



**SMFR**  
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August 14, 2025

Presiding Judge  
San Diego County Superior Court  
Attn: Grand Jury Clerk  
P.O. Box 939062  
San Diego, CA 92193-9062

Subject: Response to 2024/2025 San Diego County Civil Grand Jury Final Report  
"Fire Country: Forging a United Defense in the Back Country" (Filed May 15, 2025 –  
Recommendations R1–R3)

Dear Presiding Judge,  
On behalf of the San Miguel Consolidated Fire Protection District (SMCFPD), please find enclosed our formal response to the San Diego County Civil Grand Jury's Final Report titled "Fire Country: Forging a United Defense in the Back Country" (Filed May 15, 2025 – Recommendations R1–R3).

Our District appreciates the Grand Jury's dedication to evaluating wildfire resilience and regional service delivery. We value the opportunity to provide a comprehensive reply that addresses each of the Grand Jury's findings and recommendations. As detailed in the attached document, SMCFPD respectfully disagrees with certain conclusions, particularly regarding accelerated consolidation under the San Diego County Fire Protection District, and offers alternative approaches that preserve local control while enhancing regional cooperation.

We thank the Grand Jury for its service to our community and for the opportunity to contribute to the ongoing discussion on wildfire preparedness and public safety. Should the Court or the Grand Jury require additional clarification or supporting materials, please feel free to contact my office directly at (619) 670-0500 or via email at [alawler@sanmiguelfire.org](mailto:alawler@sanmiguelfire.org).

Sincerely,

Andy Lawler  
Fire Chief  
San Miguel Consolidated Fire Protection District

Enclosure:  
SMCFPD Grand Jury Response – "Fire Country: Forging a United Defense in the Back Country"



## **Affected Agency Response to 2024/2025 San Diego Grand Jury Final Report**

"Fire Country: Forging a United Defense in the Back Country"  
(Filed May 15, 2025 – Recommendations R1–R3)

Submitted by: Andy Lawler, Fire Chief – San Miguel Consolidated Fire Protection District (SMCFPD)

Date: August 13, 2025

### **Executive Summary**

The San Miguel Consolidated Fire Protection District (SMCFPD) recognizes and applauds the Grand Jury's intent to improve wildfire resilience and the provision of services. However, we respectfully disagree with several of its conclusions and recommendations, particularly those advocating for accelerated consolidation under the San Diego County Fire Protection District (SDCFPD). This response outlines our concerns and offers alternative strategies that preserve local control while enhancing regional coordination, efficiency, and community safety.

### **Formal Response to Grand Jury Recommendations**

**R1: Explore consolidation of additional willing FPDs to improve overall efficiency and community safety.**

#### ***Response: Disagree with Findings***

**1. Local Governance is Constitutionally and Statutorily Protected:**

California law authorizes Fire Protection Districts (FPDs) based on the Legislature's recognition that local control of fire protection services, rescue services, emergency medical services, hazardous material emergency response services, and ambulance services is critical to the public peace, health, and safety of the people of California. Local control over the types, levels, and availability of these services is a long-standing tradition in California. FPD officials have broad statutory authority to provide effective and efficient emergency services within the communities they serve, commensurate with those communities' diverse needs, resources, and geography. Forced or incentivized consolidation may conflict with the principles of local self-determination enshrined in the state's constitution and statutes.

**2. Local Autonomy Enhances Responsiveness:**

FPDs are deeply embedded in their communities. Their governance structures—involving elected local boards—ensure that fire prevention and emergency services are tailored to the unique geographic, ecological, and cultural needs of their jurisdictions. These structures also ensure political accountability for elected officials' policy decisions regarding the level, quality, and funding of these services. Consolidation risks diluting this responsiveness and accountability.

**3. Consolidation is Not a One-Size-Fits-All Solution:**

While some FPDs have voluntarily joined SDCFPD, other FPDs, like SMCFPD, have demonstrated operational excellence and fiscal responsibility independently, as recognized by our 2025 national award granted by the Government Finance Officers Association. The Grand Jury's facts and findings address improvements to SDCFPD's services and finances only; it does not examine all the FPDs' services and finances or



compare the SDCFPD's and the Independent FPDs' performance on those fronts. The recommendation to "accelerate consolidation" therefore overlooks the success of these FPDs and the potential disruption to services in the communities they serve.

**4. Standardization Must Respect Local Conditions:**

Uniform fire codes may simplify administration of fire protection services but can be counterproductive in diverse environments. For example, defensible space requirements in mountainous zones differ significantly from those in coastal or desert regions. The Grand Jury's report notes that the County's Consolidated Fire Code has "unique provisions" for each FPD and finds that defensible space and burn permit codes contribute to fire prevention efforts across unincorporated San Diego County. This finding fails to recognize that these "unique provisions" often establish more stringent fire protection requirements within the corresponding FPD, such as SMCFPD, than otherwise provided for in the Code. These provisions are tailored to the needs and risks of those communities. Many represent considered decisions by elected and professional officials, who are best positioned to adapt uniform fire code requirements to account for local needs, risks, and resources. Wholesale adoption of uniform defensible space and burn requirements—without accounting for local conditions—would likely increase, rather than decrease, fire hazards and risks in San Diego County's communities.

**5. Insurance Access Requires Broader Policy Reform:**

The report's suggestion that fire-readiness certifications will improve insurance access is overly optimistic. The insurance crisis in wildfire-prone areas is driven by state-level risk modeling and market dynamics beyond the control of local Districts.

**6. Coordination Already Exists and Can Be Strengthened:**

Mutual aid agreements, joint training exercises, and shared dispatch systems already foster regional coordination. Rather than dissolving local Districts, we advocate for enhanced interagency collaboration through Memorandums of Understanding (MOUs) and regional task forces.

**7. FPDs Provide More Than Just Fire Protection Services:**

SMCFPD responds to approximately 15,000 calls for service annually and provides rescue, EMS, and hazardous material response. Additionally, SMCFPD enforces weed abatement through a dedicated contractor—a service SDCFPD lacks in key areas.

*For example: SMCFPD employs a weed abatement contractor who ensures hazardous vegetation is cleared promptly, guided by ordinances established by our jurisdiction. In contrast, SDCFPD has no such enforcement process or program in place, nor the staff or resources to enforce roadside vegetation clearance in backcountry or Wildland-Urban Interface (WUI) areas.*

**R2: Lead an effort with current FPDs to standardize defensible space requirements and controlled burn permitting across the unincorporated areas.**

**Response: Disagree with Findings**

**1. Defensible Space Standards Already Exist:**

SMCFPD recognizes the importance of consistent fire prevention standards; however, any standardization must account for the significant diversity of environmental, geographic, and community conditions across San Diego County. FPDs currently operate under the Consolidated Fire Code, which already incorporates "unique

provisions” tailored to local risks and needs—often exceeding county-wide baselines. Eliminating these local provisions in favor of a uniform standard could undermine their effectiveness in certain areas and may unintentionally increase fire hazards. Rather than imposing a universal approach, SMCFPD recommends a collaborative process to identify, share, and adopt best practices regionally where appropriate, while maintaining the flexibility needed to address unique local conditions.

**R3: Increase cooperation with FPDs (and their respective fire safety councils) to maximize opportunities for homeowners and communities to meet wildfire hardening standards, receive home inspections, and enhance access to fire insurance.**

**Response: *Disagree with Findings***

**1. SMCFPD is Embedded with its Community Partners:**

SMCFPD strongly supports initiatives to increase community wildfire resilience, including home hardening, defensible space inspections, and public education. We already partner with local fire safe councils, community organizations, and nonprofits to conduct inspections, implement fuel reduction projects, and distribute educational resources. These initiatives are funded through a mix of local budgets, state and federal grants, and cooperative agreements. The most effective approach is locally driven initiatives supported by regional coordination. By enhancing resource sharing, expanding public outreach, and improving access to grant funding, SMCFPD can increase participation rates, broaden public awareness, and improve homeowners’ ability to secure affordable fire insurance—without mandated consolidation.

**Conclusion**

The Grand Jury’s report raises important concerns about wildfire preparedness, but its call for accelerated consolidation under the San Diego County Fire Protection District overlooks the proven value of local governance and the broad range of emergency services provided by independent fire agencies. SMCFPD operates with legal authority, strong community trust, and an established record of operational effectiveness. While regional coordination is essential, this can and does occur through mutual aid, shared training, and formal agreements—without sacrificing local control. A one-size-fits-all approach risks eroding tailored fire prevention efforts and community engagement while creating potential disruptions to other emergency services currently provided by Fire Protection Districts. SMCFPD emphasizes collaboration over consolidation and proven local leadership over structural mandates.