



August 25, 2010

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Whatcom County Planning Commission
5280 Northwest Road
Bellingham, WA 98226

Whatcom County P&DS

Re: Fire Level of Service Planning

Dear Commissioners:

At the public hearing held August 12, 2010 you received testimony arguing a philosophy centered on "response times" being an inappropriate methodology for identifying a level of service for fire protection for Whatcom County. Instead, it was suggested by Mr. Robertson, an attorney representing developer's interests, that the Whatcom County Planning Commission should consider "Fire Unit per Capita" as the basis for identifying the appropriate levels of fire service for land use planning.

The goal of measurement is to measure the impact of population increases on fire service systems, not the population increase itself. This measurement is accomplished by measuring the impact of the population increase on the defined fire/emergency response system. This is measured in units of time, not in units of population increase because the goal is to measure *the impact* of population increase. To measure the action itself (the population increase) serves to ignore the impact of the action - the effect of population on the fire/emergency response system.

If the planned population within a service area would alter the response time adversely, then the capital facility plan, including a financing plan, is developed to provide a plan for maintaining the established response time over the planning period considering the projected population increase for the area. Response times are the appropriate measure because it is the time for a defined response that affects the level of service, not the per capita of a particular fire district or fire department. Response times are a nationally accepted standard for identifying the level of service provided by the fire service, and it is essential we use response times when planning for increased development where such development may adversely impact the overall level of service provided.

The "fire unit per capita" method for calculating a level of service, when examined closely, is directly related to response times. Fire Units per Capita is a response time driven measure for level of service planning; it simply is another term that confuses the real reason for level of service planning. If one were to examine why a fire service would add another "fire unit" based on population increase, that decision to add additional units would be based on the fact that the agency can no longer respond to alarms within a sufficient time frame to meet their service

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objectives, or because their response times are increasing. Increased population has the impact of affecting the response time.

There are several critical problems that arise when using an untested Fire Units per Capita methodology for level of service planning. One such critical issue is the "out of service" time of a specific station which affects overall response times. If a one thousand increase in population occurs a ten mile distance from a hospital resulting in ten minute transport times, would a one thousand increase in population have a different impact if the distance from the hospital were thirty-five miles? The obvious answer is there would be a significant adverse impact based on increased "out of service" times which will affect concurrent alarm response times. The level of service standard cannot functionally or safely be based simply on an increase in population ignoring response time, as suggested by Mr. Robertson.

Moreover, all the operational issues identified by Mr. Robertson are key elements that should be considered when developing a capital facilities plan. They are the "key elements" that drive future capital facility planning. For instance, all of these operational elements were considered and included in North Whatcom Fire and Rescue's plan.

Warner Webb's recommendation defined in Option 3 as presented to the Commission in his Memorandum dated August 5, 2010, should be considered as the best solution for defining levels of service with one adjustment. The recommendation as presented in the memorandum states:

"Urban levels of service for fire protection shall be a response time of 8 minutes 80% of the time when the department covering the urban area has staffed the station with paid personnel. When the station is staffed with volunteers it shall be a response time of 10 minutes 80% of the time."

"Rural level of service for fire protection shall be a response time of 14 minutes 80% of the time".

I would like to recommend that the same response time credit for stations staffed with paid personnel (two minutes) be given to the rural response time category. Thus, rural areas that have stations staffed with paid personnel should receive the same two minute credit making the level of service for rural areas a twelve (12) minute response time 80% of the time.

HB 1756, Part III, Section 303 subsection (2), as amended and passed by the Washington State Legislature, specifically states: *"Every fire protection district and regional fire protection service authority shall include service delivery objectives in the written statement or policy required under subsection (1) of this section. These objectives shall include **specific response time objectives** (emphasis added) for the following service components, if appropriate"*. Mr. Robertson must not have been aware of this provision of the State law when he argued that that use of "response times" for capital facilities planning is a "violation of state law". Clearly, his statement is not accurate. Notably, no law was cited or referenced by Mr. Robertson in making such a broad misleading and erroneous statement.

But, to the point, "Service delivery objectives" as addressed in HB 1756 will always be affected by response times and any increase in service demand brought about by development will adversely impact the response times, thus adversely effecting service delivery objectives.

I appreciate your dedication in working towards an acceptable level of service for fire protection standard for the purpose of land use planning.

Sincerely,

A handwritten signature in black ink, appearing to read "T.M. Fields", written in a cursive style.

T.M. Fields
Fire Chief