	Comment	Response
103		p. 71	Once again you cannot compare our cost per call at SPFD to anyone else's cost we run ALS Ambulances and ALS engines and Trucks. If you were to add the cost of the AMR Unit to other agencies calls then you would be close. In addition on a structure fire, wildland fire etc. we send multiple units up to three ALS engines, an als truck, a battalion chief, and two chief officers. How can you compare this cost of a response or the service level to a one station cost of response? This is not a true picture of service provided and cost associated with that service. To even have the RFPD in the discussion portion of this figure shows that this is a data driven study that is not looking at level of service provided at all. Additionally this bad data is old and I would like to see how the consultant came up with these numbers as I believe there needs to be clarification on this Figure before it is published or adopted.	Level of services provided are discussed throughout the service description in the chapter. The comparison of expenditures is not intended to be read out of context of all other information provided. It is apparent that those that offer less services and rely more heavily on volunteers have lower expenditures, while those that offer a higher level of services, such as ALS, and have full-time paid personnel will have higher expenditures. Clarified in text. The numbers shown in the figure are a simple calculation of operating expenditures (not capital) divided by number of service calls.
104		p. 71	This is confusing data the narrative doesn't match the figures.	Corrected.
105		p. 72	South Placer has it's Gann Limit calculated and submitted to the County on a yearly basis. Bad outdated data.	It is not included the annual audit as required by law. Added that info about it being submitted to the County.
106		p. 73	You could add annexations as a contributor for some agencies. Eroding available tax base as Urban Sprawl erodes some agencies.	This section refers to opportunities to increase income. Annexations eroding the tax base is discussed in the Governance Structure section.

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Comment #	Commenter/Agency	Page /Section	Comment	Response
107		p. 74	In Placer County Administrations have been reduced to a skeleton crew among Fire Districts and some cities. This consolidation benefit would not be realized within the County.	The sentence is phrased as there is the potential to achieve this benefit. Circumstances will be fluid and there is no way to know what the administrative structure will look like at the time this happens. No change.
108		p. 75	Will be hard to get past the citizens unless it is proven to be revenue neutral and services are not degraded in one area to bring up another.	Noted. No change made.
109		p. 75	Currently, Loomis and South Placer are working together to Consolidate there is no plan currently to expand this effort. Any action would have to be revenue neutral and at this time Penryn and Newcastle do not have the funding or the want to consider other options collaboratively.	Incremental steps can get the agencies closer to being compatible and to garner greater support. Added content about Loomis/South Placer consolidation.
110		p. 79	Wow, very lofty goal!! Without funding this will never happen. Prop 172 is off the table according to the County.	With three of the fire districts going out for new special taxes, this may be more feasible than originally thought.
111		p. 80	Bigger isn't always better if the funding isn't in place. Districts that have a high level of service have citizens that value this service. If service is degraded to consolidate agencies then there will be a variety of public responses from the citizens. This was seen in the early 2000's when South Placer and Placer Consolidated were trying to merge.	With three of the fire districts going out for new special taxes, this may be more feasible than originally thought.

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Comment #	Commenter/Agency	Page /Section	Comment	Response
112		p. 80	Bad Data: The Town of Loomis is not a player in the Fire Service Provided. The Loomis Fire Protection District, South Placer Fire Protection District and the Penryn Fire Protection District are responsible for the fire protection of the Town of Loomis. The Town was laid over three Independent Fire Districts and doesn't have any control over fire services within the Town	This reference is to geography not providers, in order to accurately portray the territory in question. No change.
113		p. 80	That time is here! This study was initiated at the beginning of our administrative contract. It is now almost been three years. We are moving forward with consolidation. Newcastle and Penryn are not.	Updated to represent existing conditions.
114		p. 81	Disagree, service levels of SPFPD not comparable to any other Fire District in the County. ALS Engines, ALS full service staffed Truck company, ALS Transport Ambulances, fleet service facilities and mechanics, fire investigation team, Structure - Full Time Administrative staff-Chief, Deputy Chief, Division Chief, Human Resources/ Fiscal Ops Administrator, Office Manager, shift work Battalion Chiefs. The structure of SP is not similar to any other Fire District within the County.	Differences in service structure are discussed under compatibility factors. Reference to section added to text. Differences in services provided can be overcome as shown by Loomis FPD initiating ALS services to come in line with SPFPD services.
115		p. 81	Bad Data: Loomis Fire District Employees also participate in CalPERS.	Corrected.

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Comment #	Commenter/Agency	Page /Section	Comment	Response
116		p. 81	So the MSR consultant suggests that the cities fix the fire service funding problems in the county? If it's not revenue neutral to merge and service levels are reduced then the citizens will not be in favor. Which will create roadblocks and political turmoil within the County.	No, as stated in the text "A large fire protection agency has the potential to attract larger and more diverse financing sources." Adding the cities would create a more powerful centralized agency that has a greater ability to maximize funding through avenues such as grants or countywide measures (like a sales tax measure). No change.
117		p. 81	The study was not completed and did not produce any results that were worth publishing per the County.	Updated throughout report.
118		p. 82	Should be titled: Address overlap of South Placer FPD SOI with Roseville SOI	The section discusses the overlap of <u>Roseville's SOI with SPFD's bounds,</u> which needs to be appropriately addressed in SPFD's updated SOI.
119		p. 82	Annexations in the past have been poorly managed the area in question was all SPFD, overtime these deals have created pockets of area that SPFD has serviced. Livoti Track is in Roseville' SOI we will agree. The area off Sierra College and Old Auburn remains in SPFD's SOI.	Noted.

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Comment #	Commenter/Agency	Page /Section	Comment	Response
120		p. 83	<p>Disagree, as stated before there has been no outreach to SPFD on this topic and there needs to be an opportunity for public comment. While the area of the Livoti Track is within Roseville's SOI there are response agreements in place for these areas. Roseville I believe does not want to provide all City services to this area of the County as well.</p> <p>The area off of Sierra College and Old Auburn is well within SPFPD's SOI and should remain so as to not further reduce SPFPD'S service area. SPFD Station 15 is the closest station to this part of the unincorporated part of the County and SPFPD. From 1952 to present the annexations have eroded SPFPD. These citizens have enjoyed being part of SPFD and also benefit from a Fire Based integrated Advanced Life Support System including transport services. If it isn't broke don't try to fix it just to clean up a map. Please.</p>	Adoption of the MSR does not make changes to an agency's boundaries or SOI upon adoption. LAFCO is not making decisions regarding SOIs at this time. Information added to District chapter as to the District's perspective on this SOI issue.
121		p. 104	Comparing expenditures without examining levels of service gives no useful data!	See response to comment #100.
122		p. 133	Comparing expenditures without examining levels of service gives no useful data!	See response to comment #100.
123		p. 226	Please share these documents (regarding annexations) as LFPD is unaware of any incomplete annexations.	Provided.
124		p. 227	Add map	Added.
125		Figure 9-2	District has hired Paramedic Firefighters and will be going ALS within the next few months. By February 2017.	Updated.

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Comment #	Commenter/Agency	Page /Section	Comment	Response
126		p. 233	This statement about mitigation fees is not a common complaint. This statement was made about South Placer Fire District as well and appears to be consultant boiler plate.	This information was provided by the Chief at the time, and was reviewed by the District upon drafting of this chapter. Information updated to reflect the new information.
127		p. 234	Old Data: The District has moved on and the PERS case is closed. There is no accountability issues currently at LFPD under the current contract for administrative services with LFPD.	Agreed. As stated in text no readily apparent accountability or transparency problems were identified. No change.
128		p. 234	Old data many changes over three years in any agency.	See response to comment #20.
129		p. 234	Operational efficiency have increased tremendously under the administrative contract. Full-time Battalion Chief coverage, Fire Chief, Deputy Chief, fire mechanics, training, EMS ALS upgrade.	Updated.
130		p. 236	Agrees that the land use authority for unincorporated areas is the County and Town of Loomis is inside the incorporated town areas.	Noted.
131		p. 236	General plan can support these efforts but without funding Loomis and South Placer are the only agencies that can support a revenue neutral merger.	Noted.
132		p. 236	The Fire Services Improvement Study was not published. Portions of that study are now being used by the County to help the severely distressed Districts.	Updated in report.
133		p. 237	Funding does not support more stations in this area. Response times are stellar for the amount of funding generated to support the fire services from this area.	This is a general fact of life for fire districts serving remote areas. Some area will always have longer response times. No change.

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Comment #	Commenter/Agency	Page /Section	Comment	Response
134		p. 241	Old Data: Reserve Firefighter program has been revamped to an Intern program these numbers have changed.	See response to comment #20.
135		p. 241	Old data; Organizations change over three years. Please consider a complete re-write.	See response to comment #20.
136		p. 241	Old data and boiler plate from all agency chapters. CSFM has made these changes already.	Agency chapters will often repeat the same information as each agency is most likely to review its own chapter, so in the interest of ensuring information is properly circulated and reviewed it is included in all agency chapters. Volunteer certification is to be retired at the end of 2017. Still relevant. No change.
137		Figure 9-6	Figure 9-6: Agencies change over three years this is just a snapshot in time.	See response to comment #20.
138		Figure 9-7	Old Data: Needs to be revised from three years ago!	See response to comment #20.
139		p. 244	Currently in progress of upgrading ALS.	Updated.
140		p. 244	This is an understatement, SPFPD has been operationally and administratively running Loomis Fire for the past 2.5 years. We are moving forward with our Consolidation efforts.	Updated consolidation discussion.
141		p. 245	Old data- District has hired Paramedic Firefighters.	Updated.
142		p. 245	Loomis Fire agrees with this statement although. The County has made it clear there is to be no funding of Fire Services using Prop 172 funds.	The discussion of Proposition 172 funds is included in order to continue to highlight the need for the County to share regardless of the position they agency has taken. No change.

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Comment #	Commenter/Agency	Page /Section	Comment	Response
143		p. 246	Loomis Station 28 is the only staffed station in the Loomis Fire District. Loomis Station 28 covers all 18 square miles of the LFPD.	District's position added.
144		p. 247	Very approximate in the case of Placer County. Level of training, full-time /Volunteer staffing needs to be examined as well.	These items are discussed earlier in the chapter. No change.
145		p. 247	Without examining level of service, operating expenditures per capita is useless information.	Level of services provided are discussed throughout the service description in the chapter. The comparison of expenditures is not intended to be read out of context of all other information provided. No change.
146		p. 253	Of the five options Option #3 is the only option that SPFD and LFPD agree could be an option as they are currently working toward consolidation. All other options would need to be revenue neutral without degrading services already provided within the Districts.	Added District's concerns in text.
147		p. 254	This statement is made by someone that doesn't understand the fire service. There are multiple benefits that can be achieved through a merger of SPFPD and LFPD. Many of these have been achieved through the contract for services. For further information please contact the Fire Chief of these two agencies as the list of efficiencies and reduction of duplications have been completely analyzed.	Agreed, there are more than minimal benefits to this kind of consolidation. Deleted. Added identified benefits as outlined in the Consolidation Service Plan.

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Comment #	Commenter/Agency	Page /Section	Comment	Response
148		p. 254	Without a revenue neutral merge all consolidations would be a political mess for all that attempt. Any changes need to be restudied because this data is old and flawed.	Added District's concerns in text.
149		p. 254	Many underfunded agencies will make one large underfunded agency. Without revenue neutral merger options these recommendations are not going to happen. The people will not politically let this happen.	Added District's concerns in text.
150		p. 254	The citizens of the Loomis Fire District have funded their Fire Services through a Benefit Assessment and Special Tax. Any equitable service distribution cannot erode what these citizens have literally paid for by increasing their taxes.	Added District's concerns in text.
151		p. 254	Volunteers are not heavily relied upon within the Districts of the County for initial response.	Statement does not say they are relied upon for initial response. No change.
152		p. 254	These statements are based on old data.	The most significant service structure and financial health information continues to hold true and does not affect the recommendation for consolidation. No change.
153		p. 426	Comparing expenditures without examining levels of service gives no useful data!	Level of services provided are discussed throughout the service description in the chapter. The comparison of expenditures is not intended to be read out of context of all other information provided. No change.

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Comment #	Commenter/Agency	Page /Section	Comment	Response
154		p. 432	Please see remarks on page #13 Study page #11. SPFPD does not agree with annexing any area of our District. Please discuss with SPFPD before any changes are considered.	Content regarding this information has been added to the SOI discussion in the SPFPD chapter on p. 476. There is still a process for updating the SOIs of each agency that will ensure agency input.
155		p. 433	Disagree, Roseville provides service to the Livoti Track under a mutual agreement. The area of SPFPD off of Sierra College Blvd and Old Auburn Rd is serviced by SPFPD which has the closest staffed ALS Engine Company at Station #15 on East Roseville Parkway. This area must remain within the SOI of SPFPD.	Added content about the District's concerns.
156		p. 434	Omission: Roseville has an ISO rating and it is a 1.	Added.
157		p. 434	Once again expenditures without looking at the level of service is not a good indicator.	Level of services provided are discussed throughout the service description in the chapter. The comparison of expenditures is not intended to be read out of context of all other information provided. No change.
158		p. 436	Not aware of four non-contiguous parts SPFPD's map shows three? Please provide the map so we can confirm.	Map added to report.
159		p. 436	Suggest consultation with the Fire Chief before any SOI decisions are made so full impact of reconsiderations can be shared.	Content regarding this information has been added to the SOI discussion in the SPFPD chapter on p. 476. There is still a process for updating the SOIs of each agency that will ensure agency input.
160		p. 437	SPFD would like to the see the map that will be used so we can comment on before published.	Provided.

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Comment #	Commenter/Agency	Page /Section	Comment	Response
161		p. 438	Since this information was received we now have an Automatic Aid agreement with Sac Metro Fire District for their Dozer's and helicopters for use within the local responsibility area (LRA) of our District	Updated.
162		p. 438	SPFD and LFD set the standard for Fire Investigation within the County with six trained investigators and a State Certified Chief Fire Investigator we are truly the only Districts with in - house trained investigators within the County.	Noted. No change made.
163		p. 441	It should be noted that this agreement is now in it's third year and we are moving forward with consolidation. There is a 5% increase in the fee for administration and is currently \$115,000 with \$20,000 ALS administration fee that has been added since this information was given to the consultant in 2014.	Updated.
164		p. 441	Although unfunded it is the right thing to do and our citizens enjoy the property as well as visitors. Once again the local agency is doing things for the right reasons. Any assistance from any agency to offset the response into the FLSP would be helpful to maintain service levels.	Noted. No change made.
165		p. 441	We support the CRA.	Noted. No change made.

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Comment #	Commenter/Agency	Page /Section	Comment	Response
166		p. 442	While the District enjoys an excellent working relationship with S-SV and has an EOA agreement with S-SV and grandfathered rights the District through the EOA process retained all previous rights granted under 201 status. It is important to note that this level of service is the premier level of service and one the District has been providing at the highest level possible in the County since the 1960's. Along with ALS engines and truck companies the level of service is the greatest that the citizens of SPFD can be served with. Nowhere in the cost per call does the consultant identify that the multi unit response to all medical aids at the highest level possible is a contributing factor to the cost. If other agencies were responsible for the cost of an ambulance service their cost per call would rise dramatically as well as their service level to their communities.	Content added p. 444.
167		p. 442	This plan has become a reality over one and a half years ago and we know have a full-time fire prevention chief that has greatly reduced the reliance on outside contractors by two-thirds. In addition to streamlining prevention operations between LFPD and the Town of Loomis.	Updated.

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Comment #	Commenter/Agency	Page /Section	Comment	Response
168		p. 442	Although not considered by Cal -Fire to be in a zone that they would classify, the threat is great and SPFD considers much of the LRA to be in a high threat Wildland Urban Interface Area. There is no clear reason for the classification change in some of our areas. Especially along the border of the FLSP which has high density homes in LRA that butt up against SRA. SPFD and LFPD respond on initial attack to all wildland fires within SRA to minimize the threat to citizens homes which is our responsibility within the SRA.	Content added.
169		p. 442	Agreed we have a great working relationship with our CAL FIRE partners. It is all in the CRA.	Noted. No change made.
170		p. 443	Promoted to Fire Chief on 12-11-15 over one year ago.	Updated.
171		p. 444	Formal complaints are not common and usually are handled at the staff level or the Fire Chief. Complaints making it to the Board Level are extremely rare.	Added.
172		p. 445	Like all organizations there is change over three years. This data is old and needs to be reevaluated.	See response to comment #20.
173		p. 445	Fire Prevention Chief Hired.	Updated.
174		p. 445	This is now six years ago! This report was delayed way to long.	See response to comment #20.
175		p. 446	This should be stated in the beginning of the document when it states two Districts have completed CFP's.	The agencies that do capital planning are shown in Figure 3-19 and discussed on p. 74. In executive summary, it is a summary, and the level of detail is minimal. No change.

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Comment #	Commenter/Agency	Page /Section	Comment	Response
176		p. 447	This station now has a volunteer response and a live in program that keeps the station open and responding in a volunteer mode. This will be the next station to receive personnel when added back in when demand levels indicate the need to increase staffing particularly due to ambulance response.	Updated.
177		p. 447	This data is over three years old and needs to be updated!	See response to comment #20.
178		p. 451	This position was hired and has been on for a year and a half.	Updated.
179		p. 454	This is not true: The District pays up to \$1,000 a month \$858 to medical the rest to dental and vision. The basic family plan is over \$1600 a month employee makes up the difference from the \$858.	Updated.
180		p. 454	The County is not interested in giving Fire Districts any 172 funding even though ERAF Shifts happen every year for fire Districts. This has been made clear by the Board of Supervisors on many occasions.	The discussion of Proposition 172 funds is included in order to continue to highlight the need for the County to share regardless of the position they agency has taken. No change.
181		p. 454	Would be great to have some shared cost recovery with the County from PILT money but there is also not an interest from the County to help Fire Districts fund this response.	Already stated in text. No change made.
182		p. 454	The first responder fee has been implemented.	Updated.

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Comment #	Commenter/Agency	Page /Section	Comment	Response
183		p. 454	Yes and a contract was agreed to establishing a fire fund that AMR pays to support EMS Operations of Fire Agencies., South Placer cannot receive this funding due to already supporting Fire EMS operations out of our own budget to support our EOA ambulance rights.	Added.
184		p. 454	Budgeting principles were adopted in the early 2000's. Probably updated in 2013.	Corrected.
185		p. 454	Old Data: 16/17 revenue is estimated closer to \$10,000,000. This includes CFAA revenue and Mitigation funds.	See response to comment #20.
186		p. 454	We are now half way through budget year 16/17. Preparing 17/18 Budget. This MSR is out dated before it is even adopted.	See response to comment #20.
187		p. 455	Now \$115,000 with \$20,000 ALS administration fee	Updated.
188		p. 455	Old Data	See response to comment #20.
189		p. 456	Outdated information!	See response to comment #20.
190		p. 456	Sentence structure error. Consider revising.	Revised.
191		Figure 16-7	2015/2016 Current Data has the District at 2200 calls for service as of Dec 26th 2016. Which is over 4500 responses considering we respond two units to every medical aid call for service.	See response to comment #20.
192		p. 457	Staffing paragraph omits the 3 full-time shift work Battalion Chief Officers.	Corrected.
193		Figure 16-9	Old data, please see comments on page 57.	See response to comment #20.

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Comment #	Commenter/Agency	Page /Section	Comment	Response
194		Figure 16-10	Figure 16-10: The information contained within the figure was for a snapshot in time over two years ago. Apparatus have moved and uses have changed data is not a current picture of the District.	See response to comment #20.
195		p. 459	This Station is not closed presently, it is a volunteer response station with a 30 yr Volunteer Captain in charge of the live-in firefighters that staff the station.	Updated.
196		p. 462	Repeated word.	Corrected.
197		p. 462	Agreed, SOI discussions should not forget this statement as well when we discuss adjusting the boundaries of the District just to clean up the lines.	Noted. No change made.
198		p. 463	The District has expanded their efforts with Loomis Fire District at this time there is no effort from within SPFD to broaden the scope of the collaboration effort to other agencies. Although any revenue neutral proposal would be looked at by the Boards for consideration.	Clarified.
199		p. 463	Outdated numbers but major projects are still the same or completed already.	Noted. No change made.
200		p. 464	Old data again a lot can change in three years!	See response to comment #20.
201		p. 464	The County encourages but doesn't fund level of response. SPFD has a great ISO rating for the level of funding and geography/population mix.	Noted. No change made.

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Comment #	Commenter/Agency	Page /Section	Comment	Response
202		p. 465	How did the consultant come to these determinations. If looking at a years worth of data unedited then these numbers would need to be examined by the District to see how they were extracted. Calls outside of our service area do not count against our response times including calls to FLSP. Once again the County can encourage response time standards but without funding the effort does not have much say, The Board has adopted response times that are appropriate for Station placement, District geography and population, staffing levels, and dispatch time. Level of service and fire force available should also be part of the equation.	An average response time is generally not a good measure of response times as they can become skewed by outliers. The other standards are more accurate measures. Added this content to the general fire chapter. Response times were calculated with provided information for only within district responses. All mutual aid response times were deleted.

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Comment #	Commenter/Agency	Page /Section	Comment	Response
203		p. 466	Once again level of service must be looked at when examining costs. What is the per capita getting for their dollar. In this case the fact that SPFD is providing full-time personnel and operating an ALS transport function is partly why per capita costs are increased. Additionally, cities do not budget for the same items that Districts have to traditionally. Other city departments have in their budgets the Fire Departments share of that expense. These could be facilities, apparatus maintenance and replacement, legal, consulting, HR functions, payroll, and IT to name a few. City Fire Department cost cannot be compared to Districts and non-transporting fire agencies cannot be compared to transporting Fire agencies without declaring the differences in the comparison. If not the resulting data as in this case does not paint an accurate picture.	Level of services provided are discussed throughout the service description in the chapter. The comparison of expenditures is not intended to be read out of context of all other information provided. Explanation of the different expenditure levels in relation to services offered added to Fire Services chapter.
204		p. 467	Should make a bigger deal out of ISO ratings like these even in rural non-hydrated areas.	Content with sufficient detail in Fire Services chapter and in individual agency chapters. No change made.
205		p. 467	I like how the consultant broke out calls within the boundaries but level of service is still not mentioned. It should be noted that the service provided included multiple unit response to every call for service.	Level of service is described throughout the document. Response capabilities are separate from response times. Response time standards are measured entirely by time to response. Thus the indicator is isolated to assess against the standards. No change.
206		p. 468	This has happened and reliance on outside prevention work has been reduced in half.	Updated.

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Comment #	Commenter/Agency	Page /Section	Comment	Response
207		p. 469	Should also be noted that we have a higher level of service than other fire providers reviewed here. This has been stated in many areas of this study already consultant is not looking at the same service provided. Please see previous comments.	Added.
208		p. 470	Old data - Since have issued COP'S to pay down CalPers PRE-2013 UAL. Savings from sale invested in PARS OPEB trust yearly.	Deleted.
209		p. 470	See earlier comments on same wording.	Updated.
210		p. 471	If the consolidation proposal is revenue neutral and does not decrease the level of service provided to the current citizens within the District then the Board of Directors will consider additional efforts. At this point there are not any other agencies that can consolidate on a revenue neutral footing with SPFD and Loomis Fire Protection Districts.	Clarified.

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Comment #	Commenter/Agency	Page /Section	Comment	Response
211		p. 472	<p>District and it's citizens should be involved in any discussions and determinations as stated before the SOI changes since the 1950's have eroded the available tax base of the District and encouraged increased population of once rural areas. There are no areas within the Districts current Boundaries excluding the specific area of the Livoti tract that we cannot service adequately from existing stations. Additionally the area off of Sierra College and Old-Auburn Rd within the current SPFD SOI and boundaries must remain in the SPFD boundaries as our service could be reduced to the citizens of SPFD if this area is annexed into Roseville. It is not the Districts problem that past annexations were done without thought to fire providers and the impact on service and citizens quality of life. We are the closest provider to this area providing the optimal integrated fire ALS transport and engine response. The only option that is agreeable to SPFPD on the surface would be option 3. Option 5 is not an option until specifics of the proposal are agreed upon by the District and the citizens involved.</p>	<p>Added content regarding the District's point of view.</p>
212		p. 472	<p>Of the five options this is the only option that SPFD and LFPD agree could be an option as they are currently working toward consolidation. All other options would need to be revenue neutral without degrading services already provided within the Districts.</p>	<p>Added content regarding the District's point of view.</p>

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213		p. 473	<p>Consultant contradicts themselves on page 462 and 469 they state "It appears that currently the District's facilities have sufficient capacity to provide adequate services to the existing service area based on the condition of the District's facilities and SPFPD's response times to service calls. All of the District's facilities are in excellent to fair condition and are appropriately maintained and upgraded when needed. SPFPD meets the National Fire Protection Association (NFPA) standards for response to structural fire calls. The District also meets the Sierra-Sacramento Valley EMS (S-SVEMS) Agency standards for response to medical emergencies" . In this paragraph the consultant states " Adopting a coterminous SOI for the District would indicate that the current service provision structure is adequate, which is currently not the case." SPFD finds that this is an opinion of a consultant that is needing their report to have specific outcomes not based on fact or their own research data even how flawed and old it is. Once again a lot has changed since the consultant gathered their information.</p>	<p>Not a contradiction. Report subsequently states "While SPFPD operates at a level similar to the urban service providers in the County, the District has experienced financing, personnel and other constraints that limit its operational efficiency and cause a reduction in level of service." The District is well operated, but it was not immune to the recession and there were impacts resulting in a reduction in service levels. Granted, SPFPD has rebounded since, but other agencies have not rebounded and service levels amongst most of the other districts has not recovered, which makes the current service structure in the County insufficient, not specifically SPFPD's service structure. Clarified.</p>

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214		p. 473	<p>Consultant has missed the mark. SPFD and Loomis need to consolidate first because they are the only two fire Districts that can do this on a revenue neutral basis. The Public will not stand for a dilution of their service within the Loomis or South Placer Fire Districts to provide service to other areas of the County that cannot afford a functional revenue neutral consolidation.</p> <p>Please reach out to the Chief of the South Placer Fire District for more information on their consolidation effort with Loomis Fire District. There are many more areas that can reduce cost while increasing the level of service to the Districts consolidating than just reducing administrative costs. The benefits are not minimal they are exponential when it comes to the increased level of service to the community. If a larger unfunded consolidation were the case then we would agree that the benefits would be minimal and probably degrading.</p>	Added content regarding the District's point of view.
215		p. 473	<p>Once again if this agency can take over services without degrading services already provided and without using funds from agencies that are providing that level of service in other areas then I think you would get people to listen. Until then a bunch of unfunded agencies and a few appropriately funded agencies make one broke agency that delivers a substandard product.</p>	Added content regarding the District's point of view.

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Comment #	Commenter/Agency	Page /Section	Comment	Response
216		p. 473	Old Data in question: Overly broad statement and one that is an opinion of a consultant that from the information in this report should get some expert firefighters on staff. Extensive collaboration has taken place funding levels have not changed. There are efforts at the County that are happening real-time not three years ago. Please shelve this report.	Added content regarding the District's point of view.
217		p. 473	The South Placer Fire District adamantly disagrees with the consultants recommendation that the commission adopt a single SOI for unincorporated Western Placer. Before this even is discussed how would this be funded, staffed and administered. If service levels were reduced in any area to make this happen there is serious opposition from the Board and Citizens of South Placer Fire Protection District and Loomis Fire Protection District.	Added content regarding the District's point of view.

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218		p. 474	<p>As stated multiple times throughout this chapter and the beginning of this document no changes to the current SOI are the boundaries of SPFPD are acceptable just to clean up a map.</p> <p>All sphere of influence discussions regarding the Livoti track which remains in SPFPD should be noticed to the residents of the unincorporated areas of the County covered by SPFD and Cities alike. More research on the specifics of the Livoti track and response exchanges made between agencies should be investigated. Consultant did not interview District for comments on this topic. The city of Roseville water treatment plant is within the SPFD'S boundary incorporated into the City of Roseville in 1971 through Placer LAFCO without notice to the District. . Roseville provides response into the Livoti track in exchange for a response to the Water Treatment Plant and other areas before station six was built.</p> <p>Additionally the area not contiguous to SPFD on the Sacramento County line along Sierra College and Old Auburn Road including the Woodbridge Ranch Subdivision should remain in the SOI of the SPFD.</p>	<p>Added content regarding the District's point of view.</p>
219		p. 476	<p>They appear to be adequate is an understatement. Please look at the level of service provided.</p>	<p>LAFCO is required to come to a determination about the adequacy of services provided to ensure services are sufficient to meet the needs of the residents. The degree to which the services go beyond adequate is not necessary. No change.</p>

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220		p. 492	This information is confusing. CSA 28 is Placer County Fire. Please elaborate.	CSA 28 is a dependent special district of the County. It is used as a means to collect funds for PCF. PCF is a department of the county, and is not operated as a special district. The money collected by CSA 28 is placed in the PCF budget. Please refer to the description earlier on the page. No change.
221		p. 516	Without response times comparisons cannot be made to the level of service provided.	Agreed. No change made.
222		p. 516	This data is incorrect Placer Hills Fire District is 35 square miles, covered by two fire stations.	Corrected.
223		p. 516	Comparing expenditures without examining levels of service gives no useful data!	Level of services provided are discussed throughout the service description in the chapter. The comparison of expenditures is not intended to be read out of context of all other information provided. Explanation of the different expenditure levels in relation to services offered added to Fire Services chapter.