

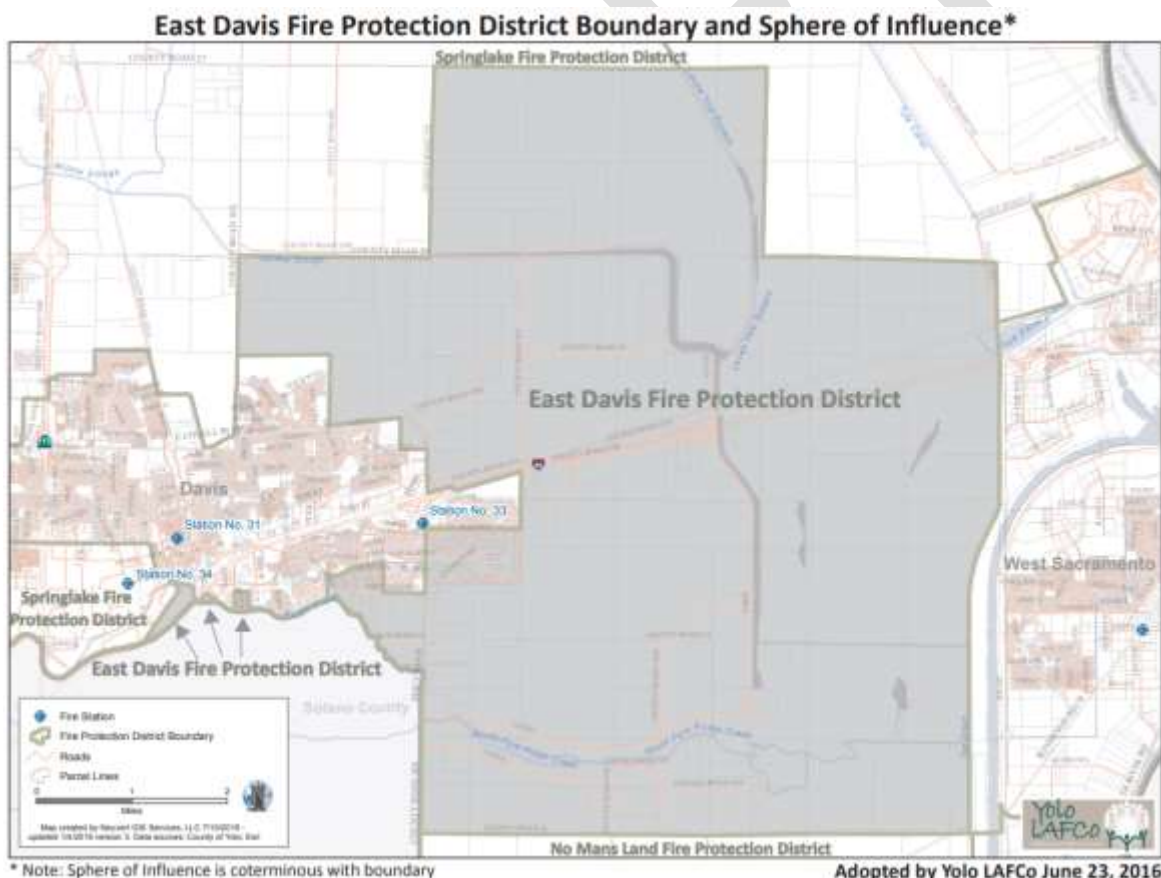
**AGENCY PROFILE**

The East Davis Fire Protection District (FPD) was formed in 1953 and is authorized to provide fire protection and emergency response services. It was formed as a dependent district to Yolo County. As such, the District's governing body is the Yolo County Board of Supervisors, which delegated its decision-making authority to a local Fire Commission with five members, each appointed by the Board of Supervisors with indefinite terms.

In 1966, the District began contracting with the City of Davis for services, ceding its employees and ownership of its facilities/equipment to the City. The District is one of three fire protection districts encompassing the unincorporated areas around Davis, each of which contract with the City of Davis for services.

The District is 29,143 acres in size and serves the unincorporated communities of El Macero, Willowbank and Davis Creek Mobile Home Park and the surrounding rural areas east of Davis. The District contains 830 residential and 2 commercial addresses and its population is estimated to be 2,075 residents.<sup>1</sup>

The East Davis FPD boundary and sphere of influence (SOI) is shown below. The SOI is coterminous with the district boundary.



<sup>1</sup> Population estimate is based on the number of residential addresses assigned in 2021 in the FPD territory with a Yolo County average of 2.5 persons per household.

**MUNICIPAL SERVICE REVIEW**

**POTENTIALLY SIGNIFICANT MSR DETERMINATIONS**

The MSR determinations checked below are potentially significant, as indicated by “yes” or “maybe” answers to the key policy questions in the checklist and corresponding discussion on the following pages. If most or all of the determinations are not significant, as indicated by “no” answers, the Commission may find that a MSR update is not warranted.

- |  |   |
|--|---|
| <input type="checkbox"/> Growth and Population                                   | <input type="checkbox"/> Shared Services                        |
| <input type="checkbox"/> Disadvantaged Unincorporated Communities                | <input checked="" type="checkbox"/> Accountability              |
| <input type="checkbox"/> Capacity, Adequacy & Infrastructure to Provide Services | <input checked="" type="checkbox"/> Broadband Access            |
| <input checked="" type="checkbox"/> Financial Ability                            | <input type="checkbox"/> Status of Previous MSR Recommendations |

**LAFCO MUNICIPAL SERVICE REVIEW:**

- On the basis of this initial evaluation, the required determinations are not significant and staff recommends that an MSR is NOT NECESSARY. The subject agency will be reviewed again in five years per Government Code Section 56425(g).
- The subject agency has potentially significant determinations and staff recommends that a comprehensive MSR IS NECESSARY and has been conducted via this checklist.

**1. GROWTH AND POPULATION**

Growth and population projections for the affected area.	YES	MAYBE	NO
a) <i>Will development and/or population projections over the next 5-10 years impact the subject agency’s service needs and demands?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) <i>Do changes in service demand suggest a change in the agency’s services?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion:**

a-b) *Will development and/or population projections over the next 5-10 years impact the subject agency’s service needs and demands? Do changes in service demand suggest a change in the agency’s services?*

No. The population for East Davis FPD is currently estimated to be 2,075 and there are no significant growth areas designated by the County. As the City of Davis annexes territory, it is detached from the District.

Service to East Davis FPD territory is dispatched by the City of Davis. Total calls that resulted in dispatched apparatus/responders were 324 in FY 18/19, 312 in FY 19/20 and 297 in FY 20/21, an 8% decrease over three years (the only FPD countywide that experienced a decrease in call volume). Growth and population projections are not suggesting a change in agency services.

**Growth and Population MSR Determination**

The population for East Davis FPD is currently estimated to be 2,075 and there are no significant growth areas designated by the County. The East Davis FPD is dispatched by the City of Davis. Total calls that resulted in dispatched apparatus/responders were 324 in FY 18/19, 312 in FY 19/20 and 297 in FY 20/21, an 8% decrease over three years (the only FPD countywide that experienced a decrease in call volume). Growth and population projections are not suggesting a change in agency services.

**2. DISADVANTAGED UNINCORPORATED COMMUNITIES**

The location and characteristics of any disadvantaged unincorporated communities within or contiguous to the sphere of influence.

	YES	MAYBE	NO
a) <i>If the subject agency provides services related to sewers, municipal and industrial water, or structural fire protection, are there any "inhabited unincorporated communities" (per adopted Commission policy) within or adjacent to the subject agency's sphere of influence that are considered "disadvantaged" (80% or less of the statewide median household income) that do not already have access to public water, sewer and structural fire protection?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) <i>If "yes" to a), it is feasible for the agency to be reorganized such that it can extend service to the disadvantaged unincorporated community? If "no" to a), this question is marked "no" because it is either not needed or not applicable.</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion:**

- a) *If the subject agency provides services related to sewers, municipal and industrial water, or structural fire protection, are there any "inhabited unincorporated communities" (per adopted Commission policy) within or adjacent to the subject agency's sphere of influence that are considered "disadvantaged" (80% or less of the statewide median household income) that do not already have access to public water, sewer and structural fire protection?*

No. The East Davis FPD territory does not appear to contain any disadvantaged unincorporated communities.<sup>2</sup> Davis Creek Mobile Home Park is likely a disadvantaged community (but may not be showing in the data due to census block size), but it receives City fire protection services on par with all the FPD territory. All "inhabited unincorporated communities" countywide receive structural fire protection services.

- b) *If "yes" to a), it is feasible for the agency to be reorganized such that it can extend service to the disadvantaged unincorporated community? If "no" to a), this question is marked "no" because it is either not needed or not applicable.*

Not applicable.

**Disadvantaged Unincorporated Communities MSR Determination**

All "inhabited unincorporated communities" countywide receive structural fire protection services. The Davis Creek Mobile Home Park is likely a disadvantaged community, but it receives city fire protection services.

<sup>2</sup> CALAFCO Disadvantaged Unincorporated Communities for State, RSG Inc. GIS Layer, dated December 10, 2021

**3. CAPACITY AND ADEQUACY OF PUBLIC FACILITIES AND SERVICES**

Present and planned capacity of public facilities, adequacy of public services, and infrastructure needs or deficiencies including needs or deficiencies related to sewers, municipal and industrial water, and structural fire protection in any disadvantaged, unincorporated communities within or contiguous to the sphere of influence.

	YES	MAYBE	NO
a) <i>Are there any deficiencies in the <b>infrastructure, equipment, and capacity of agency facilities</b> to meet <u>existing</u> service needs for which the agency does not have a plan in place to resolve (including deficiencies created by new state regulations)?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) <i>Are there any deficiencies in the <b>adequacy of services</b> to meet <u>existing</u> service needs for which the agency does not have a plan in place to resolve? Also note how services are provided (i.e., number of staff and/or contracts).</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) <i>Are there any issues regarding the agency's capacity and ability to meet the service demand of reasonably foreseeable <u>future</u> growth?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) <i>Is the agency needing to consider climate adaptation in its assessment of infrastructure/service needs?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) <i>Are there any service needs or deficiencies for disadvantaged unincorporated communities related to sewers, municipal and industrial water, and structural fire protection within or contiguous to the agency's sphere of influence?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion:**

a-e)No. East Davis FPD has not provided direct services since 1966 and has contracted with the City of Davis for fire protection and emergency response services for 56 years. The current agreement for services was executed in 2009 and expires on June 30, 2029. It is intended to provide for services long term and can be terminated with 4 years' written notice.

Staff and coverage, training, fire station, apparatus, and equipment are all provided by a city fire department which must adhere to higher performance standards. Both National Fire Protection Association (NFPA) 1720 and 1710 are standards concerning personnel deployment and response times to fires and medical emergencies: NFPA 1720 is designed primarily for communities with volunteer firefighters. NFPA 1710 is designed primarily for communities with career, or paid, firefighters.

**Capacity and Adequacy of Public Facilities and Services MSR Determination**

The East Davis FPD has not provided direct services since 1966 and has contracted with the City of Davis for fire protection and emergency response services for 56 years. The current agreement for services was executed in 2009 and expires on June 30, 2029. City fire departments must adhere to higher performance standards (NFPA 1710) than rural departments (NFPA 1720). There are no deficiencies in infrastructure, equipment, capacity, and services for current and future needs.

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

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

**4. FINANCIAL ABILITY**

Financial ability of agencies to provide services.

	YES	MAYBE	NO
a) <i>Is the subject agency in an unstable financial position, i.e. does the 5-year trend analysis indicate any issues? Does revenue growth keep pace with increased costs?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) <i>Can the subject agency improve its use of generally accepted accounting principles including: summaries of all fund balances, summaries of revenues and expenditures, general status of reserves, and any un-funded obligations (i.e. pension/retiree benefits)? Does the agency need accounting and/or financial policies that guide the agency in how financial transactions are recorded and presented?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) <i>Does the agency staff need to review financial data on a regular basis and are discrepancies identified, investigated and corrective action taken in a timely manner? The review may include reconciliations of various accounts, comparing budgets-to-actual, analyzing budget variances, comparing revenue and expense balances to the prior year, etc. If the agency uses Yolo County's financial system and the County Treasury, does the agency review monthly the transactions in the County system to transactions the agency submitted to the County for processing?</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d) <i>Does the agency board need to receive regular financial reports (quarterly or mid-year at a minimum) that provide a clear and complete picture of the agency's assets and liabilities, fully disclosing both positive and negative financial information to the public and financial institutions?</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e) <i>Is there an issue with the organization's revenue sources being reliable? For example, is a large percentage of revenue coming from grants or one-time/short-term sources?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) <i>Is the organization's revenue insufficient to fund an adequate level of service, necessary infrastructure maintenance, replacement and/or any needed expansion? Is the fee inconsistent with the schedules of similar local agencies? Does the rate/fee schedule include a specific amount identified for capital asset replacement (tied to a capital improvement plan with implementation policies)?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) <i>Is the organization needing additional reserves to protect against unexpected events or upcoming significant costs (excluding capital asset replacement, see 4f)? Has the agency identified and quantified what the possible significant risks and costs of infrastructure or equipment failure? Does the agency have a reserve policy?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) <i>Does the agency have any debt, and if so, is the organization's debt at an unmanageable level? Does the agency need a clear debt management policy, if applicable?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**YOLO LAFCO MUNICIPAL SERVICE REVIEW/SPHERE OF INFLUENCE STUDY**

**Discussion:**

**Financial Background**

**EAST DAVIS FIRE PROTECTION DISTRICT  
STATEMENT OF REVENUE, EXPENDITURES AND CHANGES IN FUND BALANCES**

	2017	2018	2019	2020	2021
<b>Revenue</b>					
Property taxes, in-lieu taxes, HOPTR	\$ 524,706	\$ 535,400	\$ 567,655	\$ 585,091	\$ 614,057
Interest	8,803	19,058	49,165	44,480	2,359
Special assessment	204,649	210,514	210,921	210,806	210,806
<b>Total Revenue</b>	<b>738,158</b>	<b>764,972</b>	<b>827,741</b>	<b>840,377</b>	<b>827,222</b>
<b>Expenditures</b>					
Contract payment to City of Davis	671,182	716,829	707,494	758,632	883,689
Other services and supplies	3,992	1,595	1,250	1,854	1,739
Contributions to other agencies	-	-	-	31,273	13,186
<b>Total Expenditures</b>	<b>675,174</b>	<b>718,424</b>	<b>708,744</b>	<b>791,759</b>	<b>898,614</b>
<b>Net income (loss)</b>	<b>62,984</b>	<b>46,548</b>	<b>118,997</b>	<b>48,618</b>	<b>(71,392)</b>
<b>Beginning Fund Balance</b>	1,226,400	1,289,384	1,335,932	1,454,929	1,503,547
<b>Ending Fund Balances</b>	<b>\$ 1,289,384</b>	<b>\$ 1,335,932</b>	<b>\$ 1,454,929</b>	<b>\$ 1,503,547</b>	<b>\$ 1,432,155</b>
<b>Fund Balances</b>					
Assigned - Other	\$ 1,038,817	\$ 1,053,199	\$ 1,077,023	\$ 1,099,718	\$ 1,111,240
Assigned - General reserve	185,359	185,359	185,359	185,359	185,359
Assigned - Encumbrances	-	-	64,171	-	-
Unassigned	65,208	97,374	128,376	218,470	135,556
<b>Total Fund Balances</b>	<b>\$ 1,289,384</b>	<b>\$ 1,335,932</b>	<b>\$ 1,454,929</b>	<b>\$ 1,503,547</b>	<b>\$ 1,432,155</b>
<b>Y-T-Y Change in total Fund Balances</b>					
Amount Increase (Decrease)	\$ 62,984	\$ 46,548	\$ 118,997	\$ 48,618	\$ (71,392)
Percentage Increase (Decrease)	5.14%	3.61%	8.91%	3.34%	-4.75%
<b>Property Tax Analysis</b>					
a. Assessed Value (AV)	\$ 522,278,656	\$ 548,053,986	\$ 561,937,435	\$ 592,076,811	\$ 619,566,844
b. Y-T-Y Percentage change in AV	4.56%	4.94%	2.53%	5.36%	4.64%
c. Current secured, unsecured and HOPT	\$ 498,854	\$ 520,788	\$ 542,523	\$ 570,343	\$ 597,587
d. District share of general 1% levy (c/a)	9.5515%	9.5025%	9.6545%	9.6329%	9.6452%

- a) *Is the subject agency in an unstable financial position, i.e. does the 5-year trend analysis indicate any issues? Does revenue growth keep pace with increased costs?*

No. The District's total revenues and total fund balances have steadily grown over the past five years and are keeping pace with increasing costs. Due to a delay of receiving strike team reimbursements from the State, the City of Davis contract payment was unexpectedly higher than normal in 2021. The reimbursements were received in 2022 and will be credited against 2022 costs. The District's total fund balance as of June 30, 2021 is \$1,432,155. Total fund balance has increased from \$1,226,400 to \$1,432,155, which is available to the District for any purpose.

**Revenue**

East Davis FPD's revenue consists of property taxes, special assessments, and interest. Like other rural fire districts, East Davis FPD relies primarily on a share of the general 1% property tax levy for the majority of its revenue. In fiscal year 2021, property taxes of \$614,057 comprised 74% of total revenues. The District's share of property taxes within its boundaries is approximately 9.6%, while the average

for all rural FPDs in the county is 6.2%. The District has levied a special assessment since 1985. In 2021 special assessment revenue was \$210,806 which accounted for 25% of total revenue.

**Expenditures**

The District contracts for fire services with the City of Davis which is the primary expenditure of the District. In fiscal year 2021 the contract payment to the City was over 98% of total expenditures. Since 2017 the annual contract payment has averaged a 7.3% increase, however, the 2021 payment increased 16.5% from fiscal year 2020, due to a delay of the City of Davis receiving strike team reimbursements from CAL FIRE. Other expenditures include accounting fees, special assessment enrollment fee, liability insurance, and weed abatement legal notices. The District is in the process of discussing alternative billing methods with the City of Davis to reduce unexpected changes in the annual contract billing.

- b) *Does the subject agency need to use generally accepted accounting principles including: summaries of all fund balances, summaries of revenues and expenditures, general status of reserves, and any un-funded obligations (i.e. pension/retiree benefits)? Does the agency have accounting and/or financial policies that guide the agency in how financial transactions are recorded and presented?*

No. The District maintains all funds in the County Treasury and uses the County's financial system to maintain its accounting records. Since the District is a dependent district, it is subject to the same accounting and financial policies as the County. Accounting and budget data including all cash receipts and disbursements are reviewed by County finance staff before they are posted.

- c) *Does the agency staff need to review financial data on a regular basis and are discrepancies identified, investigated and corrective action taken in a timely manner? The review may include reconciliations of various accounts, comparing budgets-to-actual, analyzing budget variances, comparing revenue and expense balances to the prior year, etc. If the agency uses Yolo County's financial system and the County Treasury, does the agency review monthly the transactions in the County system to transactions the agency submitted to the County for processing?*

Yes. In 2019, District commissioners did not detect that in-lieu taxes from State Fish and Wildlife was not posted to the District's fund. The error was found and corrected in the subsequent year. Due to delay on the part of the City of Davis providing information, the District experienced a net loss in fiscal year 2021 that was not anticipated. The FPD indicates it is working with the City to resolve the potential for this situation to occur again. Please see also item 4a. The District relies on an external consultant once a year during the budget process to review transactions.

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

Yes. Even though the District has very minimal accounting transactions which includes property tax, special assessment, and interest revenue postings and on average 5 invoices per year, the commissioners should review financial reports more frequent than the current practice to discuss whether transactions are accurately posted to the District's ledgers and to perform a current year budget to actual comparison. The fire commission reviews the annual State Controller's Financial Transactions report which is also prepared by an external CPA.

- e) *Is there an issue with the organization's revenue sources being reliable? For example, is a large percentage of revenue coming from grants or one-time/short-term sources?*

No. Revenues are reliable. All of the revenue is from property taxes, special assessments, and interest earned on surplus funds held by the County Treasury. All revenues are collected and allocated by the County. The District currently is not billing exempt parcels.

- f) *Is the organization's revenue insufficient to fund an adequate level of service, necessary infrastructure maintenance, replacement and/or any needed expansion? Is the fee inconsistent with the schedules of similar local agencies? Does the rate/fee schedule include a specific amount identified for capital asset replacement (tied to a capital improvement plan with implementation policies)?*

**YOLO LAFCO MUNICIPAL SERVICE REVIEW/SPHERE OF INFLUENCE STUDY**

No. The East Davis FPD does not maintain facilities or equipment. Currently the District has an accumulated a fund balance of \$1,432,155. The District, by contract, shares the increases in the net cost of the City of Davis Fire Department, after reductions for revenue from No Man’s Land and Springlake FPDs, based on the District’s share of the total assessed value of the District and the City, which is currently about 6%.

- g) *Is the organization needing additional reserves to protect against unexpected events or upcoming significant costs (excluding capital asset replacement, see 4f)? Does the agency need to identify and quantify what the possible significant risks and costs of infrastructure or equipment failure? Does the agency need a reserve policy?*

No. East Davis FPD has a total fund balance of \$1,432,155 as of June 30, 2021, which is \$902,155 in excess of the minimum recommended total fund balance of \$530,000. The minimum recommended fund balance is the total of 2 components as follows<sup>3</sup>:

- General reserve. This is the total of 50% of current secured taxes and 50% of special assessments to maintain liquidity from July through December each year when no tax/assessment revenue is received.
- Unassigned fund balance. GFOA recommendation of 15% of operating expenditures to mitigate revenue shortages and/or unanticipated expenditures.

The June 30,2021 actual and estimated recommended fund balances amounts are as follows:

	6/30/2021 Actual Balance	6/30/2021 Recommended Balance	Excess/ (Shortage)
General reserve	\$ 185,359	\$ 395,000	\$ (209,641)
Other reserve	1,111,240	-	1,111,240
Unassigned	135,556	135,000	556
<b>Total Recommended Fund Balance</b>	<b>\$ 1,432,155</b>	<b>\$ 530,000</b>	<b>\$ 902,155</b>

The total recommended fund balance as of June 30, 2021 is \$530,000, based on a general reserve balance of \$395,000 (50% of current secured taxes and 50% of special assessments) and an unassigned fund balance of \$135,000 (15% of expenditures). The District’s fund balance is currently over \$900,000 in excess of the recommended fund balance.

District representatives have indicated that the reserves are required by the agreement with the City. However, Section 8 of the agreement provides that the reserves can be established at the District’s “sole discretion.” If the contract with the City of Davis were amended and streamlined such that the East Davis FPD operated as a pass-through agency (similar to Springlake FPD’s contract with the City of Davis), this fund balance could potentially be eliminated altogether.

- i) *Does the agency have any debt, and if so, is the organization’s debt at an unmanageable level? Does the agency need a clear capital financing and debt management policy, if applicable?*

No. The District does not have any debt.

**Financial Ability MSR Determination**

The District’s total revenues and total fund balances have steadily grown over the past five years and are keeping pace with increasing costs. Like other rural fire districts, East Davis FPD relies primarily on a share

<sup>3</sup> See the Financial Sustainability Methodology on Page 1-12.



**YOLO LAFCO MUNICIPAL SERVICE REVIEW/SPHERE OF INFLUENCE STUDY**

of the general 1% property tax levy for the majority of its revenue. In fiscal year 2021, 74% of total revenues (\$614,057) came from property taxes. The District’s share of property taxes within its boundaries is approximately 9.6%, while the average for all rural FPDs in the county is 6.2%. The other 25% (\$210,806) of revenue comes from a special assessment levied since 1985. In fiscal year 2021 the contract payment was over 98% of total expenditures. The District, by contract, shares the increases in the net cost of the City of Davis Fire Department, after reductions for revenue from No Man’s Land and Springlake FPDs, based on the District’s share of the total assessed value of the District and the City, which is currently about 6%. Since 2017 the annual contract payment has averaged a 7.3% increase, however, the 2021 payment increased 16.5% from fiscal year 2020, due to a delay of the City of Davis receiving strike team reimbursements from CAL FIRE.

The District’s total fund balance as of June 30, 2021 is \$1,432,155, currently over \$900,000 in excess of the recommended best practices. The District’s policy is to retain at least 110% of one year’s expenditures in reserve, which is in excess of recommended government standards. East Davis FPD does not maintain facilities or equipment, and it can reduce its fund balance without impairing its operational capacity. If the contract with the City of Davis were amended and streamlined such that the East Davis FPD operated as a pass-through agency (similar to Springlake FPD’s contract with the City of Davis), this fund balance could potentially be eliminated altogether and drawn down to reduce constituent costs. The District maintains all funds in the County Treasury and uses the County’s financial system to maintain its accounting records. Since the East Davis FPD is a dependent district, it is subject to the same accounting and financial policies as the County and is included in the County’s Annual Comprehensive Financial Report.

**Financial Ability MSR Recommendation(s)**

- East Davis FPD should amend its reserve policy reducing the current 110% of one year’s expenditures to, at a minimum, align with government standards (SCO and GFOA). The District should also consider amending its contract with the City of Davis to simply pass-through revenues (similar to Springlake FPD’s contract with the City of Davis), which would allow the fund balance to be eliminated altogether and drawn down over time to reduce constituent costs.
- East Davis FPD should review the County ledgers at least biannually to ensure transactions are accurately posted to the District’s fund. The review should at least include a comparison to prior year actuals and a current year budget to actual.

**5. SHARED SERVICES AND FACILITIES**

Status of, and opportunities for, shared facilities.

	YES	MAYBE	NO
a) <i>Are there any opportunities for the organization to share services or facilities with neighboring, overlapping or other organizations that are not currently being utilized?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion:**

- a) *Are there any opportunities for the organization to share services or facilities with neighboring, overlapping or other organizations that are not currently being utilized?*
- No. The East Davis FPD shares services and contracts with the City of Davis for fire protection and emergency response services.

**Shared Services MSR Determination**

The East Davis FPD shares services and contracts with the City of Davis for fire protection and emergency response services.

**6. ACCOUNTABILITY, STRUCTURE AND EFFICIENCIES**

Accountability for community service needs, including governmental structure and operational efficiencies.

	YES	MAYBE	NO
a) <i>Are there any recommended changes to the organization's governmental structure or operations that will increase accountability and efficiency (i.e. overlapping boundaries that confuse the public, service inefficiencies, and/or higher costs/rates)?</i>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b) <i>Are there any issues with filling board vacancies and maintaining board members? Is there a lack of board member training regarding the organization's program requirements and financial management?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) <i>Are there any issues with staff capacity and/or turnover? Is there a lack of staff member training regarding the organization's program requirements and financial management?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) <i>Does the agency need adequate policies (as applicable) relating to personnel/payroll, general and administrative, board member and meetings, and segregating financial and accounting duties among staff and/or board to minimize risk of error or misconduct (see suggested policies list)?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) <i>Are any agency officials and designated staff <u>not</u> current in making their Statement of Economic Interests (Form 700) disclosures?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
f) <i>Does the agency need to secure independent audits of financial reports that meet California State Controller requirements? Are the same auditors used for more than six years? Are audit results <u>not</u> reviewed in an open meeting?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
g) <i>If the agency is not audited annually, does the agency need to have a qualified external person review agency finances each year (at a minimum), comparing budgets to actuals, comparing actuals to prior years, analyzing significant differences or changes, and determining if the reports appear reasonable?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
h) <i>Does the organization need to improve its public transparency via a website (see <a href="https://www.yololafco.org/yolo-local-government-website-transparency-scorecards">https://www.yololafco.org/yolo-local-government-website-transparency-scorecards</a>)?</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

**Discussion:**

- a) *Are there any recommended changes to the organization's governmental structure or operations that will increase accountability and efficiency (i.e. overlapping boundaries that confuse the public, service inefficiencies, and/or higher costs/rates)?*

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

Among the purposes of LAFCo is to review and provide information to shape the development of local agencies to advantageously provide for the present and future needs of each county and its

communities. The fire service provider landscape has changed significantly since the FPDs around Davis were originally formed decades ago. East Davis FPD began contracting for City of Davis services in 1966. No Man's Land FPD was formed in 1974, and during the formation process annexation to the East Davis FPD was considered, but "the City of Davis has refused to annex the territory to the East Davis Fire District at this time, and the East Davis Fire Protection District has therefore stated they do not desire to annex the territory."<sup>4</sup> Consequently, No Man's Land FPD was formed as a separate FPD to contract with the City of Dixon for services. However, in 1997 the service provider for No Man's Land FPD changed to the City of Davis. Springlake FPD originally contracted for services with the City of Woodland for the entirety of its territory, and then changed service providers to the City of Davis in 1985 for everything south of County Road 29 to improve response.

Therefore since 1985, the reasons the FPDs around Davis were organized as three separate districts have changed and all three FPDs have been receiving the same services from the City of Davis. All three FPDs are dependent to Yolo County and serve as funding and service mechanisms of the County, and it would enhance efficiency, increase accountability for community service needs, and be less confusing to the public if all the territory served by City of Davis were combined under one district. East Davis FPD is the agency best suited to provide this function.

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

- Reorganizing each district's boundaries to coincide with the city providing services will improve transparency and accountability. By having one district contracting with each city, residents will better be able to identify the district they are in and the fire department that serves them. Residents also would be able to more easily determine which fire commission represents them.
- By reducing the number of FPDs the City of Davis serves from three to one, reorganization will streamline the City's administrative costs of providing fire services to the rural areas. Davis will only have to manage one contract, provide fiscal services for one district, and report to one fire commission. This streamlining could allow the East Davis FPD to negotiate a lower rate, thus reducing constituents' annual assessments.
- Reducing the number of contracts that need to be negotiated will avoid inconsistencies from one district to the next. For example, the East Davis FPD's contract costs appear higher on a per dispatch basis than No Man's Land and Springlake FPDs and do not include any cost containment provisions, even though they receive the same level of service from the same fire department. As another example, East Davis FPD is the only contract district whose contract provides for an optional reserve of a full year of service costs. It appears the contract gives the discretion to the District of whether to maintain the reserve, but East Davis FPD has maintained the reserves at levels greater than other districts. Eliminating or reducing the reserve requirement would allow East Davis FPD to reduce the assessment charged to residents in its current service territory over a period of time as the reserve is drawn down. (The reserves would not be used to reduce assessments in any newly-annexed territory.)
- The volunteer fire commissioners perform an important service, especially when it comes to oversight of the City's performance. Expanding the territory of the district will also expand the pool of individuals who might be willing to serve as commissioners, which could ease the burden on those who have served long terms. It also might allow the commission to expand its membership from five to seven, which would spread out any administrative workload handled by the commissioners. While expanding the territory might result in a marginal increase in the fire commission's responsibilities, the time commitment to serve in the position would still be significantly less than for commissioners serving a district that has its own infrastructure and personnel.

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<sup>4</sup> LAFCo Report on Formation of No-man's Land FPD, January 11, 1974.

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- b) *Are there any issues with filling board vacancies and maintaining board members? Is there a lack of board member training regarding the organization’s program requirements and financial management?*

No. All of the fire commission seats are filled as appointed by the Board of Supervisors with indefinite terms (the only FPD in the county with indefinite terms). Review of the minutes indicate one commissioner seat was unfilled from May 18, 2017 to October 15, 2020 but have remained filled for some time.

<b>Name / Title</b>	<b>Start</b>	<b>End</b>
Michael McMahon /	01/29/2013	
Dave Robert /	09/15/2015	
William Weisgerber /	04/05/2016	
John Lindsey /	09/12/2017	
Tad Henderson /	06/23/2020	

- c) *Are there any issues with staff capacity and/or turnover? Is there a lack of staff member training regarding the organization’s program requirements and financial management?*

No. City staff perform the FPD services and functions.

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

No. East Davis FPD is audited annually and day-to-day operations are managed by City staff which has financial staff to review District finances. The City maintains policies to manage all FPD services and functions. The District has a Policy and Procedure Manual (V2019.1) which includes basic fire commission and financial policies.

- e) *Are any agency officials and designated staff not current in making their Statement of Economic Interests (Form 700) disclosures?*

No. The Yolo County Board of Supervisors is the conflict of interest code reviewing body for these districts. Review occurs every two years and was last approved on October 6, 2020. Districts can be exempt from filing conflict of interest disclosures if: there are no “designated employees”<sup>5</sup>; it is within a year of being inoperative; or the district does not have decision making authority and its annual operating budget is less than \$150,000 per year. The BOS has determined the East Davis FPD is exempt from filing Form 700s.

- f) *Does the agency need to secure independent audits of financial reports that meet California State Controller requirements? Are the same auditors used for more than six years? Are audit results not reviewed in an open meeting?*

No. The dependent FPDs (including East Davis FPD) are included in the annual audit of the County’s Annual Comprehensive Financial Report (ACFR). The County’s audited ACFR meets general audit requirements and the ACFR satisfies the requirements of Government Code 26909.

- g) *If the agency is not audited annually, does the agency need to have a qualified external person review agency finances each year (at a minimum), comparing budgets to actuals, comparing actuals to prior years, analyzing significant differences or changes, and determining if the reports appear reasonable?*

No. The East Davis FPD is audited annually as part of the County’s ACFR and it contracts with an external CPA to help assist with preparing the annual budget, review year end close, and prepare and submit the annual SCO Financial Transactions Report.

<sup>5</sup> “Designated employees” is defined by Government Code sections 82019 and 87302(a).

- h) *Does the organization need to improve its public transparency via a website (see <https://www.yololafco.org/yolo-local-government-website-transparency-scorecards>)?*

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

**Accountability, Structure and Efficiencies MSR Determination**

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

The fire service provider landscape has changed significantly since these three FPDs were originally formed, and since 1985 the reasons the FPDs are organized as three separate agencies has changed and all three FPDs have been receiving the same services from the City of Davis. All three FPDs are dependent to Yolo County and serve as funding and service mechanisms of the County and East Davis FPD is the agency best suited to provide these services. Reorganization would result in the following benefits: (1) Transparency, accountability and less public confusion regarding which fire commission serves them; (2) Streamline the number of FPDs the City of Davis serves, promoting efficiency; (3) Reducing the number and inconsistency of service contracts for the same level of services, potentially allowing the East Davis FPD to reduce or eliminate its reserve saving money for its constituents; and (4) Expanding the pool of individuals who might be willing to serve as commissioners and potential to expand the fire commission from 5 to 7 members which could ease the burden by spreading out any administrative workload handled by the commissioners.

All of the fire commission seats are filled as appointed by the Board of Supervisors with indefinite terms. The dependent FPD's (including East Davis FPD) are included in the annual audit of the County's Annual Comprehensive Financial Report (ACFR). It contracts with an external CPA to help assist with preparing the annual budget, review year end close and prepare and submit the annual SCO Financial Transactions Report. Dependent districts are not legally required to maintain a website; however, East Davis FPD maintains a website and received a 25% transparency score for best practices in 2021.

**Accountability, Structure and Efficiencies MSR Recommendation(s)**

- The East Davis FPD sphere of influence should be updated to include the No Man's Land FPD territory and the portion of Springlake FPD territory south of County Road 29. Those areas should then be annexed into the East Davis FPD as part of a reorganization of the Elkhorn, No Man's Land, and Springlake FPDs.
- East Davis FPD and the City should review the contract terms to consider simplifying the financial obligations of each agency, including examining the purpose of the District maintaining a high fund balance. East Davis FPD's role as a pass-through entity should be streamlined to the greatest extent feasible.
- Dependent districts are not legally required to maintain a website. However, East Davis FPD maintains a website and received a 25% transparency score for best practices in 2021. Please see the report at <https://www.yololafco.org/yolo-local-government-website-transparency-scorecards> for where improvements are needed.

**7. BROADBAND ACCESS**

Any other matter related to effective or efficient service delivery, as required by commission policy.

Per Yolo LAFCo Project Policy 6.2 “it is the intent of Yolo LAFCo to comprehensively review broadband access in MSR of local agencies that either serve communities and/or provide emergency services where broadband connection is critical (i.e. cities, CSDs, CSAs, FPDs and RDs).”

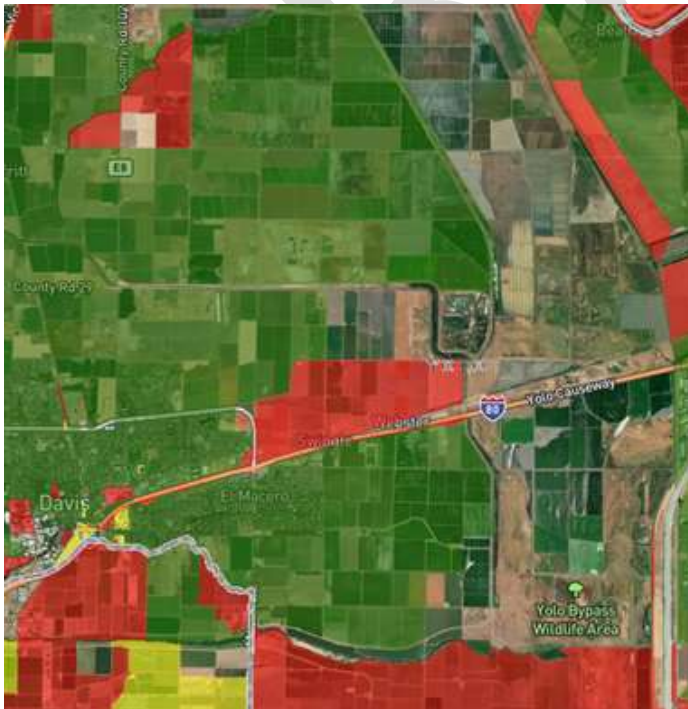
	YES	MAYBE	NO
a) <i>Is there a lack of high-performance broadband (25/3 Mbps) available in the community?</i>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
b) <i>Is there a lack of low-income subscription rates and/or digital literacy programs available?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion:**

a) *Is there a lack of high-performance broadband (25/3 Mbps) available in the community?*

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

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



b) *Is there a lack of low-income subscription rates and/or digital literacy programs available?*

No. According to the CPUC Broadband Mapping Program, broadband adoption is 60% or greater for the FPD territory.

Comcast currently offers the Internet Essentials program for low-income households that may qualify if a subscriber is eligible for public assistance programs like the National School Lunch Program, Housing Assistance, Medicaid, SNAP, SSI and others. The program includes 50/5 Mbps internet service for \$9.95 a month plus tax, no activation/equipment rental fees, an option to purchase a computer for just \$149.99 plus tax, access to free Internet training online, in print and in person, a Wireless Gateway in-home WiFi at no

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additional cost, and access to Xfinity WiFi Hotspots.

AT&T offers a similar program for low-income households that includes 25 Mbps download speeds for \$10.00 per month with free installation, in-home Wi-Fi®, no deposit and no annual contract.

Yolo County Library staff provide one-on-one computer assistance, with even with basic functions like setting up an email account<sup>6</sup> and generally help troubleshoot technology challenges. Information and instruction about basic computer/tablet/smartphone use is offered in ESL conversation clubs, classes and in Yolo Reads Adult and Family Literacy program. The library also provides hotspots and Chromebooks for those that need these items. The library does not have a formalized technology curriculum, although there have been discussions regarding adding it as a service.

**Broadband Access MSR Determination**

Overall, broadband access in the East Davis FPD does not appear to be an issue that would disrupt fire protection and emergency services. According to the CPUC Broadband Mapping Program, broadband adoption is greater than 60% for the FPD territory.

Although El Macero and Willowbank have access to 987 Mbps (or nearly 1 Gbps/"Gig") speeds, the Davis Creek Mobile Home Park only has access to 10 Mbps download and 1 Mbps upload speeds from AT&T even though 1 Gig speeds are available from Comcast immediately surrounding the Park and were likely excluded for economic reasons. Most of the rural areas in the FPD surrounding these communities are only served by wireless service and far less than the 25/3Mbps broadband threshold. Davis Creek Mobile Home Park is likely a disadvantaged unincorporated community that has internet service provided by AT&T but at less than 50% of the minimum standard, which should be addressed.

**Broadband Access MSR Recommendation**

- Yolo County should explore CASF (California Advanced Services Fund) grants to upgrade infrastructure for the Davis Creek Mobile Home Park with either the existing provider, AT&T, or Comcast which provides high speed broadband service in the immediate surrounding vicinity.

<b>8. STATUS OF PREVIOUS MSR RECOMMENDATIONS</b>			
	<b>YES</b>	<b>MAYBE</b>	<b>NO</b>
a) <i>Are there any recommendations from the agency's previous MSR that have not been implemented?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion:**

- a) *Are there any recommendations from the agency's previous MSR that have not been implemented?*  
 No. There were no recommendations from the 2016 MSR specific to the East Davis FPD.

**Status of Previous Recommendations MSR Determination**

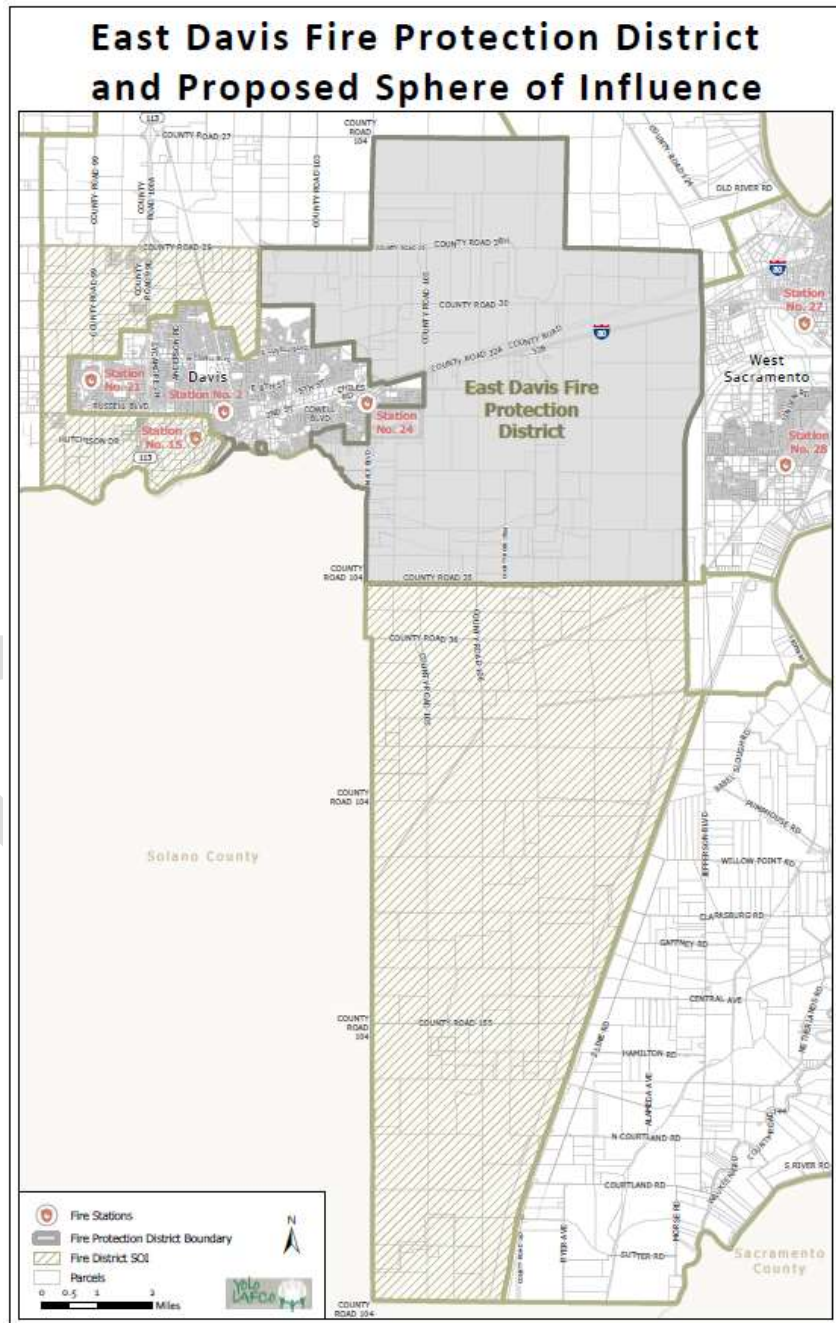
There were no recommendations from the 2016 MSR specific to the East Davis FPD.

<sup>6</sup> Email from Mark Fink, Yolo County Librarian on May 26, 2021

**SPHERE OF INFLUENCE STUDY**

On the basis of the Municipal Service Review:

- Staff has reviewed the agency’s Sphere of Influence and recommends that a SOI Update is NOT NECESSARY in accordance with Government Code Section 56425(g). Therefore, NO CHANGE to the agency’s SOI is recommended and SOI determinations HAVE NOT been made.
- Staff has reviewed the agency’s Sphere of Influence and recommends that a SOI Update IS NECESSARY in accordance with Government Code Section 56425(g). Therefore, A CHANGE to the agency’s SOI is recommended and SOI determinations HAVE been made and are included in this MSR/SOI study.





**POTENTIALLY SIGNIFICANT SOI DETERMINATIONS**

The SOI determinations below are potentially significant issues, as indicated by “yes” or “maybe” answers to the key policy questions in the checklist and corresponding discussion on the following pages.

- Present and Planned Land Uses
- Need for Public Facilities and Services
- Capacity and Adequacy of Provide Services
- Social or Economic Communities of Interest
- Disadvantaged Unincorporated Communities

**1. PRESENT AND PLANNED LAND USES**

The present and planned land uses in the area, including agricultural and open-space lands.

	YES	MAYBE	NO
a) <i>Would the SOI conflict with planned, orderly and efficient patterns of urban development? Would the SOI impact the identity of any existing communities (e.g. community boundaries, postal zones, school, or other service boundaries)?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) <i>Would the SOI result in the loss of prime agricultural land or open space?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) <i>Would the SOI conflict with any natural or made-made boundaries that would impact where services can reasonably be extended?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) <i>Is there a conflict with the adopted SACOG Metropolitan Transportation Plan/Sustainable Communities Strategy?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion:**

a-d) *Would the SOI conflict with planned, orderly and efficient patterns of urban development? Would the SOI impact the identity of any existing communities (e.g. community boundaries, postal zones, school, or other service boundaries)? Would the SOI result in the loss of prime agricultural land or open space? Would the SOI conflict with any natural or made-made boundaries that would impact where services can reasonably be extended? Is there a conflict with the adopted SACOG Metropolitan Transportation Plan/Sustainable Communities Strategy?*

No. The SOI is for fire protection and emergency response services only and would not affect present and planned land uses.

**Present and Planned Land Uses SOI Determination**

The SOI is for fire protection and emergency response services only and would not affect present and planned land uses.

**2. NEED FOR PUBLIC FACILITIES AND SERVICES**

The present and probable need for public facilities and services in the area.

	YES	MAYBE	NO
a) <i>Would the SOI conflict with the Commission's goal to increase efficiency and conservation of resources by providing essential services within a framework of controlled growth?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) <i>Would the SOI expand services that could be better provided by a city or another agency?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) <i>Does the SOI represent premature inducement of growth or facilitate conversion of agriculture or open space lands?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
d) <i>Are there any areas that should be removed from the SOI because existing circumstances make development unlikely, there is not sufficient demand to support it?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
e) <i>Have any agency commitments been predicated on expanding the agency's SOI such as roadway projects, shopping centers, educational facilities, economic development or acquisition of parks and open space?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion:**

- a) *Would the SOI conflict with the Commission's goal to increase efficiency and conservation of resources by providing essential services within a framework of controlled growth?*  
 No. The SOI promotes the Commission's goal to increase efficiency and would not promote growth. The SOI Update is intended to improve accountability for community service needs, including governmental structure and operational efficiencies.
- b) *Would the SOI expand services that could be better provided by a city or another agency?*  
 No. The SOI would not expand services; rather it better reflects and aligns with the services already provided by the City of Davis. The City of Davis is best suited to provide services more directly via the East Davis FPD. Please see MSR item 6a.
- c) *Does the SOI represent premature inducement of growth or facilitate conversion of agriculture or open space lands?*  
 No. The SOI would not result in growth or conversion of agricultural or open space land.
- d) *Are there any areas that should be removed from the SOI because existing circumstances make development unlikely, there is not sufficient demand to support it?*  
 No. The SOI Update is for fire protection and emergency response, which is provided countywide regardless of development demand.
- e) *Have any agency commitments been predicated on expanding the agency's SOI such as roadway projects, shopping centers, educational facilities, economic development or acquisition of parks and open space?*  
 No. Not applicable.

**Need for Public Facilities and Services SOI Determination**

The SOI would not expand services. It reflects and aligns FPD boundaries with the services already provided by the City of Davis. Services for No Man's Land FPD and the portion of Springlake FPD south of CR 29 have already evolved to the best service provider, the City of Davis. The SOI would align FPD

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boundaries to catch up with the evolution of fire service. The SOI promotes the Commission’s goal to increase efficiency provide services more directly via the East Davis FPD (please also see MSR item 6a).

**3. CAPACITY AND ADEQUACY OF PROVIDED SERVICES**

The present capacity of public facilities and adequacy of public services that the agency provides or is authorized to provide.

	YES	MAYBE	NO
a) <i>Are there any issues regarding the agency’s capacity to provide adequate services in the proposed SOI territory and ability to extend services?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion:**

- a) *Are there any issues regarding the agency’s capacity to provide adequate services in the proposed SOI territory and ability to extend services?*

No. The City of Davis already provides fire protection and emergency response services in the SOI territory, has capacity, and provides adequate services.

**Capacity and Adequacy of Provided Services SOI Determination**

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

**4. SOCIAL OR ECONOMIC COMMUNITIES OF INTEREST**

The existence of any social or economic communities of interest in the area if the commission determines that they are relevant to the agency.

	YES	MAYBE	NO
a) <i>Are there any social or economic communities of interest in the area if the commission determines that they are relevant to the agency (see also MSR checklist question 2b)?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion:**

- a) *Are there any social or economic communities of interest in the area if the commission determines that they are relevant to the agency (see also MSR checklist question 2b)?*

No. Not applicable.

**Social or Economic Communities of Interest SOI Determination**

There are no social or economic communities of interest in the SOI area.

**5. DISADVANTAGED UNINCORPORATED COMMUNITIES**

For an update of an SOI of a city or special district that provides public facilities or services related to sewers, municipal and industrial water, or structural fire protection, the present and probable need for those public facilities and services of any disadvantaged unincorporated communities within the existing sphere of influence.

	YES	MAYBE	NO
a) <i>If the subject agency provides public services related to sewers, municipal and industrial water or structural fire protection (same as MSR checklist question 2a) does the proposed SOI exclude any disadvantaged unincorporated community (per MSR checklist question 2b) where it either may be feasible to extend services or required to be included under SB 244?</i>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

**Discussion:**

- a) *If the subject agency provides public services related to sewers, municipal and industrial water or structural fire protection (same as MSR checklist question 2a) does the proposed SOI exclude any disadvantaged unincorporated community (per MSR checklist question 2b) where it either may be feasible to extend services or required to be included under SB 244?*

Not applicable. There are no disadvantaged unincorporated communities in the SOI territory, and all unincorporated territory receives fire protection services. The SOI Update is intended to improve accountability for community service needs, including governmental structure and operational efficiencies.

**Disadvantaged Unincorporated Communities SOI Determination**

There are no disadvantaged unincorporated communities in the SOI territory, and all unincorporated territory receives fire protection services. The SOI Update is intended to improve accountability for community service needs, including governmental structure and operational efficiencies.