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To: [LAFCO Info](#)
Cc: [Joe Serrano](#); [Francisco Estrada](#)
Subject: Public Comment- Agenda Item 6c, Countywide Fire Protection Service & Sphere Review
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Dear LAFCO Commissioners and Staff,

The proposed Resolution (No. 2026-11) for the Countywide Fire Protection Service and Sphere Review currently includes, among nine terms and conditions, direction to staff to hire an outside consultant to study the reorganization of CSA 48 into an independent fire district. However, there is no such direction regarding the reorganization of the Pajaro Valley Fire District (PVFD) into CSA 48. This omission is concerning, particularly as the PVFD reorganization appears to be a much more complex project than the CSA 48 reorganization.

I have three primary concerns regarding the PVFD reorganization:

1. The Cost: Officials acknowledged during the virtual Town Hall that reorganizing the PVFD into CSA 48 will cost \$500,000 more than maintaining the PVFD as an independent district. This additional cost to ratepayers has not been independently reviewed or justified.
2. Benefit Assessments: The proposal to apply CSA 48 assessments to PVFD parcels would generate \$1.8 million in new revenue without a vote. I am concerned that this approach may bypass the property owner protections afforded under Article XIII D of the California Constitution (Proposition 218).
3. Transparency and LAFCO's Role: To date, this process has been managed internally by LAFCO and County staff. An impartial third-party expert is necessary to ensure transparency and protect the interests of those affected.

Given the financial implications and legal complexities, I respectfully request that the Commission include, as part of the adoption of Resolution No. 2026-11, direction to staff to secure the services of a qualified consulting firm to produce an independent study of the PVFD reorganization. This study should evaluate whether the increased costs are commensurate with community needs and ensure that the extension of assessments strictly adheres to the California Constitution.

I further request that this study remain separate from the CSA 48 reorganization study. The Pajaro Valley Fire District project is complex and deserves to be evaluated on its own merits to ensure the community's interests are appropriately represented.

I'm sure the omission of an outside study for the Pajaro Valley Fire District was a simple oversight that the Commission can easily remedy at this time.

Thank you for your consideration.

Best regards,

Don Jarvis