



El Dorado County Fire Safe Council

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"Public and Private Partners Working Together to Protect People, Homes, and Natural Resources"

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Board of Forestry and Fire Protection
Attn: Edith Hannigan
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RE: BOF "SRA Fire Prevention Fund Grant Program" initial review by El Dorado County Fire Safe Council.

Comments:

Notice of Proposed Action 3.18.2016 Document

Page 2 of 7, Informative Digest/Policy Statement Overview section:

First paragraph, last sentence, regarding distribution – define "community of origin" and "proportional".

Other areas of documents refer to funds / distribution in terms, such as;

- **Commensurate** – SRA FPF Grant Program, 1666.2, section a, line 1.
- **Proportional** - SRA Grant Program, 1666.2, section a, line 3.
- **Proportional** to amount of fees collected from CALFIRE unit/Contract County - SRA Grant Program, 1666.2, section a, subsection 2, line 9.
- Policy Statement Overview section, Page 3 of 7, first paragraph, last sentence – repeats "communities of origin".

Begs the question: example; how is the CALFIRE Amador-El Dorado Unit (AEU) (funding source geographical boundary) going to determine the correct "proportional" amount of funds to be returned to each "community of origin" which should be every County? Based on other descriptive wording as noted above, especially 1666.2 of the SRA Grant Program document, I believe the AEU and other units are the communities of origin. This in turn, spawns additional questions:

1. How does each County know that County originated fire fees paid are being returned proportionally to the County of origin when the CALFIRE Units geographical boundaries often cross County lines?
2. What is the Units distribution decision process to return proportional amounts of funding allocated to Counties of origin?

Further: If our assumption is correct that the CALFIRE Units are the "community of origin" for management of grant funds that would be fine as long as "proportional" is further / additionally

governed by County Boundaries. Fire fees paid can be easily tracked by county, therefore; proportionality should be easily tracked as long as County boundaries are the common and definitive determinant of grant funding. Example; In the case of the AEU who manages activities in portions of 5 counties, proportionality could be assured by simply computing the percentage (%) allocation of total funding to be returned to individual counties within their jurisdiction. (see 1666.2 Definitions further in this document for simplified example).

Page 3 of 7, second paragraph – does this BOF grant establishment action replace the current CALFIRE governors emergency declaration SRA grant program?

Page 3 of 7, 3rd & 4th paragraphs – “found no existing State regulations that met the same purpose”, was the CALFIRE governors emergency declaration SRA grant program not official or for the same purpose?

Page 5 of 7, Cost Impacts on Representative Person or Business section, 2nd paragraph – “Other costs can be recouped in the proposed grant budget”. As this section refers to expected costs incurred, can costs incurred not in the grant period be recouped? Same issue, same page, Business Report, 2nd paragraph – *Some of these costs, incurred over the life of the grant, can be recouped as part of the administrative costs (indirect costs) provided in the grant budget.* In a broad interpretation, “life of the grant” could include preparation time. Needs clarification and definition of time period costs can be incurred in. Definition / clarification would also need to include costs of support, coordinator, direct, indirect, by contract.

SRA Fire Prevention Fund Grant Program Title 14, Chapter 13 Document

1666.1 Definitions, line 18 – We strongly support the inclusion of Fire Safe Council Coordinators in the definition of “Administrative Costs (Indirect Costs)”.

We also want to encourage recognition that coordinators efforts are consistent throughout the year contributing to fire prevention and safety efforts. Consider that these consistent efforts support local fire prevention activities that reduce the effects of fire in the state’s wildlands, watersheds and on habitable structures within the SRA. Therefore; we ask consideration that “Direct Costs” can also be used to cover salaries, benefits and expenses of Coordinator’s directly associated with a span of work that a Coordinator does in a year as it is all for the benefit of the SRA home fee payers in each county.

1666.2 Definitions, Pages 7 & 8, discussion of fees collected and calculation of distributions – The entire discussion / calculation of “expenditures over a rolling seven year period” (page 7, lines 7-9) adds unnecessary calculation and confusion to an already sensitive subject, i.e.; how does the population, not to mention Boards of Supervisors, know that funds are being returned to their county proportionately? Simplify the process;

Total funding available per (this) year	\$
Subtract administrative costs	\$
Total funds available for grants to communities (Counties)	\$
Calculate percentage (%) funding per county based on % of total fire fees paid	\$

Clarification: In our opinion, proportional should be based on the County of origin, not community of origin.

1666.3 Applicant Eligibility, #3 CCC – in the 2015-16 governors’ emergency declaration SRA funding the CCC received 5 million dollars. With the requirements for distribution as noted above, how does the CCC assure they spend funding allocated to them “proportionately” and identified to the “community of origin”? Funding to the CCC should also be proportional by county boundaries. Additionally, the CCC does many kinds of projects; trails, etc. Work sponsored by this funding should go specifically to vegetation management / fuels reduction.

1666.3 Applicant Eligibility, #5 – The Cameron Park CSD contracts with CALFIRE for fire protection services. By this language, as example; Cameron Park Fire Department (AEU Battalion 5) could receive SRA grant funding from their umbrella organization CALFIRE. If this is correct, the appearance of a conflict of interest arises.

1666.8 Concept Proposal – This phase was in the original procedural guide and was dropped in the current governor’s declaration SRA grant program. The Concept Proposal stage does not contribute any information that cannot be included in a single step grant submittal and adds to workload and costs for everyone unnecessarily. Also, it has possible reference to Cost Impacts as noted earlier relating to incurred costs and time period in which they may count.

Comment; sections 1666.8, 1666.10 and 1666.11 contain redundant verbiage. Suggest review to make these sections more concise if possible.

1666.16 Project Application Evaluation Criteria, item Community Support, 15% - many FSC’s cannot afford / do not have hard match capability and often In-Kind requirement is not feasible. These are SRA Fire Fee Funds already collected from residents and communities.

- Suggest reconsideration to lower match requirement.
- Consider allowing SRA Fire Fee’s paid in current grant cycle to be used for match?

Thank you for the opportunity to submit these comments. We would be pleased to make ourselves available if you have any questions or wish to discuss any of our comments.

Sincerely,

Steve Willis

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