

From: [WordPress](#)
To: [Joe Serrano](#)
Subject: Santa Cruz LAFCO "Correspondence re: Pajaro Valley Fire Protection District Reorganization and Independent Consultant"
Date: Sunday, June 14, 2026 2:02:36 PM

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From: Becky Steinbruner <ki6tkb@yahoo.com>
Subject: Correspondence re: Pajaro Valley Fire Protection District Reorganization and Independent Consultant

Message Body:

Dear Commissioners,

Thank you for your recommendation made at your June 3, 2026 meeting that LAFCO pursue an independent consultant to analyze the Pajaro Valley Fire Protection District reorganization as a condition of approval of the Draft 2026 Countywide Fire District Sphere and Service Review. As you remember, this recommendation was requested by Mr. Don Jarvis, in his expert opinion testimony during public comment on the Report. Mr. Jarvis has served as an expert in past fire district reorganization efforts led by LAFCO, and was responsible for seeing the Aptos/ La Selva Fire District and Central Fire District consolidation across the finish line, as an Interim Chief of Aptos/ La Selva Fire District.

Subsequently, I attended the June 10, 2026 Pajaro Valley Fire Protection District Board meeting wherein District staff merely reported that LAFCO had approved the Countywide Service and Sphere Review. I then testified regarding the Commission's recommendation to seek an independent consultant to analyze the current trajectory of LAFCO's and the District's reorganization actions.

I was very shocked to hear Chair Martone only then declare that he and Vice-Chair Dellamonica had rejected LAFCO's recommendation to hire an independent consultant to review the merger of the District with Santa Cruz County Fire Department. There was no discussion.

This decision was made in a vacuum, without any public discussion or approval of the PVFPD Board.

It is evident that, for whatever reason, some on the Board members are intent upon dissolving the District, despite clear and strong resistance voiced by several residents at the May 23 and May 26 Town Hall meetings to discuss the merger with Santa Cruz County Fire Dept.. <https://www.pajarovalleyfire.com/>

Mr. Jarvis's careful analysis has shown that the draft Santa Cruz County Fire Dept. assessments for PVFPD assessment post-annexation would cost significantly more for the same 3-0 level of staffing that a simple parcel tax increase would cost, should the District remain an independent fire district. As Mr. Jarvis pointed out to the public at the May 23, 2026 Public Meeting, a Prop. 218 assessment vehicle is not the proper tool for increasing PVFPD revenues to fund 3-0 staffing, and the District should pause the dissolution and consider a simple parcel tax increase.

This is what your Commission's June 3 recommendation to staff would have done, but it met with curious resistance from LAFCO staff, who reported that no action on the recommendation could be taken without prior approval of the PVFPD. I find this incongruent with the duties of LAFCO staff, and the fact that your Commission has already approved funding / waiving fees related to this reorganization effort, contingent upon the reorganization's completion.

The District's 2026-2027 Budget identifies \$1,436,907 rolling revenue

surplus that could be applied to the increased staffing now. (page 88 of June 10 agenda packet:

https://www.pajarovalleyfire.com/wp-content/uploads/PV-Board-Meeting-Packet-6-10-26_Amended.pdf)

A simple parcel tax increase would require 2/3 voter approval, but would be the most transparent, equitable and most cost-effective level of service to the residents within PVFPD. In my opinion, a 2/3 voter approval is possible to achieve.

Therefore, please continue public discussion of this issue at the August LAFCO meeting, and insist that LAFCO staff move forward with an independent consultant analysis (NOT done "in-house") to determine whether or not the current course of action being decided in a vacuum is the best for the residents of PVFPD.

Please respond.

Thank you.

Sincerely,

Becky Steinbruner

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This e-mail was sent from a contact form on Santa Cruz LAFCO (<https://santacruzlafco.org>)

From: [Randy Craven](#)
To: [LAFCO Info](#)
Cc: [Randy Craven](#)
Subject: Pajaro Valley Fire District Reorganization
Date: Tuesday, July 14, 2026 7:12:14 PM

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Dear LAFCO,

I believe that one of the critical roles that LAFCO plays is ensuring that the people affected by these types of reorganization projects are not adversely impacted. To fulfill that role, LAFCO staff and Commissioners must remain impartial, objective, and unbiased. Given that LAFCO staff assumed the lead role in the PVFD reorganization from the very beginning, it appears that they are an advocate of one particular approach to the exclusion of all others.

At the May 23, 2026 PVFD Town Hall meeting, Officials acknowledged that for the identified service level, the reorganization of the PVFD into CSA 48 will cost \$500,000 more than the PVFD remaining an independent fire district. To my knowledge, this is the first time this has been made public and has not been independently reviewed nor adequately justified.

Based on information in LAFCO's May 20, 2026 Financial Projections report, it is proposed that both of the existing CSA 48 Benefit Assessments be applied to the PVFD parcels at the current maximum rate, generating over \$1.8 million in new revenue from charges placed on property owner's tax bills *without a vote*. I am very concerned that this authority is being exercised without due regard for the provisions of Proposition 218. The risk of implementing this methodology incorrectly is that property owners within the reorganization area may be deprived of the protections afforded them under Article XIII D of the California Constitution.

I find it very concerning that the proposed Resolution (No. 2026-11) for the Countywide Fire Protection Service and Sphere Review includes direction to staff to hire an outside consultant to produce a feasibility study exploring the reorganization of CSA 48 into an independent fire district. However, there is no such recommendation for a feasibility study exploring the reorganization of the Pajaro Valley Fire District. The CSA 48 reorganization is likely to have no financial implications to the CSA 48 constituents but on the other hand, the Pajaro Valley Fire District reorganization proposed would add \$1.8 million dollars in new assessments to property in the PVFD.

I'm respectfully asking that the Commission engage the services of a qualified outside consulting firm to produce a feasibility study to address and evaluate, at a minimum, the increased costs of providing services to the PVFD reorganization area and whether the costs are commensurate with the services desired by the community; and to ensure that the process of extending the CSA 48 Benefit Assessments to the reorganization area adheres strictly to all applicable provisions of Article XIII D of the California Constitution.

Sincerely,

Randy Craven

From: [Don Jarvis](#)
To: [LAFCO Info](#)
Subject: Comments on the Pajaro Valley Fire District Reorganization
Date: Monday, July 27, 2026 12:03:07 PM

******CAUTION:** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email.****

Dear LAFCO Commissioners,

I would like to take this opportunity to clarify my position on the Pajaro Valley reorganization project. As a resident and property owner in the PVFPD I will be directly impacted by the proposed changes and I want the Commission to have an accurate understanding of what my concerns are.

My request to the Commission at your June 3 meeting was very succinct. I requested that the Commission undertake an objective, third-party analysis of the PVFPD reorganization project, with particular emphasis on the overall cost of the proposed services and compliance to relevant provisions of Proposition 218. As I stated, the project proposes to levy more than \$1.8 million in new assessments on property owners, and the total projected costs of \$4.4 million are about \$500,000 higher than the costs of the PVFPD remaining an independent fire district operating with a CAL FIRE contract.

LAFCO Policy 3.7 states the following:

In order for LAFCO to approve a change of organization, the proponent shall demonstrate that the subject services can be provided in a timely manner and at a reasonable cost. (emphasis added)

The amount of the proposed assessment has ballooned from about \$1 million in 2024 to today's \$1.8 million. In the context of a rural fire district, \$1.8 million is an enormous amount of money. Combined with existing revenue sources, the total revenue generated from PVFPD territory is projected at about \$4.4 million, far in excess of the reasonable cost for CAL FIRE to operate one fire station at the Basic Life Support level.

The proponents (including LAFCO staff) have not demonstrated that the subject services are being provided at a reasonable cost. In fact, there has been no independent analysis of the costs (or any other measurable criteria) of the project. The proposed assessments against the properties in the PVFD were arbitrarily set at the maximum level by staff, without any public input and without the express consent of any elected governing body.

This leads to my concerns about compliance to Proposition 218. Based on first-hand conversations and the evolution of staff's financial projections, it is clear that the basis for the projections began with the maximum amount of potential revenue, then the calculations were reverse-engineered to try to justify the taking. This methodology is a clear violation of Proposition 218. There are many other direct and indirect deviations that potentially deprive ratepayers of their protections under Article XIII-D of the California Constitution. Even a casual reading of Proposition 218 would draw one to conclude that the law does not allow a government agency to assess property owners for services that they don't directly benefit from.

It seems as though the PVFPD is viewed as a cash-cow or profit-center for funding CSA 48.

My final area of concern involves the role that LAFCO plays in projects such as this. LAFCOs have traditionally remained neutral and objective arbiters of proposed changes in local government boundaries that could be counted on to render unbiased and factual analysis, and ultimately, judgement. People affected by proposed changes could trust that LAFCO would ensure that they were not adversely impacted by the change. In contrast to this traditional approach, LAFCO staff have taken an activist role in this process, ceaselessly advocating for a "highest possible revenue" funding model.

To ensure that ratepayers are not saddled with unsubstantiated charges, a project of this magnitude absolutely deserves objective independent study. LAFCO Policy 3.7 insists that such a study be completed before allowing property owners to be subjected to this level of new assessments, especially since it is under the authority of LAFCO that such assessments would be imposed. Questions about the amount of revenue, the level of expenses, and compliance to the law should be approached with an abundance of caution and backed by verifiable data.

The PVFPD reorganization is being passed off as inevitable and trivial. It may well be inevitable, but it is far from trivial. The PVFPD reorganization is by far the most significant project LAFCO has considered since your current Executive Officer assumed the role. Despite the financial implications to property owners, important policy questions (such as shifting the financial burden from commercial interests to residences) are brushed aside, and the PVFPD Board is along for the ride, refusing to engage with their constituents in any meaningful way.

My June 3 comments to the Commission have been reinterpreted by various parties, so please allow me to clarify. I am asking for one thing and one thing only: an impartial, unbiased, thorough, and comprehensive study of the Pajaro Valley Fire District reorganization project by a qualified, independent, third-party consultant that will provide the community and your Commission with a complete and accurate analysis of all relevant information so that together we can make data-driven decisions that work for all of us.

I am not opposed to the reorganization of the PVFPD. I am however opposed to being taken advantage of, so I must insist that if we are going to engage in such a process, we do it correctly, with complete, impartial, and thorough analysis of all relevant data.

Sincerely,
Don Jarvis