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Sleepy Hollow Fire Protection District

Formal Response to the 2025–2026 Marin County Civil Grand Jury Report

"Better Service at Lower Cost - Optimizing Essential Services for the Future of Marin"

June 11, 2026

Submitted by the Board of Directors, Sleepy Hollow Fire Protection District
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PREFATORY STATEMENT

The Sleepy Hollow Fire Protection District (SHFPD) thanks the 2025–2026 Marin County Civil Grand Jury for its thorough and thoughtful examination of the county's special district landscape. We welcome the opportunity to respond formally to Findings F1 through F7.

SHFPD was established on February 28, 1949, as an autonomous Special District of the State of California, responsible for fire protection and emergency services in the unincorporated area and surrounding parcels of Sleepy Hollow in Marin County. We deliver these services through our membership in the Ross Valley Fire Department (RVFD), a Joint Powers Authority operated by the Towns of San Anselmo, Fairfax, Ross, and SHFPD. Our mission is to safeguard our community through the delivery of professional, efficient, and effective services protecting life, property, and the environment. Our vision is to be the leading fire district in delivering the highest quality and cost-effective prevention, education, and emergency response services.

SHFPD is governed by a three-member Board of Directors elected to four-year terms by the residents of the district. The Board includes individuals with extraordinary professional depth: Director Richard C. Shortall (President) retired from the San Francisco Fire Department as Assistant Deputy Chief / Emergency Manager, having promoted through the ranks from Firefighter; Director Thomas J. Finn (Secretary), who brings extensive expertise in district administration and community emergency

preparedness; Director Jennifer Gauna, Director of Operations at Fire Safe Marin, with a background in advertising, financial services, and local government, including four years as a legislative aide for Marin County. This level of professional expertise on a volunteer board is rare and has been instrumental in building the advanced wildfire preparedness programs that distinguish SHFPD from virtually every comparable district in the county.

We respond to each finding in the spirit of honest engagement, while asserting that SHFPD represents a model that the Grand Jury's report does not adequately account for - a small, operationally lean, financially transparent district that has already solved many of the problems the report identifies, through strategic partnership rather than formal consolidation.

RESPONSES TO FINDINGS

F1. The current fragmented structure of special districts results in unnecessary duplication of administrative services and operational inefficiencies.

SHFPD Response: Partially Agreem - with important qualification.
SHFPD cannot speak on behalf of other agencies. SHFPD acknowledges that duplication of administrative services is a real cost driver across Marin's special district landscape in the aggregate. However, this finding does not apply with equal force to every district. SHFPD has, by design, minimized administrative overhead through a deliberately lean governance model.

SHFPD has zero full-time employees. Administrative functions are handled by the Board directly. Financial reporting, budgeting, audit compliance, and transparency obligations are met through the Board's own effort, not through a layered administrative staff. Our annual operating revenue of approximately $2 million is managed with extraordinary efficiency. Board compensation is publicly posted and nominal — totaling $5,300 across all three directors in the fiscal year reported — representing one of the most cost-efficient governance models in the county.

The district's operational fire response is delivered through the RVFD Joint Powers Authority — itself already a form of functional consolidation encompassing Fairfax, San Anselmo, Ross, and Sleepy Hollow. SHFPD does not duplicate fire response infrastructure with its JPA partners; it contributes to a shared system.

SHFPD for years utilized County Counsel for legal services. Where F1 does have merit for SHFPD is in areas like legal counsel, insurance procurement, and certain IT functions, where some pooling of resources at the county level could yield modest savings. SHFPD would be open to participating in a county-wide shared services framework for these limited administrative functions, provided it does not compromise board autonomy over district-specific wildfire prevention priorities that require local,

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expert-driven decision-making. SHFPD expenses are minimal, and does not not have full-time employees. HR needs would not apply,.

Intended consequence of acting on F1: Reduced overhead, greater consistency of administrative quality across the county.

Unintended consequence: A county-administered shared services model risks homogenizing service delivery and prioritization. For a district like SHFPD, which has made proactive, locally tailored wildfire mitigation a central mission, administrative control is not bureaucratic excess, it is a feature. Standardized county templates may not accommodate the specialized WUI (Wildland Urban Interface) risk profile of communities like Sleepy Hollow.

F2. Some districts perform competently but lack sufficient scale to support long-term strategic investment in infrastructure, technology, staffing, and resilience.

SHFPD Response: Does Not Apply - SHFPD has proactively addressed scale through partnership and innovation.

SHFPD cannot speak to the financial status of other agencies. This finding, while maybe applicable to some smaller Marin districts, does not accurately describe SHFPD's situation. SHFPD has maintained and continues to maintain adequate funding and reserve levels, including a fully planned capital replacement program in a cost-effective manner. SHFPD has demonstrated that a small district with the right board leadership and strategic partnerships can make substantial long-term investments in resilience.

Specifically, SHFPD has:

- Achieved and maintained for the past decade **Firewise USA Community certification** (since 2016), one of approximately 1,400 nationally recognized communities, enabling residents to access homeowners insurance discounts and unlocking competitive grant funding for hazard reduction.
- Adopted in 2016 the **most stringent Fire and WUI Codes** in the county, as recommended by the Ross Valley Fire Chief.
- Completed a comprehensive **Wildfire Hazard and WUI Area Assessment** (2017), encompassing risk mapping, fire behavior modeling, evacuation route planning, and structural ignitability analysis.
- Deployed **30 satellite phones** throughout the community in the care of Block Captains to maintain emergency communications during power safety shutoffs (PG&E PSPS events) - a capability that many larger districts have not matched.
- Launched the **2026 Zone Zero Pilot Program**, providing direct assistance to residents for hazardous vegetation removal - a cutting-edge, financial assistance initiative that reflects current Cal Fire and state fire science.

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- Partnered with the **Marin County Open Space District, San Domenico School, Triple C Ranch, and Rocking H Ranch** to create shaded fuel breaks on surrounding ridge tops - a multi-agency, landscape-scale fire prevention effort that larger districts have not achieved in this community.
- Established **Chipper Days**, **Goat Grazing** programs, and a **Block Captains** network that together represent a layered, community-embedded approach to vegetation management and emergency communication.
- Acquired its own **fire truck** for district-specific operational use.
- Has been a leader in wildfire innovation due to its board make up.

These are not the outputs of a district struggling with scale. They are the outputs of a district with deep, mission-focused leadership that has leveraged partnerships strategically to extend its reach far beyond what its budget alone would suggest.

Intended consequence of acting on F2 without differentiation: Districts with genuine scale challenges benefit from consolidation support.

Unintended consequence: Treating all small districts as scale-impaired leads to consolidation pressure on districts like SHFPD that are already performing at or above the level of much larger districts. Loss of the focused, community-embedded leadership that drives SHFPD's programs could result in a net reduction in wildfire preparedness for Sleepy Hollow residents, even if total administrative units are reduced.

F3. Smaller districts are disproportionately vulnerable to staffing disruptions and catastrophic events that could rapidly impair service delivery.

SHFPD Response: Partially Agree - the framing requires context.

SHFPD cannot speak on behalf of other agencies. SHFPD acknowledges that districts with only one or two employees may face significant vulnerability to staffing disruption. This is a legitimate concern at the county level. SHFPD's current staffing model positions the district to maintain staffing levels necessary to provide fire protection and emergency medical services to Sleepy Hollow.

SHFPD's model, however, is structurally different. By operating with **zero employees** and delivering fire response services through the **RVFD JPA**, SHFPD has effectively eliminated the single-employee vulnerability that the Grand Jury is most concerned about. The district is not dependent on the continuity of any single staff member because there are no staff members. Emergency response continuity is provided by RVFD across multiple stations and jurisdictions.

Where SHFPD faces genuine vulnerability is in **board continuity** - specifically, the risk that the departure of one or two highly expert directors could substantially reduce the district's capacity to administer its advanced wildfire prevention programs, negotiate with county and regional partners, and manage

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grant-funded initiatives. This is why SHFPD is taking steps to plan for our future by initiating strategic planning, clearly defining our mission and goals. Term limit recommendation (R8) is of particular concern to us and is addressed in detail below.

Intended consequence of acting on F3: Reduced operational vulnerability across small districts with single-employee dependencies.

Unintended consequence: Mandatory term limits (R8), proposed as a response to governance stagnation, could create a new and equally serious form of institutional vulnerability - loss of irreplaceable expertise on small volunteer boards where deep knowledge is not easily replaced by general civic interest.

F4. Although consolidation is a popular idea among many elected board members, current governance structures, absence of board member term limits, and fear of loss of political influence discourage boards and administrators from initiating consolidation even when they recognize its benefits.

SHFPD Response: Partially Agree in general - does not accurately characterize SHFPD's board.

SHFPD cannot speak on behalf of other agencies. SHFPD's board members are not motivated by preservation of political influence. The compensation data speaks for itself: board members receive nominal per-meeting stipends totaling a few thousand dollars annually. There are no careers to protect, no political stepping stones at stake. The directors serve because of genuine expertise and commitment to community safety.

SHFPD has not resisted collaboration. To the contrary, the district participates in the RVFD JPA, collaborates with Fire Safe Marin, coordinates with the Marin County Open Space District, and has fostered the Sleepy Hollow Homes Association as a community fire safety partner. These are all forms of functional consolidation and collaboration in practice. SHFPD was an early champion of RVFD JPA and first to support the idea of consolidation of RVFD and CMFD.

To the extent that SHFPD has not pursued formal legal consolidation with neighboring fire entities, that reflects a considered judgment that the current JPA structure serves the community effectively - not resistance to collaboration or fear of losing influence. No comprable or logical neighboring special district exists. The closest is Kentfield which is completely different. It runs its own FD and has very unique funding mechanism. The Grand Jury's own report acknowledges that consolidation is not appropriate in every case, and that mission-focused JPA structures can represent sound governance.

The term limit recommendation requires direct engagement:

The Case Against Blanket Term Limits for SHFPD:

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The Grand Jury recommends two consecutive four-year terms as a maximum for all board members. While the rationale for this recommendation is understandable in the context of long-tenured boards that resist beneficial change, it creates a serious problem for districts like SHFPD.

Director Shortall's, Finn's and Gauna's career expertise is not the kind of knowledge that can be replicated by a motivated new resident in an eight-year term. The Firewise certification, the WUI assessment framework, the satellite phone network, the goat grazing and fuel break partnerships - these programs exist because of sustained, expert leadership applied over many years to a specific, high-risk community context.

A mandatory term limit would:

- Force the exit of directors whose expertise is genuinely irreplaceable at the board level in a community of Sleepy Hollow's size and wildfire risk profile.
- Create a governance gap that is unlikely to be filled by equally qualified candidates, since the pool of residents with professional fire service and prevention backgrounds willing to serve on a volunteer board is extremely small.
- Potentially transfer institutional knowledge to a successor board that lacks the relationships, credentials, and context to maintain SHFPD's current program sophistication.
- Raise the real possibility that the district's advanced programs atrophy or are discontinued after a board transition - an outcome that would directly increase wildfire risk to Sleepy Hollow residents.

A more nuanced recommendation would distinguish between term limits as a tool for boards captured by self-interest and those sustained by irreplaceable expertise and demonstrated performance. The Grand Jury itself notes that many board members are "passionate" and have "amassed an impressive amount of institutional knowledge." Mandatory term limits do not distinguish between productive institutional knowledge and change-resistant entrenchment.

SHFPD's position: We support mechanisms that promote accountability and prevent entrenchment. We do not support a blanket term limit rule that makes no allowance for demonstrated performance, community benefit, or the real scarcity of qualified candidates in small volunteer districts. A performance-based review or community ratification process at the end of each term would better serve the public interest than a blunt term limit.

F5. Service and pricing inequities currently exist across Marin and may increase if consolidation and functional collaboration do not accelerate.

SHFPD Response: Agree - and note that SHFPD's model minimizes this risk.

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SHFPD cannot speak on behalf of other agencies. However, the district, established in 1949, continues to provide a cost-effective and efficient model for delivering equitable fire protection and emergency medical services to Sleepy Hollow. SHFPD concurs that fee and service level disparities across Marin's special districts are a legitimate public equity concern, particularly in sanitation and water services. The data in the Grand Jury report showing sewer fees ranging from $729 to $2,237 annually across neighboring communities is striking.

SHFPD's situation in fire and emergency services is materially different. Because emergency response is delivered through the RVFD JPA covering multiple communities, residents of Sleepy Hollow, San Anselmo, Fairfax, and Ross receive emergency response from the same professional staff operating out of the same stations. This already represents a substantial degree of service-level harmonization for emergency response, the most critical service SHFPD oversees.

SHFPD's primary point of differentiation - and the service its residents most rely on from the district itself - is wildfire prevention and preparedness programming. These services are not priced to residents; they are funded through the district's property tax base and grants. The Firewise USA program, goat grazing, block captains, and direct assistance pilot program are available to all district residents.

SHFPD supports greater transparency and comparability across districts on pricing and service levels and would participate in the development of standardized KPIs as recommended.

F6. Performance metrics for essential, mission-specific services exist but they are not readily available and standardized, which prevents meaningful public comparison of district effectiveness and undermines accountability.

SHFPD Response: Agree - with a note on current SHFPD transparency.

SHFPD already posts financial documents, board compensation, audit reports, meeting minutes, and budget information publicly on its website and through the State of California Government Compensation Portal. This level of transparency reflects the board's commitment to public accountability.

The Grand Jury is correct that standardized, cross-district KPIs do not yet exist in a format that allows residents to meaningfully compare district effectiveness. SHFPD would support the development of such standards, particularly if they include wildfire prevention metrics (defensible space inspection rates, vegetation management acreage, community evacuation drill participation, and grant funding secured) that reflect the performance dimensions most relevant to high-risk WUI districts.

We caution that KPIs designed primarily around sanitation or water district metrics may not translate well to fire prevention districts with different cost drivers, risk profiles, and service delivery models. The

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county should work with fire district representatives to design metrics that genuinely reflect performance rather than administrative uniformity.

F7. Without proactive reform, future consolidations are more likely to occur through crisis-driven intervention, resulting in greater disruption and higher costs.

SHFPD Response: Agree in principle - and note that SHFPD has already acted proactively to reduce this risk.

SHFPD cannot speak on behalf of other agencies. The Grand Jury's warning about crisis-driven consolidation is well-founded at the county level. Districts that delay necessary collaboration until a financial or operational emergency forces action will face disruption, loss of institutional continuity, and likely worse outcomes for residents. However, as a member-agency of the four-member RVFD Joint Powers Authority, SHFPD has demonstrated efficient and effective service delivery through a shared governance model since 2010.

SHFPD's proactive stance - Firewise certification, WUI assessment, satellite communications, fuel management partnerships, evacuation planning, and direct assistance programming - represents the kind of advance investment that prevents crises. SHFPD has not waited for a catastrophic fire to begin hardening the community. This is the model of governance the Grand Jury should be encouraging across the county.

On the specific question of structural consolidation, SHFPD's continued participation in the RVFD JPA represents a stable, functional arrangement that has not exhibited the crisis characteristics identified in F7. The district is not at risk of collapse, financial insolvency, or service failure. Imposing consolidation pressure on a well-functioning district in the name of systemic reform would not reduce crisis risk, it would introduce unnecessary transition risk into a system that is currently working.

SUMMARY: PROS AND CONS OF CONSOLIDATION FOR SHFPD

Potential Benefits

- Access to county-wide shared services for legal, insurance, and IT functions could modestly reduce the administrative burden on volunteer board members.
- Greater scale in a consolidated fire district could enhance succession planning and reduce vulnerability to future board vacancies.
- Participation in standardized KPI reporting could increase public visibility of SHFPD's strong performance record.

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- A consolidated district board structure that includes Sleepy Hollow representation could preserve community voice while achieving administrative efficiency.

Significant Risks and Concerns

- **Loss of mission-focused leadership.** SHFPD's wildfire prevention programs are the product of deep, specialized expertise. Consolidation into a larger district with different risk priorities could dilute or eliminate the community-specific programs that currently distinguish Sleepy Hollow's preparedness.
- **Program continuity risk.** The Firewise certification, grant relationships, and community trust networks (Block Captains, SHHA partnership) are built on relationships and sustained engagement. A consolidation transition could interrupt these programs at a critical time.
- **Mandatory term limits as a separate but related risk.** Even absent formal consolidation, mandatory term limits on the current board would produce many of the same negative consequences described above - loss of expertise, program atrophy, and reduced wildfire preparedness - without any corresponding governance benefit, since SHFPD's board has not exhibited the entrenchment behaviors the Grand Jury is concerned about.
- **Scale mismatch.** Consolidation is most effective when it combines districts of similar mission and risk profile. Merging SHFPD into a broader administrative entity not specifically oriented to WUI fire risk could produce a district that is larger but less effective at the specific mission that matters most to Sleepy Hollow residents.
- **Community engagement loss.** SHFPD's small scale enables a level of direct community engagement - evacuation drills, personal outreach, block-level satellite phone deployment - that would be difficult to maintain in a larger, more bureaucratic structure.

RESPONSES TO GRAND JURY RECOMMENDATIONS

R1. By January 1, 2027, all special district boards should have conducted their first semi annual consolidation exploration meeting with similar districts and will have established a regular meeting schedule moving forward.

This recommendation has not been implemented and is not anticipated to be implemented in the future. RVFD is already a member-agency of a four-member Joint Powers Authority that provides fire protection and emergency medical services through a unified and efficient regional model.

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R2. By October 1, 2026, the Board of Supervisors should direct the development of comprehensive, cost-efficient shared services (such as IT, legal, finance, HR/payroll, harmonized compensation/benefits package, insurance) for special districts to optimize expenses and secure a Marin-wide acceptable quality standard. First limited-service offerings are encouraged to be made available by January 1, 2027.

This recommendation has not been implemented and is not anticipated to be implemented in the future. SHFPD does not provide policy direction to the Marin County Board of Supervisors. However, SHFPD will continue to participate in and cooperate with efforts that improve the efficiency and effectiveness of fire protection and emergency medical services.

R3. By January 31, 2027, with the assistance of the County, all districts should develop and publish on their website standardized, comparable Key Performance Indicators (KPIs) with regard to service pricing, finance, staffing, operations, and customer satisfaction.

This recommendation has not been implemented and is not anticipated to be in the future.

R4. By January 31, 2027, each district should publicly update findings and progress regarding consolidation opportunities, and share those findings with the Board of Supervisors and the public on a semi-annual basis.

This recommendation has not been implemented and is not anticipated to be in the future.

R5. By January 31, 2027, the Board of Supervisors should oversee compliance with R1–R4 and update the public on the districts' performance.

This recommendation has not been implemented and is not anticipated to be implemented. SHFPD does not provide policy direction to the Marin County Board of Supervisors.

R6. By October 1, 2026, in the process of implementing R1 and R2, districts should prioritize functional consolidation in operations, procurement, training, and administration as a precursor to formal consolidation.

This recommendation has already been implemented. SHFPD already achieves operational and cost efficiencies through its consolidated regional service delivery model.

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R7. By October 1, 2026, the district's board compensation, benefits, length of service, date of term end, and expenses related to board work should be clearly and prominently posted on each district's website and updated annually.

This recommendation has already been implemented regarding board compensation. The board members do not receive benefits; the district does not track length of service; and there are no expenses related to Board work.

R8. By June 1, 2027, special districts should adopt term limits of two consecutive four-year terms for all board members. Staggered implementation of term limits to avoid disruptions is encouraged.

This recommendation has not been implemented and will not be in the future.

R9. By June 1, 2027, board compensation structures should be reviewed across districts and considered for adjustment. All components of board compensation should be posted on their website (see best practice example in Appendix B).

This recommendation requires further analysis and board action related to compensation. This recommendation has been partially implemented and other portions of this recommendation have not been implemented and will not be in the future. SHFPD already posts information about board compensation on our website, so that portion is already complied with. SHFPD agrees with the spirit of this Grand Jury report that all discussions of board compensation will be held at open and public meetings where the public has a right to review and comment on any board compensation structure.

CLOSING STATEMENT

SHFPD respectfully submits that the Grand Jury's findings, while valuable and largely accurate at the county-wide level, should be applied with careful attention to context. Not every small district is a problem to be solved. Some are models to be studied.

SHFPD has achieved Firewise USA certification, deployed satellite communications infrastructure, established a community-embedded Block Captain network, adopted the county's most stringent WUI fire codes, secured landscape-scale fuel break partnerships, launched a 2026 direct assistance pilot program, and delivered all of this with a three-member volunteer board, zero employees, and one of the most transparent governance records in the county - all while contributing to a functional JPA for emergency response that already embodies the spirit of consolidation the Grand Jury recommends.

We ask that the Board of Supervisors, LAFCo, and the public recognize this distinction. The goal is better service at lower cost. SHFPD is achieving that goal. The question the county should be asking is not how

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to consolidate SHFPD away, but how to replicate what SHFPD has built across the districts that have not yet achieved it.

We stand ready to participate in county-wide shared services discussions, KPI development, and collaborative planning - and we look forward to continued partnership with our JPA colleagues at RVFD, with Fire Safe Marin, and with Marin County in service of a safer, better-prepared community.

Respectfully submitted,

Richard C. Shortall, President **Thomas J. Finn**, Secretary, **Jennifer M. Gauna,** Director **Board of Directors, Sleepy Hollow Fire Protection District,** *September 11, 2026*

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