

**Municipal Service Review  
and  
Sphere of Influence Recommendation**

**Paradise Fire Protection District  
Mono County, California**

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## SUMMARY

### Municipal Service Review Determinations

#### 1. Infrastructure Needs and Deficiencies

- The renovation or replacement of existing facilities will be needed to maintain or increase the quality of service provided by the district.
- Additional development will place more pressure on the district to augment its service capacities.
- The replacement of aging equipment and the purchase of additional equipment will be needed to maintain or increase the quality of service provided by the district.
- The district needs a longterm solution to the lack of sufficient volunteer personnel.

#### 2. Growth and Population Projections for the Affected Area

- The Mono County General Plan Land Use Element allows for additional development in the area served by the Paradise Fire Protection District.
- Growth is anticipated to occur primarily in and adjacent to existing developed areas.
- Visitors to the area will continue to increase demand for services such as emergency medical response and vehicular accident response while providing no commensurate increase in revenues available to provide those services. There is a need to have these users pay for their share of the services.
- The population in Paradise is projected to increase to 157 by 2020 and 169 by 2030, creating an increased demand for fire and emergency medical services.
- The population will continue to age, creating an increased demand for emergency medical services.

#### 3. Financing Constraints and Opportunities

- The Paradise Fire Protection District's future financing will continue to rely primarily on property assessments, fire mitigation fees and augmentation (in the form of aid from other governmental agencies and grants).
- The district's fire mitigation fee of 75 cents per square foot of new construction is above the countywide average of 63 cents per square foot. An opportunity may exist to increase the fee.
- It is becoming increasingly difficult to maintain existing service levels as costs increase over time.
- There are opportunities to coordinate with other fire districts and agencies to increase efforts to secure grant funding.

#### 4. Cost Avoidance Opportunities

- Southwestern Mono County is a discrete geographic area within Mono County with distinct community areas—Wheeler Crest and Paradise.
- Paradise FPD and the Wheeler Crest FPD are located approximately one mile apart on Lower Rock Creek Road.
- The Paradise Fire Protection District is a volunteer department with an elected board of commissioners—administrative costs are generally low.

- Although the district strives to keep operations and maintenance costs low by sharing services and training with other districts, small districts tend to suffer from a lack of economies of scale.
- Cooperation among fire districts is an important part of reducing costs.
- The cost of volunteer training is unavoidable and may be lost when trained volunteers leave the district. A possibility exists for the district to offer benefit contracts so that a volunteer agrees to be with the district for a specific amount of time or to reimburse the district for training costs.
- Integrated planning, especially long range planning, is an important part of cost avoidance. The district has no comprehensive long-range plan to address the demands imposed by growth within the district.
- The Paradise Fire Protection District and the Wheeler Crest FPD are both small districts with limited physical and financial resources. They could potentially benefit from being combined into a Southern Mono Fire Protection District, along with larger districts in Southern Mono County, with separate facilities in various community areas. Southern Mono County is experiencing huge growth and there is a need throughout the area for expanded fire protection and emergency medical services.
- Paradise FPD has suggested that structural reorganization of their district with larger districts should be evaluated in the next few years in order to improve the provision of services within their service area.

#### **5. Opportunities for Rate Restructuring**

- All funding mechanisms have inherent limitations that may prevent their implementation, use or restructure.
- The district could benefit from increasing its fire mitigation fee from \$.75 per square foot.
- The Paradise Fire Protection District should seek additional opportunities to reduce costs through cooperation and sharing with other agencies.
- The district should pursue grant funding.

#### **6. Opportunities for Shared Facilities and Resources**

- The largest impediment to greater sharing of resources and facilities in Mono County is geographic separation between fire protection districts.
- Fire districts in Mono County can share resources through joint training sessions, shared purchasing, and the implementation of mutual aid agreements.
- The **Local Hazard Mitigation Plan for Mono County** contains a number of mitigation measures to address fire hazard planning in the county's communities. While the focus of the plan is on mitigation planning for wildland fire hazards, the mitigation measures identified in the plan apply to all fire hazards in the area. Responsibility for implementing those fire hazard planning measures rests with the County, the Regional Planning Advisory Committees, and local fire protection districts.
- Paradise has no paramedic service. The County is in the process of updating its paramedic services along the Highway 395 corridor.

## **7. Government Structure Options**

- In regions of the county with separate, distinct communities that are geographically remote from each other, public services are most logically provided by single purpose special districts rather than by a larger entity such as the county.
- In regions of the county that have several small fire districts serving separate communities within the region, such as Southern Mono County, an opportunity exists to merge the districts to create a regional fire district with facilities in each community.
- Creating a regional fire district in Southern Mono County could reduce administrative costs, eliminate duplication of services, and create a more financially stable district and one that would enjoy greater economies of scale than the smaller districts. One district that was planning for future development in the Southern Mono County would also create a more cohesive approach to the longterm provision of fire protection services in the region.

## **8. Evaluation of Management Efficiencies**

- The Paradise Fire Protection District is managed by an elected board of commissioners and a volunteer fire chief.
- The board of directors' individual skills, knowledge, experience, qualifications, motivation and the time they have available for the district determine the effectiveness of the Paradise Fire Protection District and its efficiency.
- In the past, the Paradise Fire Protection District has set goals and objectives on an incremental basis to meet identified needs.
- The Paradise Fire Protection District has no longterm planning documents so needs to develop a long-range plan that addresses budgeting, managing costs, and training and utilizing personnel.
- The district needs to develop a budget and funding sources that will allow for the development of contingency funds.
- While the district provides adequate service to existing residents of the area, its ISO rating is 8/9, and it may not have the resources to serve the longterm needs of the area.

## **9. Local Accountability and Governance**

- The Paradise Fire Protection District complies with the minimum requirements for open meetings and public records.
- Public accessibility to district information is limited and is often based on the availability of the board officers.
- Public participation in the decision-making process is limited and usually occurs only when a controversial item is on the agenda.

## **Sphere of Influence Findings**

### **1. Present and Planned Land Uses**

Land use within Paradise is predominantly single-family residential with one resort commercial use. The planned land uses for the area are single-family residential uses. Development will occur within and adjacent to existing development.

### **2. Present and Probable Need For Public Facilities and Services**

Paradise has an existing and continuing need for public facilities and services to serve the increasing residential development in the area.

### **3. Present Capacity of Public Facilities and Adequacy of Public Services**

The district currently provides an adequate level of service but has identified a need to improve both its facilities and services in order to serve additional development.

### **4. Social or Economic Communities of Interest**

The district area exhibits social and economic interdependence with communities in Inyo County. An interdependence with those communities has no relevance in determining the sphere of influence for the district since special districts cannot provide services outside of their county. The district area also shares social and economic ties with residents of Wheeler Crest.

## **Sphere of Influence Recommendation**

The Sphere of Influence for the Paradise Fire Protection District, Community Service District, should remain as it is, coterminous with the boundaries of the district.

## **Reorganization Recommendation**

Section 56001 of the California Government Code states that:

The Legislature also finds that, whether governmental services are proposed to be provided by a single-purpose agency, several agencies, or a multipurpose agency, responsibility should be given to the agency or agencies that can best provide government services.

The Paradise Fire Protection District is a small district, with limited financial and physical resources. The district has expressed an interest in combining with larger districts in the area to form a Southern Mono Fire Protection District. Currently, Wheeler Crest and Paradise are served by separate fire protection entities, with separate facilities, equipment and administration, located approximately one mile apart on Lower Rock Creek Road.

At some point in the future, a regional fire district in Southern Mono County might best provide fire protection services for the area, in the process reducing administrative costs, eliminating duplication of services, and creating a more financially stable district that would enjoy greater economies of scale than the smaller districts. One district that was planning for future development in Southern Mono County would also create a more cohesive approach to the

longterm provision of fire protection services in the region. At the time reorganization is being considered, a reorganization study should be conducted to determine what governmental structure would best provide services for the region. Such a reorganization should occur only with the concurrence of both districts' Boards of Directors.

## **I. INTRODUCTION**

### **Municipal Service Reviews**

The Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 requires Local Agency Formation Commissions (LAFCOs) to conduct comprehensive reviews of all municipal services in each county in California and to periodically update that information. The purpose of the municipal service reviews is to gather detailed information on public service capacities and issues.

### **Relationship Between Municipal Service Reviews and Spheres of Influence**

The Cortese-Knox-Hertzberg Local Government Reorganization Act requires LAFCOs to develop and determine the Sphere of Influence (SOI) for each applicable local governmental agency that provides services or facilities related to development. Government Code Section 56076 defines a SOI as “a plan for the probable physical boundaries and service area of a local agency.” Service reviews must be completed prior to the establishment or update of SOIs (§56430(a)). Spheres of influence must be reviewed and updated as necessary, but not less than once every five years (§56425).

The information and determinations contained in a Municipal Service Review are intended to guide and inform SOI decisions. Service reviews enable LAFCO to determine SOI boundaries and to establish the most efficient service provider for areas needing new service. They also function as the basis for other government reorganizations. Section 56430, as noted above, states that LAFCO can conduct these reviews “before, in conjunction with, but no later than the time it is considering an action to establish a SOI.”

The Paradise Fire Protection District Municipal Service Review is being conducted in response to, and in conjunction with, an update of the sphere of influence for the district.

## **II. PARADISE FIRE PROTECTION DISTRICT**

### **DISTRICT OVERVIEW**

#### **Service Area**

The Paradise Fire Protection District was established in 1982 to provide structural fire protection to Paradise View Estates subdivision and other surrounding parcels, including Paradise Lodge. The district boundaries include approximately one square mile, adjacent to Lower Rock Creek Road in the southwest corner of Mono County (see Figure 1). Paradise is the southern most community in Mono County and is located approximately 15 miles north of Bishop in Inyo County.

Paradise is located towards the bottom of the Sherwin Grade that provides a steep ascent from Round Valley in Inyo County to Long Valley in Mono County. The area is bordered to the south by Round Valley in Inyo County, to the west by the Wheeler Crest, to the north by the Swall Meadows and Pinon Ranch areas, and to the east by the Casa Diablo area. There are no surface waters within the district. Topography within the district is fairly steep; vegetation is primarily sagebrush scrub.

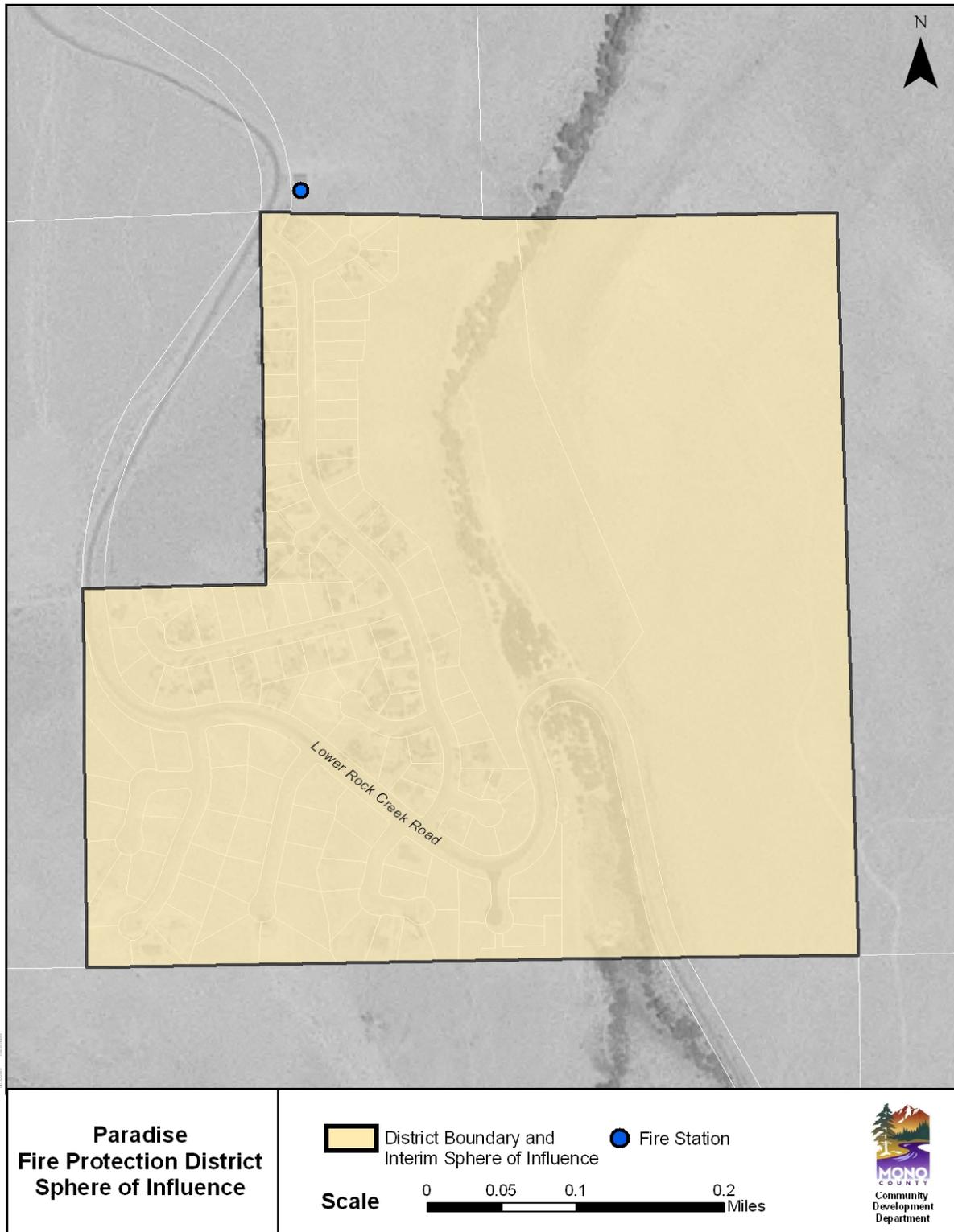
Paradise is a small residential community with one commercial use, the Paradise Lodge. The area is a bedroom community for Bishop and Mammoth Lakes and retirees; that trend is expected to continue.

The community is surrounded to the west and south by large tracts of land owned by the Los Angeles Department of Water and Power and to the north and east by large areas of public lands managed by the Bureau of Land Management (BLM).

#### **Population Characteristics**

Mono County GIS estimates that there are 132 parcels in the district, including approximately 90 developed parcels (residential or commercial parcels valued at \$10,000 or more). The district estimates that there are approximately 85 households and 170 residents within its service area.

Population data from the 2000 US Census and California Department of Finance population estimates show the population of Paradise to be 124 in 2000 and 126 in 2003 (Census 2000 Summary File 1, Table 3, Mono County Housing Element).



**Figure 1**  
**Paradise Fire Protection District Boundaries**

In 2000, 2 percent of the population in Paradise was under 5 years old, 6 percent was 5-17 years old, 64 percent was 18 to 64, and 28 percent was over 65 (Census 2000 Summary File 1). Compared to other community areas, Paradise had one of the higher percentages of its population in the senior age group. The median age in Paradise in 2000 was 57, higher than the countywide median age 40 (Census 2000 Summary File 1).

In 2000, there were 71 households in Paradise (Census 2000 Summary File 1). Eighty-six percent of the households were owner-occupied and 14 percent were rented (Census 2000 Summary File 1).

### **Services Provided**

The district serves a full time residential population in the community of Paradise as well as travelers along Highway 395. It provides fire prevention/suppression and emergency medical response services, HazMat response, wildland firefighting, technical rescue, permit approvals and development proposal reviews.

### **ISO Rating**

The Insurance Services Office (ISO) is a private organization that supplies information used by underwriters to evaluate and price particular risks, including fire protection. ISO staff gathers information on individual properties and communities and, in turn, insurers use that information in underwriting personal and commercial property insurance, commercial liability and workers compensation policies. The ratings range from a score of 10 (no fire protection at all) to 1 (best fire protection possible). The ISO rating for the Paradise Fire Protection District is 8/9.

### **Land Ownership**

The district is an island of privately owned land surrounded by publicly owned land. Land surrounding the district is owned either by the Los Angeles Department of Water and Power or is publicly owned and managed by the Bureau of Land Management (BLM).

### **Surrounding Fire Protection Facilities**

The closest fire protection district to the Paradise Fire Protection District is the Wheeler Crest Fire Protection District, which is located one mile north of the district along Lower Rock Creek Road.

### **Fire Hazard**

Wildfire hazards are considered to be one of the most prevalent natural hazards in Mono County due to their repeated occurrence, the damage they have caused in the past, and the geographically widespread nature of the hazard (Mono County Multi-Jurisdictional Local Hazard Mitigation Plan). Most of the developed parcels in the Paradise Fire Protection District are in areas identified by the California Department of Forestry and Fire Protection (CDF) as Wildland Fire Hazard Areas (see Figure 2).

### **Local Fire History**

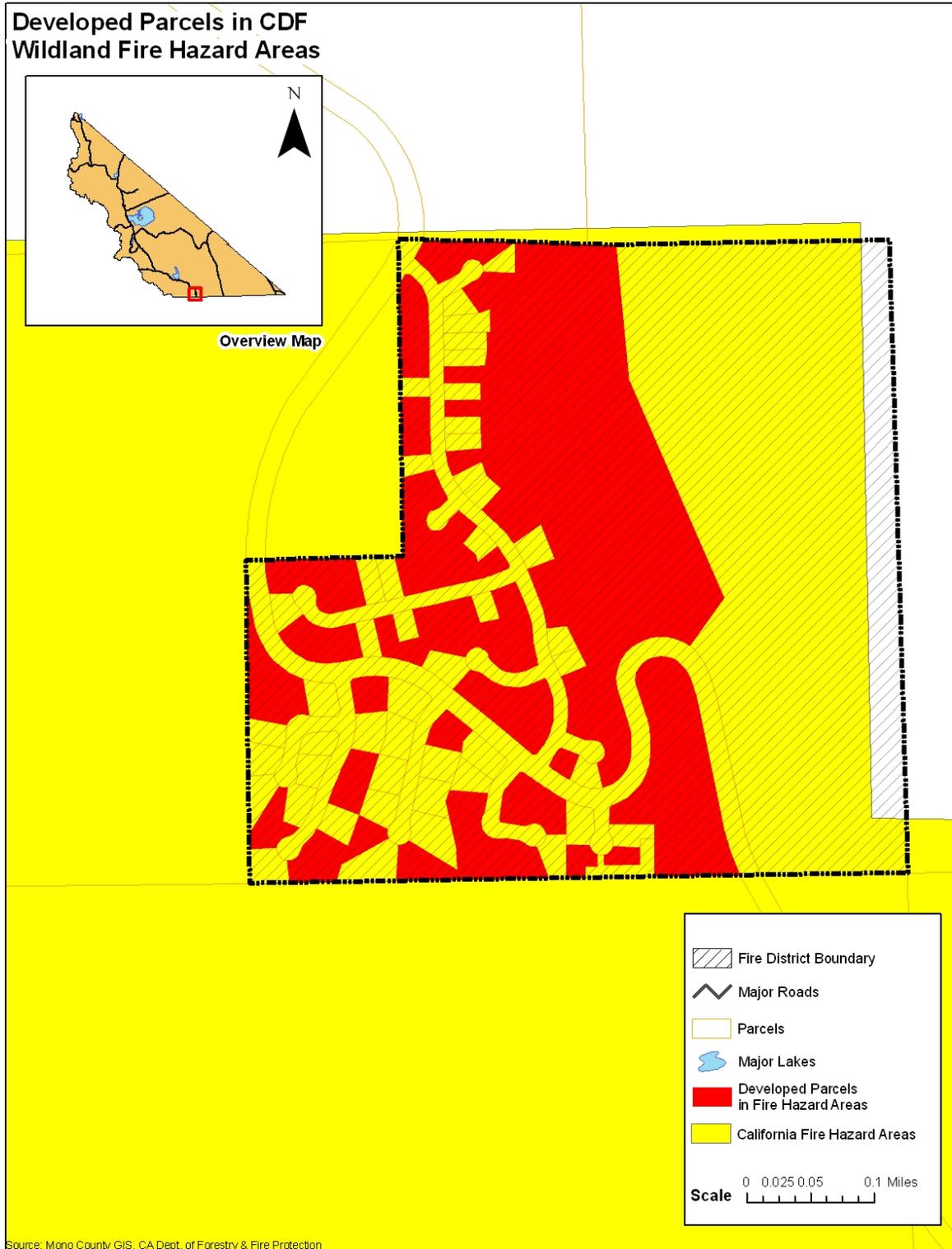
The Birch fire burned in the area in July of 2002.

### **Planned Land Uses**

The Mono County Land Use Element provides for additional development in the Paradise area. There are currently 132 lots in the development; approximately 60 percent of the lots are developed. The majority of the lots (130 lots) are small lots designated for single-family residential development. One large lot is designated Rural Resort and includes the Paradise Lodge (single-family residence, restaurant, 17 cabins). The remaining large lot is designated Estate Residential; there is a current proposal to develop 53 lots for large homes on that parcel.

### **Mono County Fire Safe Standards**

The Mono County Fire Safe Standards (Chapter 22 of the Mono County Land Development Regulations) apply to new development in State Responsibility Areas, generally areas outside fire district boundaries. They are intended to provide the same practical effect as the State's Fire Safe Regulations. The Fire Safe Standards establish basic wildland fire protection standards in the State Responsibility Areas of Mono County for emergency access; signing and building numbering; private water supply reserves for fire use; roof covering standards; and vegetation modification.



**Figure 2**  
**Paradise Wildland Fire Hazard Areas**

### **Fire Safe Council**

Fire safe councils are non-profit organizations created to advise citizens how best to deal with the threat of wildfires to homes, communities and natural resources in the urban/wildland interface. Fire safe councils provide information on creating defensible space around structures, creating fire safe landscaping, and provide home inspections. The Eastern Sierra Regional Fire Safe Council provides fire safe information to homeowners and communities throughout Inyo and Mono Counties. Many communities in Mono County have local fire safe councils. There is currently no fire safe council in Paradise.

### **District Issues of Concern**

Growth is a major concern for the district. There is a proposal for a 53-lot subdivision on steep topography to the east of the existing development. The district has noted that it needs newer apparatus and additional apparatus to serve the proposed developed as well as an expanded fire station to store the apparatus and additional equipment.

The district is concerned about its ability to meet OSHA safety requirements for training and testing of equipment and firefighters. The district notes that it has no financing for longterm needs; once development has occurred, and mitigation fees have been used, funding for capital improvements will be limited.

The district's current ISO rating is 8/9; the district has indicated that some residents of the area are unable to get fire insurance as a result of the low ISO rating. The district wants to improve its facilities, equipment, and services in order to raise its ISO rating and enable residents to get fire insurance.

### **District Planning**

The FPD, as is typical with many rural districts, does not have a master fire protection plan, or a capital improvement program. Planning for the district occurs by the fire chief and the board of commissioners on an incremental basis as the need arises.

## **DISTRICT SERVICES**

### **Fire Suppression and Emergency Medical Response**

Structural fire protection is provided to district residents from the fire station located along Lower Rock Creek Road on BLM land immediately to the north of Paradise Estates. The station is manned by 18 volunteer firefighters, with an average of 8 of them being able to respond midday. There are currently 14 fire hydrants within the district. The district estimates that 100 percent of the district is accessible within 5 minutes.

The district provides emergency medical response with 3 of the volunteer firefighters qualified as EMT1s. Eight of the volunteers are trained as First Responders. The district does not have an ambulance. There are no Advanced Life Support (ALS) services in the area; the nearest ALS services are in Bishop, 15 miles away.

The district has personnel trained in HazMat response, in wildland fire fighting, and in vehicle extrication. The district also reviews development proposals and building permits and test hydrants.

### **Mutual Aid and Service Agreements**

Mono County contains eleven fire protection districts, all of which belong to a county fire service association and are party to a countywide mutual aid agreement. The agreement formalizes the procedure for each district to send personnel and equipment to fires and emergencies beyond district boundaries when needed. The districts have also established informal service areas for the unserved private lands that are outside of any local fire protection district. These informal service areas reflect a recognized moral – not legal – responsibility of the districts to assist in the protection of life and property in such areas.

The district maintains mutual aid agreements with the Bureau of Land Management (BLM), the US Forest Service (USFS), the California Department of Forestry and Fire Protection (CDF), and the Wheeler Crest Fire Protection District. Although section 13007 of the Health and Safety Code authorizes fire protection districts to collect fees from the property owners to cover the cost of responding to a fire, the Paradise Fire Protection District derives little, if any, revenue from serving non-district areas. The district is, however, reimbursed for the cost of responding to fires on federal lands through its memorandum of understanding with the BLM and the USFS.

**Table 1: Paradise Fire Protection District Services and Programs**

| <b>Type of Service</b>                           | <b>Provider</b> | <b>Service Capacity and Other Notes</b> |
|--|-----------------|---|
| <b><i>Fire Services</i></b>                      |                 |   |
| Fire Suppression                                 | All Staff       |   |
| Residential Inspection                           |                 | Not provided                            |
| Commercial Inspection                            |                 | Not provided                            |
| Burn Permits                                     |                 | Not provided                            |
| Fire Safe Inspections                            |                 | Not provided                            |
| Hydrant Inspections                              |                 | Not provided                            |
| Defensible Space/Brush Reduction                 |                 | Not provided                            |
| HazMat   | 3 trained       |   |
| <b><i>Rescue Services</i></b>                    |                 |   |
| Swift Water Rescue                               |                 | Not provided                            |
| Rope Rescue                                      |                 | Not provided                            |
| Extrication/Vehicle Rescue                       | 3 trained       |   |
| <b><i>Medical Services</i></b>                   |                 |   |
| Basic Life Support                               | 3 EMTs          |   |
| First Responder                                  | 8 trained staff |   |
| <b><i>Other Safety Services and Programs</i></b> |                 |   |
| Public Education Program                         |                 | Not provided                            |
| School Programs                                  |                 | Not provided                            |
| Community Activities                             |                 | Not provided                            |
| <b><i>Development</i></b>                        |                 |   |
| Plans Review                                     | Chief           |   |
| Permit Approval                                  | Chief           |   |
| Will-Serve Letters                               | Chief           |   |

**Infrastructure and Facilities**

District facilities include the fire station in Paradise. The district has indicated it has a need for an additional engine bay to house a newer engine and more storage.

District equipment includes the following: two engines/pumpers, one from 1969, one from 1972. Both of the pumpers were purchased used. The district indicates that it has a need for new apparatus to replace the existing pumpers and additional apparatus to serve proposed new development.

In addition, the district has 10 personal alert safety systems (PASS), 10 self-contained breathing apparatus (SCBA), and 18 sets of personal protective clothing (PPE), as required by Federal, State and local laws and standards, including those established by OSHA and NFPA.

### **Communications**

Fires and medical emergencies are dispatched to the district from the Mono County Sheriff's Office in Bridgeport via the county's 911 emergency system. The district currently has 5 handheld radios and indicates that it has no needs for improvements to communications. The district currently does not contain cell phone towers. The district has complete internet access.

### **Administration and Staffing**

The district is managed by an elected board of commissioners. Meetings are generally held once monthly. Eighteen volunteer firefighters actively staff the district's facilities; over half the volunteers have received formal training in a variety of areas. Ten have formal training in structural firefighting; one of those has completed Firefighter II training.

The volunteers receive training on a regular basis (approximately 8 hours a month) covering basic aspects of fire suppression and use of the equipment. Training is provided in-house by the chief and assistant chief. The district participates in joint training activities with the Wheeler Crest FPD, Long Valley FPD, Mammoth Lakes FPD, and CDF. District personnel also attend specialized training sessions in emergency medical response, HazMat response, etc.

**Service Activity**

The Paradise Fire Protection District responded to 10 calls in 2005. The district's service calls are predominantly EMT calls followed by vehicle accidents.

**Table 2: Paradise Fire Protection District Call Log--2005**

| <i>Incident Type Summary</i> | <b>Number of Responses</b> | <b>Percentage (%)</b> |
|------------------------------|----------------------------|-----------------------|
| Structural                   | 0                          | <b>0%</b>             |
| Vehicle Accident             | 2                          | <b>20%</b>            |
| Emergency Medical            | 6                          | <b>60%</b>            |
| HazMat                       | 0                          | <b>0%</b>             |
| Rescue                       | 0                          | <b>0%</b>             |
| Wildland Fire                | 1                          | <b>10%</b>            |
| False Alarm                  | 1                          | <b>10%</b>            |
| <b>TOTAL</b>                 | <b>10</b>                  | <b>100%</b>           |

**Funding and Budget**

The Paradise Fire Protection District receives no property tax revenues but relies heavily on augmentation monies and property assessments for its funding. Equipment is the greatest expense of the district, at approximately 73 percent of the total budget. Services represent 7 percent of the budget, supplies represent 5 percent of the budget, and liability insurance 15 percent. The district has no outstanding debt.

**Table 3: Paradise Fire Protection District Revenues and Expenditures,  
FY 2006-2007**

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**Revenues**

*Taxes and Assessments*

|                                   |         |                         |
|-----------------------------------|---------|-------------------------|
| Property Assessments              | \$9,425 | (32 % of total revenue) |
| Licenses, Permits, and Franchises | \$5,063 | (17 % of total revenue) |

*Revenue from Use of Money and Property*

|                 |         |                         |
|-----------------|---------|-------------------------|
| Interest Income | \$4,609 | (16 % of total revenue) |
|-----------------|---------|-------------------------|

*Intergovernmental*

|       |                 |                         |
|-------|-----------------|-------------------------|
| Local | <u>\$10,000</u> | (34 % of total revenue) |
|-------|-----------------|-------------------------|

**Total Revenues** \$29,097

**Expenditures**

|                       |                |                              |
|-----------------------|----------------|------------------------------|
| Services and Supplies | \$5,778        | (60 % of total expenditures) |
| Other Expenditures    | <u>\$3,855</u> | (40 % of total expenditures) |

**Total Expenditures** \$9,633

**Excess Revenues** \$19,464

### III. SERVICE REVIEW ANALYSIS AND DETERMINATIONS

Government Code §56430 requires the analysis of nine factors when assessing the capabilities of public service agencies. Each of the required factors is discussed below as it pertains to fire protection districts in general and the Paradise Fire Protection District, Community Service District specifically.

#### 1. Infrastructure Needs and Deficiencies

##### **Overview**

*Purpose: To evaluate the infrastructure needs and deficiencies of a district in terms of capacity, condition of facilities, service quality, and levels of service and its relationship to existing and planned service users*

The infrastructure elements of fire protection and emergency services include facilities (stations), rolling stock (engines and ambulances), dispatch systems, water supplies and roadways. Service also depends on trained personnel.

In the context of fire and emergency services, infrastructure needs and deficiencies are indicated by facilities that do not provide adequate capacity to accommodate current or projected demand for service in the affected area. Adequacy of service can be measured by reviewing response times, coverage, mutual aid, staffing and the underlying water and roadway systems.

##### ***Paradise Fire Protection District--Facilities***

The district currently has one fire station in Paradise, located immediately to the north of Paradise Estates on public land managed by the BLM. The district has indicated that they need an additional bay to house additional equipment and additional storage.

##### ***Paradise Fire Protection District--Apparatus and Other Equipment***

The district relies on aging fire equipment. The district has indicated that it needs two newer apparatus to replace its existing pumpers and an additional Type I engine for backup and to serve proposed new development.

##### ***Paradise Fire Protection District--Personnel***

The district has a current volunteer staff of 18. Volunteer staff are increasingly difficult to attract and retain. Paradise is increasingly becoming a residential area for commuters to Bishop or Mammoth and for retirees. Many potential volunteers may be available only for very limited time periods or may not have the time or energy to provide community service at the level of intensity required for volunteer firefighters. Currently, 8 of the 18 district volunteers are available to respond during the middle of the day,

***Paradise Fire Protection District--Dispatch System***

The emergency services dispatch system in Mono County is operated by the Mono County Sheriff's office from facilities in Bridgeport. Volunteers receive dispatches directly over portable pagers. The adjacent Wheeler Crest FPD has indicated that paging and communication with Mono 1 is through the Casa Diablo repeater. This repeater is powered by solar panels and a wind generator. During bad weather, it has failed because of a lack of sun and wind. When it is down, they do not receive pages. The Wheeler Crest FPD has indicated that they need a new repeater with a reliable power supply.

Mono County, along with the Town of Mammoth Lakes and emergency service providers throughout the county, is in the process of a 911 Addressing Project for the entire county. Addresses are being input into the county's GIS system and being field checked for accuracy. Once the project is complete, 911 dispatchers in Bridgeport will see the location of a call displayed on an interactive map on their computer and will be able to describe the location more accurately and quickly to emergency services personnel. The district has indicated that reflective street signs would improve its services.

***Paradise Fire Protection District--Roadways***

The main access through Paradise is Lower Rock Creek Road, a paved two-lane county road. There is also a paved road through the subdivision that forms a loop with Lower Rock Creek Road, as well as several cul-de-sacs within the subdivision.

***Paradise Fire Protection District--Water Supply***

The district currently has 14 fire hydrants, installed and maintained by the Lower Rock Creek Mutual Water Company. Recently approved subdivision projects in the area will be installing additional fire hydrants. Water availability and usage has been a concern in the area, particularly for large developments.

**Determinations**

- The renovation or replacement of existing facilities will be needed to maintain or increase the quality of service provided by the district.
- Additional development will place more pressure on the district to augment its service capacities.
- The replacement of aging equipment and the purchase of additional equipment will be needed to maintain or increase the quality of service provided by the district.
- The district needs a longterm solution to the lack of sufficient volunteer personnel.

**2. Growth and Population Projections for the Affected Area**

**Overview**

*Purpose: To evaluate service needs based on existing and anticipated growth patterns and population projections.*

### ***Existing and Anticipated Growth Patterns in Paradise***

Paradise is a small, contained area of residential development. There are currently 132 lots in the development; approximately 60 percent of the lots are developed. The majority of the lots (130 lots) are small lots designated for single-family residential development. One large lot is designated Rural Resort; currently that lot includes the Paradise Lodge (single-family residence, restaurant, 17 cabins). There is a proposal to redevelop the Paradise Lodge site with 11 single-family residential lots, transforming the use from transient residential uses to full-time residential uses. The remaining large lot is designated Estate Residential; there is a current proposal to develop 53 lots for large homes on that parcel. Should the development proposals be approved as proposed, the potential buildout in Paradise could be 196 single-family residential units.

### ***Seasonal Population***

Paradise does not experience the levels of tourism that many other communities in the County do. While the visitors it does experience can cause an increased demand for services, such as emergency medical response and vehicular accident response, there is no commensurate increase in revenues available to provide those services.

### ***Population Projections***

Population data from the 2000 US Census and California Department of Finance population estimates show the population in Paradise to be 124 in 2000 and 126 in 2003. In 2000, there were 71 households in Paradise. The population in Paradise is projected to increase to 157 by 2020 and 169 by 2030 (State Department of Finance Report P-3, Population Projections<sup>1</sup>). Overall, the population in Mono County is aging. The median age in the unincorporated area increased from 33 in 1990 to 40.1 in 2000 (Mono County Housing Element). The number of seniors 65 years and older increased from 10 percent of the unincorporated population in 1990 to 12 percent in 2000. Paradise has a large percentage of older residents. In 2000, 28 percent of the total population in Paradise was 65 or older; 52 percent of the total population was 40 or older.

### **Determinations**

- The Mono County General Plan Land Use Element allows for additional development in the area served by the Paradise Fire Protection District.
- Growth is anticipated to occur primarily in and adjacent to existing developed areas.
- Visitors to the area will continue to increase demand for services such as emergency medical response and vehicular accident response while providing no commensurate increase in revenues available to provide those services. There is a need to have these users pay for their share of the services.
- The population in Paradise is projected to increase to 157 by 2020 and 169 by 2030, creating an increased demand for fire and emergency medical services.
- The population will continue to age, creating an increased demand for emergency medical services.

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<sup>1</sup> This assumes that the population in the unincorporated area remains at approximately 45 percent of the total county population and that the population in Paradise remains at approximately 2.15 percent of the total unincorporated population, as they were in 2000.

### 3. Financing Constraints and Opportunities

#### Overview

*Purpose: To evaluate factors that affect the financing of needed improvements.*

Expenses for special districts generally fall into one of three categories: (1) acquisition of facilities and major capital equipment, (2) employee expenses, and (3) ongoing operations and maintenance costs. The primary criteria that should be considered when evaluating adequacy of potential funding sources is availability, adequacy to meet the need, equity between existing and future residents, stability, and ability to cover on-going operating and maintenance costs.

#### *Paradise Fire Protection District*

The Paradise Fire Protection District is dependent on augmentation funds as its single most important source of revenue, followed by property assessments and fire mitigation fees. The district charges 75 cents per square foot for fire mitigation fees for all new development. The district's primary funding is from the County through the Special District Augmentation Fund. This is a discretionary program intended to assist fire districts achieve longterm financial stability. Augmentation funds can only be used to provide equipment for enhanced fire protection and emergency medical services within the fire districts.

In FY 2006-2007, the district received \$9,425 in property assessments (32 percent of total revenues), \$5,063 in fire mitigation fees (17 percent of total revenues), \$4,609 in interest income (16 percent of total revenues), and \$10,000 in intergovernmental transfers from the County (34 percent of total revenues).

With the increase in growth, previously adequate funding arrangements may no longer be adequate. To fund the infrastructure needed to support new residents, the district may need to rely more heavily on mechanisms such as impact fees, grants, and partnerships. Absent such changes, the Paradise Fire Protection District may be hard pressed to maintain service levels in the long run.

#### Determinations

- The Paradise Fire Protection District's future financing will continue to rely primarily on property assessments, fire mitigation fees and augmentation (in the form of aid from other governmental agencies and grants).
- The district's fire mitigation fee of 75 cents per square foot of new construction is above the countywide average of 63 cents per square foot. An opportunity may exist to increase the fee.
- It is becoming increasingly difficult to maintain existing service levels as costs increase over time.
- There are opportunities to coordinate with other fire districts and agencies to increase efforts to secure grant funding.

## 4. Cost Avoidance Opportunities

### Overview

*Purpose: To identify practices or opportunities that may aid in eliminating unnecessary costs.*

Cost avoidance opportunities are defined as actions to eliminate unnecessary costs derived from, but not limited to, duplication of service efforts, higher than necessary administration/operation cost ratios, use of outdated or deteriorating infrastructure and equipment, underutilized equipment or buildings or facilities, overlapping/inefficient service boundaries, inefficient purchasing or budgeting practices, and lack of economies of scale.

### *Paradise Fire Protection District*

Generally, in Mono County each community area is a discrete geographic area and, as a result, there is no duplication of service efforts or overlapping or inefficient service boundaries. Southwestern Mono County is its own discrete geographic area with distinct community areas in Wheeler Crest (Swall Meadows and Pinon Ranch) and Paradise. Currently, Wheeler Crest and Paradise are served by separate fire protection entities, with separate facilities, equipment and administration—the districts are located approximately one mile apart on Lower Rock Creek Road.

Due to the small size of each of these districts, their resources, both physical and financial, are extremely limited. The Paradise Fire Protection District is managed and administered by volunteer fire fighters and an elected board of commissioners. The department conducts joint training with other fire departments, including the Wheeler Crest FPD.

As they level of cooperation among fire districts in the county has increased in recent years, the districts routinely share information and best practices in order to reduce or avoid unnecessary costs. One cost that is difficult to avoid is volunteer training. Small districts may spend limited resources to train volunteer personnel only to have those qualified volunteers leave the district.

### Determinations

- Southwestern Mono County is a discrete geographic area within Mono County with distinct community areas—Wheeler Crest and Paradise.
- Paradise FPD and the Wheeler Crest FPD are located approximately one mile apart on Lower Rock Creek Road.
- The Paradise Fire Protection District is a volunteer department with an elected board of commissioners—administrative costs are generally low.
- Although the district strives to keep operations and maintenance costs low by sharing services and training with other districts, small districts tend to suffer from a lack of economies of scale.
- Cooperation among fire districts is an important part of reducing costs.
- The cost of volunteer training is unavoidable and may be lost when trained volunteers leave the district. A possibility exists for the district to offer benefit contracts so that a volunteer agrees to be with the district for a specific amount of time or to reimburse the district for training costs.

- Integrated planning, especially long range planning, is an important part of cost avoidance. The district has no comprehensive long-range plan to address the demands imposed by growth within the district.
- The Paradise Fire Protection District and the Wheeler Crest FPD are both small districts with limited physical and financial resources. They could potentially benefit from being combined into a Southern Mono Fire Protection District, along with larger districts in Southern Mono County, with separate facilities in various community areas. Southern Mono County is experiencing huge growth and there is a need throughout the area for expanded fire protection and emergency medical services.
- Paradise FPD has suggested that structural reorganization of their district with larger districts should be evaluated in the next few years in order to improve the provision of services within their service area.

## 5. Opportunities for Rate Restructuring

### Overview

*Purpose:* To identify opportunities to positively impact rates without decreasing service levels.

As noted in the Financing Constraints and Opportunities Section, funding for fire protection districts in Mono County relies heavily on property tax revenues combined with mitigation fees, augmentation funds, and other smaller revenue sources (grants, fundraisers, etc.). Each of these categories has inherent constraints that prevent an agency from restructuring them.

### *Paradise Fire Protection District*

**Property taxes** – In California, the maximum property tax assessed on any land is generally 1% of the property's value. However, the Paradise FPD receives no property tax revenues since it was formed after the passage of Proposition 13.

**Fire Mitigation Fees** – The district has a resolution adopted by the County Board of Supervisors on the agency's behalf that sets the fire fees for all new construction. The district's fee of \$.75 per square foot of new construction is above the countywide average of \$.63 per square foot but an opportunity may still exist to raise the fee.

**Grants** – Grant money is a one-time source that is useful in funding certain special projects but may be too unreliable or variable for ongoing expenses or recurring needs. Grants may help fund items that would have to be purchased out of the budget.

### Determinations

- All funding mechanisms have inherent limitations that may prevent their implementation, use or restructure.
- The district could benefit from increasing its fire mitigation fee from \$.75 per square foot.
- The Paradise Fire Protection District should seek additional opportunities to reduce costs through cooperation and sharing with other agencies.
- The district should pursue grant funding.

## 6. Opportunities for Shared Facilities and Resources

### Overview

*Purpose: To evaluate the opportunities for a jurisdiction to share facilities and resources to develop more efficient service delivery systems.*

Sharing facilities and resources can result in a more efficient and cost-effective delivery of resources.

### *Paradise Fire Protection District*

Due to the geographic distance between most communities in the county, sharing facilities is not possible. Fire districts do share resources through mutual aid agreements. The most beneficial sharing of resources to residents in the County is the practice of deploying the nearest resource to an emergency. While there are costs associated with mutual aid and/or automatic aid, there is a direct benefit when an agency can rely on its neighbors for support. This ensures that residents of the County can be assured that there will be someone who will respond to an emergency without regard to jurisdictional issues. The fire districts in Mono County tend to do this very well.

The Paradise Fire Protection District shares resources in several other ways:

- They attend shared training sessions with the Wheeler Crest FPD and the Bishop Fire Department.
- They maintain mutual aid agreements with BLM, CDF, USFS (for wildland fires), the Wheeler Crest FPD, and the Bishop Fire Department.
- They attend monthly county fire chiefs meetings.

The **Multi-Jurisdictional Local Hazard Mitigation Plan** prepared for Mono County and the Town of Mammoth Lakes identified a number of mitigation measures to address fire hazard planning in the county's communities. While the focus of the **Local Hazard Mitigation Plan** is on mitigation planning for wildland fire hazards, the mitigation measures identified in the plan apply to all fire hazards in the area, i.e.:

**Mitigation W-3:** Review and, if necessary update, the County's General Plan land use policies and regulations and building regulations to ensure that they address fire hazard planning as a component of the development process.

**Mitigation W-5:** Develop community-level fire plans for communities throughout the county, utilizing resources and assistance from the California Fire Alliance. These fire plans should address the following:

- Developing an informed, educated public that takes responsibility for its own decisions relating to wildfire protection.
- Developing an effective wildfire suppression program for local communities.
- Developing an aggressive hazardous fuel management program.
- Revising land use policies and standards to ensure that they protect life, property and local resource values.
- Implementing construction and property standards that provide defensible space.

**Mitigation W-6:** Develop and implement an ongoing countywide program to increase public awareness of wildland fire hazards.

**Mitigation W-7:** All communities and fire protection districts should participate in the Eastern Sierra Regional Firesafe Council.

**Mitigation W-8:** The county and the town should appoint a fire hazard coordinator with the responsibility for developing fire plans for the county, participating in the Eastern Sierra Regional Firesafe Council and the California Fire Alliance, coordinating with local, state, and federal fire protection and suppression entities, developing and implementing public education and awareness programs concerning fire safety including safe building materials and landscaping, and applying for funding for fire hazard mitigation such as fuel reduction programs.

**Mitigation W-10:** Help local landowners participate in the state's Vegetation Management Program (VMP), when applicable. The Vegetation Management Program (VMP) is a cost-sharing program that focuses on the use of prescribed fire and mechanical means to address wildland fire fuel hazards and other resource management issues on State Responsibility Area (SRA) lands.

**Mitigation W-11:** Help local landowners participate in CDF's hazardous fuel reduction program.

**Mitigation W-12:** Help local landowners participate in the BLM's Wildland Urban Interface Grant Awards program for hazardous fuel reduction.

Responsibility for implementation of these mitigation measures lies with the County, the Regional Planning Advisory Committees, local fire protection districts, and the County Office of Emergency Services.

### ***Emergency Medical Services***

In areas of the county with paramedic services (generally along the Highway 395 corridor from the Nevada state line south to the Inyo County line), local fire protection district personnel play a crucial role in supporting the County paramedics with manpower, extrication services, and as "first responders". Paradise has no paramedic service since it has in the past been an area of low population density and a relatively low volume of calls for emergency medical services.

The County charges for its paramedic services and has traditionally used areas of high volume and high revenues to help offset the cost of operations in areas of lower call volume and lower revenues. The County paramedic program is in the process of updating its system along the Highway 395 corridor to address identified needs.

### **Determinations**

- The largest impediment to greater sharing of resources and facilities in Mono County is geographic separation between fire protection districts.
- Fire districts in Mono County can share resources through joint training sessions, shared purchasing, and the implementation of mutual aid agreements.
- The **Local Hazard Mitigation Plan for Mono County** contains a number of mitigation measures to address fire hazard planning in the county's communities. While the focus of the plan is on mitigation planning for wildland fire hazards, the mitigation measures identified in the plan apply to all fire hazards in the area. Responsibility for implementing those fire hazard planning measures rests with the County, the Regional Planning Advisory Committees, and local fire protection districts.

- Paradise has no paramedic service. The County is in the process of updating its paramedic services along the Highway 395 corridor.

## 7. Government Structure Options

### Overview

*Purpose: To consider the advantages and disadvantages of various government structures to provide service.*

Government Code §56001 declares that it is the policy of the State to encourage orderly growth and development essential to the social, fiscal, and economic well being of the State. The Code further states that “this policy should be effected by the logical formation and modification of the boundaries of local agencies, with a preference granted to accommodating additional growth within, or through the expansion of, the boundaries of those local agencies which can best accommodate and provide necessary governmental services.”

For local agency consolidations to occur there has to be significant (and popularly desired) cost savings or an increase in service. For fire protection districts, consolidations might be recommended if any of the following would occur as a result of consolidation:

1. A reduction in the number of stations where service coverage might create unnecessary overlap.
2. An increase in the staffing of stations where currently staffing is limited.
3. An increase in staffing that reduces response times can be achieved.
4. A reduction in the number of senior administrative staff can be achieved.
5. Economies of scale for costly services can be attained.

### ***Paradise Fire Protection District***

Generally, in Mono County each community is a discrete geographic area and, as a result, there is no duplication of service efforts or overlapping or inefficient service boundaries. Southwestern Mono County is its own discrete geographic area with distinct community areas in Wheeler Crest (Swall Meadows, Pinon Ranch) and Paradise. Currently, Wheeler Crest and Paradise are served by separate fire protection entities, with separate facilities, equipment and administration, located approximately one mile apart on Lower Rock Creek Road. Due to the small size of each of these districts, their resources, both physical and financial, are extremely limited.

Communities in Mono County are unincorporated, except for the Town of Mammoth Lakes. Government for a variety of services is provided for those areas by Mono County. The county has several distinct regions, i.e. Antelope Valley, Bridgeport Valley, Mono Basin, June Lake, Long Valley, Wheeler Crest/Paradise, and the Tri-Valley. Due to the geographical distance between these regions, and between some of the communities within certain regions, there needs to be separate fire services in each community area. Local governance of those services is generally desired by residents in each region and is generally the most sensible approach since funding generated within a region is then spent in that region. However, some regions of the county, such as Wheeler Crest and Paradise, have several small fire districts serving separate communities within the region. It would be possible to merge those districts into a regional fire

district with facilities in each community. Creating a regional fire district in Southern Mono County could reduce administrative costs, eliminate duplication of services, and create a more financially stable district and one that would enjoy greater economies of scale than the smaller districts. One district that was planning for future development in Southern Mono County would also create a more cohesive approach to the longterm provision of fire protection services in the region.

### **Determinations**

- In regions of the county with separate, distinct communities that are geographically remote from each other, public services are most logically provided by single purpose special districts rather than by a larger entity such as the county.
- In regions of the county that have several small fire districts serving separate communities within the region, such as Southern Mono County, an opportunity exists to merge the districts to create a regional fire district with facilities in each community.
- Creating a regional fire district in Southern Mono County could reduce administrative costs, eliminate duplication of services, and create a more financially stable district and one that would enjoy greater economies of scale than the smaller districts. One district that was planning for future development in the Southern Mono County would also create a more cohesive approach to the longterm provision of fire protection services in the region.

## **8. Evaluation of Management Efficiencies**

### **Overview**

*Purpose: To evaluate the quality of public services in comparison to cost.*

As defined by OPR, the term “management efficiency,” refers to the organized provision of the highest quality public services with the lowest necessary expenditure of public funds. An efficiently managed entity (1) promotes and demonstrates implementation of continuous improvement plans and strategies for budgeting, managing costs, training and utilizing personnel and customer service and involvement, (2) has the ability to provide service over the short and long term, (3) has the resources (fiscal, manpower, equipment, adopted service or work plans) to provide adequate service, (4) meets or exceeds environmental and industry service standards, as feasible considering local conditions or circumstances, (5) and maintains adequate contingency reserves. “Management Efficiency” is generally seen as organizational efficiency including the potential for consolidation.

The purpose of management is to effectively carry out the principal function and purpose of an agency. Good management will ensure that the agency’s mission is accomplished and that the agency’s efforts are sustainable into the future. Unfortunately, “good management” is a relatively subjective issue, and one that is hard to quantify.

### ***Paradise Fire Protection District***

The Paradise Fire Protection District is managed by an elected board of commissioners and a volunteer fire chief. Management input is also provided during monthly Mono County fire chief meetings. As a small district, the Paradise Fire Protection District has limited physical and

financial resources. The district is able to provide adequate service in the short-term to the existing residents of the area but may not have the resources to provide longterm services to the planned development in the area.

The district currently has no comprehensive longterm planning documents. The district's current ISO rating is 8/9, which is low. The district has no contingency reserves.

### **Determinations**

- The Paradise Fire Protection District is managed by an elected board of commissioners and a volunteer fire chief.
- The board of directors' individual skills, knowledge, experience, qualifications, motivation and the time they have available for the district determine the effectiveness of the Paradise Fire Protection District and its efficiency.
- In the past, the Paradise Fire Protection District has set goals and objectives on an incremental basis to meet identified needs.
- The Paradise Fire Protection District has no longterm planning documents so needs to develop a long-range plan that addresses budgeting, managing costs, and training and utilizing personnel.
- The district needs to develop a budget and funding sources that will allow for the development of contingency funds.
- While the district provides adequate service to existing residents of the area, its ISO rating is 8/9, and it may not have the resources to serve the longterm needs of the area.

## **9. Local Accountability and Governance**

### **Overview**

*Purpose: To evaluate the accessibility and levels of public participation associated with an agency's decision-making and management processes.*

Special districts such as fire protection districts are required to adopt budgets at open public meetings and to file their budgets with the county auditor. They are required to have annual or biennial independent audits. Districts are subject to the Ralph M. Brown Act for meetings, agendas and minutes. They are also subject to the Public Records Act.

Complying with the minimum open meeting and information requirements is not sufficient to allow an adequate amount of visibility and accountability. Outreach efforts, including convenient meeting times, additional notice of meetings and dissemination of district information, are desirable.

### ***Paradise Fire Protection District***

The Paradise Fire Protection District complies with the minimum open meetings and public information requirements. The district has indicated that few members of the public attend board meetings unless a controversial item is on the agenda.

**Determinations**

- The Paradise Fire Protection District complies with the minimum requirements for open meetings and public records.
- Public accessibility to district information is limited and is often based on the availability of the board officers.
- Public participation in the decision-making process is limited and usually occurs only when a controversial item is on the agenda.

## **IV. SPHERE OF INFLUENCE RECOMMENDATION**

In determining the sphere of influence for each local agency, Government Code §56425 requires the Local Agency Formation Commission to consider and prepare a written statement of its determination with respect to four required findings. Each of the required findings is discussed below as it pertains to the Paradise Fire Protection District, Community Service District.

### **1. Present and Planned Land Uses**

***Discussion:***

Present land uses in the area served by the Paradise Fire Protection District are primarily residential and agricultural with limited commercial facilities. The Mono County GIS estimates that there are 132 parcels in the district, including approximately 90 developed parcels (residential or commercial parcels valued at \$10,000 or more). Population data from the 2000 US Census and California Department of Finance population estimates show the population of Paradise to be 124 in 2000 and 126 in 2003. In 2000, there were 71 households in Paradise.

Paradise is a small, contained area of residential development. There are currently 132 lots in the development; approximately 60 percent of the lots are developed. The majority of the lots (130 lots) are small lots designated for single-family residential development. One large lot is designated Rural Resort; currently that lot includes the Paradise Lodge (single-family residence, restaurant, 17 cabins). There is a proposal to redevelop the Paradise Lodge site with 11 single-family residential lots, transforming the use from transient residential uses to full-time residential uses. The remaining large lot is designated Estate Residential; there is a current proposal to develop 53 lots for large homes on that parcel. Should the development proposals be approved as proposed, the potential buildout in Paradise could be 196 single-family residential units.

***Finding:***

Land use within Paradise is predominantly single-family residential with one resort commercial use. The planned land uses for the area are single-family residential uses. Development will occur within and adjacent to existing development.

### **2. Present and Probable Need For Public Facilities and Services**

***Discussion:***

Increased development throughout the district's service area has created an increased need for fire protection services now. The buildout allowed by the General Plan will create a greater demand for those services in the future.

***Finding:***

Paradise has an existing and continuing need for public facilities and services to serve the increasing residential development in the area.

### **3. Present Capacity of Public Facilities and Adequacy of Public Services**

***Discussion:***

The district has no latent powers; fire protection is the only service it is authorized to provide. While the district provides adequate services with its existing facilities, infrastructure, and personnel, its ISO rating is 8/9. One of the district's major objectives is improve its facilities and services in order to lower its ISO rating and to serve additional development.

***Finding:***

The district currently provides an adequate level of service but has identified a need to improve both its facilities and services in order to serve additional development.

### **4. Social or Economic Communities of Interest**

***Discussion:***

Due to the physical geography of Southwestern Mono County, residents of Wheeler Crest and Paradise tend to interact socially and economically with adjacent communities in Inyo County. Interaction with other communities in Mono County is limited although increasing residential development in the area may provide housing for residents who work in other Mono County communities. Residents of Paradise do share social and economic ties with residents of Wheeler Crest.

***Finding:***

The district area exhibits social and economic interdependence with communities in Inyo County. An interdependence with those communities has no relevance in determining the sphere of influence for the district since special districts cannot provide services outside of their county. The district area also shares social and economic ties with residents of Wheeler Crest.

### **Sphere of Influence Recommendation**

The Sphere of Influence for the Paradise Fire Protection District should remain as it is, coterminous with the boundaries of the district.

### **Reorganization Recommendation**

Section 56001 of the California Government Code states that:

The Legislature also finds that, whether governmental services are proposed to be provided by a single-purpose agency, several agencies, or a multipurpose agency, responsibility should be given to the agency or agencies that can best provide government services.

The Paradise Fire Protection District is a small district, with limited financial and physical resources. The district has expressed an interest in combining with larger districts in the area to form a Southern Mono Fire Protection District. Currently, Wheeler Crest and Paradise are served by separate fire protection entities, with separate facilities, equipment and administration, located approximately one mile apart on Lower Rock Creek Road.

At some point in the future, a regional fire district in Southern Mono County might best provide fire protection services for the area, in the process reducing administrative costs, eliminating duplication of services, and creating a more financially stable district that would enjoy greater economies of scale than the smaller districts. One district that was planning for future development in Southern Mono County would also create a more cohesive approach to the longterm provision of fire protection services in the region. At the time reorganization is being considered, a reorganization study should be conducted to determine what governmental structure would best provide services for the region. Such a reorganization should occur only with the concurrence of both districts' Boards of Directors.

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