

Clarksburg Fire Protection District

P.O. Box 513
Clarksburg, CA 95612

July 27, 2016

“POLICY” STATEMENT RE CAL WATER FIX

To: State Water Resources Control Board

The Bay Delta Conservation Plan/California WaterFix (“**BDCP/CA WaterFix**”) proposes to dramatically alter the way in which the Clarksburg Fire Protection District (the “**District**”) meets its mission and delivers emergency services within District boundaries and in accord with its mutual aid agreements. Those mutual aid agreements include agreements with other fire districts within the northern Sacramento-San Joaquin Delta.

Although the District timely and properly requested cooperating and coordinating agency status with each state and federal regulatory agency responsible for the Bay Delta Conservation Plan (“**BDCP**”) by District letter dated November 5, 2009, its requests have been ignored.

The District is a unit of local government in the Sacramento-San Joaquin Delta (the “**Delta**”). The District generally covers all of the geographical area south of the city limits of the City of West Sacramento, west of the Sacramento River, east of the Sacramento Deep Water Ship Channel, and to the southern boundary of Yolo County. The District lies entirely within the legal boundaries of the Delta. The geographical area covered by the District lies entirely within the Plan Area (as defined in the BDCP/CA WaterFix).

The mission and purpose of the District is to provide reliable fire suppression and emergency medical response to the people, residents, structures and businesses within the boundaries of the District and assist in holding insurance rates as low as possible. In order to meet this mission and purpose the District relies upon a number of existing physical and economic facts within the District, including:

1. Reliant for the majority of its funding from agricultural land uses and operations, a system of assessments (including special assessments and a portion of general real property taxes) on real property parcels and structures, the maintenance of agricultural viability and land values, and the determination and payment of fees to meet the financial obligations of the District;
2. A system of roads and travel routes for the delivery of services both within the District and to facilitate and continue the existing deliveries of as needed mutual aid

to and from other fire districts through existing agreements and, through strike teams, throughout California;

3. The on-going system of purchase and maintenance of equipment comprised of rolling stock, personal protection, fire suppression, medical aid, and supportive supplies, materials and equipment; and

4. The maintenance of existing levees and flood protection to reduce the risk of floods and the damage cause by inundation by water.

A number of State and federal entities are discussing formulating various devices, strategies, policies, habitat conservation plans, reports and other procedures (together, “**Plans**”) which appear to have the potential to significantly and seriously disrupt or even prevent the District from accomplishing its mission and purpose by alteration of the physical and economic facts listed above. The BDCP/CA WaterFix is one of these Plans currently under consideration.

This letter constitutes the District’s Comment Letter Number Two focusing on the estimated impact on the District which will result from the proposed project, in one or another alternatives, (the “**Projects**”), and the cost to the District as a result of the Projects.

Throughout all of these comments, when impacts and/or effects are described or identified in any way, such impacts are to be deemed significant impacts for purposes of CEQA analysis, and such effects are deemed adverse effects for purposes of NEPA analysis.

In a typical year the District responds to approximately 25 fire suppression calls, 75 medical aid calls, and 68 other “first responder” calls. Depending upon the specifics of the actual construction project which may go forward (and specifically not agreeing that any project of any scope should go forward), the District forecasts a significant and substantial increase in call volume due to construction activities and increased traffic in and through the District. After the completion of all construction activity, and as a result of proposed project operations, the District estimates a nominal increase in call volume due to operational and maintenance activities relating to the project. The increased call volumes as a result of construction, and also as a result of operations, will both be substantial, serious and significant impacts and effects on and for the District.

Comments Regarding Direct Financial Impact

The District has determined that if the project as proposed proceeds, additional costs and impacts will be caused to the District. It is estimated, based on an analysis of call volume and type over the past 10 years, that with the increased traffic within the

District, additional construction related activities, and other matters related to the proposed project, its construction, and its operations, as proposed by the Draft EIR/EIS and RDEIR/SDEIS, emergency requests for assistance within the District and under mutual aid agreements with other Districts will increase by approximately 100 calls per year.

In order to meet this demand, it is estimated that the hiring of personnel in the persons of a Fire Chief, Battalion Chief, Captain, one or more Engineers, and Fire Fighters will be required. Additional equipment will need to be purchased, and additional other costs will be incurred. Additional training will be required. In total, it is estimated that the direct financial impact of the project as proposed to the District will be \$1,675,000 on an annualized basis. This estimate is subject to updates in information and to further and more accurate information which may be received in the future.

The District states that the project proponents should be responsible to cover and pay the District for all of the actual costs of the project, its constructions and its operations.

Please contact me if you have any questions.

Very truly yours,

CLARKSBURG FIRE PROTECTION DISTRICT

By: 

Mark Pruner, Chair

Board of Directors/Commissioners

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