Fort Myers Beach
FIRE DISTRICT

Iona-McGregor
FIRE DISTRICT

Feasibility Study
FIRE DISTRICT MERGER

December 2025

J. Angle GROUP, LLC

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Our sincere appreciation is extended to each of you…

Fort Myers Beach Fire District

Scott Wirth
Fire Chief

Jane Thompson
Finance Director

Chris Armiger
Assistant Chief–Operations

Randy Kraus
Assistant Chief–Administration

Jennifer Campbell
Fire Official

Iona-McGregor Fire District

Seth Comer
Fire Chief

Joel Guzman
Deputy Chief–Administration

Khalid Aquil
Deputy Chief–Operations

Mark Winzenread
Chief Finance Officer

Jackielou Mozes
Fire Marshal

Diana Hernden
Division Chief–EMS & Health/Safety

John Wisdom
Division Chief–Training

Brian Crisman
Division Chief–Logistics

Linnea Nodarse
Executive Assistant

Yohana Rothenberg
Human Resources Manager

…and to each of the firefighters, officers, EMS providers, support staff, and elected and appointed officials that daily serve the citizens and visitors of each fire district and Lee County.

Executive Summary

As described in the Request for Qualifications, the purpose of the study is to determine whether a merger of the two districts would be operationally and financially beneficial to the taxpayers of both the Fort Myers Beach and the Iona-McGregor Fire Control Districts. The districts wanted to assess the feasibility of consolidating the two agencies into one new independent special fire district. It is within this framework that this study was conducted.

From an operational perspective, the J. Angle Group, LLC, (JAG) found no compelling reasons to merge the two districts into a single new independent fire district. Based on JAG team findings, some recommendations were made to increase collaboration between the two districts; however, JAG did not find that a merger would provide any significant operational benefits. When considering the industry-standard travel time for first-arriving units of four (4) minutes, the critical response force needed for various emergencies, and a 1.5-mile travel distance, the current fire station locations and staffing levels are appropriate. Units and staffing would not change in a merged organization.

Two operational concerns mentioned in feedback across both internal and external surveys were the loss of the CFAI fire accreditation that IMFD currently holds and the potential loss of EMS transport by FMBFD.

From a financial perspective, there were again no compelling reasons to recommend a merger. JAG projected—with various assumptions—revenue and expenses for a notional merged organization using existing personnel and service delivery levels. It was found that the merged district would experience additional costs and therefore not be beneficial. Further, although FMBFD taxpayers would experience similar millage rates to those forecast in the status quo model, IMFD taxpayers would likely see increases in millage of up to 0.5 mills over the next five years, compared to the status quo model.

The internal and external feedback results in this document also provide valuable insights into the perspectives shared by the respondents. Again, the feedback does not point to a compelling desire to merge the districts.

Like many fire service organizations, FMBFD and IMFD continually improve and evolve their operations. This report provides a snapshot of FMBFD and IMFD as of the time the information was gathered—late 2024 and early 2025. It was not possible to capture all changes that may have been made during the report's development.

Overview of the Fire Districts

Fort Myers Beach Fire Control District

Established in 1949, FMBFD serves a population of approximately 7,573 within a five-square-mile area. The district is governed by an elected five-member Board of Fire Commissioners and has adopted a 2.80-mill ad valorem levy for FY25 on properties located in the district. FMBFD is an all-hazards fire district providing traditional fire suppression, medical first response (MFR), and ground emergency medical transport (GEMT) (ambulance) service at the advanced life support (ALS) level.

FMBFD operates three fire stations (one of which is being rebuilt following damage sustained during Hurricane Ian in 2022) and six frontline response apparatus, including cross-staffed units, with EMS resources deployed from all district fire stations. FMBFD employs 15 administrative and support staff and about 48 operational staff. FMBFD currently has an Insurance Services Office (ISO©) Public Protection Classification (PPC) of Class 2.

Iona-McGregor Fire Protection & Rescue Services District

Established in 1975, IMFD serves a population of approximately 63,332 within a 39-square-mile area. The district is also governed by an elected five-member Board of Fire Commissioners and has adopted a levy ad valorem tax of 2.50 mills on properties located in the district for FY25. IMFD is also an all-hazards fire district providing traditional fire protection, wildland firefighting, and ALS-level medical first response. Unlike FMBFD, IMFD does not provide GEMT service—patient transport is handled by the Lee County Division of Emergency Medical Services (LCEMS).

IMFD operates five fire stations (two of which are currently under repair due to storm damage suffered during Hurricane Ian in 2022, with an expected completion date in mid-2025) and nine (9) frontline response apparatus, including cross-staffed units, with EMS resources deployed from all district fire stations.

IMFD employs 17 administrative and support staff and 81 operational staff. IMFD currently has an Insurance Services Office (ISO) rating Public Protection Classification (PPC) of Class 2 and is accredited by the Commission on Fire Accreditation International (CFAI).

Key Findings

- **Demographics and Community Impact:** In total, FMBFD and IMFD serve a population of over 70,000. Both districts serve predominantly older populations, with a significant share aged 65 and older in Lee County, Florida. Hurricane Ian in 2022 had a significant impact on the population and infrastructure of both FMBFD and IMFD.
- **Organizational Structure:** Both districts have well-defined governance structures and operational frameworks. FMBFD and IMFD have similar organizational hierarchies, with Fire Chiefs overseeing various divisions and departments. Together, the districts employ 32 administrative and support staff and 129 operational staff.
- **Service Delivery and Performance:** Both districts provide comprehensive fire suppression, emergency medical services (EMS), and specialized rescue operations through participation with Urban Search & Rescue (USAR) Task Force 6. Together, the districts deploy 15 frontline apparatus, staffed by 36 personnel from eight fire stations, meeting the minimum operational staffing requirement. FMBFD and IMFD have robust aid agreements with neighboring districts and departments to enhance service delivery.
- **Financial Overview:** The primary revenue source for both districts is ad valorem taxes. FMBFD and IMFD have experienced steady revenue growth over the past five years, with significant capital investments in infrastructure and equipment. FMBFD's overall revenue has increased by 35% from FY19 through FY23, with an average annual increase of 7.9%. During this same period, IMFD's revenue has increased approximately 6.3% annually. As of FY24, both districts continued to experience the negative financial impacts of Hurricane Ian.
- **Critical Issues and Challenges:** Key challenges include maintaining revenue consistency, enhancing professional development, addressing staffing shortages, and managing the impact of natural disasters. Specifically, FMBFD is challenged with constructing facilities, including rebuilding a fire station destroyed by Hurricane Ian, and maintaining its GEMT program. IMFD has a strong desire to maintain its positive culture and labor-management relationship while remaining an accredited agency.

General Partnering Options

Based on the comprehensive analysis of FMBFD and IMFD, JAG was able to evaluate the potential opportunities for shared service delivery between the two fire districts in the region. This can range from a simple, fundamental sharing of resources and programs to a legal merger of two agencies into a single organization, which may take multiple forms.

The following options have been identified as potentially feasible, each with its advantages and disadvantages, which are explained in detail in the "General Partnering Strategies & Merger Options" section of this report.

- **Maintain Status Quo (Autonomy):** Both districts continue to operate independently, focusing on internal improvements and collaboration through interlocal agreements.
- **Interlocal Agreements to Collaborate:** Enhance collaboration between FMBFD and IMFD by formalizing interlocal agreements, sharing resources, and jointly developing training programs.
- **Legal Merger:** Assess the feasibility of a legal merger between FMBFD and IMFD to establish a unified fire district with a single millage rate. This option would require careful planning, stakeholder engagement, and legislative approval.

General Recommendations

JAG has provided the following recommendations based on several specific findings. Each finding is explained in detail in the "General Recommendations" section of this report.

Management Components

- **Recommendation A-1:** FMBFD and IMFD should prepare for and update their current Strategic Plans.
- **Recommendation A-2:** FMBFD should conduct regularly scheduled staff meetings with the administrative staff.
- **Recommendation A-3:** FMBFD should provide monthly operational reports.
- **Recommendation A-4:** FMBFD and IMFD should consider developing and adopting Long-Range Master Plans.
- **Recommendation A-5:** FMBFD should develop and adopt a Succession Plan.

Health, Wellness, & Safety

- **Recommendation B-1:** IMFD should develop a Risk Management Plan.
- **Recommendation B-2:** IMFD should install apparatus-mounted filtration systems on diesel apparatus.
- **Recommendation B-3:** FMBFD should consider implementing a Chaplain Program.
- **Recommendation B-4:** FMBFD should ensure that safety committee meetings are regularly scheduled.

Service Delivery & Performance (Data Analysis)

- **Recommendation C-1:** FMBFD and IMFD should continue preparing for the implementation of the National Emergency Response Information System (NERIS).
- **Recommendation C-2:** FMBFD and IMFD should consider developing a Data Outlier Management Policy to help ensure the accuracy of incident records.
- **Recommendation C-3:** As part of implementing NERIS, FMBFD and IMFD should adopt a system and written policy for incident data review and quality improvement.
- **Recommendation C-4:** IMFD should review the use of NFIRS Incident Type Code 611, dispatched and canceled en route code (and/or the NERIS equivalent).

Life Safety Programs

- **Recommendation D-1:** FMBFD and IMFD should consider closer collaboration between the two districts regarding community risk reduction.
- **Recommendation D-2:** IMFD should consider reinstating plan reviews from Lee County within the district.

Collaboration Considerations

As mentioned, a variety of cooperation options can be pursued between the two fire districts, each with its own financial implications. Quantifying those is difficult, if not impossible, given the unknowns surrounding their structures. Based on this, JAG has made several recommendations regarding interlocal agreements for collaboration. Each is explained in detail in the "Collaboration Considerations" section of this report.

- **Recommendation E-1:** FMBFD and IMFD should study the possibility of a joint training center.
- **Recommendation E-2:** FMBFD and IMFD should explore merging administrative support functions.
- **Recommendation E-3:** FMBFD and IMFD should study the possibility of shared support functions.
- **Recommendation E-4:** FMBFD and IMFD should review agreements with third-party vendors to identify opportunities for consolidation.

Financial Impact of the Recommendations

Finally, JAG utilized all historical data and analysis to evaluate the financial implications of maintaining the status quo versus pursuing a complete merger between FMBFD and IMFD. The analysis focuses on two end-member models: the status quo (two separate districts) and a complete merger (one district) with a common millage rate. Each option is explained in detail in the "Financial Impact of the Recommendations" section of this report.

Status Quo Model: Fort Myers Beach Fire District

- **Revenue Assumptions:** The primary funding source is ad valorem revenue. The forecast model accounts for Hurricane Ian's impact and projects future trends based on historical data. The total taxable value is expected to increase significantly due to the replacement of older properties with higher-value multi-family occupancies.
- **Expense Assumptions:** Personnel services are a significant recurring expenditure, with an assumed annual increase of 3.5%. Operating expenses are projected to increase at an annual rate of 6.2%. Debt service continues through FY27.
- **Fund Balance Assumptions:** The model allocates the total fund balance based on the timing of capital expenditures and district policy. The forecast indicates a decline in the fund balance below the target in FY27, with recovery by FY30.

Status Quo Model: Iona-McGregor Fire District

- **Revenue Assumptions:** Like FMBFD, the primary funding source is ad valorem revenue. The forecast model projects an increase in total taxable value, with adjustments based on state estimates and historical trends.
- **Expense Assumptions:** Personnel services are projected to increase by 3.5% annually. Operating expenses are expected to rise at an annual rate of 7.5%. The forecast includes Capital Improvement Plan expenditures.
- **Fund Balance Assumptions:** The model shows a decline in the fund balance below the district's reserve goal in FY27–28, with recovery expected by FY29.

Consolidated Single District Model

- **Revenue Assumptions:** Combines the taxable values and other revenues of both districts. The forecast model excludes ambulance revenue, assuming Lee County would not grant a Certificate of Public Convenience and Necessity for ambulance service to the successor district.
- **Expense Assumptions:** Personnel costs are based on the higher average pay and benefits for each position, reflecting the prevailing market rates. Operating expenses are initially higher due to merger-related costs but are expected to decrease in subsequent years.
- **Fund Balance Assumptions:** The combined model assumes the total fund balances of both districts are carried forward. The forecast indicates that the total fund balance will approach the target by FY30.

Tax Impact & Projections of a Legal Merger

- **FMBFD:** It is projected that FMBFD would see a slight reduction in the tax rate in the first, fourth, and fifth years of a complete merger.
- **IMFD:** The tax rate is projected to increase annually throughout the forecast period compared to the current status quo.

Section I:
EVALUATION OF THE FIRE DISTRICTS

Organizational Description of the Fire Districts

The following provides an overview of the communities served and a general description of the components and programs provided by the Fort Myers Beach Fire Control District (FMBFD) and the Iona-McGregor Fire Protection and Rescue Service District (IMFD).

Overview of the Communities Served

Both fire districts are within Lee County, Florida. As of the 2020 Decennial Census, the county's population was 760,822.[1] The incorporated communities in Lee County include the Cities of Bonita Springs, Cape Coral, and Fort Myers; the Town of Fort Myers Beach; and the Village of Estero.[2]

Fort Myers Beach Fire District Demographics

The population of the fire district was approximately 2,500 persons when originally incorporated.[3] The service area encompasses nearly five square miles. Within the district is the incorporated Town of Fort Myers Beach located on Estero Island, which was established in 1995.

Population Statistics

FMBFD had an estimated 2024 urban population of 7,573 persons, with a population density of just over 1,528 per square mile.[4] However, FMBFD reported to JAG that the population decreased to approximately 5,500 after Hurricane Ian in September 2022. Approximately 63% of the population is aged 65 years and older, with 25% being individuals with a disability.[5] Approximately 95% of the population is White, while the remaining 5% are of other racial backgrounds.

Economics & Housing Statistics

About 13% of the district's population is considered below the poverty level.[6] As of 2024, the median household income was $73,056. Unemployment in 2024 was estimated at approximately 2.2%.[7]

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[1] American Community Survey (2018–2022), U.S. Census Bureau.
[2] Lee County website (www.leegov.com/resources/maps).
[3] Fort Myers Beach Fire Control District website (www.fmbfirefl.gov/about-us).
[4] American Community Survey (2018–2022), U.S. Census Bureau and Esri Data Axle (2024).
[5] Ibid.
[6] American Community Survey (2018–2022), U.S. Census Bureau.
[7] American Community Survey (2018–2022), U.S. Census Bureau and Esri Data Axle (2024).

As of 2022, there were an estimated 11,037 total housing units in FMBFD, with a median home value of $466,312.[8] About 15% of the total housing units are renter-occupied, with 15% being mobile homes.[9]

Iona-McGregor Fire District Demographics

The fire district's service area is just over 39 square miles, with about 20 miles of shoreline and canals.[10] IMFD reported that resources from its five stations respond to an area of nearly 42 square miles and 397 road miles.

Population Statistics

The estimated 2024 population of IMFD was 63,332, with a population density of 1,604 persons per square mile. About 48% of the population is aged 65 years and older, with 23% being persons with a disability.[11] White persons comprise 84% of the population, 3% Asian, 3% Black, and 3% another race.[12]

Economics & Housing Statistics

Approximately 9% of the population is considered to be living below the poverty level.[13] As of 2024, the median household income was $69,326. The unemployment rate in 2024 was estimated at 3.2%.[14]

As of 2022, there were an estimated 45,581 total housing units in IMFD, with a median home value of $275,652.[15] About 25% of the total housing units are renter-occupied, with 14% being mobile homes.[16]

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[8] American Community Survey (2018–2022), U.S. Census Bureau and Esri Data Axle (2024).
[9] Ibid.
[10] Data reported to JAG by IMFD.
[11] American Community Survey (2018–2022), U.S. Census Bureau and Esri Data Axle (2024).
[12] Ibid.
[13] American Community Survey (2018–2022), U.S. Census Bureau and Esri Data Axle (2024).
[14] American Community Survey (2018–2022), U.S. Census Bureau and Esri Data Axle (2024).
[15] Ibid.
[16] Ibid.

Figure 1 compares the demographic statistics of the two district communities.

Figure 1: Comparison of FMBFD & IMFD Demographics

District	2024 Population	Age 65 & Older	Below Poverty Level	Service Area[A]	Housing Units	Median Income[B]
FMBFD	7,573	63%	13%	5	11,037	$73,056
IMFD	63,332	48%	9%	39	45,581	$69,326
Totals:	**70,905**			**44**	**56,618**	

[A] Approximate square miles.
[B] Household income.

As shown in Figure 1, there are significant differences between the two fire districts. Most industry experts agree that a community's population composition and demographics are the most significant drivers of fire and EMS service demand. Therefore, fire district leaders need to have a clear understanding of their citizens.

Impact of Hurricane Ian

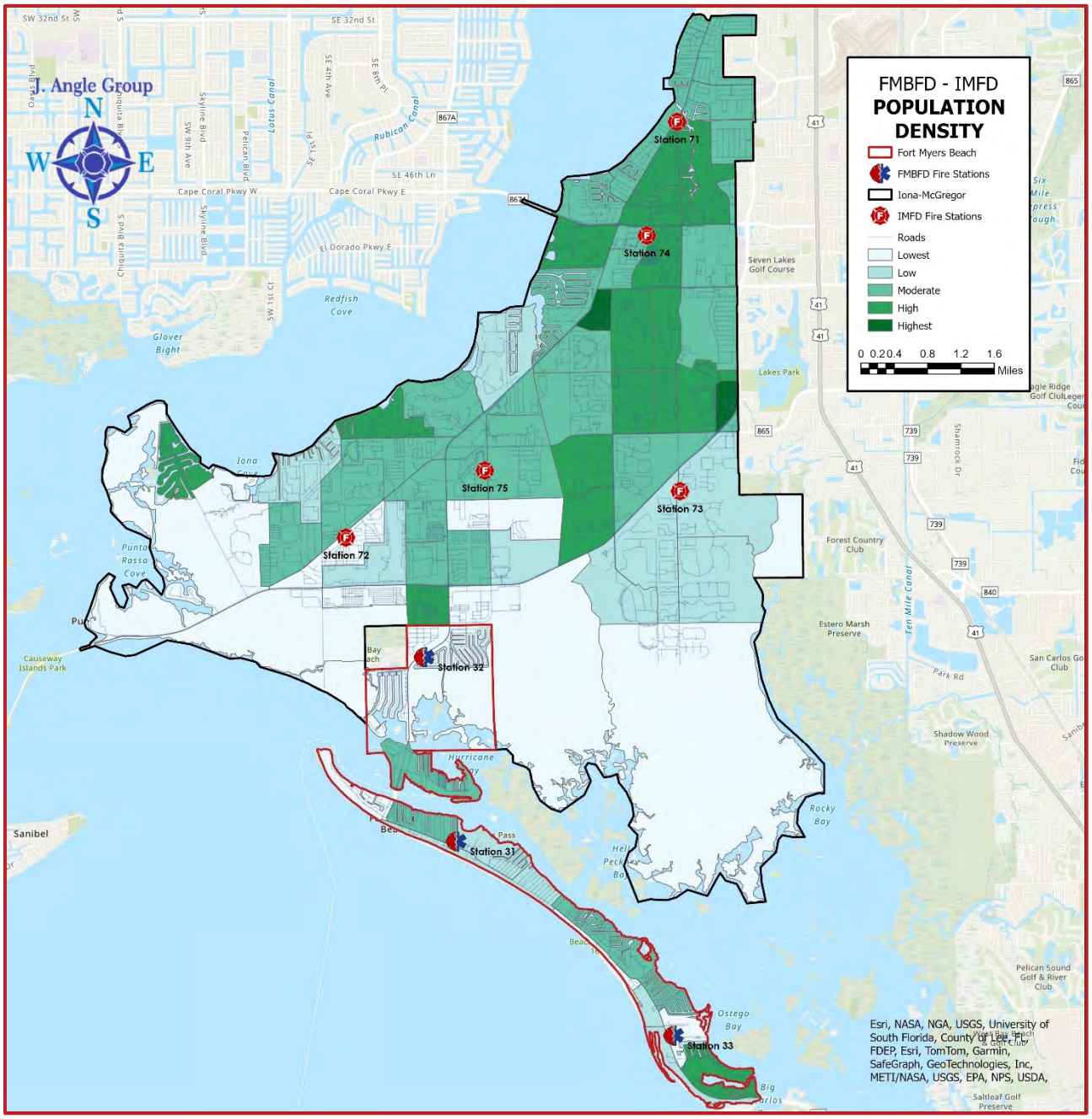
On September 28, 2022, Hurricane Ian made landfall in Lee County. It was a Category 4 (but later upgraded to a Category 5) storm with wind gusts up to 161 mph.[17] The storm produced more than $112 billion in damage—shown in Figure 2—to residential and commercial structures. This included some of the fire stations in both fire districts.

Figure 2: Impact of Hurricane Ian on Fort Myers Beach

[17] Ian Progress Report, Lee County, FL (www.ianprogress.leegov.com).

Figure 3 shows the population density of each fire district.

Figure 3: Population Densities of FMBFD & IMFD (2024)



Fort Myers Beach Fire Control District

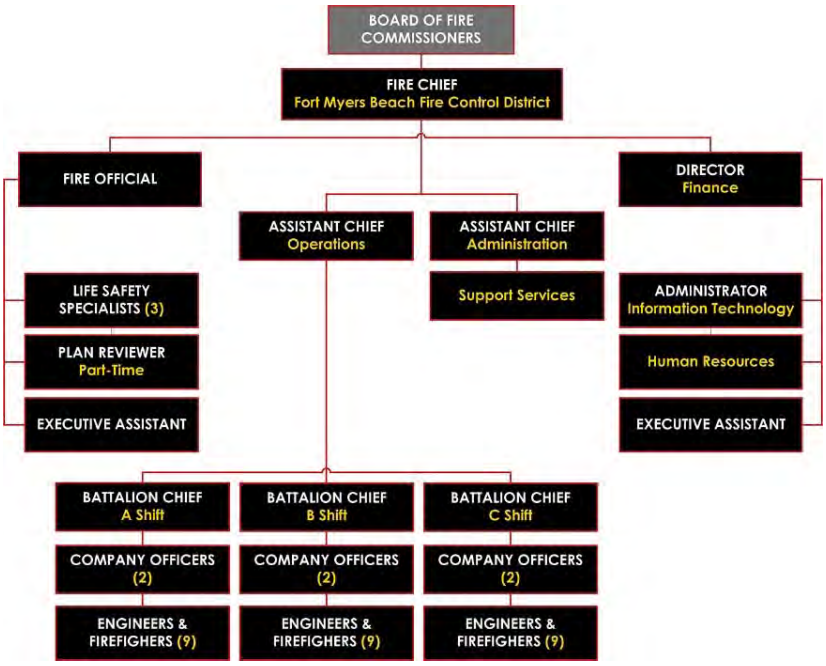
FMBFD was originally established in 1949 by the Beach Improvement Association, Inc. It was incorporated as the Fort Myers Beach Fire Control District the following year.[18] The district has since become a full-service career fire department.

Governance & Lines of Authority

The Fort Myers Beach Fire Control District is governed by an elected five-member Board of Fire Commissioners. The Board oversees the Fire Chief and meets regularly to address the budget, financial aspects, and long-term and strategic fire district goals.

Figure 4 illustrates the current organizational structure of the fire district.

Figure 4: FMBFD Organization Chart (2024)



As shown in Figure 4, the Fire Chief directly supervises the Director of Finance, a "Fire Official" who manages life safety; an Assistant Chief (AC) of Operations, and an Assistant Chief of Administration. The Operations AC supervises a shift Battalion Chief (BC) on each of the three shifts. Each shift has at least two company officers and a combination of engineers and firefighters.

[18] Fort Myers Beach Fire Control District website (www.fmbfirefl.gov/about-us).

The profile of FMBFD, as reported to the Special District Accountability Program, is summarized in Figure 5.[19]

Figure 5: FMBFD Profile (2024)

Item	Description
Status:	Independent
County:	Lee
Local Governing Authority:	Lee County
Special Purpose(s):	Fire Control & Rescue
Date Created/Established:	May 1, 1951
Creation Documents:	Chapters 2000-422 (Codified) & 2008-275, Laws of Florida
Statutory Authority:	Chapter 191, Florida Statutes
Governing Body:	Elected
Revenue Source:	Ad Valorem, Fees
Creation Method:	Special Act

Operations & Services

FMBFD is an all-hazards fire district providing traditional fire suppression, medical first response (MFR), and ground emergency medical transport (GEMT) (ambulance) service at the advanced life support (ALS) level.

Fire suppression is assisted through automatic aid agreements from adjacent fire agencies. FMBFD participates in the Region 6 Urban Search & Rescue (USAR) Team with six of its members. Hazardous materials responses are conducted at the Basic Operations level. Mutual aid is requested for these incidents when necessary.

The fire district deploys its personnel and apparatus through three staffed fire stations (one of which is being rebuilt due to storm damage). Two stations have a three-person engine company. A two-person rescue and a Battalion Chief are deployed from Station 31. A three-person ladder truck and a two-person ambulance are deployed from Station 33.

[19] www.floridajobs.org/community-planning-and-development/special-districts/special-district-accountability-program.

In March 2022, FMBFD was assigned a Public Protection Classification (PPC®) grade of Class 2 by the Insurance Services Office (ISO). Class 1 represents the highest grade and 10 the lowest. The PPC® grade primarily affects businesses' insurance rates, but, in some cases, can also significantly affect the cost of residential fire insurance.

Life Safety & Public Education

The fire district conducts fire inspections, plan review, and code enforcement. FMBFD also conducts plan reviews on behalf of four other fire agencies. The district's Fire Official is a certified arson investigator who conducts fire cause investigations. When necessary, the Lee County Arson Task Force is requested.

Since Hurricane Ian in 2022, the Fort Myers Beach Fire Control District has been limited in its ability to deliver public education and prevention programs.

Iona-McGregor Fire Protection and Rescue Service District

The district was originally established in 1945 as the Lee County Fire Control District.[20] The fire district was created following the passage of House Bill 757.

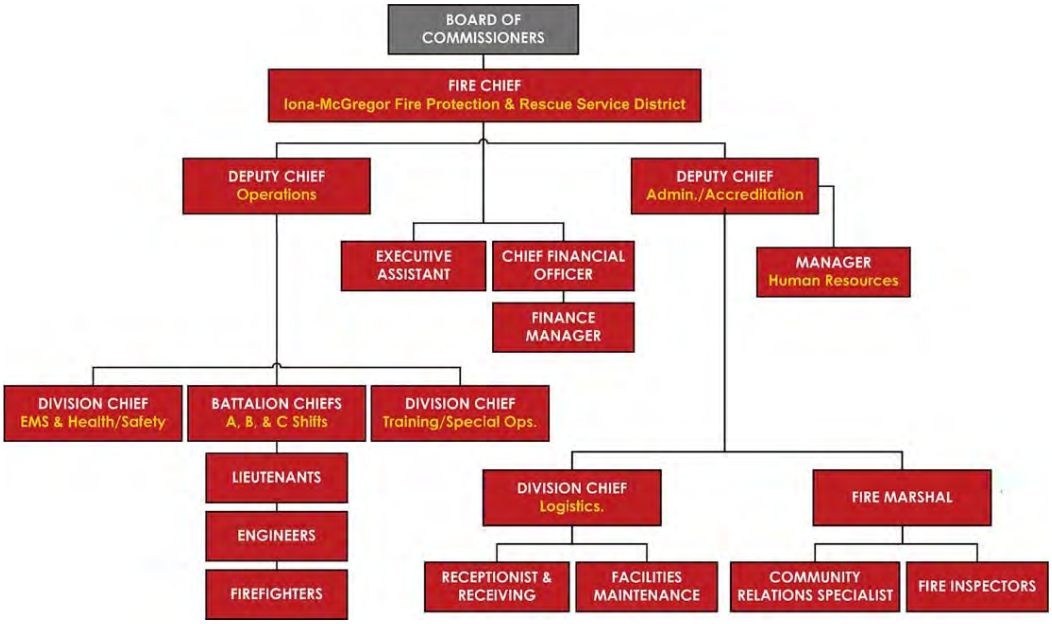
Governance & Lines of Authority

As with FMBFD, the Iona-McGregor Fire Protection and Rescue Service District is governed by an elected five-member Board of Fire Commissioners. The Board oversees the Fire Chief and meets regularly to address the budget, financial aspects, and long-term and strategic fire district goals.

[20] IMFD website (www.ionafiredistrict.com/our-history).

Figure 6 illustrates IMFD's current organizational structure.

Figure 6: IMFD Organization Chart (2024)



The organizational chart shows that the IMFD Fire Chief supervises the Deputy Chief of Operations, the Deputy Chief of Administration/Accreditation, the Chief Financial Officer, and an Executive Assistant. The DC of Administration/Accreditation oversees the Manager of Human Resources (HR), the Division Chief of Logistics, and the IMFD Fire Marshal. The Logistics Chief is responsible for Facilities Maintenance. The Fire Marshal supervises the Fire Inspectors and a Community Relations Specialist.

The Deputy Chief of Operations oversees a Division Chief of EMS & Health/Safety, a Division Chief of Training/Special Operations, and three shift Battalion Chiefs (BC) assigned to one of three shifts (A, B, or C). Shift BCs supervise the Lieutenants, engineers, and firefighters assigned to operations.

The Iona-McGregor Fire District profile, as reported to the Special District Accountability Program, is summarized in Figure 7.[21]

Figure 7: IMFD Profile (2024)

Item	Description
Status	Independent
County	Lee
Local Governing Authority	Lee County
Special Purpose(s)	Fire Control & Rescue
Date Created/Established	July 5, 1975
Creation Documents	Chapter 2000-384, Laws of Florida (Codified)
Statutory Authority	Chapter 191, Florida Statutes
Governing Body	Elected
Revenue Source	Ad Valorem
Creation Method	Special Act

Operations & Services

IMFD is also an all-hazards public safety organization providing traditional fire protection, wildland firefighting, and ALS-level medical first response. Unlike FMBFD, IMFD does not provide GEMT service.

The district provides several types of special operations services, including water rescue, technical rescue/USAR, and hazardous materials responses at the Operations level, with the assistance of mutual aid resources.

The fire district deploys its personnel and apparatus through five staffed fire stations (two of which are under repair from storm damage, with expected completion in mid-2025). Each fire station is owned by the fire district except for Station 75, which is leased from Lee County.

[21] www.floridajobs.org/community-planning-and-development/special-districts/special-district-accountability-program

In September 2018, IMFD was assigned a Public Protection Classification (PPC®) grade of Class 2 by the Insurance Services Office (ISO). On August 30, 2023, the Iona-McGregor Fire Protection and Rescue Service District was accredited by the Commission on Fire Accreditation International (CFAI).

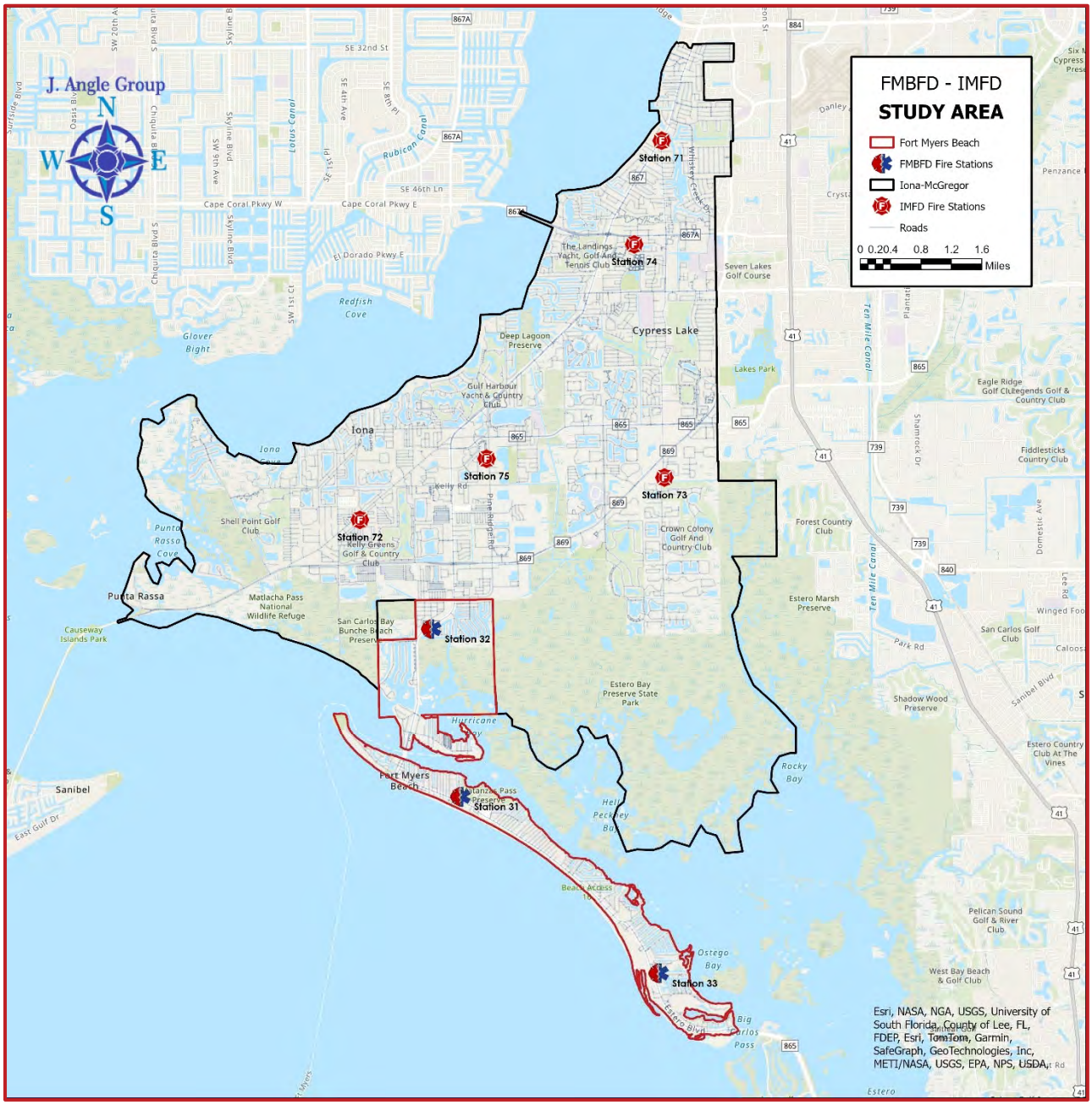
Life Safety & Public Education

The fire district conducts fire inspections and code enforcement but does not conduct plan reviews. Additionally, IMFD conducts arson and fire cause investigations. When necessary, the Lee County Arson Task Force may be requested.

The fire district offers an extensive public education program, providing a wide range of training and education to community members, schools, and other organizations. Programs range from CPR and automated external defibrillation (AED) training to kitchen fire safety classes and much more.

Figure 8 shows the service area boundaries of each of the fire districts.

Figure 8: IMFD & FMBFD Service Area Boundaries



Other Regional Public Safety Resources

Emergency Communications & 911

The Lee County Department of Public Safety operates the Emergency Dispatch Center, also known as "Lee Control." The center receives calls from local Primary Public Safety Answering Points (PSAPs) in Lee County—typically the Lee County Sheriff's Office or local police department. Lee Control provides dispatch services and communications for fire districts and EMS agencies, including FMBFD and IMFD.

Lee Control call-takers and dispatchers are certified as emergency medical dispatchers (EMD) and emergency fire dispatchers (EFD) by the International Academies of Emergency Dispatch (IAED). In 2012, Lee County Public Safety Communications received dual accreditation from the IAED Accredited Center of Excellence.

Emergency Medical Transport Services

The Lee County Division of Emergency Medical Services (LCEMS) is a "third-service" ground emergency medical transport provider based in Fort Myers. LCEMS provides patient care and transport at the ALS level.

IMFD does not provide patient transport; instead, it relies on LCEMS for this service. Lee County EMS houses and deploys medic units from IMFD Stations 72, 73, and 74. In addition, Station 75 is leased from Lee County. LCEMS considers this as its Station 27 and deploys a medic unit from that location. As mentioned, FMBFD provides ALS-level ambulance transport to its community.

LCEMS staff includes certified emergency medical technicians (EMT), paramedics, field supervisors, and administrative staff. In addition to its Office of EMS Operations, the EMS Division maintains the Office of the Medical Director.

Air Medical Transport

Through a public-private partnership, the Lee County Department of Public Safety operates "LeeFlight." The helicopter is staffed with a pilot, a flight nurse, and a certified paramedic from Lee County.

Urban Search & Rescue

In Southwest Florida and surrounding areas, Urban Search & Rescue (USAR) Task Force 6 (designated FL-TF 6) provides specialized rescue responses for trench, swiftwater, confined-space, low- and high-angle rope, and structural collapse rescues.

FL-TF 6 comprises more than 80 firefighters, paramedics, and various specialists from 12 agencies across the region. Volunteer specialists in emergency medicine, structural engineering, canine search, and other fields also serve on the task force. Both FMBFD and IMFD provide personnel to the task force.

Hospitals & Tertiary Care Facilities

The region has at least nine clinical facilities, including a children's hospital. There is only one designated trauma center in the area. Gulf Coast Hospital (GCH) is designated a Level II Trauma Center. Located in Fort Myers, GCH is also a stroke center with a cardiac catheterization lab capable of performing percutaneous coronary interventions (PCIs), also known as "heart attacks" or ST-elevation myocardial infarctions (STEMI). The hospital also provides online medical control to EMS providers.

The other full-service clinical facility is Physicians Regional Medical Center (PRMC). Although not a designated trauma center, PRMC is a stroke center with PCI capabilities. Figure 9 lists the various hospitals and clinical facilities in the region.

Figure 9: Regional Hospitals & Clinical Facilities

Clinical Facility	Trauma Level	Stroke Center	PCI & Cath.	Distance From[1]	
				FMBFD	IMFD
Cape Coral Hospital	N/A	No	No	17 mi.	8 mi.
Lee Health Coconut Point[2]	N/A	No	No	18 mi.	16 mi.
Golisano Children's Hospital	N/A	No	No	7 mi.	6 mi.
Gulf Coast Hospital	Level II	Yes	Yes	12 mi.	5 mi.
HealthPark Medical Center	N/A	No	Yes	7 mi.	6 mi.[3]
Lee Memorial Hospital	N/A	No	No	15 mi.	5 mi.
Naples Community Hospital-North	N/A	No	Yes	19 mi.	31 mi.
NCH Bonita (NCH Freestanding ER)[2]	N/A	No	No	18 mi.	16 mi.
Physicians Regional Medical Center	N/A	Yes	Yes	26 mi.	32 mi.

[1] Approximate distances in miles from each fire district.

[2] Freestanding emergency department.

[3] Distance from administrative station; ranges from 4.9–6 miles, depending on route taken.

As shown in Figure 9, high-acuity patients will likely be transported directly to Gulf Coast Hospital, approximately 5–12 miles from each fire district.

Mutual Aid Departments

Both fire districts have mutual aid and automatic aid agreements with other local fire departments. Figure 10 lists the organizations that provide mutual and/or automatic aid to both fire districts, in addition to some of the resources available from each fire department.

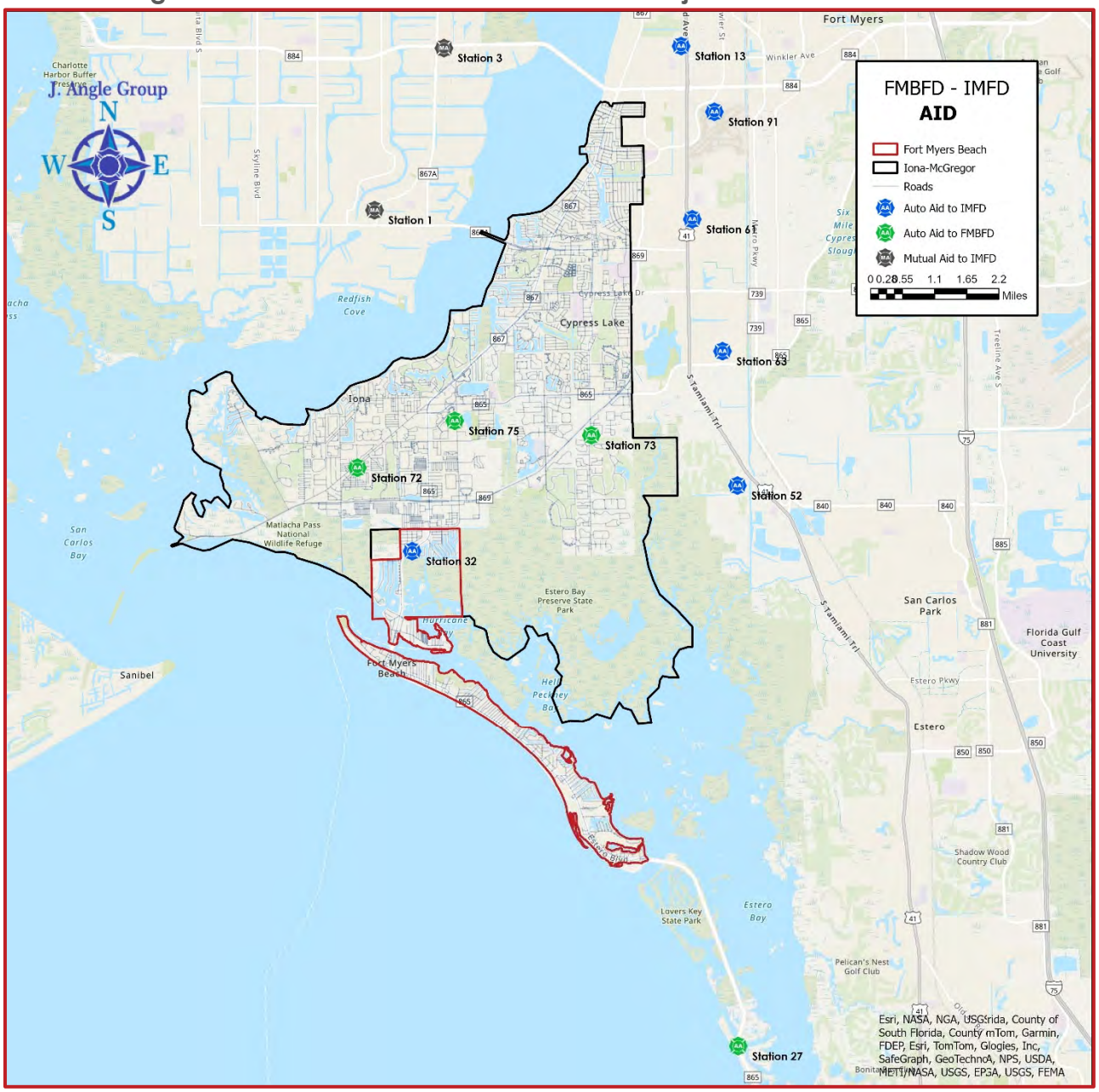
Figure 10: Automatic Aid Providers

Automatic Aid Provider	Station No.	No. of Engines	No. of Rescues	Other Units	Daily Staff
Fort Myers Beach					
Bonita Springs Fire & Rescue	#27	1	—	—	3
Iona-McGregor Fire	#72	1	1	—	5
	#73	1	1	—	5
	#75	1	—	Battalion Chief	4
Iona-McGregor					
Fort Myers Beach FD	#32	1	—	—	3
Fort Myers Fire Department	#13	1	1	—	5
San Carlos Park Fire	#52	1	—	—	3
South Trail Fire & Rescue	#61	1	1	—	5
	#63	1	1	—	5

In the Iona-McGregor Fire District, Lee County Emergency Medical Services provides ground emergency medical transport with Medic 8 deployed from IMFD Station 73 and Medic 27 from IMFD Station 75. The Fort Myers Beach Fire Control District provides transport, and Lee County EMS will provide mutual aid patient transport when indicated. Currently, Medic 15 is housed and deployed from FMBFD Station 32.

Figure 11 shows the locations of the mutual and automatic aid fire stations adjacent to the two fire agencies.

Figure 11: Mutual & Automatic Aid Stations Adjacent to IMFD & FMBFD



Independent Special Fire Control Districts

The Florida Legislature creates independent special fire control districts to provide fire suppression and related activities within the district's territorial jurisdiction. As of March 26, 2025, there were 53 active independent special fire control districts in the State of Florida.

The Independent Special Fire Control District Act (Chapter 191, Florida Statutes) provides standards, direction, and procedures to promote greater uniformity in the operation and governance of these districts, including financing authority, fiscally responsible service delivery, and the election of members to the governing boards.

The act controls more specific provisions than a special act or general law of local application, creating a fire control district's charter, which requires every fire control district to be governed by a five-member board, and provides:

- General powers;
- Special powers;
- Authority and procedures for the assessment and collection of ad valorem taxes;
- Authority and procedures for the imposition, levy, and collection of non-ad valorem assessments, charges, and fees; and
- Issuance of district bonds and evidence of debt.

Fire control districts may levy ad valorem taxes on real property within the district of no more than 3.75 mills unless a greater amount was previously authorized. A district may also levy non-ad valorem assessments. The district board may adopt a schedule of reasonable fees for services performed.

Additionally, the district board may impose an impact fee, if authorized by law, and if the local general-purpose government has not adopted an impact fee for fire services distributed to the district for construction purposes.

There are 14 sections in Chapter 191, Florida Statutes, which apply to independent fire control districts. Figure 12 is a summary of these sections.

Figure 12: Florida Chapter 191, Florida Statues, Contents

Section	Title
191.001	Short title.
191.002	Legislative intent.
191.003	Definitions.
191.004	Preemption of special acts and general acts of local application.
191.005	District Board of Fire Commissioners: membership, officers, meetings.
191.006	General powers.
191.007	Exemption from taxation.
191.008	Special powers.
191.009	Taxes, non-ad valorem assessments, impact fees, and user charges.
191.011	Procedures for the levy and collection of non-ad valorem assessments.
191.012	District issuance of bonds, bond anticipation notes, or other evidence of indebtedness.
191.013	Intergovernmental coordination.
191.014	District creation and expansion.
191.015	Codification.

Section 191.009, Florida Statutes, provides funding options for independent special fire control districts. Ad valorem taxes, non-ad valorem (NAV) assessments, impact fees, and user charges are permitted. Any or all of these funding options are available to an independent fire district and exist in addition to contractual fees for services. Each of these options is summarized as follows.

Ad Valorem Taxes

An elected board of an independent special fire control district may levy and assess ad valorem taxes on all taxable property in the district to construct, operate, and maintain district facilities and services; to pay the principal of, and interest on, general obligation bonds of the district; and to provide for any sinking or other funds established in connection with such bonds.

An ad valorem tax levied by the board for operating purposes, exclusive of debt service on bonds, may not exceed 3.75 mills unless a higher amount has been previously authorized by law, subject to a referendum as required by the State Constitution and Chapter 191, Florida Statutes.

The levy of ad valorem taxes, according to Section 191.009, Florida Statutes, must be approved by a referendum called by the board when the proposed levy of ad valorem taxes exceeds the amount authorized by a prior special act, general law of local application, or county ordinance approved by referendum.

Non-Ad Valorem Assessments

A district may levy non-ad valorem assessments as defined in Section 197.3632, Florida Statutes, as assessments not based upon millage that can become a lien against a homestead as permitted in Section 4, Article X, of the Florida State Constitution. These assessments are permitted to be used to construct, operate, and maintain those district facilities and services provided pursuant to the general powers listed in Section 191.006, Florida Statutes; the special powers listed in Section 191.008, Florida Statutes; any applicable general laws of local application; and a district's enabling legislation.

The rate of such assessments must be established by resolution of the board in accordance with the procedures outlined in Section 191.009, Florida Statutes. Non-ad valorem assessment rates set by the board may exceed the maximum rates established by a special act, county ordinance, the previous year's resolution, or referendum in an amount not to exceed the average annual growth rate in Florida personal income over the previous five years. Non-ad valorem assessment rate increases within the personal income threshold are deemed within the maximum rate authorized by law at the time of initial imposition.

Proposed non-ad valorem assessment increases that exceed the rate set the previous fiscal year or the rate previously set by special act or county ordinance, whichever is more recent, by more than the average annual growth rate in Florida personal income over the last five years, or the first-time levy of non-ad valorem assessments in a district, must be approved by a referendum of the electors of the district.

The referendum on the first-time levy of an assessment shall include a notice of the future non-ad valorem assessment rate increases permitted by this act without a referendum. Non-ad valorem assessments shall be imposed, collected, and enforced under Section 191.011, Florida Statutes.

Non-ad valorem assessments, as permitted for independent fire districts, may be used to fund emergency medical services and emergency transport services.[22] However, if a district levies a non-ad valorem assessment for emergency medical services or patient transport services, the district shall cease collecting ad valorem taxes.

It is recognized that the provision of emergency medical services and emergency transport services constitutes a benefit to real property, similar to other improvements performed by a district, such as fire suppression, fire protection, fire prevention, emergency rescue, and first-response medical aid.

User Charges

The board may provide a reasonable schedule of charges for the following services:

- Providing special emergency services that include:
  - Firefighting occurring in or to structures outside the district
  - Motor vehicles
  - Marine vessels
  - Aircraft
  - Rail cars
  - Or because of the operation of such motor vehicles or marine vessels to which the district is called upon to render such emergency service.
- Fighting fires occurring in or at refuse dumps or as a result of an illegal burn, where fire, dump, or burn is not authorized by general or special law, rule, regulation, order, or ordinance, and which the district is called upon to fight;
- Responding to, assisting, or mitigating emergencies that either threaten or could threaten the health and safety of persons, property, or the environment to which the district has been called (including a charge for responding to false alarms); and
- Imposing charges for inspecting structures, plans, and equipment to determine compliance with fire safety codes and standards.

The district shall have a lien upon any real property, motor vehicle, marine vessel, aircraft, or rail car for any charge assessed as described previously.

[22] As opposed to case law precluding their use by dependent districts.

Impact Fees

If the general purpose local government has not adopted an impact fee for fire services which is distributed to the district for construction within its jurisdictional boundaries, and the Legislature has authorized independent special fire control districts to impose impact fees by special act or general law other than this act, the board may establish a schedule of impact fees in compliance with any standards set by general law for new construction to pay for the cost of new facilities and equipment, the need for which is in whole or in part the result of new construction.

The impact fees collected by the district shall be kept separate from other district revenues and must be used exclusively to acquire, purchase, or construct new facilities or portions needed to provide fire protection and emergency services to new construction.

New facilities are defined as land, buildings, and capital equipment, including but not limited to fire and emergency vehicles, radiotelemetry equipment, and other firefighting or rescue equipment. The board shall maintain adequate records to ensure that impact fees are expended only for permissible new facilities or equipment. The board may enter into agreements with general-purpose local governments to share in the revenues from fire protection impact fees imposed by such governments.

Figure 13 summarizes the major types of revenue sources used by Florida's 53 independent fire districts as of March 26, 2025.

Figure 13: Florida Independent Fire District Revenue Sources

Type of Revenue[A]	Number[B]	Percentage
Ad Valorem	28	53%
Assessments	8	15%
Non-Ad Valorem	5	9%
Ad Valorem, Assessments	2	4%
Ad Valorem, Non-Ad Valorem	2	4%
Fees, Non-Ad Valorem	2	4%
Ad Valorem, Agreement, Fees	1	2%
Ad Valorem, Assessments, Donations, Fees	1	2%
Ad Valorem, Fees	1	2%
Ad Valorem, Grants	1	2%
Assessments, Grants	1	2%
Fees, Ad Valorem, Non-Ad Valorem	1	2%

[A] It is possible that some districts may not have reported all their revenue sources, but instead only the most prominent ones.

[B] As of March 2025.

Merging Special Districts

Following are two processes for merging independent special districts, as provided in the Florida Statutes.[23]

Merging Independent Special Districts Created by Special Act

By special act, the legislature may merge independent special districts that were created and are currently operating under the authority of the special act.

[23] www.flsenate.gov/Laws/Statutes/2021/Chapter189/PART VII

The special act merging the special districts must be approved at separate referenda of the impacted local governments by a majority of the resident electors, or for special districts in which landowners elect a majority of governing body members, most of the landowners voting in the same manner by which each independent special district's governing body is elected. The special act merging the special districts must include a plan of a merger that addresses transition issues, such as:

- Effective date
- Governance
- Administration
- Powers
- Pensions
- Assumption of all assets and liabilities

If a county or municipality passes an ordinance or resolution in support of a merger, it must pay any referendum-related expenses.

Initiating the Merger of Special Districts Created by Special Act

Two or more special districts may elect to merge into a single independent special district if each of these criteria is met:

- They are contiguous.
- They have similar functions.
- They have elected governing bodies (this does not apply to independent special districts, whose governing bodies are elected by district landowners voting on the acreage they own within the district).

Two ways exist to initiate the merger proceedings:

- Joint Merger Plan by Resolution, initiated by each special district's governing body.
- The electors of each special district initiate a qualified elector initiative.

Detailed information on the Joint Merger Plan, as outlined in the Resolution initiated by the Governing Body, can be found in Appendix B.

Fire Control Districts Merger

According to the Special District Accountability Program, the following fire control districts have merged since 2014.[24]

- East Naples Fire Control and Rescue District and Golden Gate Fire Control and Rescue District became the Greater Naples Fire Rescue District on November 4, 2014 (Chapter 2014-240, Laws of Florida).
- Big Corkscrew Island Fire Control and Rescue District and North Naples Fire Control and Rescue District became the North Collier Fire Control and Rescue District on January 1, 2015 (Chapter 2015-191, Laws of Florida).
- Myakka Fire Control District, also known as Myakka City Fire Control District and East Manatee Fire Rescue District, became the East Manatee Fire Rescue District on October 1, 2021 (Chapter 2021-257, Laws of Florida).

[24] https://floridajobs.org/community-planning-and-development/special-districts/special-district-accountability-program/official-list-of-special-districts/merged-special-districts

Introduction to the Stakeholder Input

During the initial stages of planning a merger feasibility study, it became evident that engaging both internal and external stakeholders is crucial for the following reasons:

1. **Bringing Diverse Perspectives:** Involving firefighters, administrators, community members, and local officials brings varied insights, ensuring a comprehensive understanding of the merger's potential impacts and benefits.
2. **Addressing Needs and Concerns:** Engaging stakeholders helps identify specific needs, expectations, and concerns, enabling anticipation of challenges and potential resistance.
3. **Building Trust and Support:** Transparency through stakeholder involvement fosters trust and garners community and department members' support, streamlining implementation.
4. **Facilitating Communication:** Open dialogue ensures stakeholders stay informed, resolves misunderstandings, and enables active participation throughout the process.
5. **Improving Decision-Making:** Feedback from stakeholders enables more informed decisions that align with community priorities and departmental needs.
6. **Fostering Collaboration:** Engagement encourages teamwork among departments and the community, fostering innovative solutions and a shared vision for future services.
7. **Assessing Community Impact:** Understanding community perspectives is crucial for evaluating potential effects. The first step in the feedback process was to identify the internal and external stakeholders. The groups included:
   - Internal Stakeholder Groups
     - All Members of FMBFD
     - All Members of IMFD
   - External Groups
     - Residents of the District
     - Business Owners in the District
     - The Town of Fort Myers Beach

- Lee County Emergency Management
- Lee County Emergency Communication
- Lee County Emergency Medical Services
- International Association of Firefighters Local 1826

Face-to-face meetings and online surveys were utilized to maximize participation in the process. A comprehensive summary of the results, along with further descriptions of each, can be found in Appendix A.

Management Components

Effectively managing a fire service organization is a complex and evolving challenge for fire service leaders, often impacted by financial constraints, political pressures, and increasingly demanding community expectations. Today's fire service organization must address management complexities that include an effective organizational structure, setting and measuring service levels, staying abreast of new technologies and methods, evaluating and maintaining a qualified force, staff development for effective succession planning, and financial sustainability for the future.

Foundational Management Elements

An efficient and effective organization must be based on several baseline management components. These include a clearly stated *mission* (the fundamental purpose of an organization), a *vision* for the future (where the organization is going), and the *values* or *guiding principles* (how the organization will treat its members as it navigates from its current state to its desired future). These fundamental elements enable organizations to assess their current environment and establish strategic initiatives, goals, and objectives to move forward in a progressive manner.

Baseline management components are critical to any fire service organization's successful short-term and long-term planning. These, in addition to planning processes such as Strategic and Master Plans, enable organizational improvements in areas including the creation and maintenance of policies and procedures, the enhancement of internal and external communication practices, the improvement of operational deployment, record-keeping, and sustainable financial practices. Figure 14 compares the baseline management components and planning practices of the participating districts.

Figure 14: Foundational Management Elements

District Mission & Goals	FMBFD	IMFD
Mission statement adopted	Yes	Yes
Vision established and communicated	Yes	Yes
Values established	Yes	Yes
Master Plan completed	No	No
Standards of Cover completed	Yes (2021)	Yes (2022)
Strategic Plan completed	Yes (2022)	Yes (2021)

Fort Myers Beach Fire District

Mission Statement

FMBFD has adopted the following mission statement:

To honorably serve our community by providing caring, compassionate service through devoted professionals.

Vision Statement

FMBFD has adopted the following vision statement:

To be a best-in-class organization, shaping our community through excellence in service, changing lives in all that we do.

Values

The values of FMBFD are:

Professionalism—Loyalty—Integrity

Planning Processes

FMBFD completed a Standards of Cover document in 2021 and a Strategic Plan in 2022, which the Board of Fire Commissioners has adopted. The Strategic Plan covers the timeframe of 2022 to 2025. Both documents are available on the district's website. Although FMBFD does not currently have a Master Plan, the district did complete a 10-year comprehensive planning document in 2008. The district also completed a state-mandated performance review document in 2023.

Iona-McGregor Fire District

Mission Statement

IMFD has adopted the following mission statement as a component of its strategic planning process in 2021:

We exist to exceed the expectations of our community by protecting lives and property through exemplary emergency response, community risk reduction, and public outreach.

Vision Statement

IMFD has adopted the following vision statement as a component of its strategic planning process in 2021:

Iona-McGregor Fire Protection and Rescue District members are united in the pursuit of continuous improvement in all district operations.

Meeting or exceeding the needs and expectations of those within our district is evident in our commitment to community relations and demonstration of service delivery excellence.

Focusing on our internal communications, personnel relations, training and development, the provision of appropriate physical resources, and maintenance of organizational guidance ensures a world-class workforce.

Dedication to fulfilling our mission, living our values, and accomplishing our goals will guarantee that we bring this vision to fruition.

Values

The values of IMFD are:

Pride—Compassion—Diversity—Professionalism

Planning Processes

IMFD completed a Standards of Cover document in 2022 and a Strategic Plan in 2021, which the Board of Fire Commissioners has adopted. The Standards of Cover document is updated annually by the district.

The Strategic Plan, covering the period from 2021 to 2026, is available on the district's website. Although IMFD does not currently have a Master Plan, the district did complete a state-mandated performance review document in 2023.

Internal Assessment of Critical Issues & Future Challenges

The rapidly changing environment of emergency services frequently presents a complex array of critical issues and emerging challenges for organizational leaders to address. No single leader should address these issues and challenges alone and must engage and involve their organization's numerous talented and capable members at all levels.

FMBFD and IMFD leadership were asked to identify the five critical issues facing their organizations as a component of this study. Figure 15 summarizes the issues identified by the participating districts to search for commonalities that could lead to more cohesive planning in the future.

Figure 15: Critical Issues Identified by District Leadership

Issue	FMBFD	IMFD
1	More officer vacancies than qualified candidates.	Future revenue consistency.
2	Enhancing professional development.	Maintain current positive culture and labor-management relationship.
3	Encouraging hands-on training for mid-level supervisors.	Maintenance of accredited agency status.
4	Replenishing administrative staff vacancies.	Unfunded mandates.
5	Constructing needed facilities.	Growing call volume.

Regulatory, Policy, & Guidance Documents

Regulatory, policy, and guidance documents are vital for success in all phases of a fire organization's operations and provide a critical framework for an effective and efficient organization.

These documents provide a standardized set of rules, regulations, and policies to guide appropriate behavior and accountability. This is especially important in emergency services, given the rapidly changing environment and circumstances often associated with these organizations.

Figure 16 compares the regulatory documents of the participating districts.

Figure 16: Regulatory Documents

Regulatory Documents	FMBFD	IMFD[A]
SOGs available for review	Yes	Yes
SOGs regularly updated	Yes	Yes (3 years)
SOGs used in training evolutions	Yes	Yes
District policies available for review	Yes	Yes
Internally reviewed for consistency	Yes	Yes
Internally reviewed for legal mandates	As needed	Yes
Training on policies provided	Yes	Yes

[A] Annual review of Human Resource policies.

Internal & External Communication Processes

Effective communication within an organization and with its external environment is a critical component of achieving an efficient, responsive, and effective fire service organization. In today's world, the public expects strategic, frequent, responsive, and transparent communication from a range of sources. Likewise, an organization's internal members have the same expectations. Therefore, organizations that lack effective communication can struggle to reach their full potential. Figure 17 compares the communication methods of the participating districts.

Figure 17: Communication Methods

Methods	FMBFD	IMFD
Regular staff meeting	No	Quarterly
Agency intranet	SharePoint	SharePoint/PowerDMS
Written memos	Yes	Yes
Internal newsletters	No	No
All-hands meetings	Periodically	Periodically
Community newsletter	No	No
District website	Yes	Yes
Social media accounts	Yes	Yes
Community surveys	Yes	Strategic Planning Process

Fort Myers Beach Fire District

FMBFD utilizes multiple avenues of internal communications. Staff meetings are scheduled as needed. All FMBFD personnel can access the district intranet site and department-specific email addresses. Written memos and member forums (periodic Fire Chief roundtables) are utilized, and there is an open-door policy/statement for informal conversations with personnel. The vertical communications path is clearly identified through a chain of command.

External communications are accomplished using the district's social media accounts and the FMBFD website. At the time of this report, the FMBFD Facebook account had over 55,000 followers, the X (formerly Twitter) account had over 1,400 followers, and the Instagram account had over 3,300 followers. All accounts appear to be updated frequently with valuable information and public safety messaging.

Iona-McGregor Fire District

IMFD utilizes multiple internal communication channels. Regularly scheduled staff meetings are held quarterly. Additionally, all supervisors are directed to hold weekly meetings with their subordinates to reinforce the chain of command and ensure smooth communication.

All IMFD personnel have access to district intranet sites (SharePoint and PowerDMS) and are assigned departmental email addresses. Written memos and member forums are utilized, and an open-door policy is available for informal conversations with personnel. The vertical communications path is clearly identified through a chain of command.

External communications are accomplished using the district's social media accounts and the IMFD website. At the time of this report, the IMFD Facebook account had over 4,800 followers, the X (formerly Twitter) account had over 50 followers, the Instagram account had over 1,600 followers, and the LinkedIn account had 105 followers. All accounts appear to be updated frequently with valuable information and public safety messaging.

Records Management

Comprehensive documentation of activities is of paramount concern for any fire service organization. Quality data is crucial for ensuring that informed management decisions are made to support an organization's effective and efficient operation. Additionally, proper record-keeping is essential to ensure compliance with legal, regulatory, and industry best practices.

Figure 18 compares the RMS and reporting methods of the participating districts.

Figure 18: Records Management & Reporting

Report Type	FMBFD	IMFD
Electronic reports	Yes	Yes
Software used—Fire	ESO	ESO
Software used—EMS	ESO	ESO
Financial reports	Monthly	Monthly
Management reports	Monthly	Monthly
Operational reports	Quarterly	Monthly
Annual report produced	Yes	Yes
Incident reports	Yes	Yes
Patient care reports	Yes	Yes
Exposure records	Yes	Yes
SCBA testing	Contracted	Contracted
Hose testing	Contracted	Contracted
Ladder testing	Contracted	Contracted
Pump testing	Contracted	Contracted
Breathing air testing	Contracted	Contracted
Gas monitors calibrated	Internal	Internal
Vehicle maintenance	Contracted	Contracted

Fort Myers Beach Fire District

FMBFD typically produces an annual report; however, one was not completed for the 2022–2023 period. The district plans to complete one in 2024. Once completed, the annual report is provided to all internal stakeholders and the public through the district's website. FMBFD has a convenient process for public records requests through its website.

Iona-McGregor Fire District

IMFD produces a comprehensive annual report that includes incident data and performance metrics. This report is available electronically to the public on the district's website and is also shared internally via email. IMFD has a process for public records requests on its website. Apparatus maintenance and repairs are handled by South Florida Emergency Vehicles.

Document Control & Security

Facilities and equipment are critical elements for any fire organization to meet its mission, representing a significant investment of public tax dollars that necessitates the importance of proper security. Additionally, properly securing an organization's records is crucial for compliance with legal and regulatory requirements.

Fort Myers Beach Fire District

FMBFD facilities are secured using keycard access and CCTV. Computers with incident software are available at all FMBFD stations. Internal IT staff monitor computer systems for threats. Hard-copy files are stored on-site in elevated, fireproof filing cabinets. Additionally, archived records are maintained off-site with a third-party vendor. All electronic computer files are backed up.

Iona-McGregor Fire District

IMFD facilities are secured using keycard access. Computers with incident software are available at all IMFD stations and secured through restricted access. Hard-copy files are protected in locked filing cabinets, while others are protected in the offices of document custodians. All access is restricted through secured access zones in the stations. IMFD utilizes multiple platforms for electronic file back-ups, including Microsoft Office 360, PowerDMS, NFORS, ESO, FlowMSP, and Vector Solutions.

Overall Management Elements Comparisons Summary

Figure 19 provides an overview of the management components currently in place for FMBFD and IMFD.

Figure 19: Management Components Comparisons Summary

Components	FMBFD	IMFD
Foundational Statements (Mission, Vision, Values)	Yes	Yes
Planning Processes (Master, Strategic, SOC)	Yes	Yes
Reporting Software (Fire & EMS)	ESO	ESO
Required Testing (SCBA, Hose, Ladder, Pump, Air)	Contracted	Contracted

Planning for Fire Protection & EMS

Fire and EMS organizations exist in a rapidly changing environment; FMBFD and IMFD are no different. The tools and methods used to provide services are constantly evolving, as regulations governing tasks and activities become more stringent. New construction methods and additional risks to protect can create challenges that quickly catch the unwary off guard.

An organization must continuously monitor its internal and external fire protection services environment to remain ahead of these challenges. When change occurs, the organization must also make progressive corrections to provide an appropriate level of service.

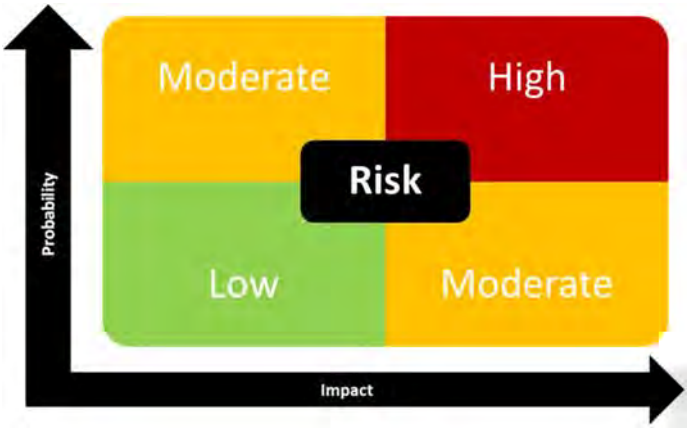
FMBFD and IMFD must focus on two fronts: efficiently utilizing available resources and effectively targeting programs or activities that meet the community's evolving needs. A fire organization can establish a vision for the future through appropriate planning, creating a framework for decision-making, and charting its course. The quality and accuracy of the planning determine the organization's success.

Preparing for the future requires both discipline and organization. Therefore, an emergency services organization should plan at four distinct levels: tactical, operational, strategic, and master (long-range) planning. Additional planning that fire organizations should consider includes succession planning and capital improvement planning.

Tactical Planning

As emergency response agencies, fire organizations must thoroughly understand their community's risks, which must be quantified and assessed. Multiple risk/consequence or risk/probability matrices are available, but regardless of the labels on the axes, the identified risk falls into one of the quadrants as shown in Figure 20.

Figure 20: Risk (Impact/Probability Matrix)



As risk is generally quantified into one of the four quadrants, a decision is made based on the level of risk. Communities cannot eliminate the risk of harm, suggesting that some risk persists within them. Likewise, there cannot be a 100% chance of risk since that would render it a certainty rather than a risk.

Every community accepts a certain level of risk, recognizing that it is improbable, impractical, and unaffordable to eliminate all risks. The matrix sets realistic targets for risk management, defining the acceptable and unacceptable risk levels. Using a matrix helps fire organization leaders determine the line between acceptable and unacceptable risk. The quadrants in Figure 20 may be defined as follows.

- **Low Impact/Low Probability:** Risks in the bottom left corner are low level, with acceptable consequences if the incident occurs. These are considered Low Risk and are often regarded as acceptable, requiring no further action.
- **Low Impact/High Probability:** Risks in the top left corner are considered Moderate Risk; if the incident occurs, the fire department can usually handle it with existing resources. However, efforts should be made to reduce the likelihood of these incidents. Risk-reduction strategies pay significant dividends in minimizing these risks.

- **High Impact/Low Probability:** Risks in the bottom right corner are significant if they occur, but they are very unlikely to happen. Risks in this quadrant are referred to as Moderate Risk and primarily require training and contingency planning. A fire department may spend time and energy preparing for such an incident and may even acquire specialized equipment and other non-staff resources to mitigate this risk. Community risk reduction strategies, including public education, community engagement, and code enforcement, effectively help reduce these risks.
- **High Impact/High Probability:** Risks in the top-right corner are critical and considered High Risk. These should be the highest priorities for the fire department and the community. Implemented systems (staffing, equipment, and community risk reduction and preparedness) should provide aggressive action to reduce and mitigate these risks.

Once the community's risks are identified and appropriately categorized, action plans are developed consistently with each category. This process involves tactical planning, which includes preparing incident strategies for potential emergencies, typically in pre-fire and emergency management planning.

Pre-Fire Planning

Pre-fire planning occurs when high-risk facilities are visited and preplanned in the event of a potential incident happening at the location. Fire personnel can become very familiar with these facilities, understanding the risks they present and the features the buildings contain. Their knowledge can be used to gain a tactical advantage, such as installing area-separation walls or incorporating built-in fire deluge systems.

These facilities are known as target hazards and are typically defined by the following:

- Buildings with potentially sizeable occupant loads.
- Buildings with populations who are partially or wholly non-ambulatory.
- Buildings of sizes larger than 12,000 square feet.
- Buildings that contain process hazards, such as hazardous materials or equipment, and require special attention and care to ensure safety.

A comprehensive pre-fire planning program should also include specific plans for addressing hazards and hazardous materials and be completed in accordance with NFPA 1620: *Standard for Pre-Incident Planning*. Pre-fire plans should be easy to use and provided to company officers and command staff as quick reference tools when responding to incidents at these identified target hazards. At a minimum, plans should include critical information, including:

- Building construction.
- Occupancy characteristics.
- Incorporated fire protection systems.
- Capabilities of public or industrial responding personnel.
- Water supply.
- Exposure factors.
- Facility layouts.

Figure 21 compares the pre-fire planning programs of the participating districts.

Figure 21: Pre-Fire Planning Program

Pre-Fire Planning	FMBFD	IMFD
Pre-Incident Planning (based on NFPA 1620)	Yes (Directive 21-0615A)	Yes (FlowMSP)
Specific Hazard Plans	Yes	Yes
Hazardous Materials Planning	No	Yes

Emergency Management Planning

Emergency planning and management are essential for fire service organizations, especially those like FMBFD and IMFD, which are responsible for protecting a geographical area prone to severe weather events such as hurricanes.

Emergency management, once a low priority in the public's mind, has risen to the conscious level of everyday life. Emergency preparedness planning enables the management of the life cycle of any potential crisis a community may face.

Although FMBFD and IMFD have a specific hurricane response plan, neither district has an internal Comprehensive Emergency Management Plan (CEMP). FMBFD and IMFD take an all-hazards approach to preparedness and coordination with the county emergency management agency[25] (Lee County). Lee County's CEMP, which was developed in 2018 and adopted by the County Commission, explains the processes, procedures, and tools put in place to prevent, prepare for, respond to, recover from, and mitigate against the hazards identified in the Hazard Identification and Risk Assessment (HIRA), but is also utilized for all hazards.

The CEMP provides for the establishment of up to ten Geographic Divisions that may be activated to manage specific response and recovery activities in a catastrophic disaster. Under these disaster conditions, some Operations Section Activities (Section 7) may be directed by the Geographic Division when it is established. A field command post or multi-agency coordination center (MACC) can be established to serve as a field EOC for the assigned Geographic Division. FMBFD is part of the South Islands Division, while IMFD is part of the Central Lee Geographic Division.

Lee County's Emergency Management Division maintains mandated programs and plans required by State of Florida statutes and federal law, such as the special needs program, the local mitigation strategy (LMS), the CEMP, and the post-disaster redevelopment plan. During Emergency Operations Center (EOC) activations, the division facilitates the multi-jurisdictional response and recovery activities. The EOC serves as the central location for multiple levels of government and agencies to coordinate decisions, resources, and public information at a strategic level.

Operational Planning

Operational planning prepares ongoing organization activities and their integration into other regional response networks. Operational planning encompasses establishing minimum staffing policies, standardized response protocols, regional incident command planning, mutual aid arrangements, automatic aid planning (both locally and regionally), and resource identification and allocation.

Within an organization, operational plans should ensure the deployment of adequate resources in the event of an emergency. FMBFD (2021) and IMFD (2024) have both developed Community Risk Assessments/Standards of Cover to accomplish this goal.

[25] leegov.com/public safety/emergencymanagment.

In December 2018, all Lee County fire departments and districts, including FMBFD and IMFD, entered into a countywide automatic aid agreement. This agreement was established to provide mutual aid in emergencies or other situations that require specialized assistance.

Additionally, a 2024 interlocal agreement was entered into by all Lee County fire departments and districts, ensuring that the closest unit responds to an emergency scene regardless of jurisdictional boundaries.

Figure 22 compares the operational planning programs of the participating districts.

Figure 22: Operational Planning Programs

Operational Planning	FMBFD	IMFD
Response Planning (run cards, fire demand zones, etc.)	Yes	Yes
Operational and Incident Command	Yes	Yes
Mutual/Automatic Aid	Yes	Yes

Strategic Planning

Strategic planning supports the organization's mission and sets and prioritizes short-term internal goals. Often completed after a Master Plan, a Strategic Plan typically involves a three- to five-year planning window. Community involvement in the process is critical, as the Strategic Plan should be customer-oriented while accomplishing the following:

- Development or review of a mission statement, which requires careful attention to the services currently provided and those that can be provided in the future.
- Development or review of the agency's vision statement moving forward.
- Establishment or review of the agency's values.
- Identification of the strengths, weaknesses, opportunities, and challenges of the agency.
- Determination of the community's service priorities.
- Understanding of the community's expectations of the agency.
- Establishment of realistic goals and objectives for the future.

- Identification of implementation tasks for each objective.
- Definition of service outcomes in the form of measurable performance objectives and targets.

Figure 23 compares the strategic planning programs of the participating districts.

Figure 23: Strategic Planning Programs

Strategic Planning	FMBFD	IMFD
Current Strategic Plan	Yes (2022–2025)	Yes (2021–2026)
Date Developed	12/2021	2021
Adopted by Elected Officials	Yes (1/26/2022)	Yes (1/26/2022)
Reviewed Periodically	Yes	Reviewed quarterly & updated annually

Long-Range Master Planning

Master or long-range planning prepares the organization for future service delivery effectiveness by projecting the service delivery environment. Long-range master planning focuses on the broader perspective and future needs of the fire rescue service. The need for more robust planning processes is communicated regularly by members of the fire service and the community members they serve.

Fire service organizations that engage in a long-range master planning process can utilize this valuable information to answer the following three questions:

- Where is the organization today? (Agency Evaluation)
- Where will the organization need to be in the future? (The Master Plan)
- How will this organization get there? (The Strategic Plan)

A comprehensive Master Plan enables the projection of future needs and provides the strategies to address them. Generally, a Master Plan is designed to provide a view of the organization in a 10–15-year time frame. Neither FMBFD nor IMFD has a current Master Plan in place.

Succession Planning

Succession planning involves identifying and developing new leaders within an organization who can replace current leaders upon their retirement or departure. This process enhances the availability of experienced, capable organizational members prepared to assume available leadership roles. Due to the high complexity and specialized skills required for their jobs, this planning component is crucial for fire service organizations as they seek to replace outgoing leaders.

Effective succession planning efforts are commonly characterized by identifying and developing internal candidates through comprehensive education and mentoring programs. These efforts are aimed at producing strong organizational "bench depth." Like a sports team, organizations with the deepest and strongest bench tend to handle adversity effectively, thus leading to long-term success.

Leaders and future leaders are found at every level of a fire service organization. In addition, anticipated leadership turnover can cause anxiety throughout organizations such as FMBFD and IMFD. Because of this, organizational leadership must communicate succession planning efforts to all members. A comprehensive succession planning program begins with the hiring process, which underscores the need for an all-encompassing approach to this critical planning component.

Figure 24 compares the succession planning programs of the participating districts.

Figure 24: Succession Planning Program

Succession Planning	FMBFD	IMFD
Succession Plan	No	Yes (EH)
Date Developed	N/A	Unsure
Adopted by Elected Officials	N/A	No
Reviewed Periodically	N/A	Yes (3 years)

Capital Improvement Planning

Capital improvement planning is a process of making capital investments to improve an organization's infrastructure. In the fire service, this could include facilities, apparatus, and equipment. Fire service organizations should maintain an updated Capital Improvement Plan to ensure long-term financial and operational success.

Capital improvement planning is critical to any organization's administrative planning processes. Figure 25 compares the capital improvement planning programs of the participating districts.

Figure 25: Capital Improvement Planning Programs

Description	FMBFD	IMFD
Capital Improvement Plan	Yes	Yes (Excel document)
Date Developed	Annually	A tool for budgeting
Adopted by Elected Officials	Yes	No
Reviewed Periodically	Annually	Continual

Overall Planning Programs Comparisons Summary

Figure 26 provides an overview of the current planning programs for FMBFD and IMFD.

Figure 26: Planning Comparisons Summary

Planning Programs	FMBFD	IMFD	Comments
Pre-Incident Planning	Yes	Yes	—
Mutual/Automatic Aid	Yes	Yes	Countywide mutual & automatic aid agreements
Strategic Plan	Yes (2022–2025)	Yes (2021–2026)	—
Master Plan	No	No	—
Succession Plan	No	Yes	Employee handbook
Capital Improvement Plan	Yes	Yes	FMBFD has a Sustainment Plan in the budget; IMFD had a spreadsheet

Staffing & Personnel

The greatest asset for any organization is its personnel. Therefore, managing an organization's human capital is essential in ensuring maximum production while employees enjoy high job satisfaction. Job satisfaction is typically a combined result of several factors, including consistent management practices, a safe working environment, recognition of positive workforce practices, inclusion, equitable treatment, and the encouragement of workforce input.

The size and structure of an organization's staff depend on the organization's specific needs and requirements. Organizational priorities should align with the community they serve. Several national organizations provide guidance and recommendations on staffing, including the Occupational Safety and Health Administration (OSHA), the National Fire Protection Association (NFPA), and the Center for Public Safety Excellence (CPSE). This section provides an overview of FMBFD and IMFD staffing configurations.

Two distinct groups of staff are common in most fire service organizations. The first is the administrative and support staff that directly serves internal customers by providing the management and support needed to deliver effective and efficient emergency services. Some support staff members provide direct specialty functions, such as public education and fire prevention, to external customers.

The second group is the operational staff, or internal customers, who provide emergency services to external customers and are typically the most recognized group among the citizens. Ensuring a balance between these two groups is crucial to delivering effective, efficient emergency services and high-quality customer service.

Administrative & Support Staffing

Providing operational staff with the means and ability to respond to and mitigate emergencies safely, effectively, and efficiently is a primary responsibility of administrative and support staff.

Additional responsibilities of this group include planning, organizing, directing, coordinating, and evaluating the various programs utilized within FMBFD and IMFD. In many cases, administrative and support staff concurrently handle a variety of responsibilities, some of which do not fall under the previously mentioned categories.

Figure 27 compares the administrative and support staffing of FMBFD and IMFD.

Figure 27: Administrative & Support Staffing

Position Title	FMBFD	IMFD
Fire Chief/Administrator	1	1
Assistant Chiefs	2	0
Deputy Chiefs	1	2
Division Chiefs	0	4
Fire Marshal	1	0
Life Safety Specialists	3	3
Plan Reviewer	.5	0
Community Relations Specialist	0	1
Director of Finance & Admin. Services	1	0
Chief Financial Officer	0	1
Finance Manager	0	1
Executive Assistant	1	1
Administrative Assistant	1	0
Receptionist/Receiving	0	1
Information Technology Technician	1	0
Human Resources Manager	0	1
Human Resources Generalist	1	0
Facilities & Logistics Coordinator	1	0
Facilities Maintenance	0	1
FTE Totals:	**14.5**	**17**

As with many fire service organizations, administrative and support staff typically serve in multiple roles with varying job responsibilities. IMFD has several examples: one of the four Division Chiefs serves as the Fire Marshal and Fire Investigator, and a uniformed Fire Inspector also serves as an additional Fire Investigator.

It is worth noting that although some titles may vary by district, there are likely to be similarities in job responsibilities across districts. For example, the Administrative Assistant at FMBFD could have similar responsibilities to those of the Receptionist/Receiving member in IMFD. Administration and support staffing represent 23% of the total FMBFD workforce and 17% of the total IMFD workforce.

Operational Staffing

As previously discussed, the operational staff is typically the face of any fire service organization due to their increased interaction with the citizens they serve. This group is involved with nearly every facet of the organization's operations.

Figure 28 compares the operational staffing of the participating districts.

Figure 28: Operational Staffing

Position Title	FMBFD	IMFD
Battalion Chiefs	3	3
Captains	3	0
Lieutenant/Paramedics	2	13
Lieutenants	4	2
Engineers/Apparatus Operators/Paramedics	6	10
Engineers/Apparatus Operators	3	5
Firefighter/Paramedics	26	29
Firefighter/EMTs	1	19
FTE Totals:	**48**	**81**

Fort Myers Beach Fire District

A three-platoon system working 24-hour rotations yields an average 56-hour workweek, accomplishing shift operations for FMBFD. The minimum operational daily staffing goal for FMBFD is 14 personnel responding from three fire stations on six front-line apparatus. It should be noted that the FMBFD numbers reflected in Figure 28 include 12 additional operational staff anticipated to be hired for the staffing of the rebuilt fire station.

Iona-McGregor Fire District

A three-platoon system working 24-hour rotations yields an average 56-hour workweek, accomplishing shift operations for IMFD. The minimum operational daily staffing goal for IMFD is 22 personnel responding from five fire stations on nine front-line apparatus.

Comparison of Regional & National Operational Staffing

The National Fire Protection Association (NFPA)[26] issues the United States Fire Department Profile. This report provides valuable regional and national statistics for comparing fire department organizations based on the populations they serve. Although other factors are considered, this information can be critical when determining the number of firefighters needed to serve a community based on current population counts.

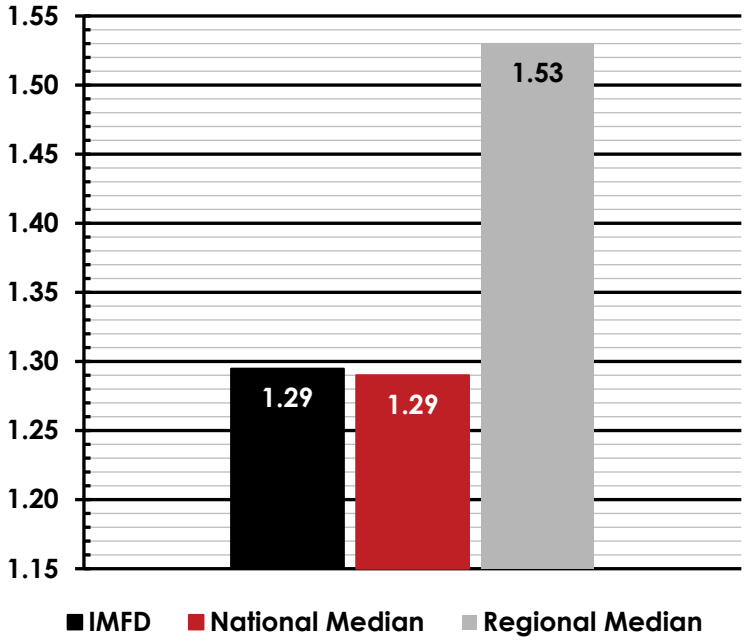
It should be noted that the profile statistics are based on 2020 figures, the most recent update available from the NFPA. Additionally, the profile does not provide staffing data for fire organizations serving communities with populations of less than 10,000; thus, comparisons for FMBFD (population of 7,573 in 2024) are not provided.

This analysis utilized a population of 63,332 from 2024, which equals the total for the entire IMFD service area. IMFD currently has 0.24 fewer FTE operational positions compared to regional organizations.

[26] www.nfpa.org//-/media/Files/News-and-Research/Fire-statistics-and-reports/Emergency-responders/osFDProfileTables.pdf.

Figure 29 shows the current comparison of the number of firefighters on staff per 1,000 population in the IMFD service region compared to national and regional medians.

Figure 29: IMFD Firefighters per 1,000 Population



Methodology for Incident Staffing

Responding with the appropriate fire district apparatus and sufficient responders is critical for all emergency incidents, but it is especially true for fire suppression operations. Staffing methodologies for fire suppression operations are typically derived from national organizations. For example, OSHA safety regulations (CFR 1910.120) require that personnel entering a building involved in a fire must do so in groups of two or more. Furthermore, before personnel can enter a building, at least two additional firefighters must be on-scene and assigned to conduct search and rescue operations in case the initial crew becomes trapped. This is referred to as the "two-in, two-out rule."

Fort Myers Beach Fire District

As previously discussed, FMBFD has a minimum daily staffing requirement of 14 personnel. Several fire suppression apparatus and EMS units are housed at the two (soon to be three) FMBFD fire stations, and cross-staffing is utilized to respond to dispatched emergencies, including technical rescue-related incidents. The actual response of FMBFD to incidents and performance will be analyzed in a separate section of the report.

Figure 30 illustrates the current staffing model for FMBFD.

Figure 30: FMBFD Current Staffing Model

Station	Apparatus	Minimum Staffing
31	Engine 31	3 personnel
	Rescue 31	2 personnel
	Battalion 31	1 personnel
32	Engine 32	3 personnel
33	Truck 33	3 personnel
	Ambulance 33	2 personnel
	Total:	**14 personnel**

Iona-McGregor Fire District

As previously discussed, IMFD has a minimum daily staffing requirement of 22 personnel. Several fire suppression apparatus and EMS units are housed at the five IMFD fire stations, and cross-staffing is utilized to respond to dispatched emergencies such as technical rescues (Squad 73) and water-related emergencies (Marine 70).

As with FMBFD, the actual IMFD response to incidents and performance will be analyzed in a separate section of the report. Although medical transport units from Lee County EMS are housed in some IMFD stations, this section does not include staffing for these units.

Figure 31 illustrates the current staffing model for IMFD.

Figure 31: IMFD Current Staffing Model

Station	Apparatus	Minimum Staffing
71	Engine 71	3 personnel
72	Engine 72	3 personnel
	Rescue 72	2 personnel
73	Squad 73	3 personnel
	Rescue 73	2 personnel
74	Truck 74	3 personnel
	Rescue 74	2 personnel
75	Engine 75	3 personnel
	Battalion 70	1 personnel
	Total:	**22 personnel**

Staffing Practices by District

The next section is a general overview of the staffing practices within FMBFD and IMFD.

Application & Recruitment Process

Human capital is a fire district's greatest asset, and hiring and retaining high-quality, capable employees is crucial for organizational success. Therefore, a comprehensive hiring process begins long before a new employee becomes a member of either agency.

Although FMBFD does not have an official recruitment program, job openings on its website include a detailed flyer defining minimum job qualifications, preferred qualifications, benefits, wages, and the application process. FMBFD utilizes the National Testing Network (NTN) for entry-level job openings.

The application process includes a minimum qualifications check, reference check, background check (financial, criminal, and polygraph), candidate physical agility test (CPAT), written test (through NTN), interview (panel interview plus Fire Chief interview), psychological assessment, and a pre-employment physical.

For recruitment purposes, IMFD utilizes Indeed and other social media sites to attract new members. The application process includes a minimum qualifications check, reference check, fingerprinting, motor vehicle records check, physical agility test (have passed the CPAT within 12 months of the start date), and an interview process that consists of two stages: an initial panel interview followed by a final interview with the Fire Chief, pre-employment physical, polygraph, and psychological evaluation.

Disciplinary Process

Accountability is vital to a fire department's mission and to ensuring effective, efficient operations. Therefore, FMBFD and IMFD have disciplinary processes, which are communicated to their members through district policies (FMBFD Policies 230-233 & IMFD Policy 6.5, available on PowerDMS).

An appeals process is also a component of the disciplinary process when disagreements are present, as defined by district policies and/or labor agreements. Neither FMBFD nor the IMFD has any pending litigation.

Testing, Measuring, & Promotion Processes

FMBFD and IMFD employ functional testing, measurement, and promotional methods that utilize internal or external resources, as well as time-tested, validated methods. For example, FMBFD personnel perform in-house skills, fitness, and performance evaluations biannually. IMFD also completes skills and fitness performance evaluations.

For IMFD, skill performance is evaluated annually through assessments of firefighter and technical rescue (TRT)skills. Fitness evaluations are conducted as part of the annual Lifescan physicals. At the time of this report, IMFD was implementing annual performance evaluations (Spring 2025). IMFD utilizes a promotional assessment center format for the Engineer, Lieutenant, and Battalion Chief positions.

Labor Agreements

FMBFD and IMFD firefighters are represented by the International Association of Firefighters (IAFF) Southwest Florida Professional Firefighters Local 1826. Collective bargaining agreements (CBAs) address wages, hours, and terms and conditions of employment.

Reports & Records

FMBFD and IMFD securely archive personnel records, including injury and accident reports, medical records, and exposure records. Additionally, personnel records, including disciplinary, medical, and administrative records, are maintained by the respective human resources administrative staff members of the fire district.

FMBFD personnel and health-based files are confidential and secured by a third-party vendor. At the time of this report, performance evaluations were being transitioned to a new software system. FMBFD utilizes Telestaff software for staffing and Sage software for Payroll.

IMFD personnel and health-based files are confidential and stored in both digital and paper formats, secured by the Human Resources Manager. At the time of this report, performance evaluations had been completed for probationary employees, and annual evaluations were being transitioned to all employees in the future. IMFD utilizes several software systems for records, including SharePoint, Essential Personnel (evaluations), and Employee Navigator.

Overall Staffing & Personnel Comparisons Summary

Figure 32 provides an overall summary comparing staffing and personnel practices.

Figure 32: Staffing & Personnel Comparisons Summary

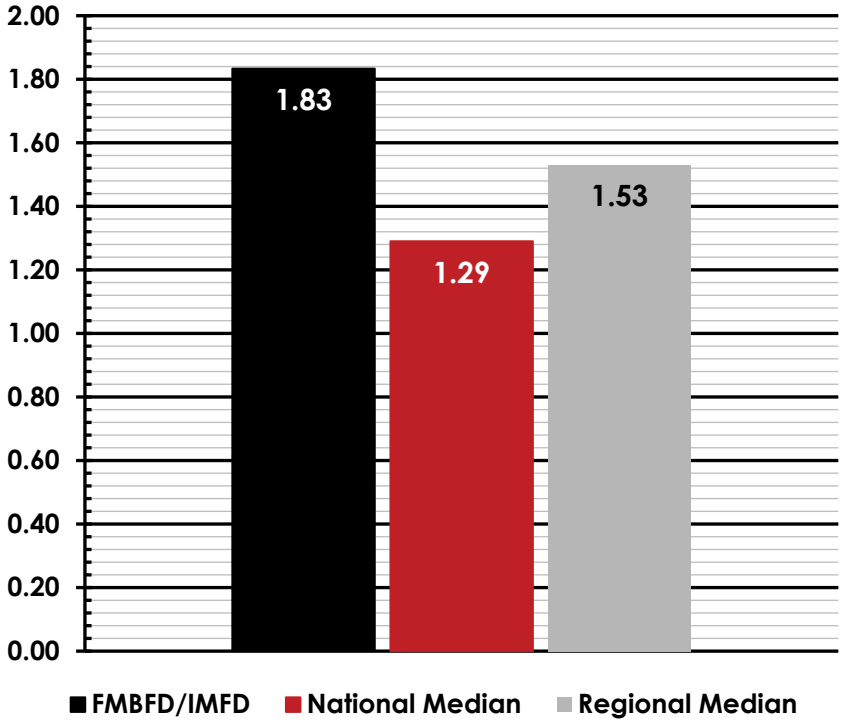
Staffing & Personnel	FMBFD	IMFD	Comments
Administrative & Support Staffing	14.5	17	—
Percent of Administrative/Support Staffing vs. Operational Staffing	23%	17%	—
Operational Staffing	48	81	—
Minimum Daily Operational Staffing	14	22	—
Operational Shift Schedule	24/48	24/48	56-hr. workweek for FMBFD & IMFD
Application & Recruitment Process	Yes[A]	Yes[A]	FMBFD & IMFD require CPAT
Labor Agreements	Yes	Yes	Both–IAFF 1826
Personnel Records Management	Yes	Yes	—
Discipline Process	Yes	Yes	By the policy of both
Testing, Measuring, & Promotional Processes	Yes	Yes	—

[A] No recruitment program.

Figure 33 illustrates a hypothetical comparison of the number of firefighters per 1,000 population for both FMBFD and IMFD in the service region, along with national and regional medians.

This analysis used a combined population of 70,905 from 2024, equal to the total for both districts' service areas. The combined comparison currently has 0.3 more FTE operational positions than regional organizations.

Figure 33: Combined (FMBFD & IMFD) Firefighters per 1,000 Population



Wages & Benefits Comparison

Figure 34 compares the average wages and benefits for the various positions and ranks of members of FMBFD and IMFD for FY25. As shown, not all the ranks and positions are equivalent to those of the other fire district. In addition, there are disparities in average wages and benefits between similar positions at FMBFD and IMFD. The figure shows that, as adopted in FY25 budgets, FMBFD had 62 employees, while IMFD had 98.

Figure 34: Comparison of FMBFD & IMFD Average Wages & Benefits (FY2025)

Fort Myers Beach Fire District				Position Title	Iona-McGregor Fire District			
Ct.	Pay	Benefits	Total		Ct.	Pay	Benefits	Total
1	180,960	112,600	**293,560**	Fire Chief	1	231,131	137,803	368,934
1	166,192	105,506	**271,698**	Deputy Chief	1	208,169	117,768	325,937
2	162,718	100,751	**263,470**	Assistant Chief	No position			
No position				Division Chief	4	180,495	109,314	**289,808**
1	162,448	117,139	**265,126**	Fire Marshal	No position[1]			
3	79,227	50,245	**119,730**	Inspector	3	98,617	54,507	153,124
3	146,003	102,466	**234,941**	Battalion Chief	3	174,724	111,898	286,622
3	157,342	109,469	**252,640**	Captain	No position			
2	146,714	103,920	**237,066**	Lieutenant/Medic	13	147,760	94,714	242,475
4	132,034	96,257	**215,554**	Lieutenant	2	141,847	93,501	235,348
6	122,942	91,509	**202,230**	Engineer/Medic	10	130,197	82,924	213,121
3	113,131	86,386	**187,853**	Engineer	5	119,837	86,471	206,308
26	95,961	77,422	**162,693**	Firefighter/Medic	33	110,210	75,621	185,830
1	76,132	67,069	**133,635**	Firefighter/EMT	15	94,202	61,718	155,920
No position				Chief Financial Officer	1	188,541	73,947	**262,488**
1	168,168	56,476	**224,644**	Director Finance/Admin.	No position			
No position				Finance Manager	1	98,530	47,283	**145,813**
1	73,403	43,936	**117,339**	Executive Assistant	1	85,764	50,753	136,517
1	70,491	33,378	**103,869**	Administrative Asst.	No position			
No position				Receptionist	1	57,332	45,262	**102,594**
No position				Human Resources Mgr.	1	88,760	40,990	**129,750**
1	65,000	41,759	**106,759**	HR Generalist	No position			
1	121,264	56,337	**177,601**	IT Technician	No position			
No position				Community Relations Sp.	1	96,252	23,085	**119,337**
No position				Facilities Maintenance	1	89,308	35,430	**124,738**
1	60,778	40,664	**101,442**	Facilities/Log. Coord.	No position			
Total: 62 Personnel				**— Total Staff Count —**	**Total: 98 Personnel**			

[1] One of the Division Chiefs has been assigned the duties of the Fire Marshal.

Health, Wellness, & Safety Programs

Fire service organizations operate in inherently hazardous environments, requiring the implementation of all reasonable precautions to minimize exposure and ensure consistent medical monitoring. Therefore, wellness programs must include education on topics such as healthy lifestyles, illness and injury prevention, and, most recently, cancer prevention and mental health support.

Health & Wellness Programs

The vital task of health and wellness is typically addressed through numerous ongoing processes and comprehensive policies and procedures. The following section explains the health, wellness, and safety programs currently in place for FMBFD and IMFD.

Medical Exams (Physicals)

Ensuring the health and wellness of fire service personnel typically involves initial and ongoing medical examinations. Medical exam programs should comply with NFPA 1582: *Standard on Comprehensive Occupational Medical Programs for Fire Departments*. A comprehensive medical exam program should also include an infectious control program, based on NFPA 1581: *Standard on Fire Department Infection Control Program*, and a fitness-for-duty evaluation program that provides a process for return to duty.

Figure 35 compares the medical exam programs for the participating fire districts.

Figure 35: Medical Exam Programs

Medical Exams	FMBFD	IMFD
Medical Standards Established	Yes	Yes
Based on NFPA 1582 Standard	Yes	Yes
Initial Medical Exam Required	Yes	Yes
Periodic Medical Exams	Annually	Annually
Infection Control Program Meets NFPA 1581	Yes	Yes
Process in place for a Fitness for Duty Evaluation[A]	Yes	No

[A] Includes a return to work.

Cancer

As the rates of specific types of cancer continue to increase among firefighters, as scientifically proven by educational institutions such as the University of Miami's Sylvester Comprehensive Cancer Center's Firefighter Cancer Initiative (FCI), fire service organizations are beginning to take a proactive approach toward protecting their members.[27] A comprehensive cancer prevention program should provide a holistic approach to addressing this disease in the fire service, including mitigation activities at fire stations, incident scenes, and post-incident periods.

Besides the cancer risks associated with fighting fires, diesel exhaust is a significant threat to fire service personnel. According to the American Cancer Society[28], the Environmental Protection Agency (EPA) has classified diesel exhaust as "likely to be carcinogenic to humans."

In addition, the National Institute for Occupational Safety and Health (NIOSH) has determined that diesel exhaust is a "potential occupational carcinogen." Based on these factors and other overwhelming evidence, diesel exhaust is a likely pathway for exposures within the fire service.

In 2019, the Florida Legislature acknowledged scientific evidence linking firefighting to certain types of cancer. Based on this, Senate Bill 426 created Florida Statute 112.1816, which requires employers to provide cancer benefits for firefighters. Under the terms of this law, eligible firefighters diagnosed with certain types of cancer automatically are entitled to cancer-related benefits at no cost to the firefighters, as well as enhanced retirement disability and death benefits and duty-related death benefits.

[27] https://umiamihealth.org/sylvester-comprehensive-cancer-center/accomplishment-reports/2021/building-healthier-communities/firefighter-cancer-initiative.

[28] www.cancer.org/cancer/risk-prevention/chemicals/diesel-exhaust-and-cancer.html.

Figure 36 compares the cancer prevention programs across the participating fire districts.

Figure 36: Cancer Prevention Programs

Cancer Prevention	FMBFD	IMFD
Contamination Reduction Policy/Procedures in Place	Draft	Yes
Diesel Exhaust Protection	Yes	St. 71 Only
Decontamination Policy/Procedures in Place (PPE & SCBE)	Yes	Yes
Extractors Provided	Yes[A]	Yes[B]
Training Provided (awareness, prevention, mitigation, & risk)	Vector Solutions	Yes
Cancer Benefits in Compliance with Florida Chapter 2019–21	Yes	Yes
Exposure Tracking	Yes	Yes

[A] Stations 31 & 32.
[B] Stations 72, 73, 74, & 75.

Mental Health

A recent emphasis has been placed on mental health support for first responders. Notable increases in diagnosed post-traumatic disorders and suicide rates have been driving increased awareness of mental health support. Comprehensive mental health programs should include critical-incident stress debriefings, employee assistance programs, substance abuse prevention programs, and chaplaincy services.

Additionally, fire organizations should be tracking exposures related to traumatic events. Florida Statute 112.1815 provides first responders with post-traumatic stress disorder (PTSD) provisions under workers' compensation coverage.[29] However, benefits depend on specific qualifying events, making overall exposure tracking a critical component in protecting the first responder.

[29] www.leg.state.fl.us/statutes/index.cfm?App_mode=Display_Statute&Search_String=&URL=0400-0499/0440/Sections/0440.151.html.

Figure 37 compares the current mental health programs for the participating fire districts.

Figure 37: Mental Health Programs

Mental Health	FMBFD	IMFD
Critical-Incident Stress Debriefing (CISD) Available	Yes (802)	Yes
Member Assistance Program (MAP)	Yes	Yes
Substance Abuse Policy/Program	Yes	Yes
Occupational Exposure Policy (Traumatic Events)	Yes	Yes
Fire District Chaplain	No	Yes

Safety Programs

Providing and maintaining safe working conditions requires a variety of programs and initiatives. Developing and adhering to a comprehensive Risk Management Plan is critical. Such a plan should address risks associated with the following:

- Administration
- Facilities
- Training
- Vehicle operations
- Protective clothing and equipment
- Operations at emergency incidents
- Non-emergency services or activities
- Products of combustion, carcinogens, and other incident-related health hazards

The Risk Management Plan should include risk identification, risk evaluation, priority establishment, risk control, and risk management monitoring. Additionally, fire organizations should have a personal accountability procedure, an incident management system, and a rehabilitation system that meets NFPA standards.

According to Florida Statute 633.522, Florida Administrative Code 69A-62.043, and NFPA 1550: *Standard for Emergency Responder Health and Safety*, Chapter 6, fire organizations are required to establish a safety committee that meets quarterly.

Additionally, all fire facilities should be inspected quarterly to identify safety concerns and ensure compliance with applicable codes and regulations. Figure 38 compares the safety programs in place for the participating fire districts.

Figure 38: Safety Programs

Safety Programs	FMBFD	IMFD
Comprehensive Risk Management Plan	Yes (801)	No
Safety and Health Policy	Yes	Yes
Personnel Accountability Procedure (NFPA 1561)	Yes (600)	Yes
Incident Management System (NFPA 1561)	Yes (603)	Yes
Rehabilitation System (NFPA 1584)	Yes (603)	Yes
Traffic Incident Management	Yes (803)	Yes
Post-Incident Analysis	Yes (603)	Yes
Quarterly Facility Inspections	Yes	Yes
Established Safety Committee	Yes	Yes

Health, Wellness, & Safety Programs Comparisons Summary

Figure 39 summarizes the health, wellness, and safety programs for FMBFD and IMFD.

Figure 39: Health, Wellness, & Safety Programs Comparisons Summary

Health, Wellness, & Safety	FMBFD	IMFD	Comments
Medical standards established based on NFPA 1582	Yes	Yes	
Cancer Contamination Reduction Policy/Procedures in Place	Draft	Yes	FMBFD has a draft SOP
Designated Health and Safety Officer	Yes	Yes	
Comprehensive Risk Management Plan	Yes (801)	No	
Safety and Health Policy	Yes	Yes	IMFD is on a three-year review cycle
Established Safety Committee	Yes	Monthly	FMBFD's meeting schedule is inconsistent

Financial Overview of the Fire Districts

This section of the study provides background information on the historical and current financial conditions of FMBFD and IMFD.

To understand fire service financial resources and costs within the study area, JAG first reviewed each agency's individual historical revenues and expenditures. This involved a five-year historical review to the extent that the data were available. Historical trend data for individual agencies were later used to develop key assumptions, leading to financial forecasts of revenue, expenses, and fund balances for FY26–30 under both the status quo and potential alternative configurations.

This comparative snapshot of historical financial results sets the stage for modeling potential financial outcomes of various service delivery models, ranging from the status quo to a full merger of the districts and helps to assess the fiscal viability of the alternatives now and into the future. This analysis relies on extensive documentation provided by the districts, including actual and adopted budget documents, as well as the districts' annual external financial audits, where available.

Financial analysis is important in determining the potential for a fire district merger. Therefore, JAG has developed data-driven models to test the respective options using the provided data. A modeled budget fairly represents each agency's monetary policy and practices, neutralizing differences or accounting for financial peculiarities. This modeling approach enables a fair comparison of the agencies, providing a realistic public cost for each agency's operations and a means to effectively evaluate the financial impact of integration.

Historical Revenues & Expenses

The following discussion presents historical revenue and expenses for each district. A short summary of each district is provided, along with a comparative millage rate. Although the primary funding source for each district is ad valorem taxes, each also has distinct revenue streams and various expense categories; therefore, descriptions and analyses may differ slightly.

Fort Myers Beach Fire District

FMBFD was established in 1949 when the Beach Improvement Association organized a small volunteer fire department. In 1951, the Florida Legislature, under the provisions of the Laws of Florida, Chapter 51-27676, and Florida Statute Chapter 633, established FMBFD as an independent special district and governs it through an elected board. The legislature amended the boundaries in 2008. It operates on a fiscal year from October 1 to September 30 and uses an accrual basis for accounting.

This methodology follows generally accepted accounting principles (GAAP), which are used by cities, counties, and many larger fire districts, focusing on the measurement of economic resources. It recognizes revenues and expenses when a transaction occurs. As shown in Figure 40, FMBFD adopted a millage rate of $2.80/$1,000 taxable value for FY25. The ad valorem revenue supporting the FY25 budget is obtained using the initial taxable value from form DR420.

FMBFD maintains two separate funds as of FY25, of which the General Fund is its primary operating fund. The district established a Capital Improvement Fund (based on its long-term CIP) to account for reserves committed to large capital projects. The following analysis combines both funds and their respective fund balances. Interfund transfers result in net zero and are not shown.

FMBFD participates in two defined benefit programs administered by the State of Florida: the Florida Retirement System (FRS) and the Retiree Health Insurance Subsidy (RHIS) Program, both of which are cost-sharing, multiple-employer programs. Employers and employees contribute annually to the FRS, with employers also contributing to the RHIS program. The State of Florida determines annual contribution rates.

FMBFD also provides Other Post-Employment Benefits (OPEB) to certain classes of employees. The Retiree Health Insurance Trust Fund Plan, a Voluntary Employee Benefit Association (VEBA) plan, provides health insurance benefits for retirees who retired on or after October 1, 2008, in accordance with GASB 74. OPEB (medical, dental, and vision) benefits are provided to those who retired on or before September 30, 2008, according to GASB 75. Any potential district merger would require the parties to negotiate OPEB liability.

Figure 40: FMBFD Budget and Finance Overview

Component	Description
Fiscal Year	Oct. 1–Sept. 30
Assessed Property Value (FY25)	$4,642,975,363
Operating Budget	$21,180,900
Adopted Millage Rate	2.80 Mills

Figure 41 and Figure 42 summarize the actual FMBFD revenues for FY19–24 (FY24 is not externally audited but is based upon the trial balance) and adopted revenues for FY25. The primary source of district revenue is property taxes.

Figure 41: FMBFD Revenue (FY19 Actual–FY25 Adopted)—Part A

Revenue	2019 Actual	2020 Actual	2021 Actual	2022 Actual
Taxes	10,456,777	12,322,291	12,835,065	13,467,183
Ambulance/EMS Fees	597,855	583,054	736,101	583,725
Intergovernmental	24,580	28,430	20,773	17,627
Permits/Fees	207,598	310,967	574,529	523,992
Interest	174,469	123,678	14,262	116,911
Recurring Revenue:	**$11,461,279**	**$13,368,420**	**$14,180,730**	**$14,709,438**
Impact Fees	10,933	2,117	42,182	73,092
Grant Income	77,825	87,272	157,293	117,996
Sale of Surplus Items	2,839	170,215	—	119,600
Other Income	5,862	62,588	224,568	65,760
Non-Recurring:	**$97,459**	**$322,192**	**$424,043**	**$376,448**
TOTAL REVENUE:	**$11,558,738**	**$13,690,612**	**$14,604,773**	**$15,085,886**

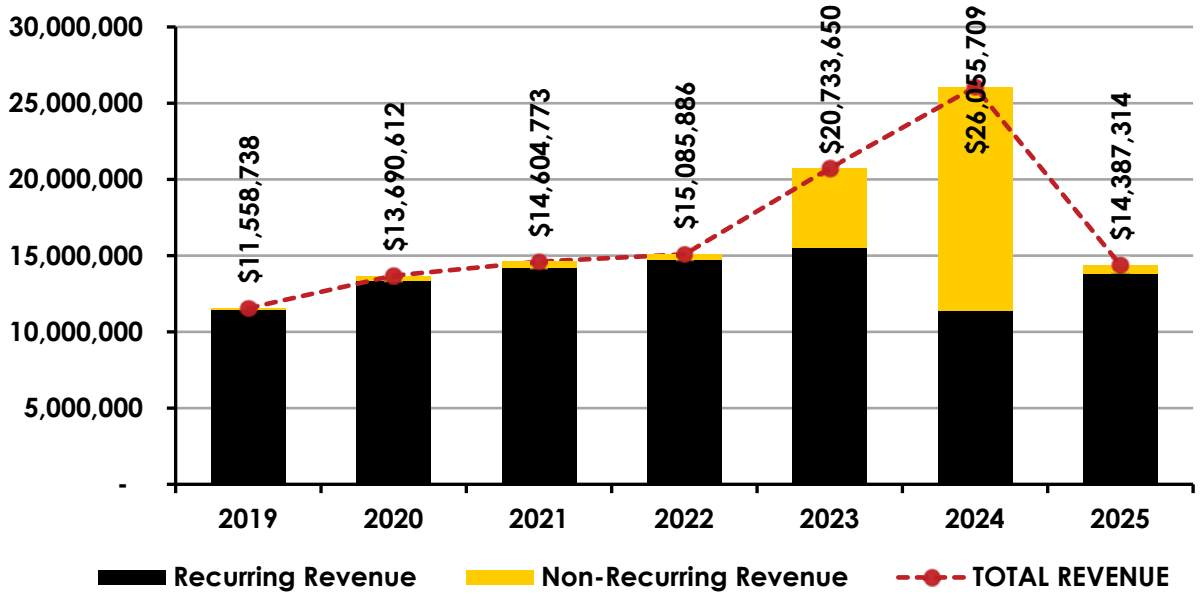
Figure 42: FMBFD Revenue (FY19 Actual–FY25 Adopted)—Part B

Revenue	2023 Actual	2024 Unaudited	2025 Adopted
Taxes	13,830,709	9,035,060	12,350,314
Ambulance/EMS Fees	188,814	154,135	110,000
Intergovernmental	22,892	21,720	21,000
Permits/Fees	596,555	829,945	850,000
Interest	887,701	1,347,875	525,000
Recurring Revenue:	**$15,526,671**	**$11,388,735**	**$13,856,314**
Impact Fees	17,673	9,030	40,000
Grant Income	2,242,500	14,560,068	—
Sale of Surplus Items	—	200	486,000
Other Income	2,946,806	97,676	5,000
Non-Recurring:	**$5,206,979**	**$14,666,974**	**$531,000**
TOTAL REVENUE:	**$20,733,650**	**$26,055,709**	**$14,387,314**

It should be noted that, although a $9 million construction grant from the State of Florida is shown as grant revenue in the FY24 trial balance, the subsequent audit indicates it as deferred revenue. In either case, it is a non-recurring revenue source that impacts district finances, and its timing does not materially affect future modeling.

Figure 43 compares the district's recurring and non-recurring revenue to total revenue. Recurring revenues comprise the bulk of the district's annual revenue, which has grown year-over-year from FY19 through FY23, with overall revenue increasing from $11.46 million in FY19 to $15.53 million in FY23, a 35% increase. This represents an average annual increase of approximately 7.9%, driven by tax revenue that has risen at an average annual rate of approximately 7.2%.

Figure 43: FMBFD Recurring vs. Non-Recurring Revenue (FY19 Actual–FY25 Adopted)



The impact of Hurricane Ian (September 2022) on the district and its ad valorem revenue stream is evident in FY24. Figure 44 shows the total taxable value for FMBFD from FY19 through FY24. Catastrophic hurricane damage significantly impacted assessed values and resulting ad valorem revenue. The significant rise in non-recurring revenue that same fiscal year resulted, in part, from a state disaster grant of just over $5 million to offset lost ad valorem revenue.

Figure 44: FMBFD Total Taxable Value (FY19–FY24)

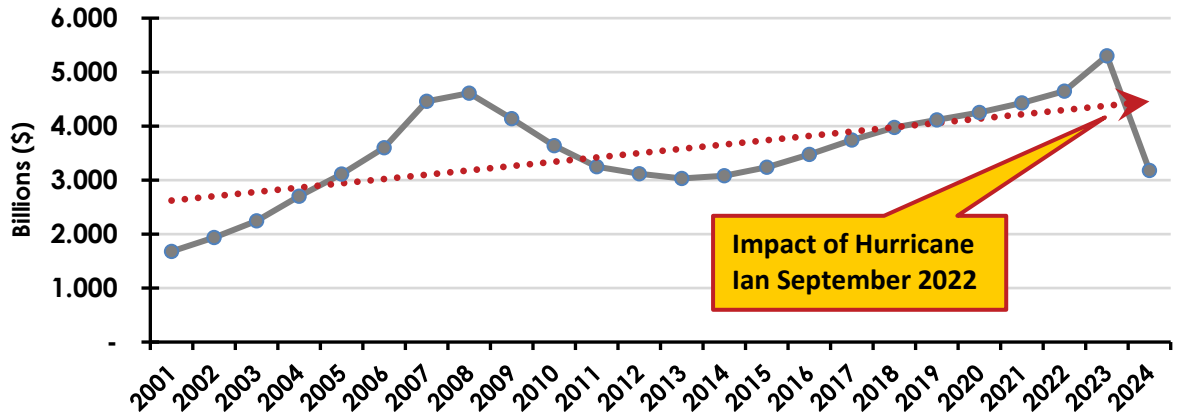


Figure 45 and Figure 46 show FMBFD expenses for FY19–24 (FY24 is not externally audited but is based upon the trial balance) and FY25 as adopted. Capital expenses are considered non-recurring and have ranged from $200,000 to $5.6 million.

The bulk of annual capital expenditures was for land acquisition, followed by apparatus and equipment. During the historical period (including FY25 adopted), equipment expenditures averaged approximately $170,000 annually, while apparatus expenditures averaged approximately $490,000 annually.

Figure 45: FMBFD Expenses (FY19 Actual–FY22 Actual)—Part A

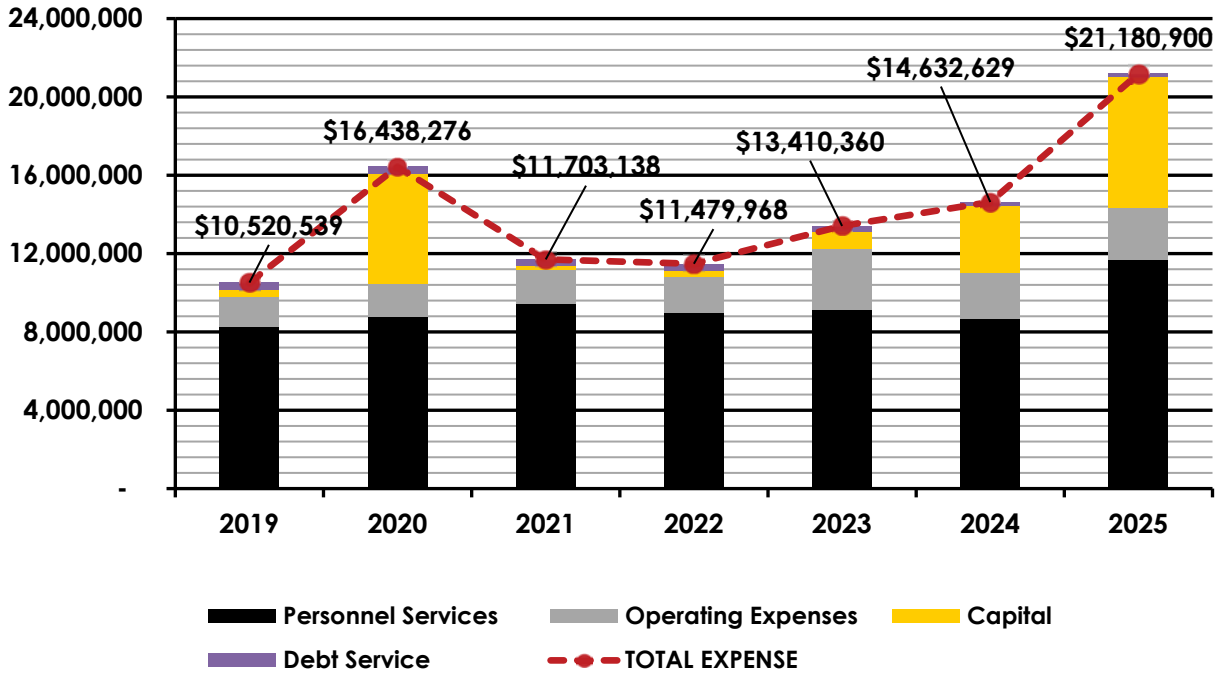
Expense	2019 Actual	2020 Actual	2021 Actual	2022 Actual
Personnel Services:	**8,284,189**	**8,784,506**	**9,430,253**	**8,967,236**
Salaries/Wages	5,298,488	5,529,742	5,968,120	5,656,383
Benefits	2,985,701	3,254,764	3,462,133	3,310,853
Operating Expenses:	**1,533,693**	**1,684,153**	**1,737,349**	**1,837,868**
Professional/Contractual	445,522	522,490	601,579	617,389
Communications/Freight	95,237	99,735	101,523	108,721
Utilities/Insurance	252,574	207,998	229,520	241,280
Repairs & Maintenance	211,354	256,014	304,458	263,557
Miscellaneous	16,831	18,522	18,283	9,728
Operating Supplies/Tools	331,635	372,735	303,680	451,204
Education/Training	113,813	90,682	73,952	68,176
Other Services	66,727	115,977	104,354	77,813
Debt Service:	**387,366**	**387,366**	**331,940**	**331,901**
Principal	324,691	333,317	286,446	294,386
Interest	62,674	54,049	45,494	37,515
Recurring Expenses:	**10,205,248**	**10,856,025**	**11,499,542**	**11,137,005**
Land	—	4,007,774	—	—
Buildings/Improvements	133,970	82,500	47,163	-
Equipment	75,262	152,313	89,574	342,963
FF&E	9,150	6,262	—	—
Rolling Equipment (Apparatus)	96,909	1,333,402	66,859	—
Non-Recurring Expense:	**315,291**	**5,582,251**	**203,596**	**342,963**
TOTAL EXPENSES:	**$10,520,539**	**$16,438,276**	**$11,703,138**	**$11,479,968**

Figure 46: FMBFD Expenses (FY23 Actual–FY25 Adopted)—Part B

Expense	2023 Actual	2024 Unaudited	2025 Adopted
Personnel Services:	**9,126,483**	**8,686,567**	**11,706,320**
Salaries/Wages	5,679,777	5,353,824	7,318,100
Benefits	3,446,706	3,332,743	4,388,220
Operating Expenses:	**3,105,689**	**2,319,606**	**2,663,390**
Professional/Contractual	806,798	444,024	861,650
Communications/Freight	98,002	79,118	120,020
Utilities/Insurance	254,338	334,172	346,200
Repairs & Maintenance	209,571	250,191	297,600
Miscellaneous	26,834	14,238	33,690
Operating Supplies/Tools	227,725	354,789	676,600
Education/Training	63,635	83,125	245,110
Other Services	1,418,786	759,949	82,520
Debt Service:	**259,462**	**166,678**	**166,690**
Principal	230,076	142,722	147,600
Interest	29,386	23,956	19,090
Recurring Expenses:	**12,491,634**	**11,172,851**	**14,536,400**
Land	—	3,400,000	—
Buildings/Improvements	86,978	27,483	1,000,000
Equipment	79,921	32,295	422,500
FF&E	—	—	29,500
Rolling Equipment (Apparatus)	751,827	—	1,192,500
Non-Recurring Expenses:	**918,726**	**3,459,778**	**2,644,500**
TOTAL EXPENSES:	**$13,410,360**	**$14,632,629**	**$17,180,900**

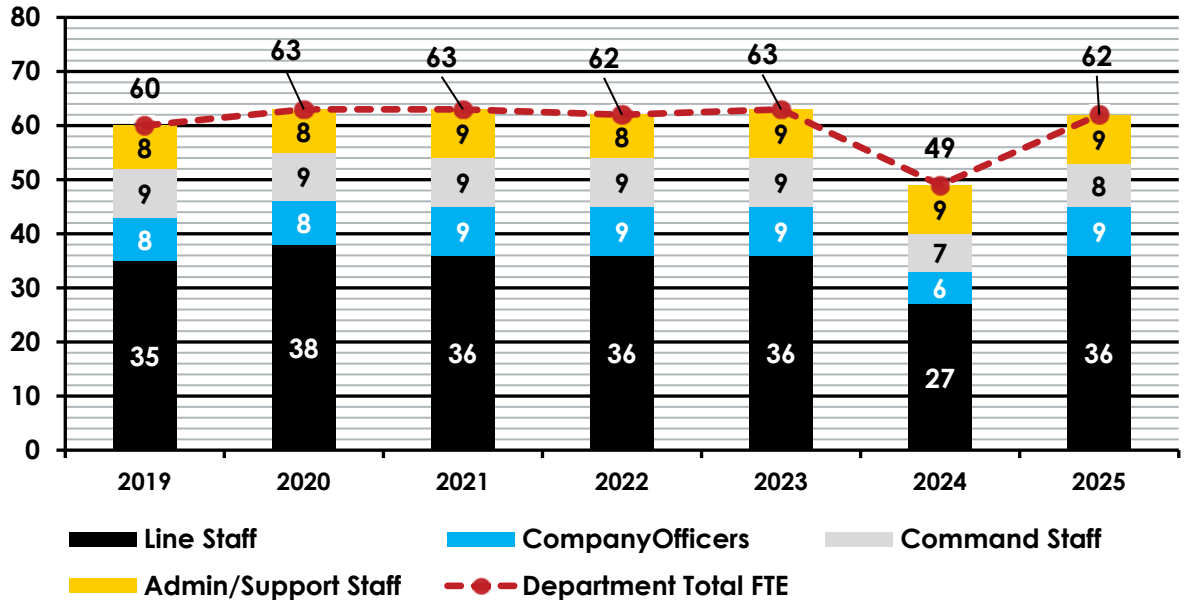
Figure 47 shows FMBFD expenses by major category, illustrating the variable impact of capital expenditures on overall expenses. Notably, major land purchases of $5.6 million and $3.5 million were made in FY20 and FY24, respectively, and the substantial completion of the Station 31 project is also evident. Recurring expenses rose from $10.2 to $12.5 million between FY19 and FY23, driven by increased operating expenses, specifically storm-related expenses incurred in FY23.

Figure 47: FMBFD Expenses by Major Categories (FY19 Actual–FY25 Adopted)



Although increasing somewhat over the period, personnel costs have remained relatively flat from FY20 through FY24, despite a reduction in staff in FY24. With the planned reopening of Station 31, FMBFD has reinstated budgeted positions to fully staff the station. Staffing levels from FY19 through FY25 are shown in Figure 48. Except for FY24, staffing levels remained relatively consistent throughout the period.

Figure 48: FMBFD Staffing Levels from FY19 Actual through FY25 Adopted



Although the increase in personnel costs between FY24 and FY25 partially reflects the addition of staff with the reopening of Station 31, the primary increase is due to significant compensation changes for district employees whose pay and benefits remained relatively static from FY20 to FY24. A comparison of pay and benefits across all positions from FY19 to FY25 was conducted by position to determine the average annual increase in both salary and benefits over the six-year period. Only overtime related to normally scheduled hours was included.

The weighted average annual increase was calculated for each position and for the entire district (the cumulative average increase for each position multiplied by the number of employees in that position, divided by the total number of employees). FMBFD position weighted average annual salary increased 5.37% annually, while benefits increased an average of 4.79% annually. These figures will not directly correlate with individual experiences but will reflect the district's total experience over six years, providing trend data for future predictions of personnel costs, excluding personnel additions.

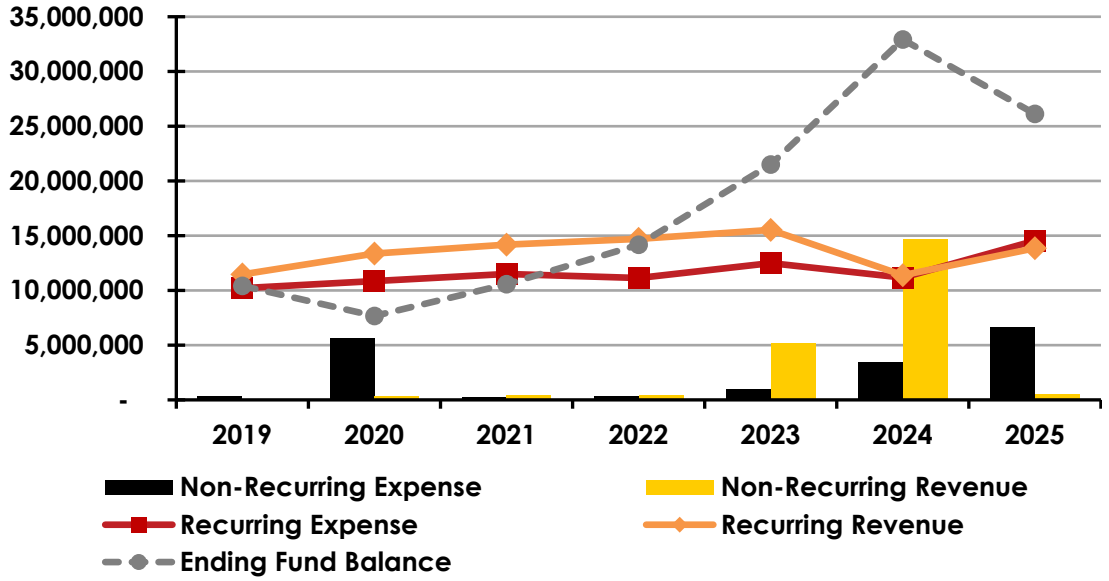
Figure 49 summarizes the district's historical financial trajectory, comparing total revenue, total expenses, and the difference between the two (positive or negative), and how that difference affects the district's annual ending fund balance.

The district earned more recurring revenue from FY19 through FY24 than it spent on recurring obligations. This represents sound financial practice and generally has a positive impact on the year-end fund balance. The best financial practice is to fund recurring costs—such as personnel, operating, and debt obligations—through recurring rather than one-time revenue sources, instead of relying on fund balance or, even worse, incurring additional debt.

Recurring expenses exceed recurring revenue, as adopted in FY25. Although not problematic in the short term, the district will need to closely monitor recurring revenue versus expenses and adjust appropriately if this trend continues.

Grant funding from the State of Florida following Hurricane Ian had a significant positive impact on the fund balance, in addition to the positive impact of the difference in recurring revenue versus expenses.

Figure 49: FMBFD Expense, Revenue, & Impact (FY19 Actual–FY25 Adopted)



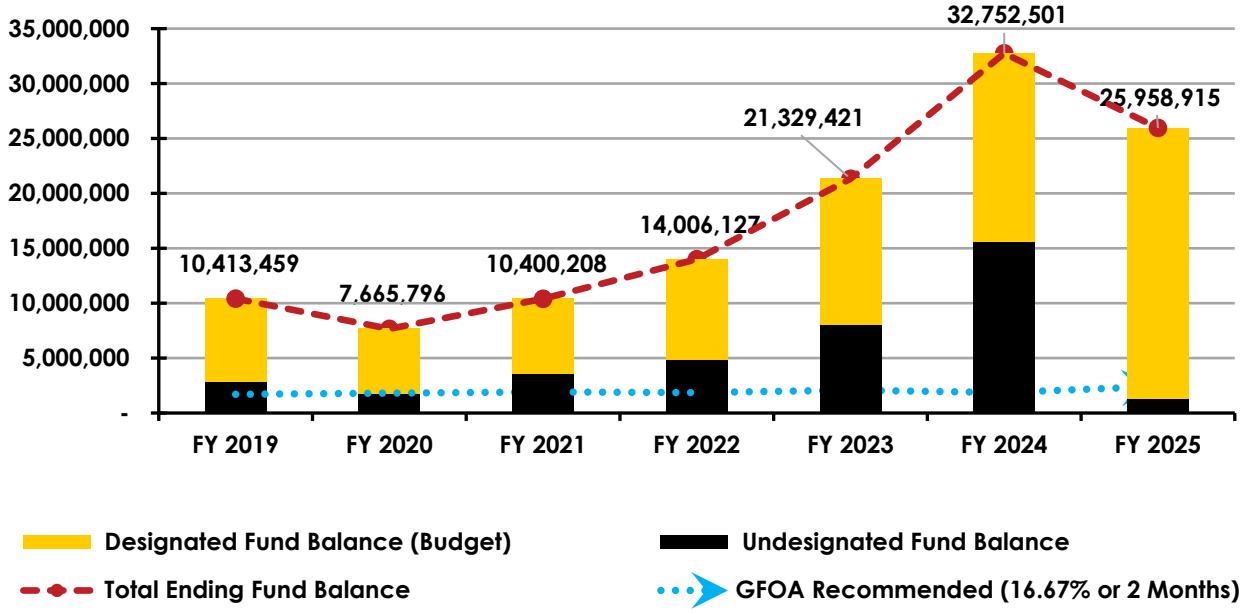
Although the district's fund balance may appear higher than necessary, examining the district's policy on long-term funding for capital apparatus, equipment, and facilities is instructive. The following Figure 50 illustrates the distribution of fund balance from FY19 to FY25, with the FY25 fund balance projected. District policy bases reserve funding on a rigorous, long-range Capital Improvement Plan (CIP) that determines the life expectancy and replacement timing for capital items by class.

An annual inflation factor (5%) is applied, and fractional replacement costs for each item are allocated in a designated reserve each year, such that when it comes time for replacement, the funds are fully available to purchase the necessary item without having to incur interest through various financing methodologies such as bonding, commercial paper, lease purchase, etc. An annual millage rate is adopted to fund both annual operating expenses and this designated reserve for long-term replacement.

The district also reserves funds for emergency disaster response, equivalent to a 30-day all-out operational response. A millage sustainment reserve fluctuates as needed to maintain a steady, consistent millage rate year over year.

The Government Finance Officers Association (GFOA) further recommends that governmental entities maintain a reserve sufficient to fund two months of recurring expenses (approximately 16.67%). The blue dashed line in Figure 50 shows this amount each year. Although the undesignated fund balance exceeds the GFOA-recommended level through FY24, the district is closer to this goal in FY25. Despite the difficulties caused by Hurricane Ian, the district remains in a sound financial position thanks to its fiscal policy.

Figure 50: FMBFD Fund Balance Analysis (FY19 Actual–FY25 Projected)



Iona-McGregor Fire District

IMFD is an independent special district originally established in 1975 under the provisions of the Laws of Florida Chapters 75-421 and Florida Statute Chapter 633, and as further amended by the legislature in 2000. As is FMBFD, IMFD is governed by a five-person elected board and operates on a fiscal year from October 1 to September 30. The district uses a modified accrual basis for accounting.

This methodology follows generally accepted accounting principles (GAAP), which are used by cities, counties, and many larger fire districts. It focuses on current financial resources, recognizing revenues when they are both measurable and available, and expenses when the related liability is incurred. Similar to FMBFD, IMFD has also established a separate fiduciary fund to account for the retiree insurance fund, known as VEBA. As shown in Figure 51, the IMFD adopted a General Fund millage rate of $ 2.50 per $1,000 of taxable value for FY25. The ad valorem revenue supporting the FY25 budget is obtained using the initial taxable value from form DR420. IMFD maintains a General Fund as its primary operating fund. The district's General Fund accounts for all district reserves, whether restricted, committed, assigned for future capital projects, or unassigned.

IMFD participates in two defined benefit programs administered by the State of Florida: the Florida Retirement System (FRS) and the Retiree Health Insurance Subsidy (RHIS) Program, both of which are cost-sharing, multiple-employer programs. Both the employer and employee contribute annually to the FRS, with the employer also contributing to the RHIS program. The State of Florida determines annual contribution rates.

IMFD also provides Other Post-Employment Benefits (OPEB) to certain classes of employees. The Retiree Health Insurance Trust Fund Plan, a Voluntary Employee Benefit Association (VEBA) plan, provides health insurance benefits in accordance with GASB 74 and 75 OPEB. Any potential district merger would require the parties to negotiate OPEB liability.

Figure 51: IMFD Budget & Finance Overview

Component	Description
Fiscal Year	Oct. 1–Sept. 30
Assessed Property Value (FY25)	$10,944,747,010
Operating Budget	$31,045,083
Adopted Millage Rate	2.50 Mills

Figure 52 and Figure 53 summarize actual IMFD revenues for FY19–24 (FY24 is not externally audited but is based upon the trial balance) and adopted revenues for FY25. The primary source of district revenue is property taxes.

Figure 52: IMFD Revenue (FY19 Actual–FY25 Adopted)—Part A

Revenue	2019 Actual	2020 Actual	2021 Actual	2022 Actual
Taxes	19,614,372	19,929,482	20,136,907	22,215,024
Intergovernmental	39,550	66,677	21,974	72,269
Permits/Fees	68,629	44,567	52,350	59,690
Rents	33,453	34,122	34,805	35,501
Interest	303,860	169,296	64,470	117,216
Recurring Revenue:	**20,059,864**	**20,244,144**	**20,310,506**	**22,499,700**
Impact Fees	169,792	99,387	38,894	100,670
Grant Income	—	109,628	44,715	120,014
CARES Act Funding	—	382,020	99,917	—
Sale of Surplus Equip.	38,705	36,664	157,172	—
Insurance Proceeds	—	—	—	—
Other Income	33,915	24,952	122,673	76,171
Non-Recurring:	**242,412**	**652,651**	**463,371**	**296,855**
TOTAL REVENUE:	**$20,302,276**	**$20,896,795**	**$20,773,877**	**$22,796,555**

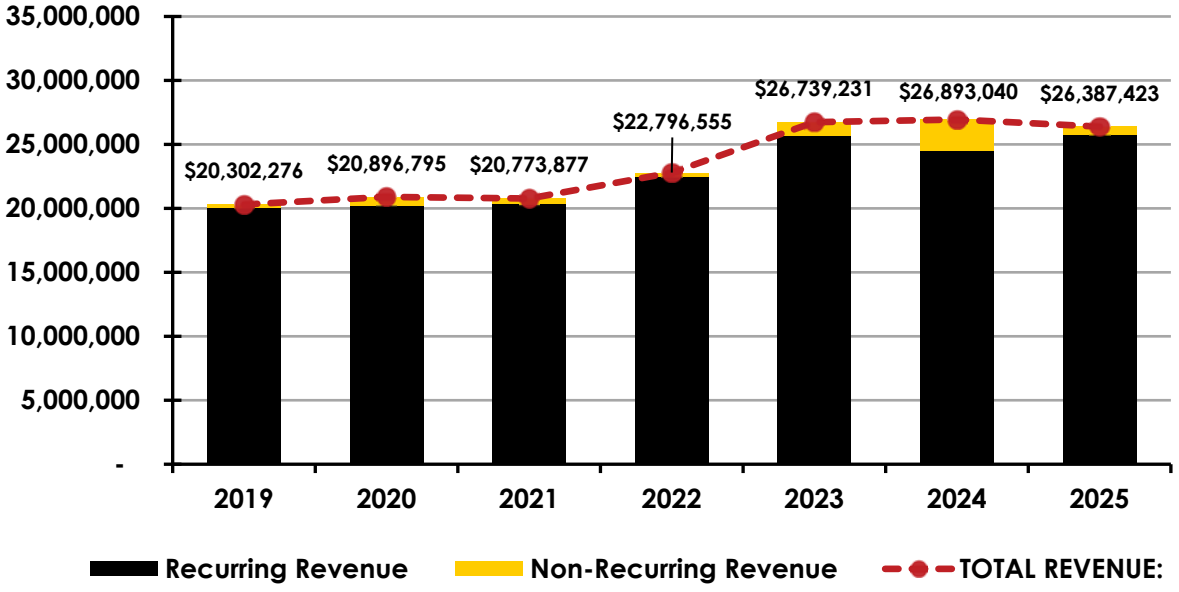
Figure 53: IMFD Revenue (FY19 Actual–FY25 Adopted)—Part B

Revenue	2023 Actual	2024 Unaudited	2025 Adopted
Taxes	24,634,489	23,068,467	24,689,600
Intergovernmental	51,668	51,600	57,360
Permits/Fees	38,505	196,714	183,000
Rents	26,878	27,415	27,963
Interest	914,077	1,150,398	900,000
Recurring Revenue:	**25,665,617**	**24,494,594**	**25,857,923**
Impact Fees	189,665	70,621	75,000
Grant Income	—	97,700	-
CARES Act Funding	—	—	—
Sale of Surplus Equip.	120,900	—	—
Insurance Proceeds	737,837	2,120,399	445,000
Other Income	25,212	109,726	9,500
Non-Recurring:	**1,073,614**	**2,398,446**	**529,500**
TOTAL REVENUE:	**$26,739,231**	**$26,893,040**	**$26,387,423**

Figure 54 compares the district's recurring and non-recurring revenue to total revenue. Recurring revenues comprise the bulk of the district's annual revenue, which remained relatively flat at approximately $20 million per year from FY19–21, growing to almost $25.7 million in FY23, representing a 26% increase over the two-year period.

This represents an average annual increase of approximately 6.3% since FY19, driven by a rise in tax revenue that has increased at an average annual rate of about 5.9%.

Figure 54: IMFD Recurring vs. Non-Recurring Revenue (FY19 Actual–FY25 Adopted)



The impact of Hurricane Ian (September 2022) on the district and its ad valorem revenue stream, although less severe than that on FMBFD, is still evident in FY24. Figure 55 shows the total taxable value for IMFD from FY20 through FY25. Damage from the hurricane significantly impacted assessed values and resulting ad valorem revenue.

The millage rate remained steady at 2.5 mills per $1,000 taxable value from FY22 to FY25. The significant rise in non-recurring revenue in FY24 resulted primarily from $2.1 million in insurance proceeds offsetting storm damage and a FEMA grant of about $97,700.

Figure 55: IMFD Total Taxable Value (FY20–FY25)

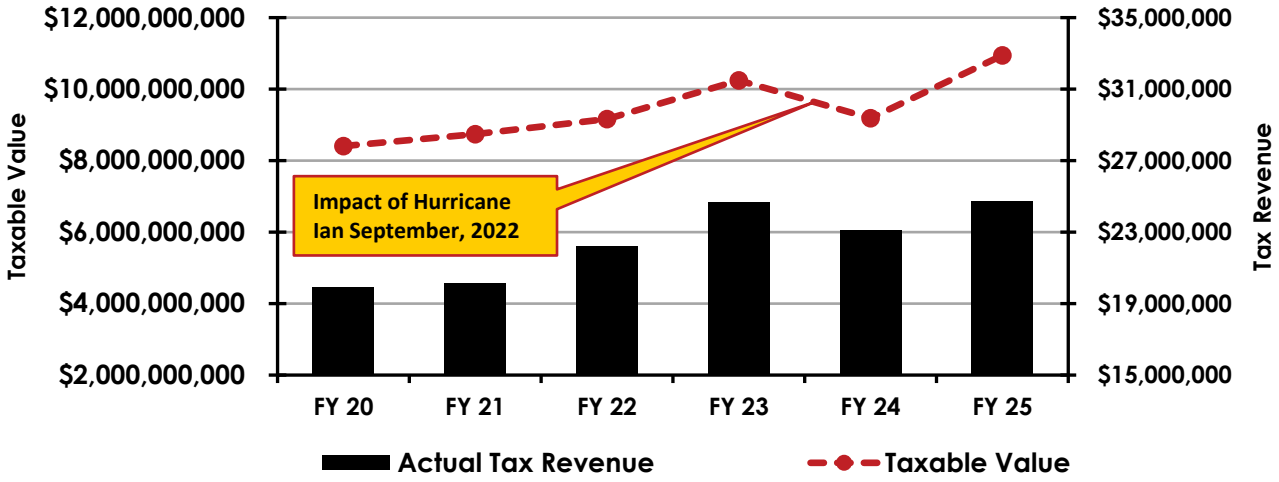


Figure 56 and Figure 57 show IMFD expenses for FY19–24 (FY24 is not externally audited, but is based on the trial balance), and for FY25 as adopted. Capital expenses are considered non-recurring expenses and have varied from a low of $172,000 in FY19 to a high of $4.5 million, as adopted.

Storm repairs to buildings damaged by Hurricane Ian began with expenditures of $570,000 in FY23, continued with $2.9 million in FY24, and are projected at $2.3 million in FY25. During the historical period (including FY25 adopted), equipment expenditures averaged approximately $138,000 annually, while apparatus expenditures averaged approximately $770,000 annually.

Figure 56: IMFD Expenses (FY19 Actual–FY25 Adopted)—Part A

Expense	2019 Actual	2020 Actual	2021 Actual	2022 Actual
Personnel Services:	**15,331,962**	**16,060,860**	**16,908,034**	**17,971,351**
Salaries/Wages	9,999,369	10,412,870	10,950,983	11,461,296
Benefits	5,332,593	5,647,990	5,957,051	6,510,055
Operating Expenses:	**2,307,113**	**2,402,913**	**2,677,693**	**2,709,405**
Professional/Contractual	700,137	722,609	726,191	793,074
Communications/Freight	140,559	138,825	130,144	116,167
Utilities/Insurance	274,868	265,406	262,951	297,552
Repairs & Maintenance	483,601	610,346	772,312	612,477
Miscellaneous	49,739	42,291	58,808	67,647
Operating Supplies/Tools	407,156	374,263	454,634	462,464
Education/Training	233,506	232,628	244,801	321,507
Other Services	17,547	16,545	27,852	38,517
Debt Service:	**456,850**	**162,295**	**100,045**	**75,034**
Principal	444,107	156,354	97,686	74,386
Interest	12,743	5,941	2,359	648
Recurring Expenses:	**18,095,925**	**18,626,068**	**19,685,772**	**20,755,790**
Land	—	—	—	—
Buildings/Improvements	—	—	—	—
Equipment	110,465	212,022	99,568	52,490
FF&E	—	—	—	—
Apparatus	61,968	1,284,813	1,321,933	176,519
Non-Recurring Expenses:	**172,433**	**1,496,835**	**1,421,501**	**229,009**
TOTAL EXPENSES:	**$18,268,358**	**$20,122,903**	**$21,107,273**	**$20,984,799**

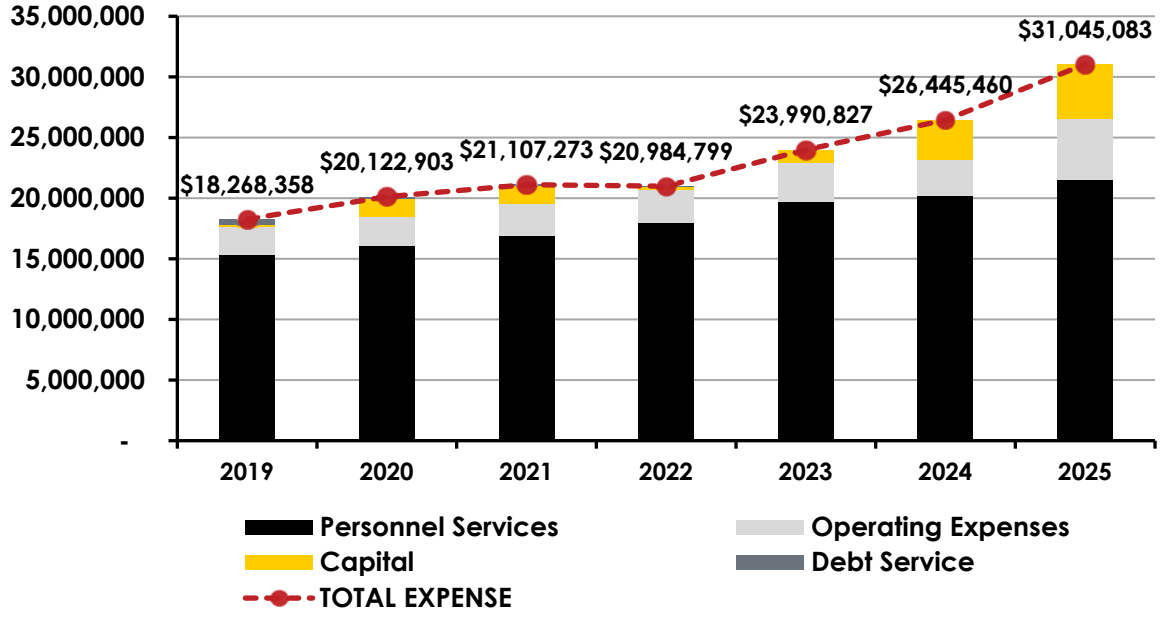
Figure 57: IMFD Expenses (FY19 Actual–FY25 Adopted)—Part B

Expense	2023 Actual	2024 Unaudited	2025 Adopted
Personnel Services:	**19,653,164**	**20,177,097**	**21,470,294**
Salaries/Wages	12,375,803	12,394,069	13,211,715
Benefits	7,277,361	7,783,028	8,258,579
Operating Expenses:	**3,295,589**	**3,025,763**	**5,107,321**
Professional/Contractual	1,143,569	923,819	1,012,803
Communications/Freight	110,531	123,905	127,700
Utilities/Insurance	345,268	406,265	573,581
Repairs & Maintenance	717,372	686,913	1,853,065
Miscellaneous	74,450	17,425	132,800
Operating Supplies/Tools	526,627	485,185	722,445
Education/Training	346,003	382,251	635,461
Other Services	31,769	—	49,466
Debt Service:	**—**	**—**	**—**
Principal	—	—	—
Interest	—	—	—
Recurring Expenses:	**22,948,753**	**23,202,860**	**26,577,615**
Land	—	—	—
Buildings/Improvements	569,236	2,923,068	2,264,468
Equipment	56,025	117,719	297,000
FF&E	—	—	—
Apparatus	416,813	201,813	1,906,000
Non-Recurring Expenses:	**1,042,074**	**3,242,600**	**4,467,468**
TOTAL EXPENSES:	**$23,990,827**	**$26,445,460**	**$31,045,083**

Figure 58 illustrates IMFD expenses by major category, showing the variable impact of capital expenditures on overall expenses, particularly with major facility projects in FY23–25. Recurring expenses increased from $18.1 million to $26.6 million between FY19 and FY25, as adopted, driven by higher personnel and operating expenses.

Operating expenses increased from $2.3 million in FY19 to a projected $5.1 million in FY25, representing an average annual increase of 14.2%. These increases are driven in part by storm-related costs. District debt was retired in FY22, although the district continues to make annual lease payments for a staff vehicle through FY29 as part of its operating expenses.

Figure 58: IMFD Expense by Major Categories (FY19 Actual–FY25 Adopted)



Although staffing levels have remained consistent throughout the period, as shown in Figure 59, personnel costs have increased from $15.3 million in FY19 to a projected $21.5 million in FY25 for an average annual increase of 5.77%.

Figure 59: IMFD Staffing Levels (FY19 Actual–FY25 Adopted)

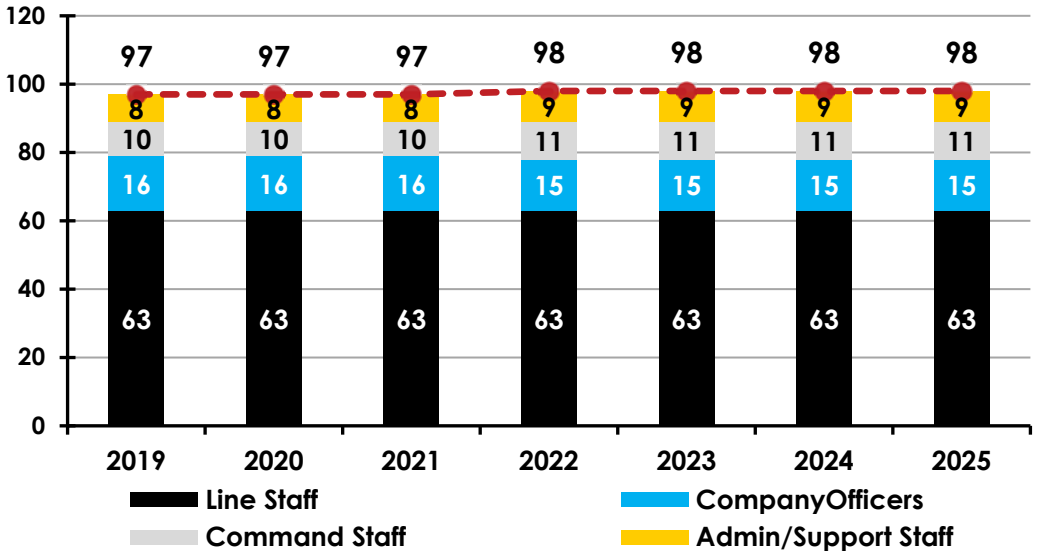
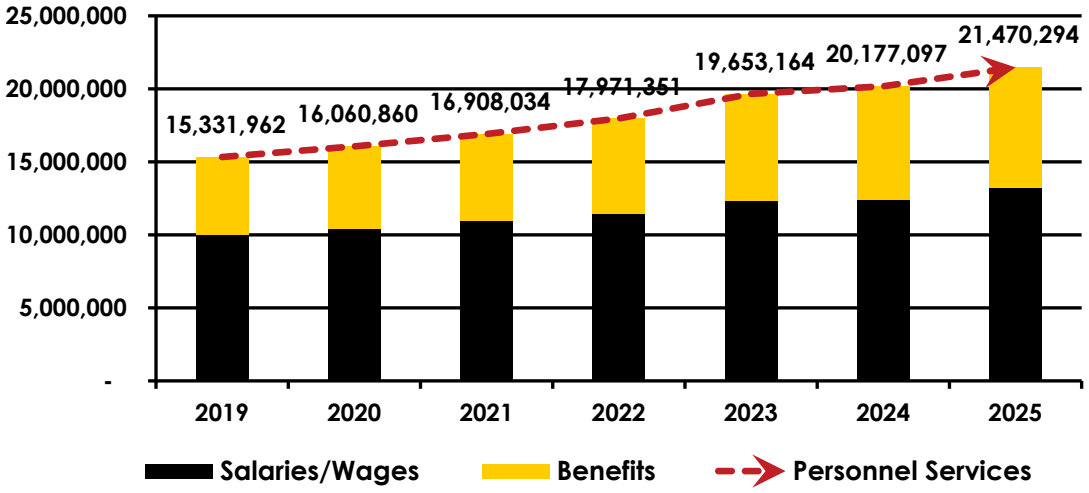


Figure 60 shows a comparison of salaries, wages, and benefits over the historical period. Benefits as a percentage of salaries/wages have risen from 53% in FY19 to almost 63% in FY25, as adopted.

Figure 60: IMFD Personnel Costs (FY19 Actual–FY25 Adopted)



The weighted average annual increase was calculated for each position and the district (cumulative average increase for each position "x" number of employees in each position divided by total employees).

IMFD weighted average annual salary increased an average of 4.91% annually, while benefits increased an average of 4.86% annually. These figures will not directly correlate with individual experiences but will reflect the district's total experience over six years, providing trend data for future predictions of personnel costs, excluding personnel additions.

Figure 61 summarizes the district's historical financial trajectory, comparing total revenue, total expenses, and the difference between the two (positive or negative), and how that difference affects the district's annual ending fund balance. The district earned more recurring revenue from FY19 through FY24 than it spent on recurring obligations. This represents sound financial practice and generally has a positive impact on the year-end fund balance.

The best financial practice is to fund recurring costs—such as personnel, operating, and debt obligations—through recurring rather than one-time revenue sources, rather than relying on fund balance or, even worse, incurring additional debt. Large construction and apparatus expenditures planned for FY25, combined with a deficit in recurring revenue compared to recurring expenditures, resulted in a significant reduction in the ending fund balance. Although not problematic in the short term, the district will need to closely monitor recurring revenue versus expense and adjust appropriately if this trend continues into future fiscal years.

Figure 61: IMFD Expense, Revenue, & Impact on Ending Fund Balance

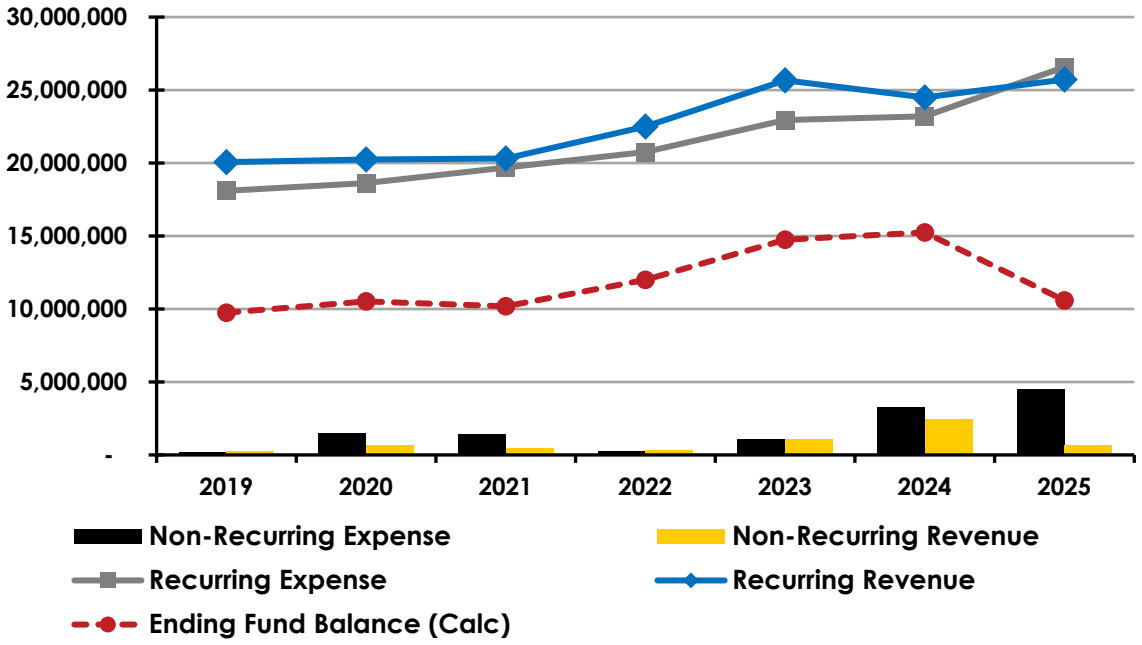
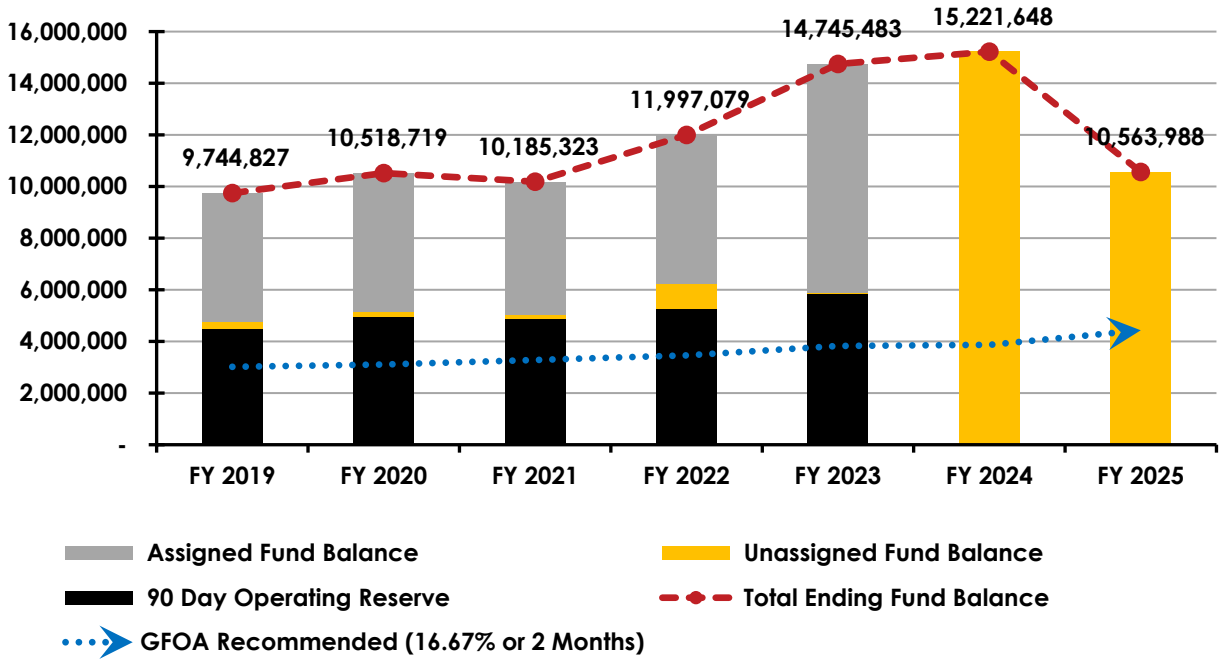


Figure 62 illustrates the distribution of fund balance from FY19 to FY25, including the projected FY25 fund balance. The district maintains a fund balance policy that assigns funds to various categories each fiscal year, including a hurricane/disaster reserve, a 90-day operating reserve, an apparatus/capital replacement reserve, and a reserve for OPEB obligations (unlike FMBFD). The remaining ending fund balance is unassigned and can be used for any purpose.

Although the figure shows all ending fund balances as unassigned in FY24–25, the district has not yet identified (or the data is unavailable) how much of the fund balance will be assigned to each category. The Government Finance Officers Association (GFOA) recommends that governmental entities maintain a reserve sufficient to fund at least two months of recurring expenses (approximately 16.67%). The blue dashed line in the figure shows this amount for each year.

The district's policy is to maintain a three-month or 25% operating (recurring expenses) reserve, exceeding the GFOA-recommended amount. Despite the difficulties resulting from Hurricane Ian and the FY25 reduction in ending fund balance, the district is in sound financial shape at this time, given its current fiscal policy. However, the recurring funding deficit discussed for FY25, as adopted, may become a factor if not addressed.

Figure 62: IMFD Fund Balance Analysis (FY19 Actual–FY25 Projected)



Capital Facilities & Equipment

Apparatus and other vehicles, trained personnel, firefighting and emergency medical equipment, and fire stations are the essential capital resources necessary for fire districts to carry out their missions. No matter how competent or numerous the firefighters are, it would be impossible for the two fire districts to perform their responsibilities effectively if appropriate capital equipment is unavailable for operations personnel.

Since the essential capital assets for emergency operations are facilities, apparatus, and other emergency response vehicles, this portion of the report will address them in the following sections.

Fire Station Features

Fire stations play an integral role in delivering emergency services for several reasons. Generally, a station's location will determine its response times to emergencies. A poorly located station can mean the difference between confining a fire to a single room and losing the structure, or survival or death from sudden cardiac arrest.

Fire stations also need to be designed to adequately house equipment and apparatus, meeting the needs of the organization and its personnel.

Fire station activities should be closely examined to ensure the structure is adequately sized and functional. Examples of these functions can include the following:

- Residential living space and sleeping quarters for on-duty personnel (all genders)
- Bathrooms and showers (all genders)
- Training, classroom, and library areas
- Kitchen facilities, appliances, and storage
- The housing and cleaning of apparatus and equipment, including decontamination and disposal of biohazards
- Administrative and management offices, computer stations, and office facilities
- Firefighter fitness area
- Public meeting space

Facility Inventories

In gathering information from the fire districts, JAG asked each fire district to rate the condition of its fire stations using the criteria in Figure 63. The results are shown in the figures following the criteria list.

Figure 63: Criteria Utilized to Determine Fire Station Conditions

Excellent	Like-new condition. No visible structural defects. The facility is clean and well-maintained. The interior layout is functional, with no unnecessary impediments to the apparatus bays or offices. No significant defect history. Building design and construction match the building's purposes. Age is typically less than ten years.
Good	The exterior has a good appearance with minor or no defects. Clean lines, good workflow design, and only minor wear on the building interior. The roof and apparatus apron are in good working order, absent any significant full-thickness cracks, crumbling of the apron surface, or visible roof patches or leaks. Building design and construction match the building's purposes. Age is typically less than 20 years.
Fair	The building appears structurally sound with a weathered appearance and minor to moderate non-structural defects. The interior condition shows normal wear and tear but flows effectively to the apparatus bay or offices. Mechanical systems are in working order. Building design and construction may not align with the building's intended purpose. Shows increasing age-related maintenance but with no critical defects. The typical age is 30 years or older.
Poor	The building appears cosmetically weathered and worn, with potential structural defects, though none are imminently dangerous or unsafe. Large, multiple full-thickness cracks and crumbling concrete may exist on the apron. The roof has evidence of leaking and has been repaired multiple times. The interior is poorly maintained and shows signs of advanced deterioration, with moderate to significant non-structural defects. Problematic age-related maintenance and major defects are evident. It may not be well suited to its intended purpose. Age is typically greater than 40 years.

Fort Myers Beach Headquarters & Fire Stations

The following figures list the features of the Fort Myers Beach District's headquarters facility and fire stations.

Figure 64: Fort Myers Beach Fire District Headquarters

Address/Physical Location:	100 Voorhis St., Fort Myers Beach, FL 33931

Structure	
Date of Original Construction	2003
Renovation Dates	2022
Auxiliary Power	Yes (new generator)
General Condition	Good
ADA Compliant	Yes
Total Square Footage	2,960 sq. ft.
Facilities Available	
No. of Separate Offices	9
No. of Computer Workstations	11
Maximum Staff Capability	11
Kitchen Facilities	Microwave only
Bathroom/Shower Facilities	2
Conference Meeting Rooms	1
Safety & Security	
Facility Sprinklered	Yes
Smoke/CO Detection	Yes
Security System	No

Figure 65: FMBFD Station 31

Address/Physical Location:	2545 Estero Blvd., Fort Myers Beach, FL 33931

Structure						
Date of Original Construction	Completion scheduled for March 2026					
Renovation Dates	Repairing due to storm damage					
Auxiliary Power	Included in the plan design					
General Condition	New					
Number of Apparatus Bays	Drive-through Bays	3	Back-in Bays	0.5		
ADA Compliant	Yes					
Total Square Footage	13,000 sq. ft.					
Facilities Available						
Sleeping Quarters	0	Bedrooms	8	Beds	8	Dorm Beds
Maximum Staffing Capability	8					
Exercise/Workout Facilities	Yes					
Kitchen Facilities	Yes					
Bathroom/Shower Facilities	Yes					
Training/Meeting Rooms	No					
Washer/Dryer Clothes	Yes					
Washer/Dryer PPE (Extractor)	Yes					
Safety & Security						
Station Sprinklered	Yes					
Smoke/CO Detection	Yes					
Decontamination/Bio. Disposal	Yes					
Security System	Yes					
Apparatus Exhaust System	Yes					
Contamination Control Zones	No					

Figure 66: FMBFD Station 32

Address/Physical Location:	17891 San Carlos Blvd., Fort Myers Beach, FL 33931

Structure						
Date of Original Construction	2008					
Renovation Dates	N/A					
Auxiliary Power	Yes					
General Condition	Good					
Number of Apparatus Bays	Drive-through Bays	0	Back-in Bays	3		
ADA Compliant	Yes					
Total Square Footage	12,376 sq. ft.					
Facilities Available						
Sleeping Quarters	0	Bedrooms	7	Beds	7	Dorm Beds
Maximum Staffing Capability	7					
Exercise/Workout Facilities	Yes					
Kitchen Facilities	Yes					
Bathroom/Shower Facilities	Yes					
Training/Meeting Rooms	Yes					
Washer/Dryer Clothes	Yes					
Washer/Dryer PPE (Extractor)	Yes					
Safety & Security						
Station Sprinklered	Yes					
Smoke/CO Detection	Yes					
Decontamination/Bio. Disposal	Yes					
Security System	Yes					
Apparatus Exhaust System	Yes					
Contamination Control Zones	No					

Figure 67: FMBFD Station 33

Address/Physical Location:	121 Lenell Rd., Fort Myers Beach, FL 33931

Structure						
Date of Original Construction	2008					
Renovation Dates	N/A					
Auxiliary Power	Yes					
General Condition	Good					
Number of Apparatus Bays	Drive-through Bays	0	Back-in Bays	3		
ADA Compliant	Yes					
Total Square Footage	5,991 sq. ft.					
Facilities Available						
Sleeping Quarters	0	Bedrooms	6	Beds	6	Dorm Beds
Maximum Staffing Capability	6					
Exercise/Workout Facilities	Fitness equipment in the rear of the apparatus bay					
Kitchen Facilities	Yes					
Bathroom/Shower Facilities	Yes					
Training/Meeting Rooms	No					
Washer/Dryer Clothes	Yes					
Washer/Dryer PPE (Extractor)	No					
Safety & Security						
Station Sprinklered	Yes					
Smoke/CO Detection	Yes					
Decontamination/Bio. Disposal	Yes					
Security System	Yes					
Apparatus Exhaust System	Yes					
Contamination Control Zones	No					

Iona-McGregor Fire Stations

Figure 68: IMFD Station 71

Address/Physical Location:	5401 Winkler Rd., Fort Myers, FL 33919

Structure						
Date of Original Construction	1965					
Renovation Dates	2009, 2023					
Auxiliary Power	Currently not installed due to station remodel					
General Condition	Excellent					
Number of Apparatus Bays	Drive-through Bays	0	Back-in Bays	1		
ADA Compliant	Yes					
Total Square Footage	2,316 sq. ft.					
Facilities Available						
Sleeping Quarters	4	Bedrooms	4	Beds	4	Dorm Beds
Maximum Staffing Capability	4					
Exercise/Workout Facilities	Yes					
Kitchen Facilities	Yes					
Bathroom/Shower Facilities	Yes					
Training/Meeting Rooms	No					
Washer/Dryer Clothes	Yes					
Washer/Dryer PPE (Extractor)	No					
Safety & Security						
Station Sprinklered	Yes					
Smoke/CO Detection	Yes					
Decontamination/Bio. Disposal	Yes					
Security System	No					
Apparatus Exhaust System	Yes					
Contamination Control Zones	No					

Figure 69: IMFD Station 72

Address/Physical Location:	16551 McGregor Blvd., Fort Myers, FL 33908

Structure						
Date of Original Construction	1977					
Renovation Dates	2023					
Auxiliary Power	Yes					
General Condition	Excellent					
Number of Apparatus Bays	Drive-through Bays	3	Back-in Bays	0		
ADA Compliant	Yes					
Total Square Footage	4,936 sq. ft.					
Facilities Available						
Sleeping Quarters	7	Bedrooms	8	Beds	8	Dorm Beds
Maximum Staffing Capability	8					
Exercise/Workout Facilities	Yes					
Kitchen Facilities	Yes					
Bathroom/Shower Facilities	Yes					
Training/Meeting Rooms	No					
Washer/Dryer Clothes	Yes					
Washer/Dryer PPE (Extractor)	Yes					
Safety & Security						
Station Sprinklered	Yes					
Smoke/CO Detection	Yes					
Decontamination/Bio. Disposal	Yes					
Security System	No					
Apparatus Exhaust System	No (but using a PPV fan)					
Contamination Control Zones	After completion of the remodel					

Figure 70: IMFD Station 73

Address/Physical Location:	15961 Winkler Rd., Fort Myers, FL 33908

Structure						
Date of Original Construction	1990					
Renovation Dates	2009, 2012					
Auxiliary Power	Yes					
General Condition	Good					
Number of Apparatus Bays	Drive-through Bays	3	Back-in Bays	0		
ADA Compliant	Yes					
Total Square Footage	13,793 sq. ft.					
Facilities Available						
Sleeping Quarters	7	Bedrooms	8	Beds	8	Dorm Beds
Maximum Staffing Capability	8					
Exercise/Workout Facilities	Yes					
Kitchen Facilities	Yes					
Bathroom/Shower Facilities	Yes					
Training/Meeting Rooms	Yes					
Washer/Dryer Clothes	Yes					
Washer/Dryer PPE (Extractor)	Yes					
Safety & Security						
Station Sprinklered	Yes					
Smoke/CO Detection	Yes					
Decontamination/Bio. Disposal	Yes					
Security System	No					
Apparatus Exhaust System	No					
Contamination Control Zones	No					

Figure 71: IMFD Station 74

Address/Physical Location:	6061 South Pointe Blvd., Fort Myers, FL 33919

Structure						
Date of Original Construction	2003					
Renovation Dates	N/A					
Auxiliary Power	Yes					
General Condition	Excellent					
Number of Apparatus Bays	Drive-through Bays	4	Back-in Bays	0		
ADA Compliant	Yes					
Total Square Footage	12,681 sq. ft.					
Facilities Available						
Sleeping Quarters	11	Bedrooms	12	Beds	12	Dorm Beds
Maximum Staffing Capability	N/A					
Exercise/Workout Facilities	Yes					
Kitchen Facilities	Yes					
Bathroom/Shower Facilities	Yes					
Training/Meeting Rooms	Yes					
Washer/Dryer Clothes	Yes					
Washer/Dryer PPE (Extractor)	Yes					
Safety & Security						
Station Sprinklered	Yes					
Smoke/CO Detection	Yes					
Decontamination/Bio. Disposal	Yes					
Security System	No					
Apparatus Exhaust System	No (but using a PPV fan)					
Contamination Control Zones	No					

Figure 72: IMFD Station 75

Address/Physical Location:	15660 Pine Ridge Rd., Fort Myers, FL 33908

Structure						
Date of Original Construction	2009					
Renovation Dates	N/A					
Auxiliary Power	Yes					
General Condition	Excellent					
Number of Apparatus Bays	Drive-through Bays	3	Back-in Bays	0		
ADA Compliant	Yes					
Total Square Footage	37,080 sq. ft.					
Facilities Available						
Sleeping Quarters	15	Bedrooms	15	Beds	15	Dorm Beds
Maximum Staffing Capability	N/A					
Exercise/Workout Facilities	Yes					
Kitchen Facilities	Yes					
Bathroom/Shower Facilities	Yes					
Training/Meeting Rooms	Yes					
Washer/Dryer Clothes	Yes					
Washer/Dryer PPE (Extractor)	Yes					
Safety & Security						
Station Sprinklered	Yes					
Smoke/CO Detection	Yes					
Decontamination/Bio. Disposal	Yes					
Security System	Cameras on the exterior and in the bay					
Apparatus Exhaust System	No					
Contamination Control Zones	No					

Collective Summary of the Fire Stations & Facilities

Figure 73 summarizes some of the features of the stations operated by FMBFD and IMFD.

Figure 73: Combined Features of the FMBFD & IMFD Fire Stations (2025)

Station	Square Footage	Apparatus Bays	Available Beds	General Condition	Station Age
Fort Myers Beach Fire Stations					
Station 31[A]	13,000	3	8	Excellent	New (2026)
Station 32	12,376	3	7	Good	17 years
Station 33	5,991	3	6	Good	17 years
Iona-McGregor Fire Stations					
Station 71	2,316	1	4	Excellent	2 years
Station 72[B]	4,936	3	8	Excellent	2 years
Station 73	13,793	3	8	Good	13 years
Station 74	12,681	4	12	Excellent	22 years
Station 75	37,080	3	15	Excellent	16 years
Grand Totals:	**102,173**	**23 bays**	**68 beds**	**Average:**	**13 years**

[A] Station being renovated; will be completed in 2026.
[B] Renovated in 2023.

The two districts will have a combined total of eight fire stations by 2026 (following the rebuilding of FMBFD Station 31). Collectively, the districts have the capacity to house at least 23 apparatus and nearly 70 personnel. All stations were considered in "Good" or "Excellent" condition.

Apparatus & Vehicles Fleet Inventories

Reviewing each fire district's fleet inventory is especially important if the two organizations merge. A legal merger of FMBFD and IMFD would likely result in the merging of apparatus inventories and other equipment.

Since firefighters may not be familiar with the operation, features, and equipment carried on an apparatus from another fire district, training and orientation on this equipment will be very important to avoid potential problems.

The apparatus must be sufficiently reliable to transport firefighters and equipment rapidly and safely to the incident scene. Additionally, such vehicles must be adequately equipped and function properly to ensure that the delivery of emergency services is not compromised. For this reason, they are expensive and offer minimal flexibility in use and reassignment to other emergency services missions.

As a part of this study, JAG requested that each fire district provide a complete fleet inventory (apparatus, ambulances, command units, support vehicles, specialty units, etc.).

The fire districts were asked to rate the condition of their apparatus using the criteria in the following Figure 74:

Figure 74: Criteria Used to Determine Apparatus & Vehicle Condition

Evaluation Components	Points Assignment Criteria
Age:	One point for every year of age, based on the in-service date.
Miles/Hours:	One point for every 10,000 miles or 1,000 hours.
Service:	One, three, or five points are assigned based on the service type received (e.g., a pumper would receive five points since it is classified as severe-duty service).
Condition:	This category considers body condition, interior condition, accident history, anticipated repairs, and other relevant factors. The better the condition, the lower the points assigned.
Reliability:	Points are assigned as one, three, or five, depending on the frequency a vehicle is in for repair (e.g., five points would be assigned to a vehicle in the shop two or more times per month on average, while one point would be assigned if in the shop on average of once every three months or less.

Point Ranges	Condition Rating	Condition Description
Under 18 points	Condition I	Excellent
18–22 points	Condition II	Good
23–27 points	Condition III	Fair (consider replacement)
28 points or higher	Condition IV	Poor (immediate replacement)

Fort Myers Beach Fire District Fleet

Figure 75 lists the inventory of the current frontline apparatus and other Fort Myers Beach Fire District vehicles.

Figure 75: FMBFD Frontline Fleet Inventory (2025)

Unit	Type	Manufacturer	Year	Condition	Features
Engine 32	Engine	Sutphen	2018	Good	
Truck 33	Ladder	Sutphen	2019	Good	
Rescue 32	Ambulance	Freightliner	2022	Excellent	
Support 32	Support	Ford	2020	Good	Four-wheel drive
Support 33	Support	Ford	2017	Good	Four-wheel drive
Command & Staff Vehicles					**Assigned To**
B01	Chevrolet Tahoe		2020	Good	Fire Chief
B02	Ford F-150		2018	Good	Assistant Chief
B03	Ford F-150		2018	Good	Assistant Chief
B06	Chevrolet Tahoe		2019	Good	Fire Marshal
B07	Ford F-150		2019	Good	Fire Inspector
B08	Ford F-150		2018	Good	Fire Inspector
B09	Ford F-150		2018	Good	Fire Inspector
B30	Ford Expedition		2017	Good	Battalion Chief

Figure 75 shows that FMBFD maintains a relatively young fleet of apparatus and command vehicles. Fire apparatus, support vehicles, and the frontline ambulance range in age from 2–7 years, while command and staff vehicles range from 4–7 years. FMBFD currently maintains one engine and two ambulances in reserve status.

Iona-McGregor Fire District Fleet

Figure 76 lists the current frontline apparatus inventory and other IMFD vehicles.

Figure 76: IMFD Frontline Fleet Inventory (2025)

Unit	Type	Manufacturer	Year	Condition	Features
Engines & Aerial Apparatus					
Engine 71	Engine	Sutphen	2020	Good	1,500 GPM/750 GAL
Engine 72	Engine	Sutphen	2019	Good	1,500 GPM/750 GAL
Engine 75	Engine	Sutphen	2015	Good	1,500 GPM/750 GAL
Truck 74	Truck	Sutphen	2019	Good	1,500 GPM/300 GAL
Rescues & Squads					
Rescue 72	Rescue	Ford F350	2023	Good	—
Rescue 73	Rescue	Ford F350	2023	Good	—
Rescue 74	Rescue	Ford F350	2023	Good	—
Squad 73	Squad	Sutphen	2021	Good	1,500 GPM/750 GAL
Marine 70	Watercraft	Metal Shark	2014	Good	32-foot Defiant

Figure 77 shows the various vehicles assigned to the command staff.

Figure 77: IMFD Assigned Command Staff Units (2025)

Unit	Type	Manufacturer	Year	Condition	Assigned To
Iona 1	Command	Ford	2018	Good	Fire Chief
Iona 2	Command	Ford	2018	Good	Deputy Chief
Iona 3	Command	Chevrolet	2022	Good	Deputy Chief
Iona 4	Command	Ford	2020	Good	Division Chief
Iona 5	Command	Ford	2022	Good	Division Chief
Iona 6	Command	Chevrolet	2025	Excellent	Division Chief
Iona 7	Command	Dodge	2023	Excellent	Division Chief
Battalion 70	Command	Chevrolet	2024	Good	Battalion Chief
Battalion 79	Command	Chevrolet	2019	Good	Battalion Chief

In addition to the apparatus and vehicles listed in Figure 76 and Figure 77, IMFD maintains three vehicles assigned to Inspectors, one for the Community Relations Specialist, one for

the Facilities Coordinator, and two other apparatus utilized as high-water vehicles. IMFD also maintains Engines 78 and 79, as well as Rescues 78 and 79, in reserve.

Other Capital Equipment

Emergency Medical Devices

Figure 78 lists the current combined inventories of ALS-level cardiac monitor/defibrillators for each fire district. This information is important for determining compatibility between the two agencies and Lee County EMS.

Figure 78: Inventory of the Fire District Cardiac Devices (2024)

Device Brand & Models	FMBFD	IMFD	Totals
ZOLL® X Series® (all 2020 models)	7	0	**7**
ZOLL® X Series® (all 2016 models)	0	10	**10**
Totals:	**7**	**10**	**17**

IMFD maintains nine UESCOPE® video laryngoscopes manufactured in 2022.

Self-Contained Breathing Apparatus

Figure 79 lists the manufacturers, models, and quantities of self-contained breathing apparatus (SCBA) used by each fire district.

Figure 79: Fire District SCBA Inventories (2024)

Manufacturer & Models	FMBFD	IMFD	Totals
Scott™ Air-Pak™ 75 SCBA	27	0	**27**
Scott™ Air-Pak™ X3	0	46	**46**
Scott™ RIT-Pak III System	3	8	**11**
Scott™ 45/5500 Cylinders	54	117	**171**

Service Delivery & Performance

In this section, JAG reviewed the current service delivery and performance of FMBFD and IMFD. JAG analyzed the operational components of service delivery and performance from multiple perspectives, including:

- Service demand
- Resource distribution
- Resource concentration
- Resource reliability
- Response performance

To provide the highest level of service to the citizens and visitors of the districts, the sum of all these components must be effective and efficient. FMBFD and IMFD will achieve this through efficient notifications of incidents and rapid responses from effectively located facilities with appropriately typed apparatus staffed with an adequate number of properly trained personnel.

NERIS
NATIONAL EMERGENCY RESPONSE INFORMATION SYSTEM

THE U.S. FIRE ADMINISTRATION (USFA) HAS PARTNERED WITH THE U.S. DEPARTMENT OF HOMELAND SECURITY'S (DHS) SCIENCE AND TECHNOLOGY DIRECTORATE (S&T), AND THE FIRE SAFETY RESEARCH INSTITUTE (FSRI) TO DEVELOP AND LAUNCH A NEW INTEROPERABLE FIRE INFORMATION AND ANALYTICS PLATFORM, KNOWN AS THE NATIONAL EMERGENCY RESPONSE INFORMATION SYSTEM (NERIS).

THE GOAL OF NERIS IS TO EMPOWER THE LOCAL FIRE AND EMERGENCY SERVICES COMMUNITY BY EQUIPPING THEM WITH NEAR REAL-TIME INFORMATION AND ANALYTIC TOOLS THAT SUPPORT DATA- INFORMED DECISION-MAKING FOR ENHANCED PREPAREDNESS AND RESPONSE TO INCIDENTS INVOLVING ALL HAZARDS.

HTTPS://WWW.USFA.FEMA.GOV/DOWNLOADS/PDF/NERIS/NERIS-INFORMATION-SHEET.PDF

This section provides a current analysis of service delivery and response performance in the FMBFD and IMFD service areas, offering a snapshot of the various components of service delivery. In addition to this analysis, FMBFD and IMFD leadership should continuously monitor performance and incorporate it into their planning processes.

Data Sources

The data for this study, obtained from FMBFD and IMFD, were sourced from the districts' records management systems (RMS). Both districts use ESO® Software's Emergency Reporting software for the National Fire Incident Reporting System (NFIRS). These sources provided data from January 1, 2019, through December 31, 2024.

Figure 80 summarizes the incident data available for analysis from FMBFD. JAG utilized the dataset best suited for each analysis.

Figure 80: FMBFD Summary of Data Sources

Sources	2019	2020	2021	2022	2023	2024
NFIRS All (Units)	5,754	5,545	6,764	4,803	2,504	3,046
NFIRS Single (Incidents)	3,243	3,209	3,935	2,840	1,747	2,281

Figure 81 summarizes the incident data available for analysis from IMFD. As with FMBFD, JAG used the dataset best suited for each analysis.

Figure 81: IMFD Summary of Data Sources

Sources	2019	2020	2021	2022	2023	2024
NFIRS All (Units)	10,957	10,621	11,316	12,766	12,397	13,217
NFIRS Single (Incidents)	9,645	9,493	8,992	9,597	9,291	10,061

Regarding NFIRS data, it is crucial to ensure that the data collected is complete and accurate, as this information is utilized at all levels, from local budget development to the identification of national preparedness initiatives. Accurate fire incident reports are crucial and can significantly impact a local department just as much as the entire United States.

When incidents are documented for the NFIRS, there is the potential for data entry errors—mistakes that can alter the intended meaning of the information. Several mistakes across a region may not be significant, but multiple mistakes in the same region—or worse, widespread mistakes across the entire country—can dramatically affect the meaning of the data. The same result occurs when data is generalized, such as the overuse of the codes for “unknown,” “none,” or “other.”

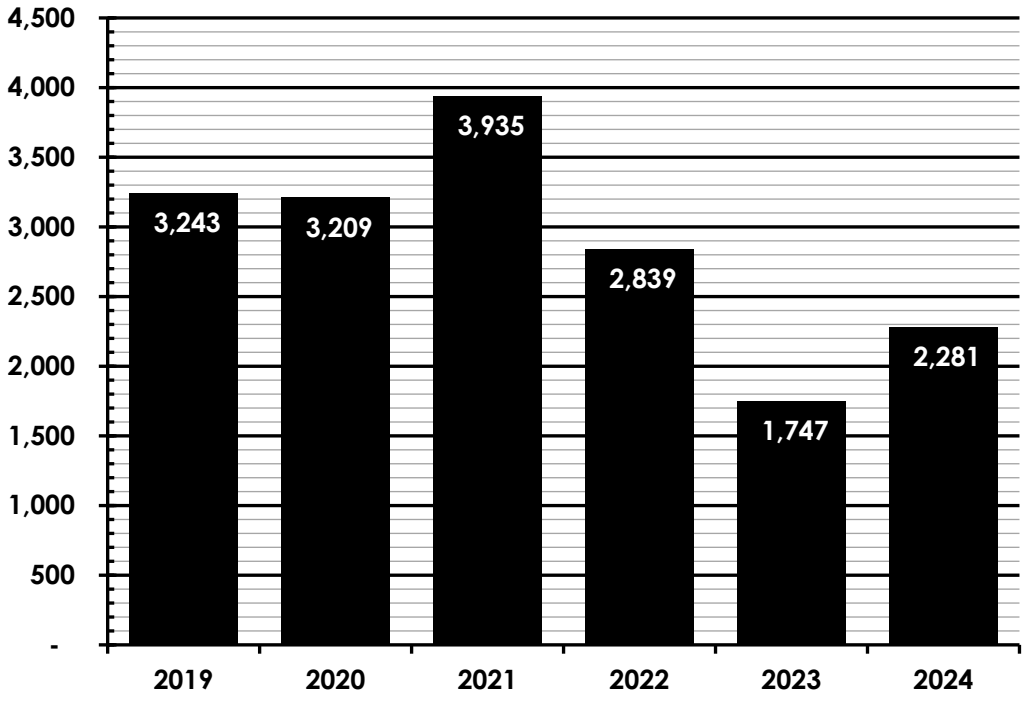
Service Demand

The service demand analysis reviews current and historical service demand by incident type and temporal variation. GIS software provides a geographic display of demand.

Fort Myers Beach Fire District

Figure 82 displays historical FMBFD service demand for the previous six calendar years. Overall, service demand decreased by approximately 29.7% from 2019 to 2024. This represents an average annual decrease of approximately 5%. Hurricane Ian made landfall in the area in late September 2022, contributing to the decrease in incident volume from 2022 through 2024.

Figure 82: FMBFD Incident Volume (2019–2024)



NFIRS has developed a classification system to categorize incident types. These codes identify the various types of incidents to which fire departments respond. When analyzed in this manner, an agency can better determine the demand for service and what training may be of priority for its responders. This information is also valuable for guiding community risk reduction programs.

The codes consist of three digits and are grouped into series by the first digit, as shown in the following Figure 83.

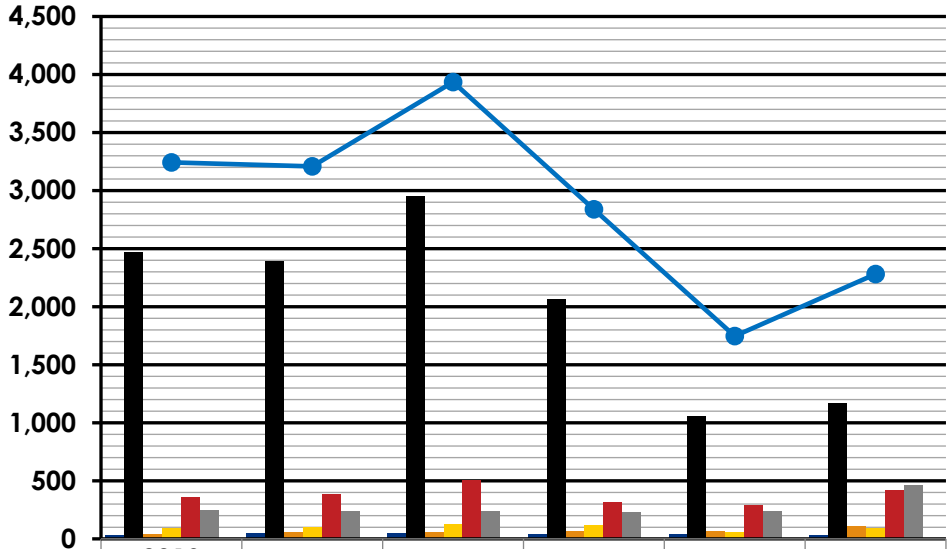
Figure 83: NFIRS Incident Code & Descriptions

Type Code	Incident Description
100 Series	Fires
200 Series	Overpressure Rupture, Explosion, Overheat (No Fire)
300 Series	Rescue and Emergency Medical Service (EMS) Incidents
400 Series	Hazardous Condition (No Fire)
500 Series	Service Call
600 Series	Canceled, Good Intent
700 Series	False Alarm, False Call
800 Series	Severe Weather, Natural Disaster
900 Series	Special Incident Type

Incidents typed as Fires (NFIRS 100s) include all types of fires, such as structure, wildland, vehicle, etc. False Alarms (NFIRS 700s) include manual and automatic fire alarms in which no fire problem was identified. The Other category includes NFIRS codes such as Overpressure Rupture (No Fire) (NFIRS 200s), Severe Weather and Natural Disaster (NFIRS 800s), and Special Incidents (NFIRS 900s). Hazardous Condition (NFIRS 400s), Service Call (NFIRS 500s), and Canceled or Good Intent (NFIRS 600s) incidents in which the district's services were not needed after units were dispatched comprise the balance of the incidents.

Figure 84 shows the analysis of overall service demand. Incident demand fluctuated up and down based on NFIRS incident type over the preceding six calendar years. The most significant increase in service demand was for incidents coded as Hazardous Condition (400 series), with an 189.5% increase based on a limited number of incidents. However, since Rescue and EMS incidents account for the highest percentage of FMBFD's overall volume, it is important to note the over 52% decrease during the period.

Figure 84: FMBFD Annual Demand by Incident Type (2019–2024)



	2019	2020	2021	2022	2023	2024
100	30	44	52	37	36	33
300	2471	2394	2952	2062	1053	1167
400	38	54	57	68	65	110
500	95	96	124	118	55	89
600	360	385	505	313	290	418
700	245	235	238	230	241	458
Other	4	1	7	11	7	4
Total	3,243	3,209	3,935	2,839	1,747	2,281

Although Figure 84 analyzes overall demand for services, it is also essential to examine how the various incident types compare to the overall number. As shown, the majority of demand for services was within the EMS and Rescue category, at 70%. Good Intent incidents followed this at 13%, and False Alarm calls at 10%.

As depicted in Figure 85, emergency medical incidents accounted for the largest percentage of calls for service, consistent with what is typically observed nationwide.

Figure 85: FMBFD NFIRS Service Demand by Type (2019–2024)

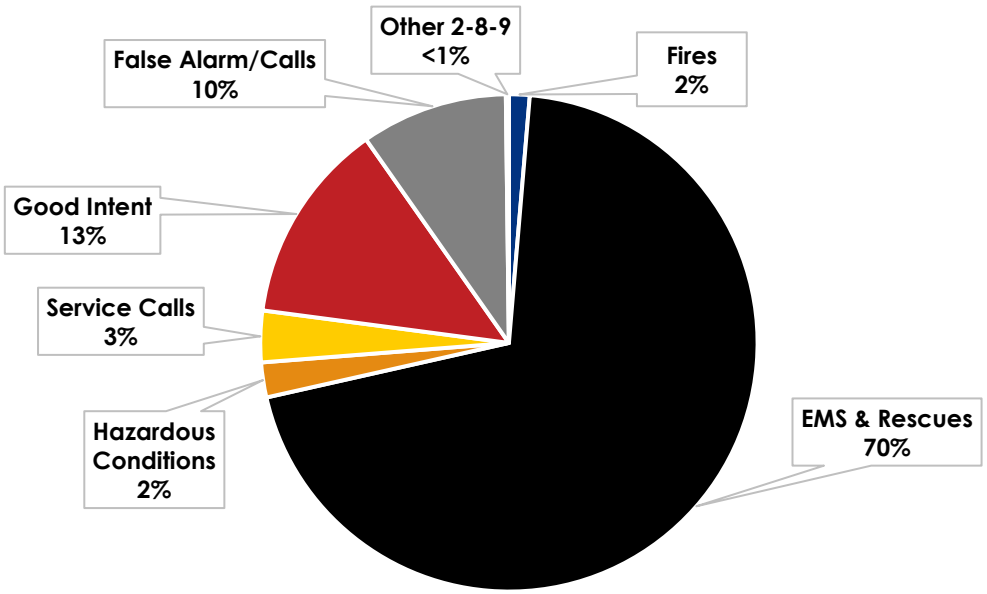


Figure 86 shows the relationship between counts and cumulative percentage by type.

Figure 86: FMBFD NFIRS Service Demand by Type (2019–2024)

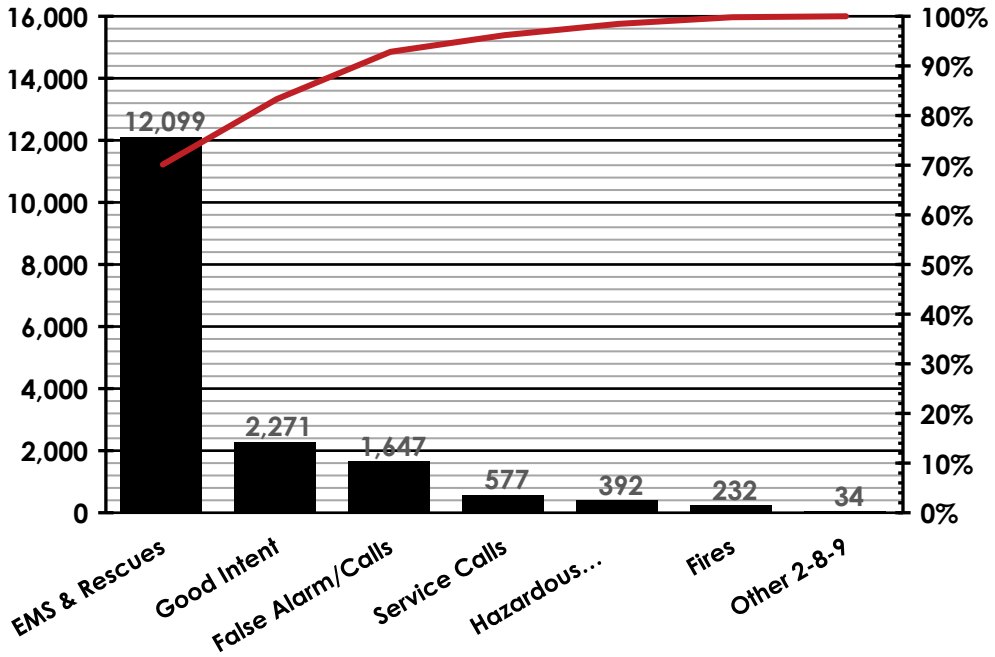


Figure 87 illustrates service demand for FMBFD based on property type. Residential occupancies accounted for the highest demand within all reported incident-type categories.

Figure 87: FMBFD Service Demand by NFIRS Property Type (2019–2024)

NFIRS Property Use Category	Fires[1]	EMS[2]	Alarms[3]	Others[4]
0–Property Use, Other	0.0%	0.10%	0.0%	0.06%
1–Assembly (restaurant, bar, theater, library, church, airport)	6.25%	10.01%	8.87%	5.55%
2–Educational (school, daycare center)	0.00%	0.03%	0.13%	0.24%
3–Healthcare, Detention, Correction (nursing home, hospital, medical office, jail)	0.96%	1.32%	0.06%	1.28%
4–Residential (private residence, hotel/motel, residential board)	52.88%	55.41%	83.74%	52.80%
5–Mercantile, Business (grocery store, service station, office, retail)	4.33%	3.16%	1.74%	4.21%
6–Industrial, Utility, Agriculture, Mining	0.96%	0.23%	0.00%	0.37%
7–Manufacturing	0.00%	0.02%	0.00%	0.00%
8–Storage	0.96%	4.19%	2.38%	2.32%
9–Outside Property, Highway, Street	33.65%	25.53%	3.08%	33.2%

[1] NFIRS 100s.
[2] NFIRS 300s.
[3] NFIRS 700s.
[4] All other incident types.

Iona-McGregor Fire District

Figure 88 displays historical IMFD service demand for the previous six calendar years. Overall, service demand increased by approximately 5.4% from 2019 to 2024. This represents an average annual increase of approximately 0.9%.

Figure 88: IMFD Incident Volume (2019–2024)

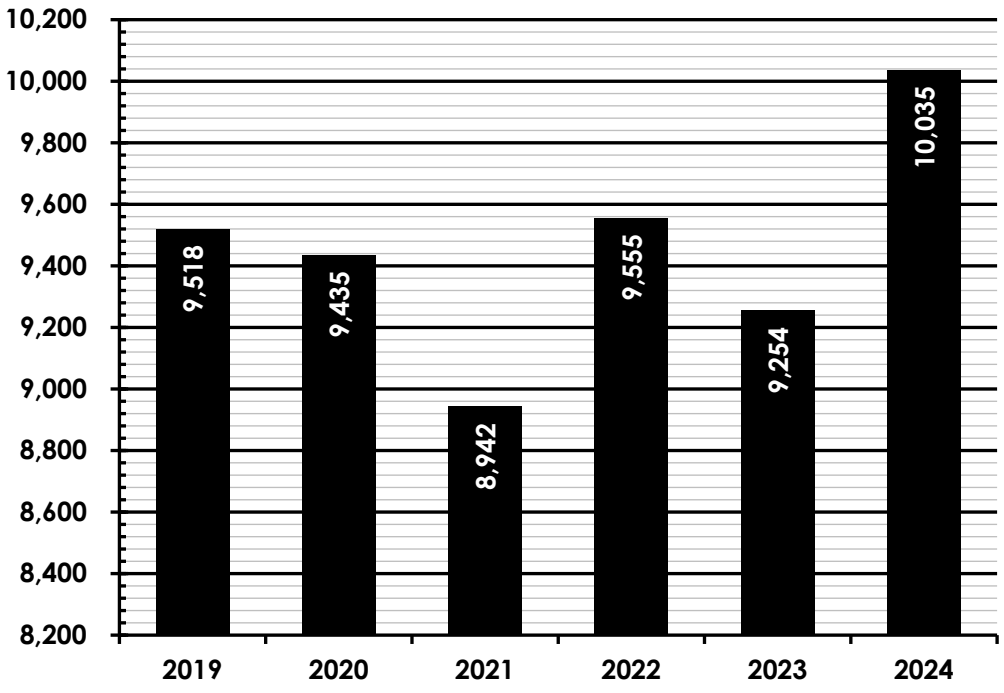
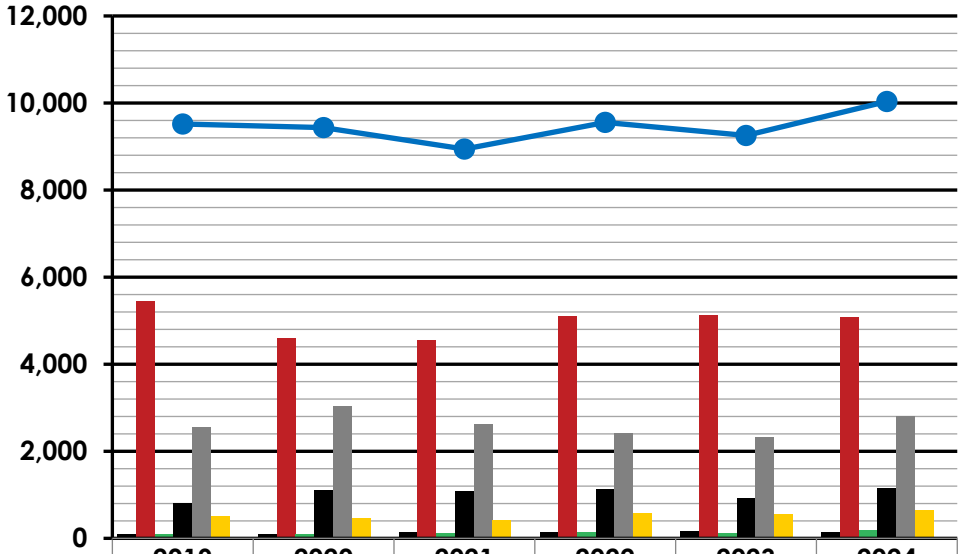


Figure 89 shows the analysis of the overall demand for services. Incident demand fluctuated up and down based on NFIRS incident type over the preceding six calendar years. The most significant increase in service demand was for incidents coded as Hazardous Condition (400 series), with a 103.4% increase based on a limited number of incidents.

Since Rescue and EMS incidents account for the highest percentage of IMFD's overall volume, it is noteworthy that there has been a decrease of over 6% during this period.

Figure 89: IMFD Annual Demand by Incident Type (2019–2024)



	2019	2020	2021	2022	2023	2024
100	103	102	134	153	162	134
300	5437	4610	4542	5103	5137	5088
400	88	102	116	145	130	179
500	800	1112	1095	1131	928	1147
600	2555	3030	2625	2421	2327	2806
700	510	455	408	570	559	658
Other	25	24	22	32	11	23
Total	9,518	9,435	8,942	9,555	9,254	10,035

As illustrated in Figure 90, the majority of demand for services was within the EMS and Rescue category, accounting for 53%. Good Intent incidents followed this at 28%, and Service Calls incidents at 11%. In discussions with senior staff about the low percentage of incidents categorized as EMS, it was concluded that some EMS incidents may have been coded incorrectly as canceled en route.

Figure 90: IMFD NFIRS Service Demand by Type (2019–2024)

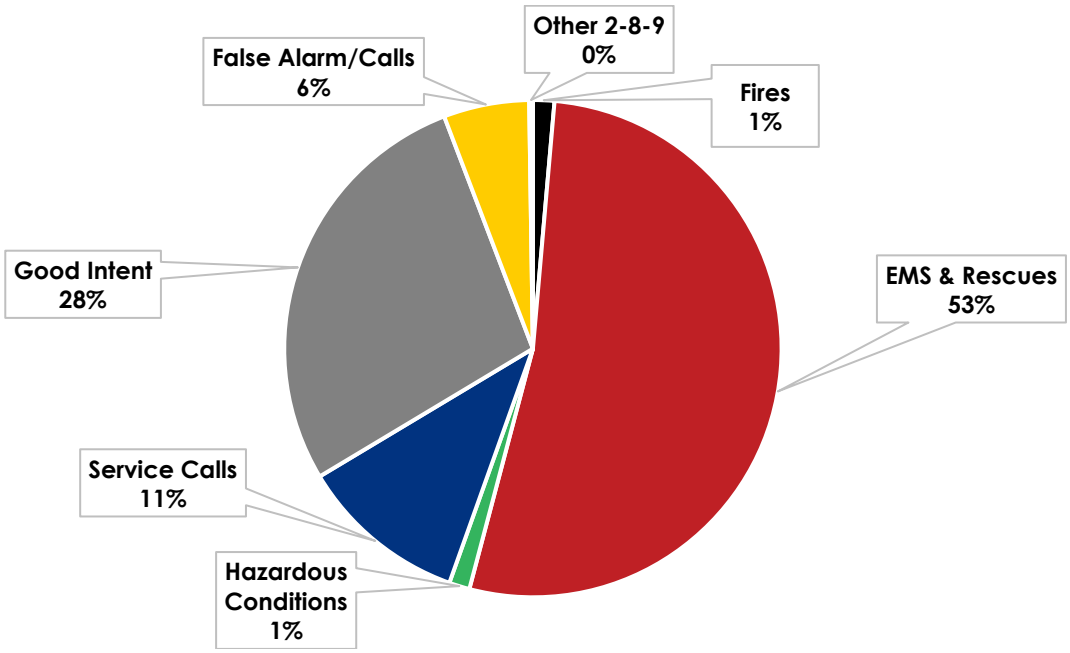


Figure 91 illustrates the relationship between counts and cumulative percentage by incident type.

Figure 91: IMFD NFIRS Service Demand by Type (2019–2024)

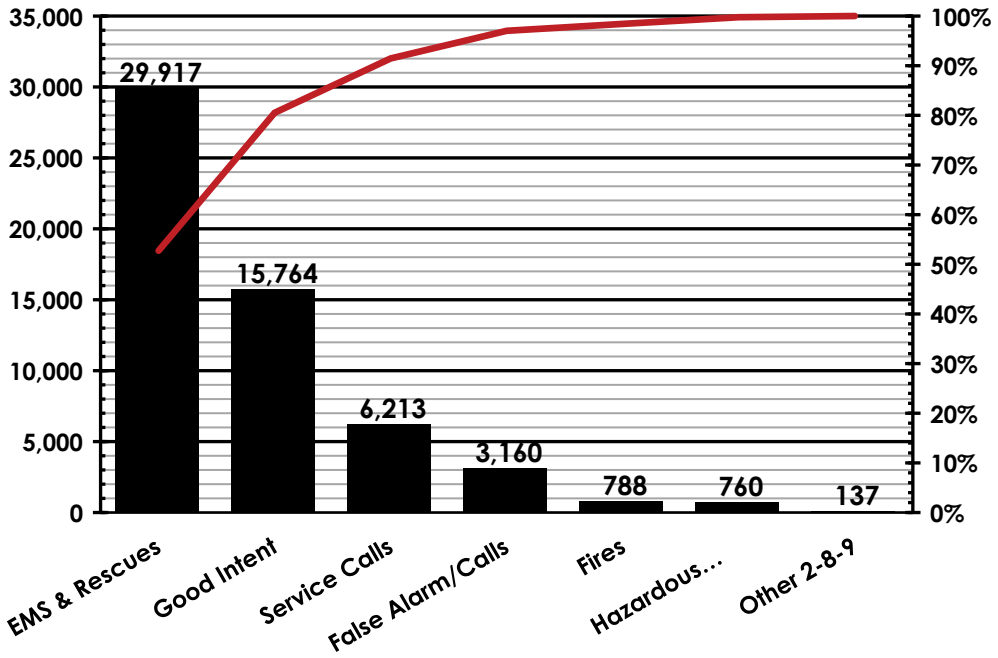


Figure 92 illustrates service demand for IMFD based on property type. Residential occupancies accounted for the highest demand within all reported incident-type categories.

Figure 92: IMFD Service Demand by NFIRS Property Type (2019–2024)

NFIRS Property Use Category	Fires[1]	EMS[2]	Alarms[3]	Others[4]
0–Property Use, Other	0.15%	1.2%	0.3%	1.74%
1–Assembly (restaurant, bar, theater, library, church, airport)	2.50%	2.5%	5.937%	2.25%
2–Educational (school, daycare center)	0.15%	0.6%	4.00%	0.47%
3–Healthcare, Detention, Correction (nursing home, hospital, medical office, jail)	1.47%	24.4%	13.18%	18.60%
4–Residential (private residence, hotel/motel, residential board)	50.29%	57.6%	63.51%	62.39%
5–Mercantile, Business (grocery store, service station, office, retail)	7.21%	2.4%	8.49%	3.51%
6–Industrial, Utility, Agriculture, Mining	1.32%	0.0%	0.13%	0.13%
7–Manufacturing	0.15%	0.00%	0.00%	0.01%
8–Storage	1.32%	0.45%	2.49%	0.38%
9–Outside Property, Highway, Street	35.44%	10.8%	1.97%	10.5%

[1] NFIRS 100s.
[2] NFIRS 300s.
[3] NFIRS 700s.
[4] All other incident types.

Temporal Analysis

After analyzing the types of incidents, the next step is to consider temporal analysis. The temporal component becomes essential when leadership plans for the current and future delivery of services. With this knowledge, the districts can better determine staffing needs and non-response activities such as hose testing, hydrant testing, incident pre-plans, training, and apparatus maintenance.

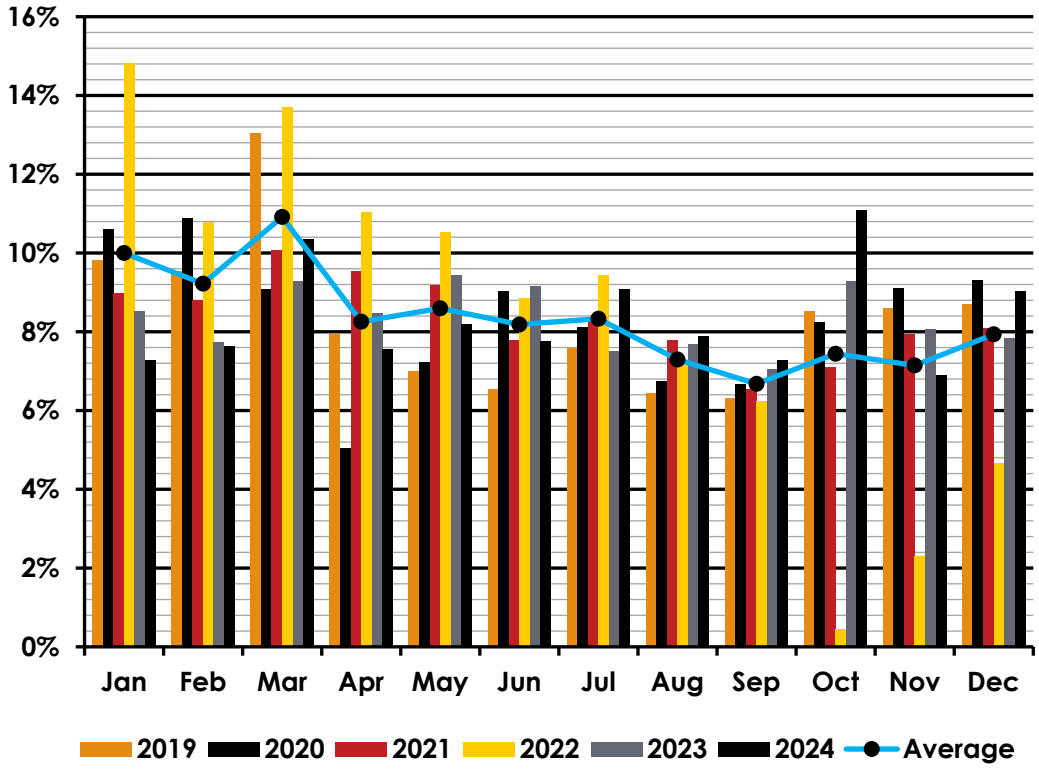
Unless noted, each temporal component is presented as a percentage relative to the total service demand during the six most recent full calendar years.

Fort Myers Beach Fire District

The first temporal component determines the service demand for each month of the year. Understanding this component allows leadership to schedule non-response activities during the lower service-demand months.

As illustrated in Figure 93, service demand fluctuated throughout the year, with a 4.24% difference between the busiest and slowest months. On average, the lowest demand for services occurred in September, with demand increasing in March to reach the highest average demand for services.

Figure 93: FMBFD NFIRS Service Demand by Month (2019–2024)

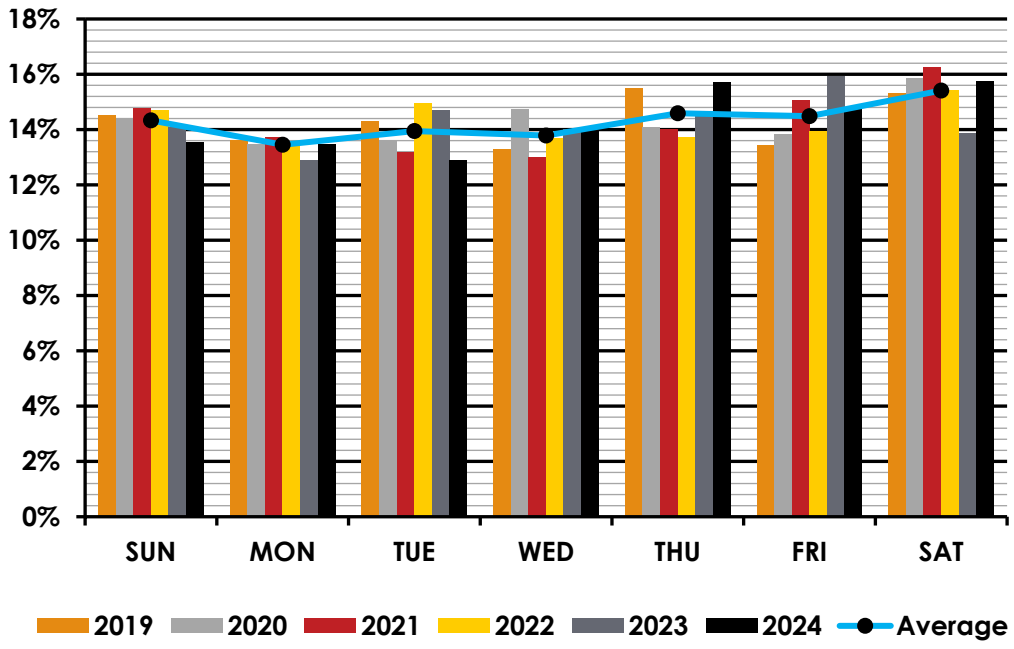


The second temporal component analyzed the day of the week to determine which day shows the greatest demand for service. Typically, the most noticeable variation occurred on weekends, when service demand decreased. This is expected, as greater activity occurs during the workweek, such as an increase in the transient population associated with the retail and commercial labor force.

Generally, activity levels increased during the workweek. However, weekends tend to show higher activity in areas such as FMBFD's service area, which has a significant population increase due to tourism.

As illustrated in Figure 94, and as expected, Mondays exhibited the lowest percentage of service demand for FMBFD. Weekends showed the highest demand, with a peak on Saturdays. The difference between the busiest and the slowest day was 1.96%.

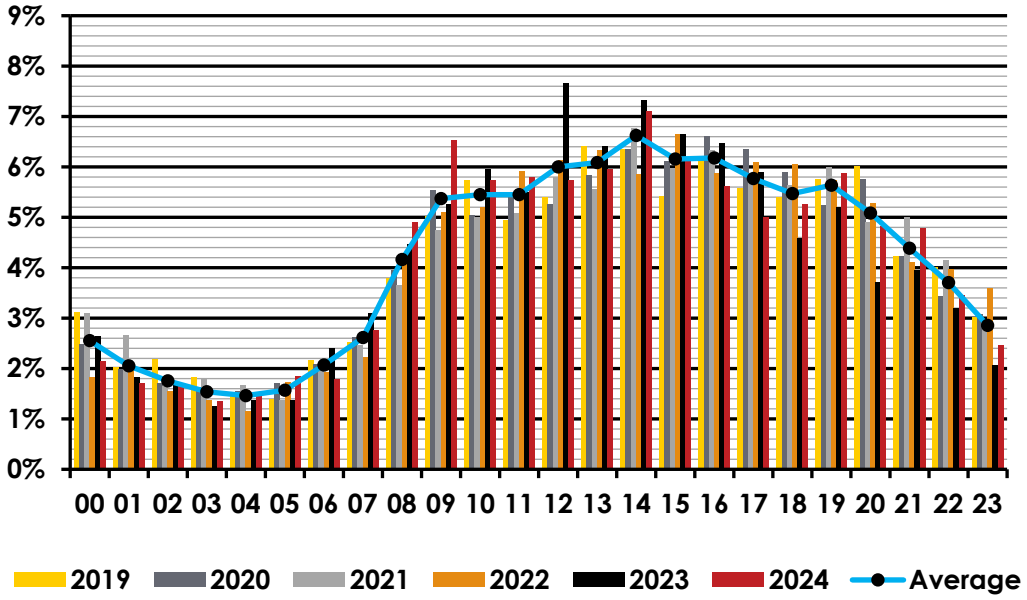
Figure 94: FMBFD NFIRS Service Demand by Weekday (2019–2024)



The final temporal component concerns determining the time of day that service demand occurs. As illustrated in Figure 95, average service demand began to increase in the early morning hours—coinciding with the community waking up and preparing for the day. Throughout the morning, service demand continued to increase, coinciding with the movement of the population from their homes and the resumption of their daily activities.

Demand reached a transient peak at 2 PM and then gradually decreased, coinciding with the population completing their daily activities and returning home. The decrease continued until reaching its lowest point at 4 AM.

Figure 95: FMBFD NFIRS Service Demand by Hour (2019–2024)



Although service demand is lowest during the early morning hours, according to the National Fire Data Center, fatal residential fires occur most frequently late at night or in the early morning hours when most people are asleep, a significant factor contributing to fatalities. From 2018 to 2020, fatal fires were highest from midnight to 1 AM Fatal fires were most prevalent when residential fire incidence was generally at its lowest, making nighttime fires the deadliest. The eight-hour peak period (11 PM to 7 AM) accounted for 45% of fatal residential fires.

Charting the temporal demands for service, both day and time, is valuable. Figure 96 compares average demand by day and hour, with relative values shown by color. The darker greens indicate lower demand, while the darker reds indicate the highest demand.

Figure 96: FMBFD NFIRS Service Demand by Day & Time (2022–2024)

Hour	Sun	Mon	Tue	Wed	Thu	Fri	Sat
00	2.88%	2.07%	2.15%	1.16%	2.50%	1.88%	2.31%
01	2.57%	1.74%	1.54%	2.10%	1.80%	1.78%	1.73%
02	2.26%	2.51%	1.13%	0.95%	1.80%	0.89%	2.02%
03	2.06%	1.09%	1.43%	0.74%	1.50%	1.19%	1.35%
04	1.54%	0.98%	1.64%	1.05%	1.00%	1.58%	1.44%
05	1.54%	2.07%	1.64%	1.68%	2.50%	1.19%	1.15%
06	1.44%	3.05%	1.84%	1.79%	1.80%	2.28%	1.92%
07	2.47%	2.62%	2.25%	2.42%	2.69%	3.17%	2.69%
08	4.63%	4.36%	4.41%	4.10%	5.59%	4.26%	4.14%
09	4.42%	7.09%	6.15%	6.30%	4.49%	5.74%	5.29%
10	4.42%	6.65%	6.25%	5.04%	5.69%	6.53%	4.52%
11	5.25%	5.34%	6.05%	7.14%	5.79%	5.35%	5.49%
12	6.38%	4.91%	6.86%	6.51%	7.39%	5.94%	6.64%
13	6.07%	5.45%	7.17%	7.04%	6.49%	6.34%	5.10%
14	6.69%	7.20%	8.61%	5.88%	5.89%	6.14%	6.16%
15	5.66%	7.96%	6.86%	6.93%	6.59%	5.54%	5.97%
16	5.86%	5.78%	5.64%	5.57%	5.39%	7.43%	5.87%
17	5.14%	5.23%	5.53%	6.93%	4.79%	5.54%	6.54%
18	5.97%	5.13%	5.43%	5.57%	4.59%	4.95%	6.26%
19	7.61%	4.69%	4.92%	4.83%	7.09%	4.46%	5.87%
20	4.63%	4.47%	3.69%	5.15%	4.29%	4.75%	6.06%
21	3.81%	3.71%	4.41%	4.83%	3.89%	4.46%	4.91%
22	3.19%	3.38%	2.56%	3.89%	3.49%	4.75%	3.95%
23	3.50%	2.51%	1.84%	2.42%	2.99%	3.86%	2.60%

As noted, 2 p.m. coincided with the highest average daily demand, as shown previously. An additional analysis depicts that the 2 p.m. demand was highest on Tuesdays compared to the other days and times. Figure 97 captures the busiest consecutive periods. The information can be used to identify periods for increased staffing or placing additional apparatus in service.

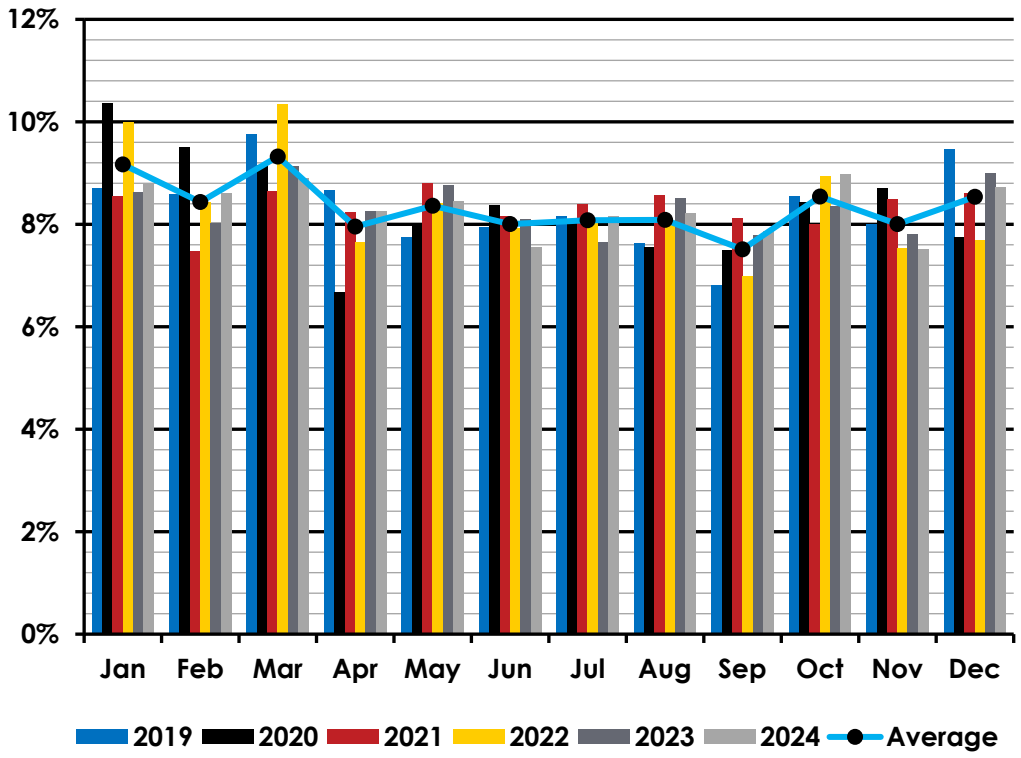
Figure 97: FMBFD Busiest Consecutive Service Delivery Periods (2022–2024)

Periods	8 Hours	10 Hours	12 Hours
Hours	1000–1800	1000–2000	0900–2100
Percentage of Total:	**49%**	**60%**	**70%**

Iona-McGregor Fire District

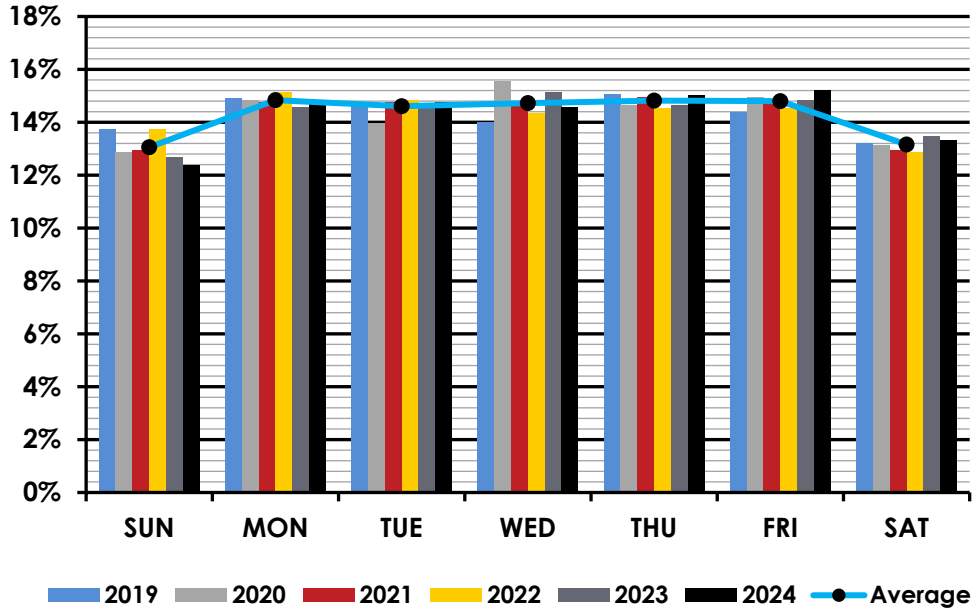
As illustrated in Figure 98, service demand is cyclical throughout the year, with a difference of only 1.81% between the busiest and slowest months. On average, the lowest demand for services occurred in September, rising to a peak in March, the month with the highest average demand.

Figure 98: IMFD NFIRS Service Demand by Month (2019–2024)



As illustrated in Figure 99, and as expected for a non-tourism-driven area, unlike FMBFD's service area, Sundays exhibited the lowest percentage of service demand for IMFD. The weekdays showed the highest demand figures, with a peak on Mondays. The difference between the busiest and the slowest day was 1.78%.

Figure 99: IMFD NFIRS Service Demand by Weekday (2019–2024)



As with FMBFD's service area, as illustrated in Figure 100, average service IMFD demand began to increase in the early morning hours—coinciding with the community waking up and preparing for the day. Throughout the morning, service demand continued to increase, coinciding with the movement of the population from their homes and the resumption of their daily activities.

Demand reached a transient peak at 11 AM and then gradually decreased, coinciding with the population completing their daily activities and returning home. The decrease continued until reaching its lowest point at 3 AM.

Figure 100: IMFD NFIRS Service Demand by Hour (2019–2024)

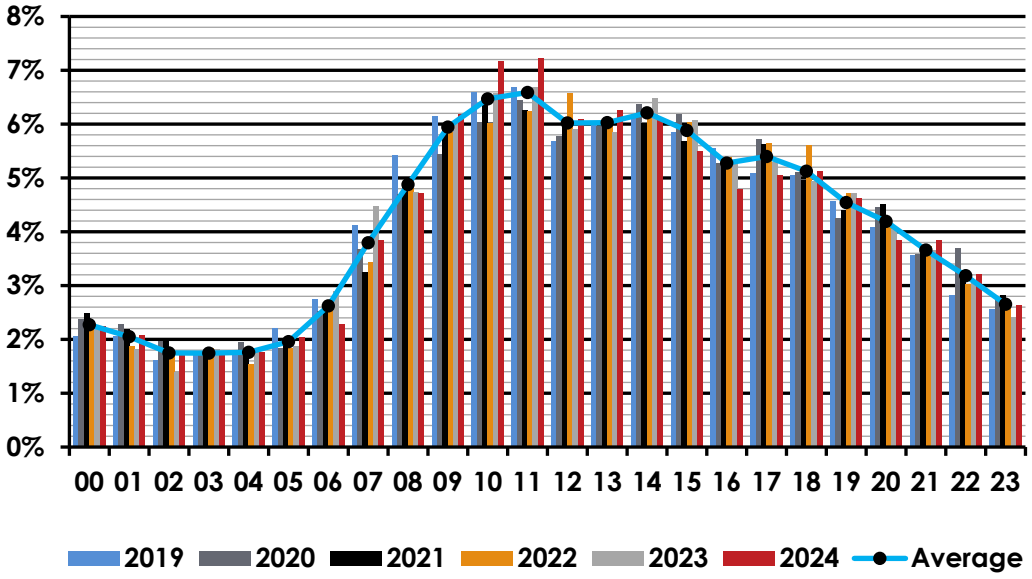


Figure 101 compares average demand by day and hour in IMFD's service area, illustrating the relative values shown in color. The darker greens indicate lower demand, while the darker reds indicate the highest demand.

Figure 101: IMFD NFIRS Service Demand by Day & Time (2022–2024)

Hour	Sun	Mon	Tue	Wed	Thu	Fri	Sat
00	2.73%	2.05%	1.94%	1.86%	2.39%	2.35%	2.46%
01	2.91%	1.72%	1.69%	1.86%	1.87%	1.60%	1.96%
02	2.27%	1.70%	1.17%	1.37%	1.43%	1.70%	1.91%
03	2.11%	1.65%	1.52%	1.67%	1.80%	1.72%	2.12%
04	2.03%	1.54%	1.69%	1.41%	1.59%	1.60%	2.04%
05	2.08%	2.00%	1.62%	1.91%	1.45%	2.16%	2.19%
06	3.07%	2.66%	2.13%	2.59%	2.72%	2.14%	2.90%
07	3.74%	4.15%	3.91%	3.15%	4.10%	4.00%	4.31%
08	4.57%	5.43%	4.80%	5.04%	4.71%	4.37%	4.26%
09	5.29%	5.94%	6.65%	6.00%	6.75%	6.37%	5.04%
10	6.07%	6.50%	7.22%	6.61%	6.79%	6.74%	6.09%
11	5.75%	6.85%	7.10%	6.80%	6.91%	7.48%	5.93%
12	5.13%	6.74%	6.84%	6.29%	6.09%	6.16%	5.90%
13	5.69%	6.25%	5.74%	6.83%	6.72%	5.76%	5.41%
14	5.51%	6.41%	7.61%	6.05%	6.09%	5.81%	6.14%
15	4.89%	6.08%	6.42%	6.43%	6.30%	5.88%	4.78%
16	4.62%	5.45%	5.18%	5.01%	5.06%	5.90%	4.78%
17	5.45%	5.03%	5.13%	5.25%	5.34%	5.44%	5.62%
18	5.96%	5.01%	4.99%	5.48%	4.83%	4.62%	5.80%
19	4.94%	4.22%	4.55%	4.47%	4.87%	4.93%	4.83%
20	4.38%	3.82%	3.61%	4.28%	3.51%	3.90%	4.86%
21	4.36%	3.15%	3.35%	3.88%	3.58%	3.76%	4.26%
22	3.66%	3.05%	2.53%	3.18%	2.83%	2.86%	3.79%
23	2.78%	2.59%	2.60%	2.57%	2.25%	2.74%	2.64%

As noted, 11 AM coincided with the highest average daily demand, as shown in Figure 100. An additional analysis shows that the 11 AM demand was highest on Fridays compared to other days and times.

Figure 102 captures the busiest consecutive periods.

Figure 102: IMFD Busiest Consecutive Service Delivery Periods (2022–2024)

Periods	8 Hours	10 Hours	12 Hour
Hours	0900–1700	0900–1900	0800–2000
Percentage of Total:	**49%**	**59%**	**67%**

Resource Distribution Analysis

Although incident-type and temporal analyses provide valuable insights into the types and timing of service demand, understanding its geographic distribution is also essential. JAG utilized geographic information systems (GIS) software to plot the locations of incidents within FMBFD's and IMFD's service areas and to calculate the relative incident density for each service area.

Figure 103 illustrates all incident densities within FMBFD's and IMFD's service areas for 2024.

Figure 103: FMBFD & IMFD Density—All Incidents (2024)

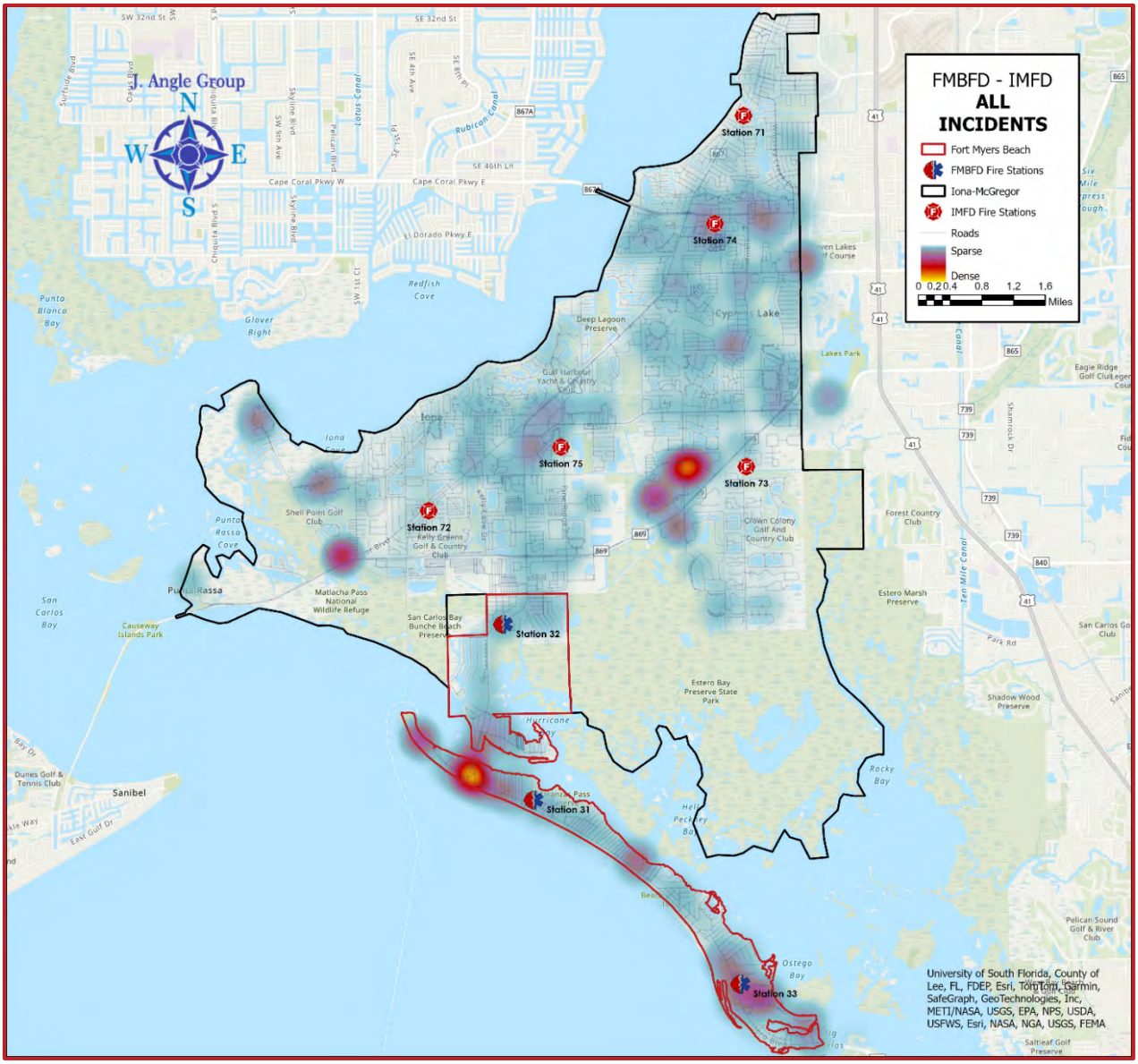


Figure 104 shows the density of fire incidents within the FMBFD and IMFD service areas during the 2024 calendar year.

Figure 104: FMBFD & IMFD Density—Fire Incidents (2024)

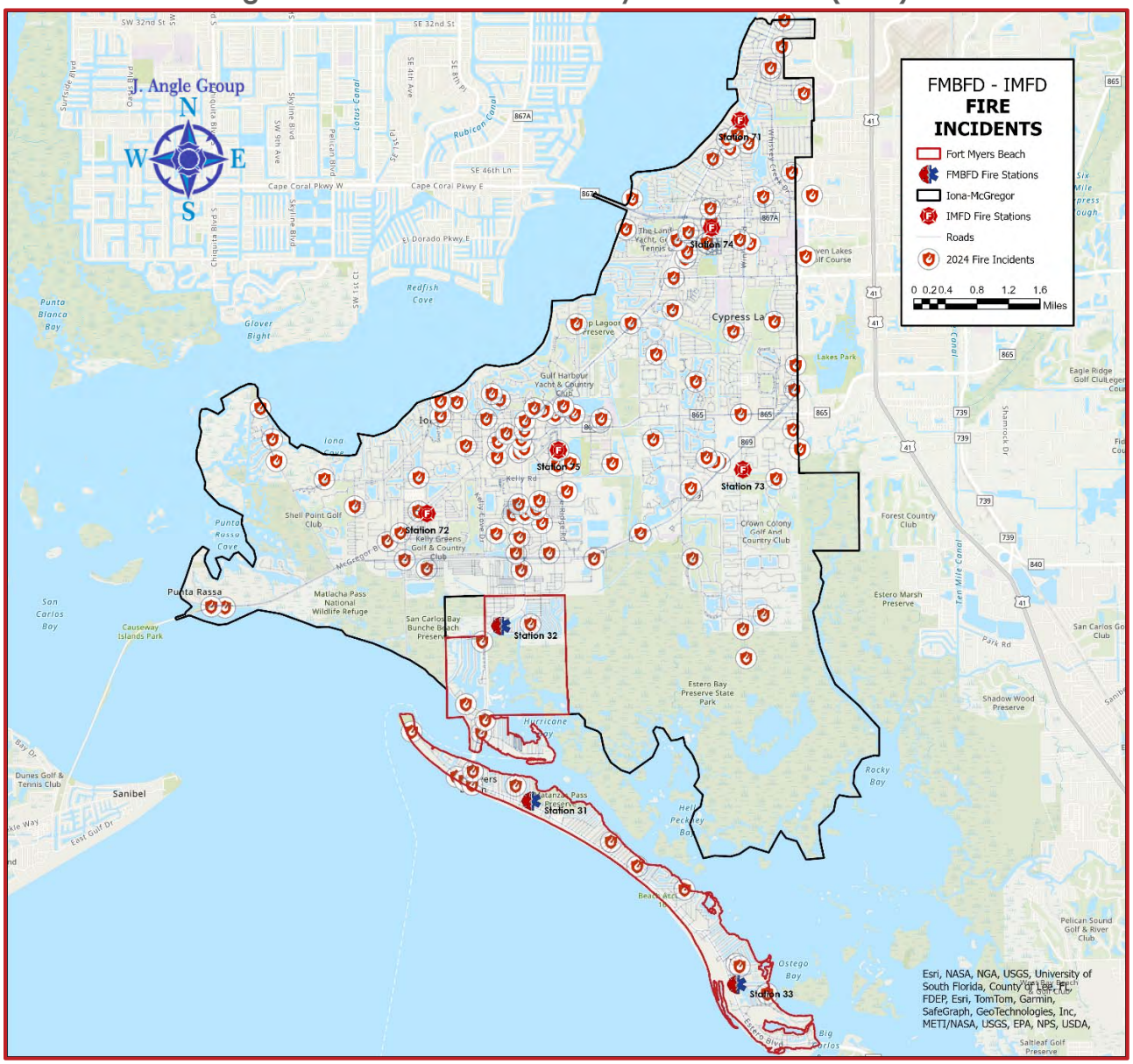
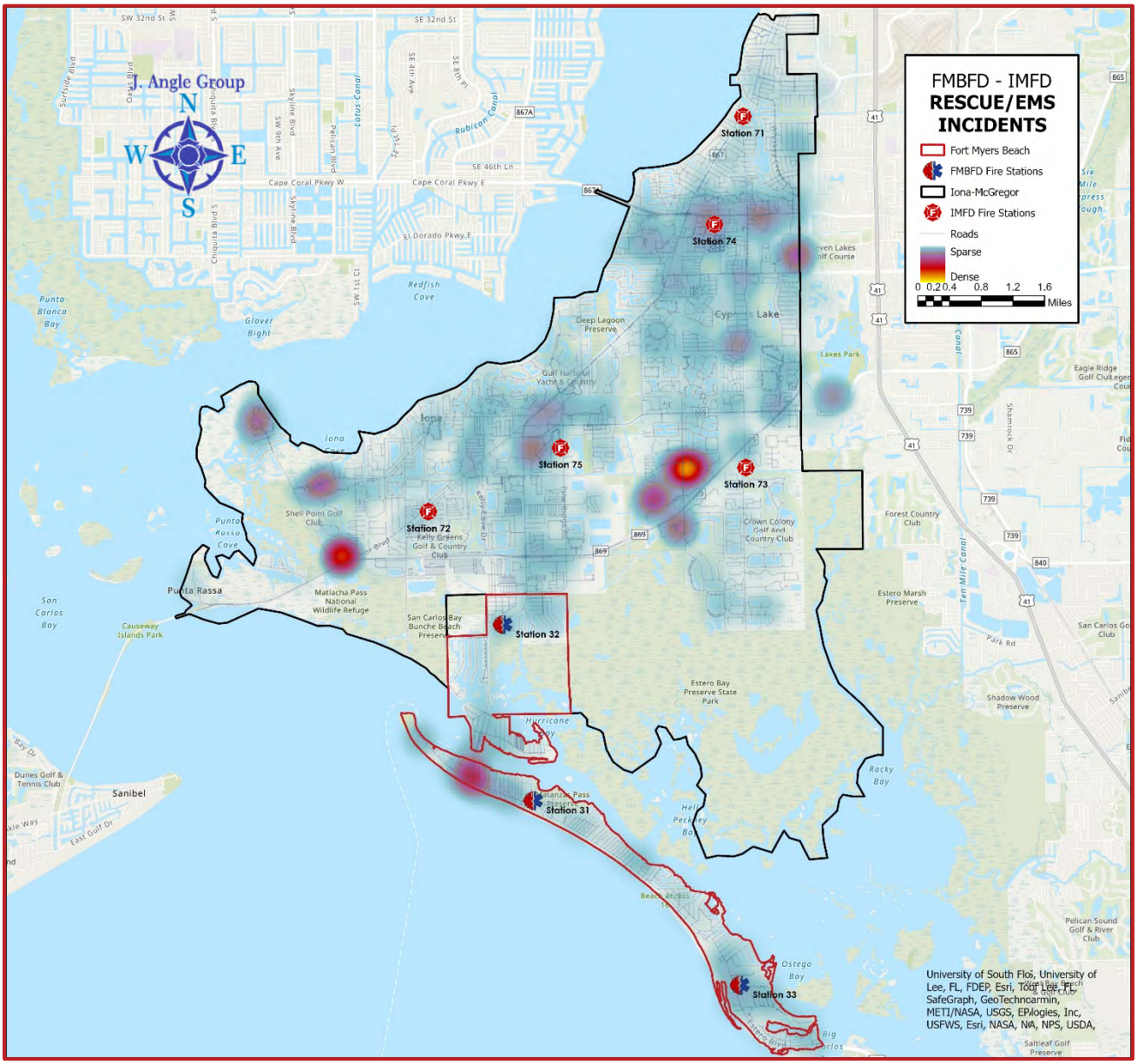


Figure 105 shows EMS incident density within the FMBFD's and IMFD's service areas for 2024.

Figure 105: FMBFD & IMFD Density—EMS Incidents (2024)



ISO Distribution

The Insurance Services Office, Inc. (ISO), a subsidiary of Verisk Analytics, is a national data analytics provider that evaluates fire protection for communities nationwide. ISO assesses all areas of fire protection and breaks them down into four major categories: Emergency Communications, Fire Department, Water Supply, and Community Risk Reduction. Following an on-site evaluation, an ISO rating—specifically, a Public Protection Classification (PPC®) number ranging from 1 (best protection) to 10 (no protection)—is assigned to a community.

The PPC® score is developed using the Fire Suppression Rating Schedule (FSRS), which outlines sub-sections for each of the four major categories and details the specific requirements for each evaluation area.

A community's ISO rating is important when considering fire station and apparatus distribution and deployment, as it impacts the cost of fire insurance for residents and business owners. The ability of a fire district to arrive on the scene of an incident equipped with sufficient personnel, equipment, and water to mitigate a fire effectively is a critical factor in an ISO evaluation.

To determine whether a structure is eligible to receive a PPC rating lower than ten, it cannot be more than 5 road miles from a fire station. Typically, areas outside of 5 road miles may be subject to a split ISO rating if the fire district can demonstrate that sufficient fire flow is available.

In addition, to receive maximum credit for the station and apparatus distribution, ISO evaluates the percentage of the community (contiguously built-up area) within specific distances of both engine/pumper companies (1.5 miles) and aerial/ladder apparatus (2.5 miles).

Fort Myers Beach Fire District

Figure 106 illustrates fire station distribution for the FMBFD service area and the roadways within the ISO's required 5 miles of travel distance. Of the 58 miles of roads in the FMBFD service area, all 58 miles (100%) are within 5 miles of a fire station.

Figure 106: FMBFD Station Distribution—ISO 5-Mile Travel Distance Criteria

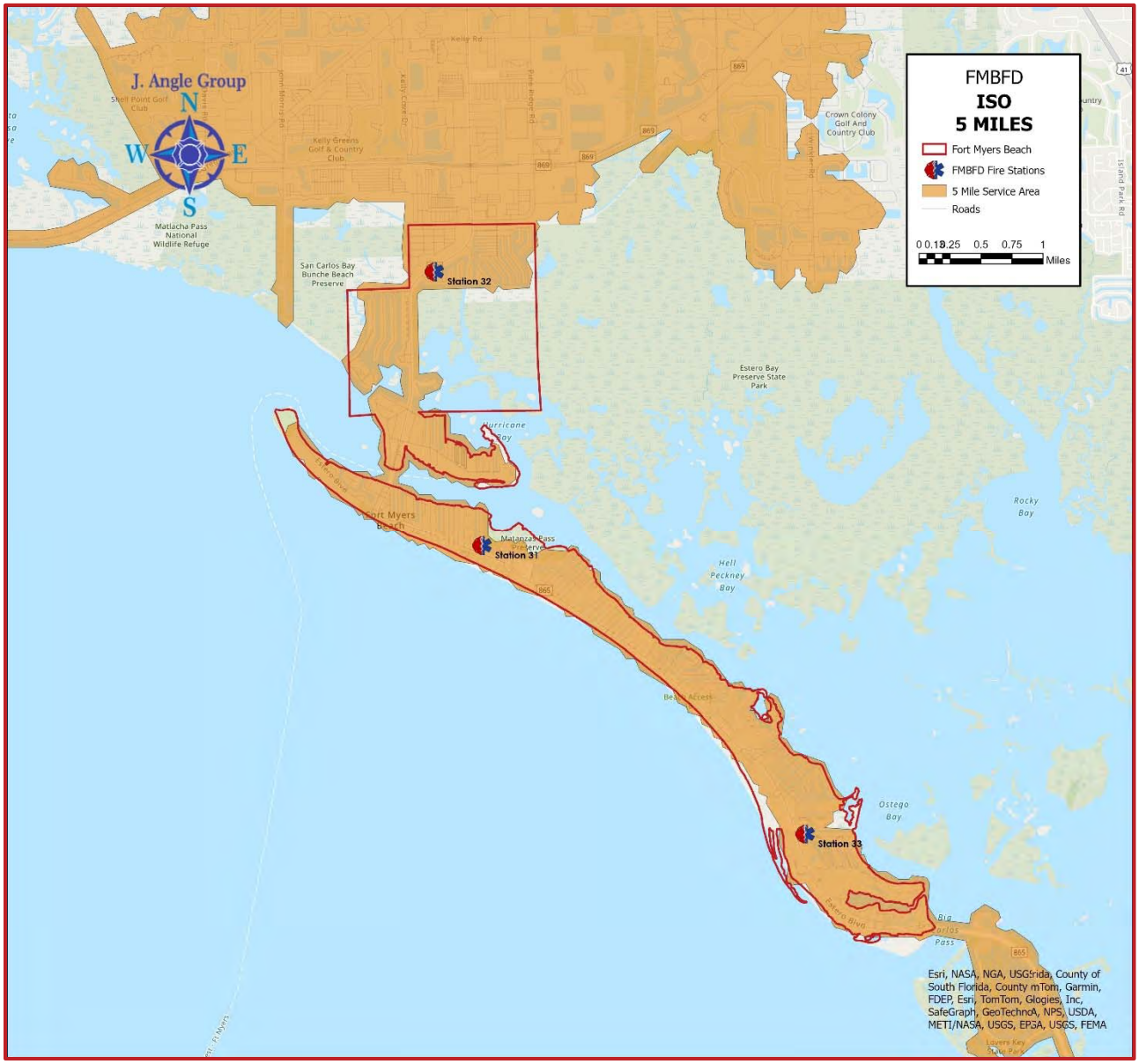


Figure 107 illustrates the engine company distribution for FMBFD and the roadways within the ISO-required 1.5 miles of travel distance. In this case, 48 miles, or 83% of the roadways, are within 1.5 miles of a fire station with an assigned engine company or a pump-capable apparatus.

Figure 107: FMBFD Station Distribution—ISO 1.5-Mile Travel Distance Criteria

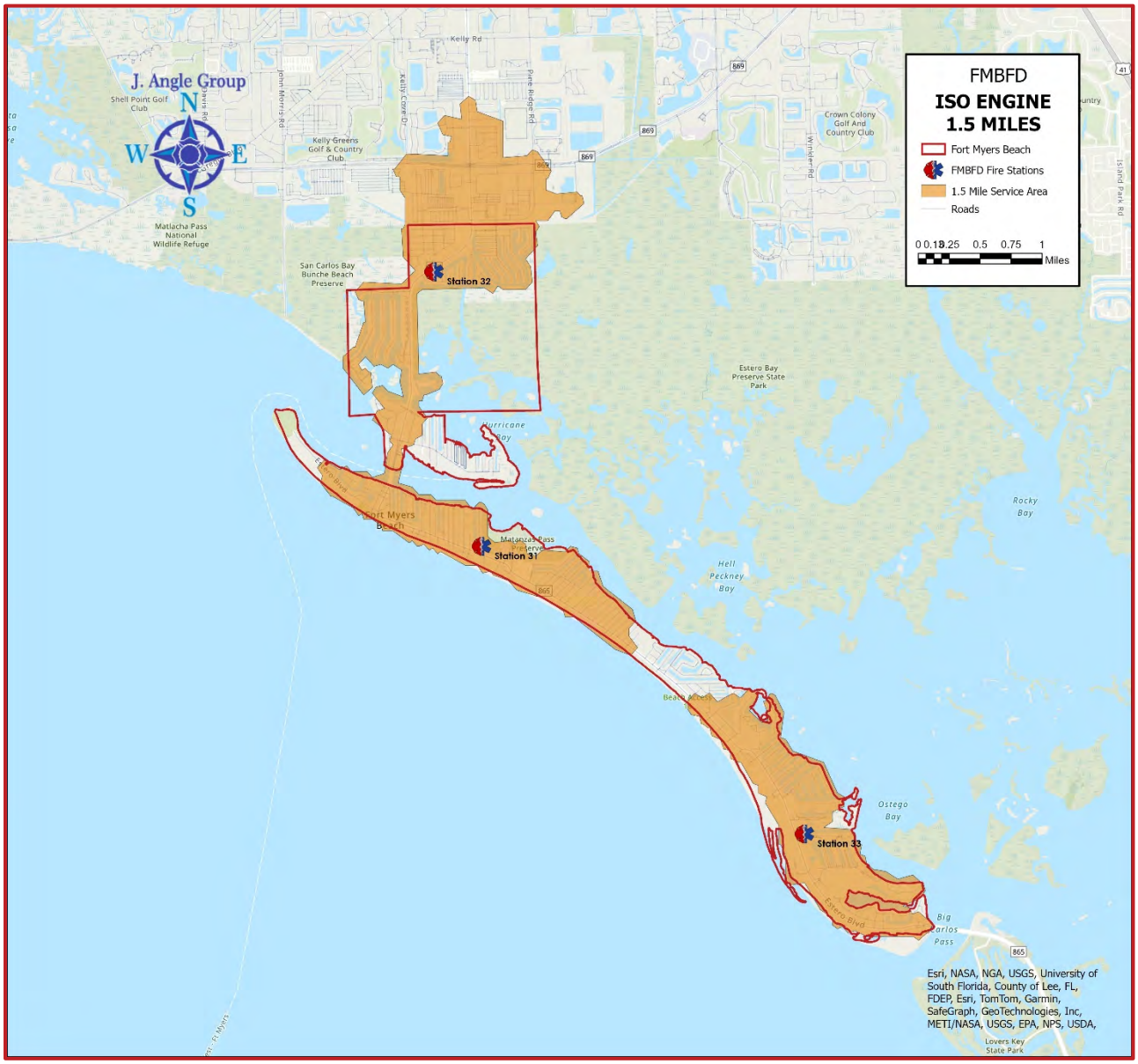
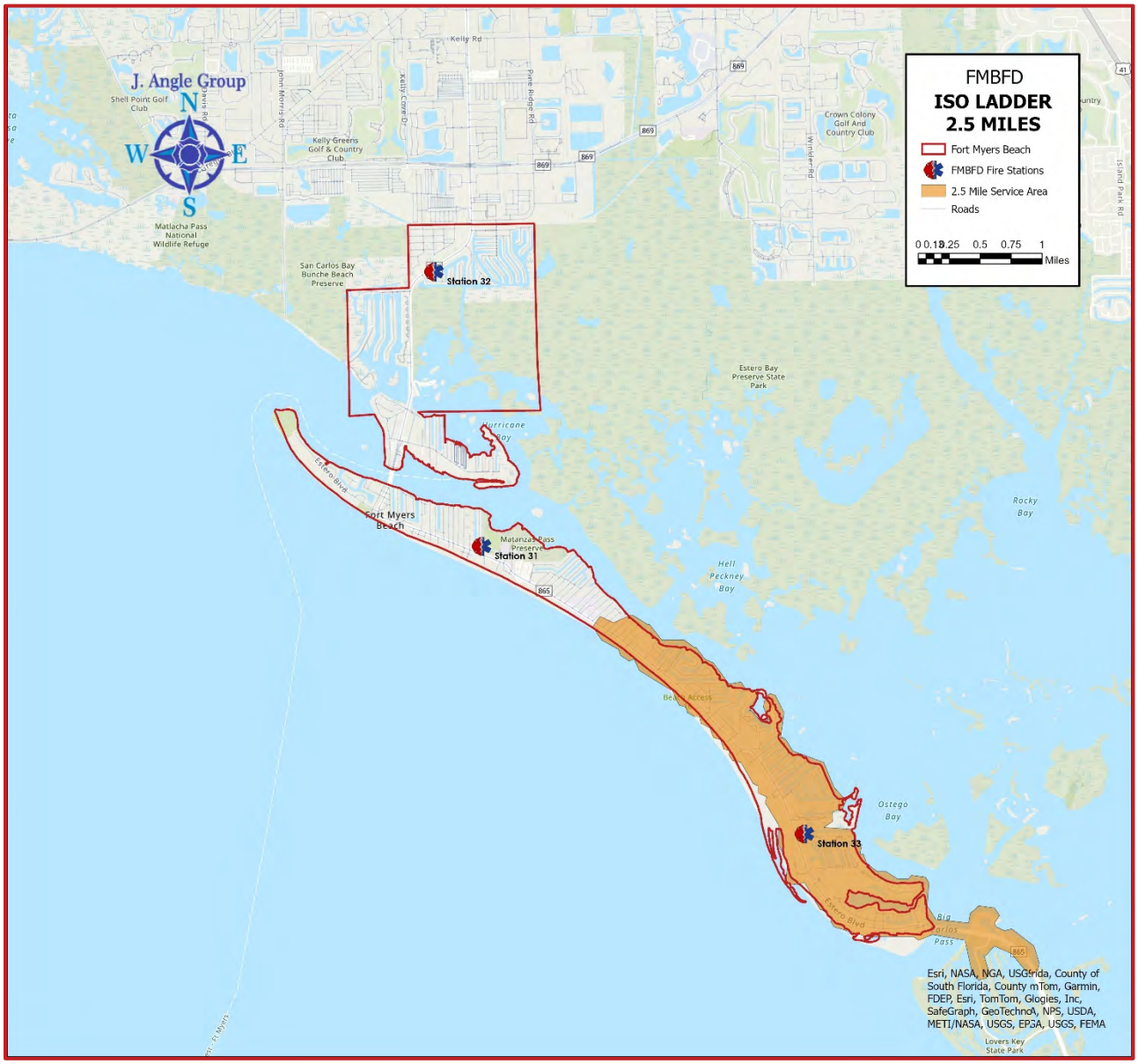


Figure 108 illustrates the truck (aerial/ladder) company distribution for FMBFD and the roadways within the ISO-required 2.5 miles of travel distance. In this case, 21 miles or 36% of the roadways are within 2.5 miles of Station 33, the only FMBFD fire station with an assigned truck company (Truck 33).

Figure 108: FMBFD Station Distribution—ISO 2.5-Mile Travel Distance Criteria



Iona-McGregor Fire District

Figure 109 illustrates the distribution of fire stations for the IMFD service area and the roadways within the ISO's required 5 miles of travel distance. Of the 408 miles of road in the IMFD service area, all 408 miles (100%) are within 5 miles of a fire station.

Figure 109: IMFD Station Distribution—ISO 5-Mile Travel Distance Criteria

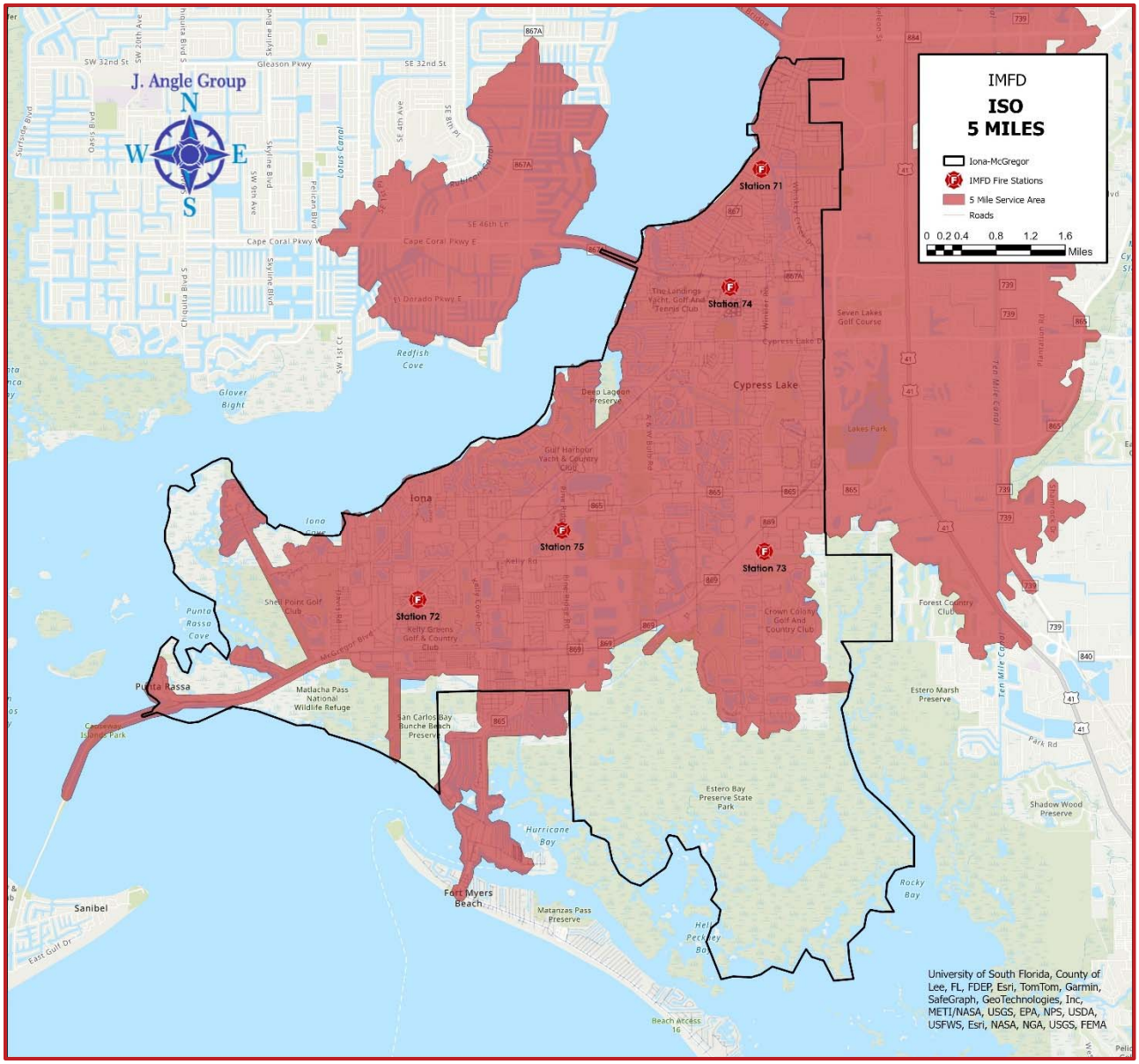


Figure 110 illustrates the engine company distribution for IMFD and the roadways within the ISO required a travel distance of 1.5 miles. In this case, 243 miles, or 60% of the roadways, are within 1.5 miles of a fire station with an assigned engine company or a pump-capable apparatus.

Figure 110: IMFD Station Distribution—ISO 1.5-Mile Travel Distance Criteria

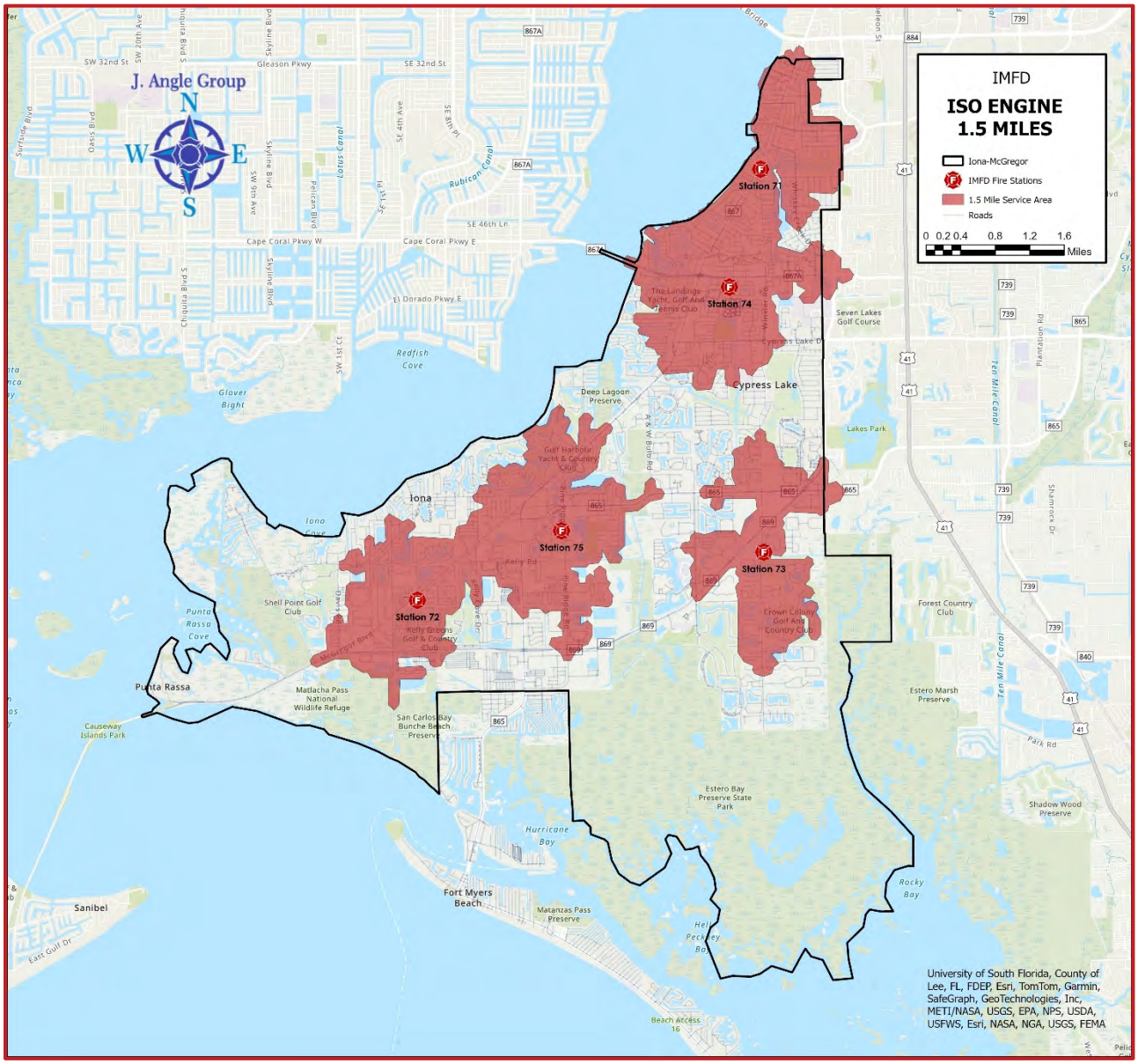
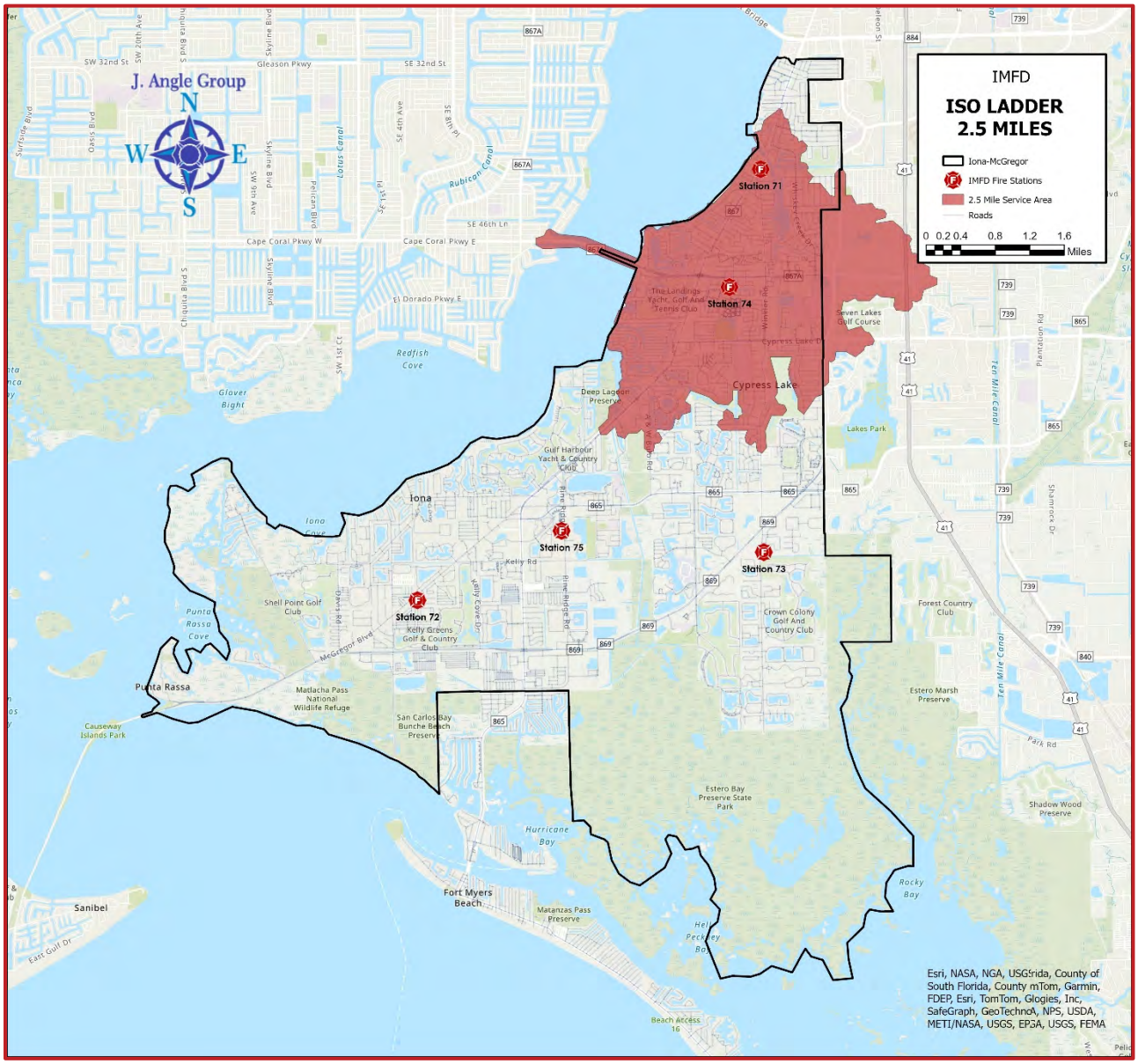


Figure 111 illustrates the truck (aerial/ladder) company distribution for IMFD and the roadways within the ISO-required 2.5-mile travel distance. In this case, 119 miles or 29% of the roadways are within 2.5 miles of Station 74, the only IMFD fire station with an assigned truck company (Truck 74).

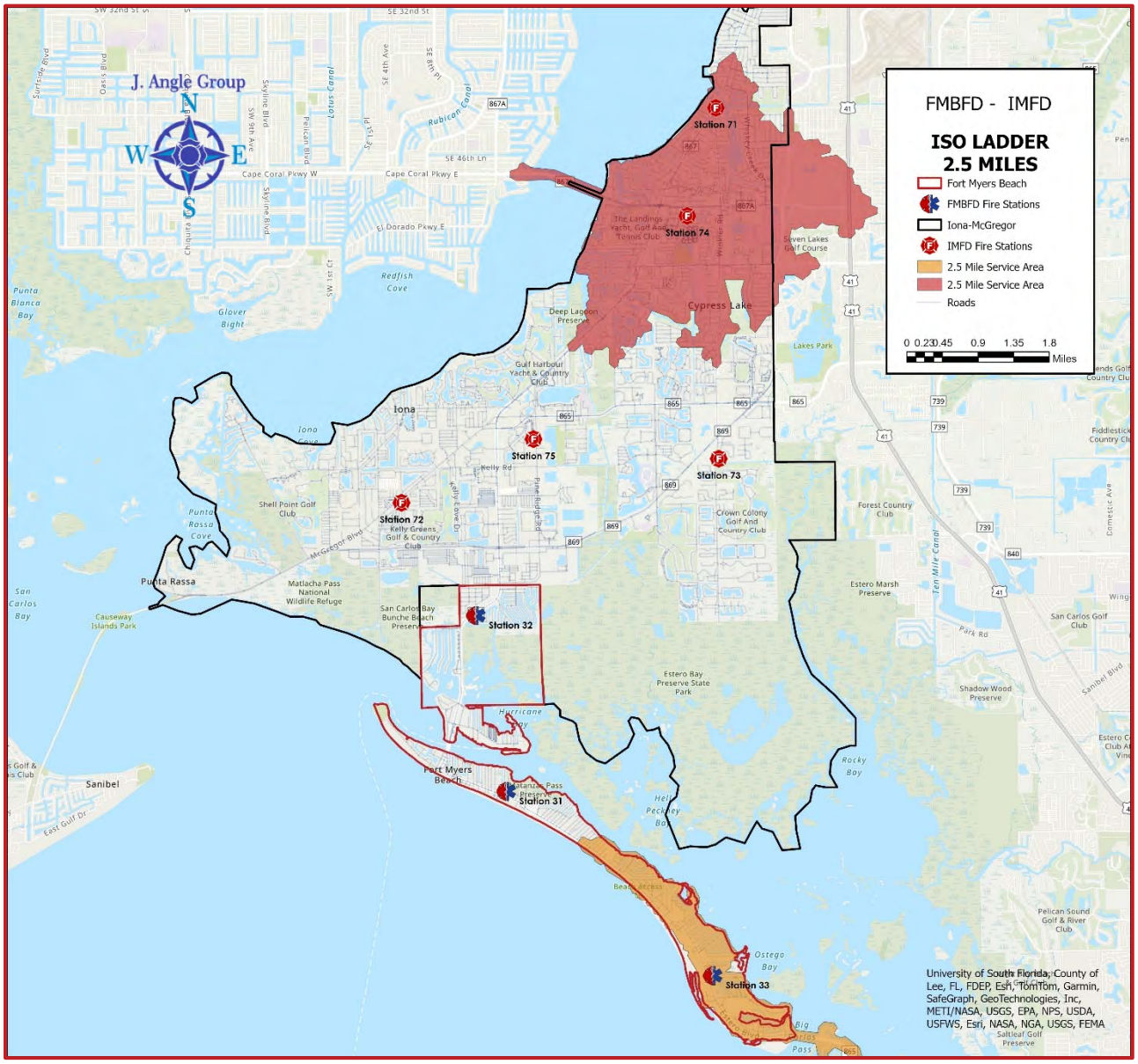
Figure 111: IMFD Station Distribution—ISO 2.5-Mile Travel Distance Criteria



Combined Truck Company Distribution

Figure 112 illustrates the truck (aerial/ladder) company distribution for the FMBFD's and IMFD's service areas and the roadways within the ISO-required 2.5 miles of travel distance. Combined, the two truck companies' distribution provides coverage for 141 road miles or 30% of the combined area.

Figure 112: FMBFD & IMFD—ISO 2.5-Mile Travel Distance Criteria

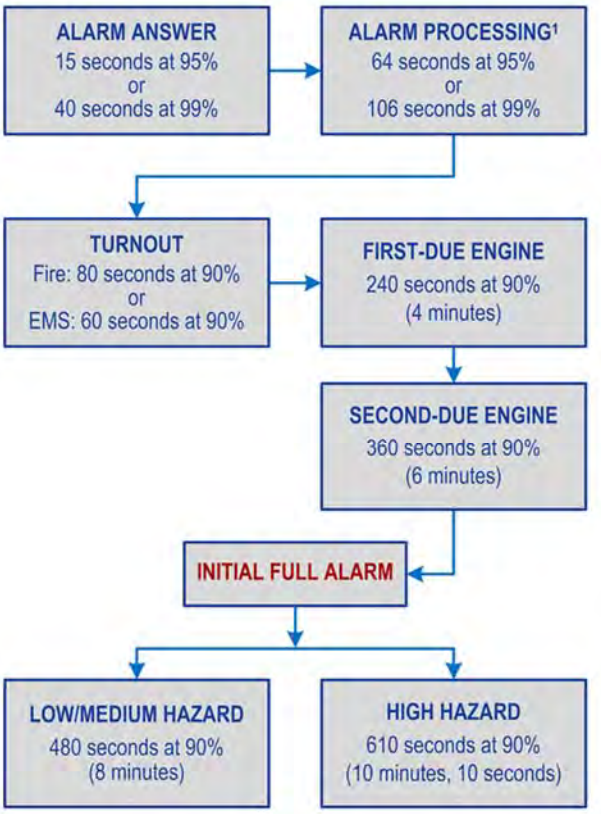


NFPA Distribution

The NFPA 1710 standard specifies that career-staffed fire departments deploy resources such that 90% of emergency service demand can be reached by the first-arriving unit within 4 minutes or less of travel time. Additionally, the standard recommends that the second-due engine arrive in 6 minutes or less and that the full first-alarm assignment should arrive within 8 minutes or less of travel time at a low- to medium-hazard fire suppression incident (measured at the 90th percentile) and in 10 minutes, 10 seconds or less of travel time for high-hazard incidents. This means that all units required to conduct fire suppression operations must arrive on the scene and commence operations within the specified travel time.

Figure 113 illustrates the performance standards from NFPA 1710. The "Response Performance" section will discuss the actual alarm processing (call processing), turnout, first-due engine (travel time), response time, and total response time performance of FMBFD and IMFD.

Figure 113: NFPA 1710 Standard Response Process



[1]From NFPA 1710, which references NFPA 1221 (2019), which states high-priority incidents should be at 60 seconds or less at 90%.

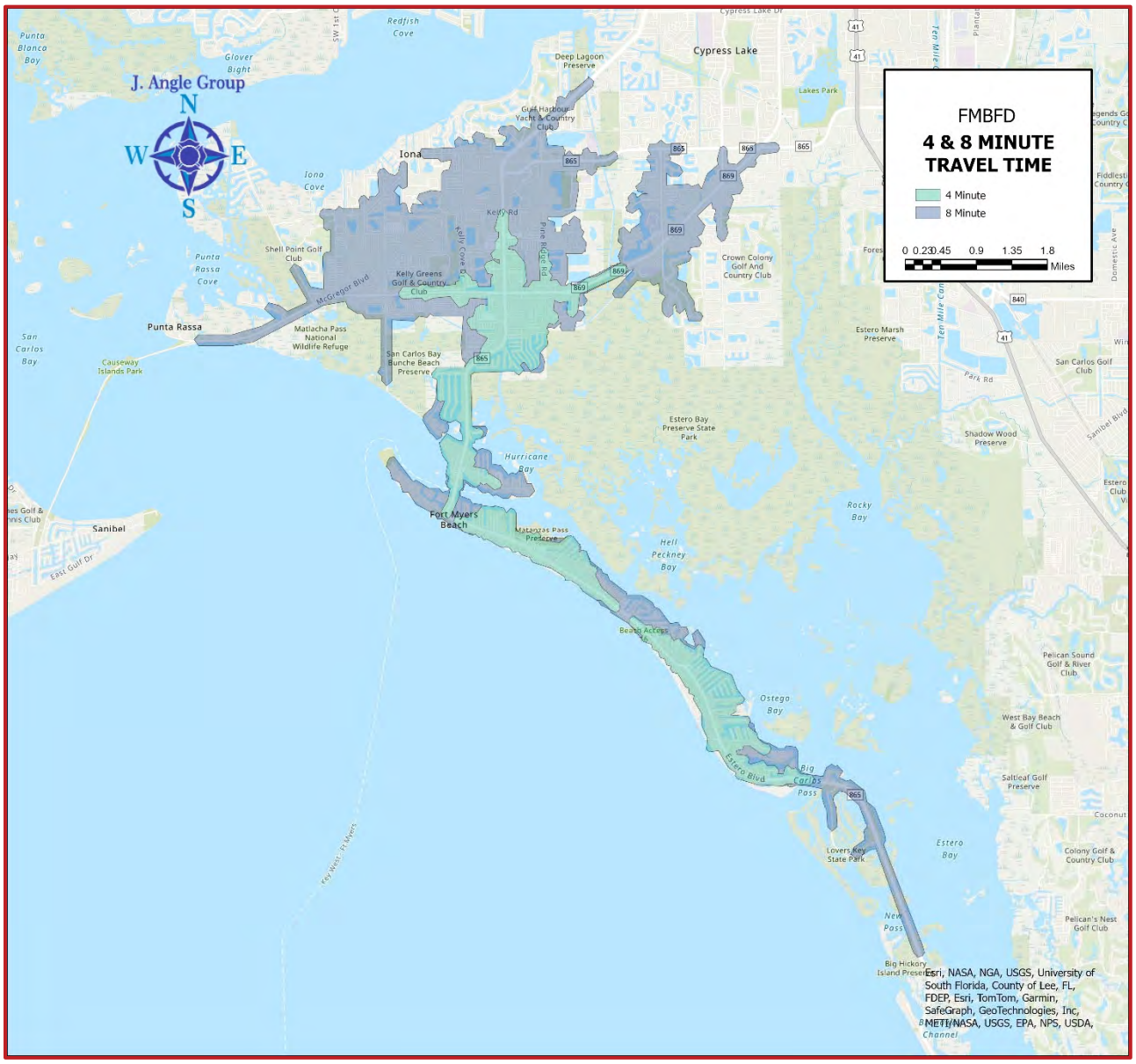
Fort Myers Beach Fire District

As illustrated in Figure 114, using GIS to estimate travel time, approximately 78% (45 miles) of the FMBFD service area is within 4 minutes of a fire station, and the additional 22% is within 8 minutes of one of the three FMBFD stations. All 58 miles (100%) within the FMBFD service area are covered within an 8-minute travel time.

In addition to FMBFD staffing, the district participates in the Lee County mutual/automatic aid program, which enables neighboring agencies to respond to an initial alarm and allows FMBFD to utilize these resources to augment the effective response force, as described in the following section.

Travel time is calculated using the posted speed limit and adjusted for negotiating turns, intersections, and one-way streets.

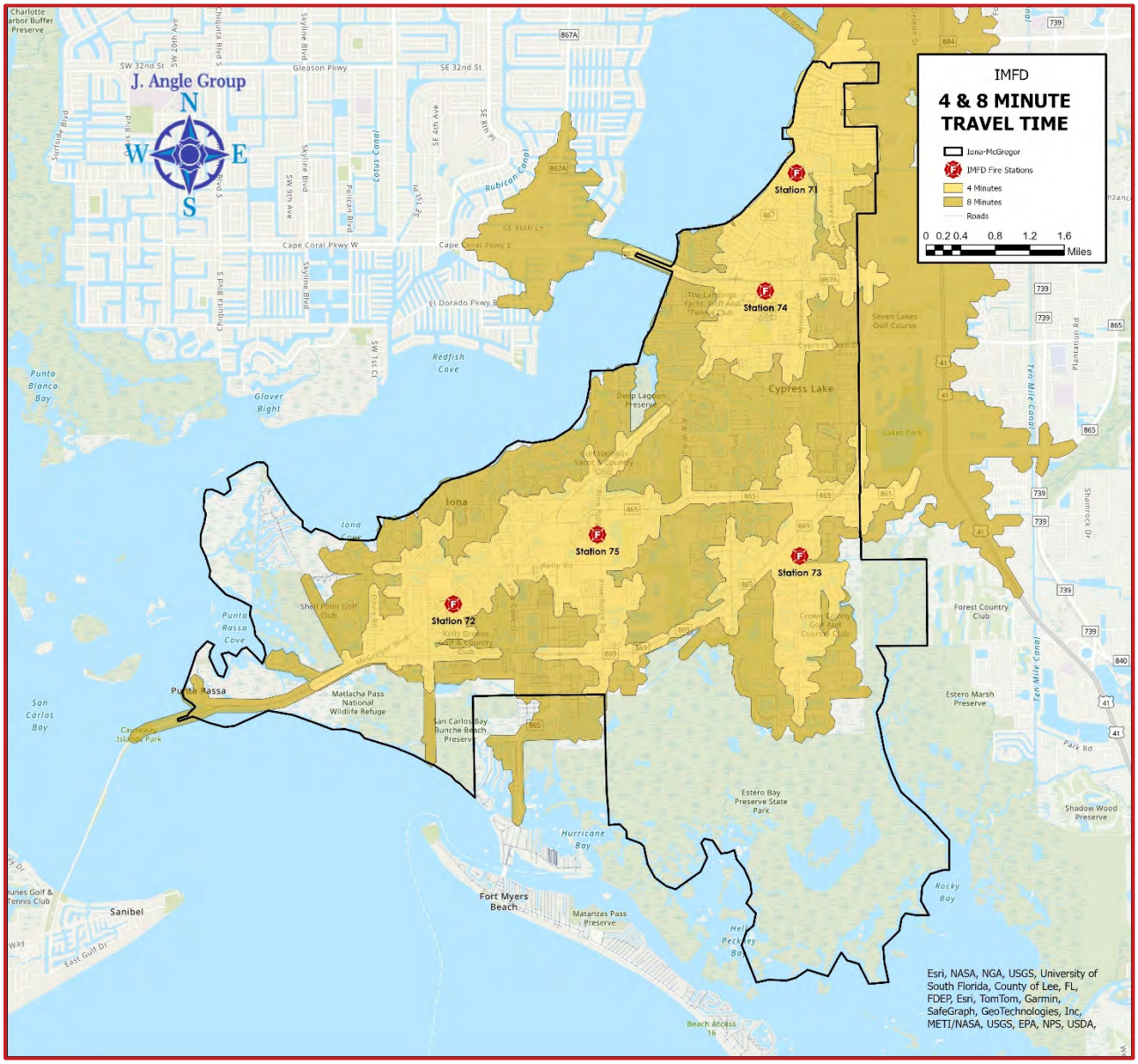
Figure 114: Station Distribution—4-Minute/8-Minute Travel Time FMBFD Stations



Iona-McGregor Fire District

As illustrated in Figure 115, approximately 59% (240 miles) of the IMFD service area is within 4 minutes of a fire station, and an additional 39% is within 8 minutes from one of the five IMFD stations. In total, 401 miles (98%) within the IMFD service area are covered in 8 minutes or less. In addition to IMFD staffing, like FMBFD, the district also participates in the Lee County mutual aid and automatic aid program.

Figure 115: Station Distribution—4-Minute & 8-Minute Travel Time IMFD Stations



Effective Response Force Capabilities Analysis

Accepted firefighting procedures call for the arrival of the entire initial assignment, or effective response force (ERF) with sufficient apparatus and personnel to effectively deal with an emergency based on its level of risk within a reasonable time. NFPA Standard 1710 specifies that career-staffed fire departments deploy resources so that 90% of emergency service demand can be reached within 4 minutes or less.

Additionally, the standard recommends that the full first alarm assignment for a low-to-moderate-risk structure fire (single-story residential structure) should arrive at a fire suppression incident within 8 minutes of travel or less (measured at the 90th percentile). This means that all units needed to conduct fire suppression operations must arrive on scene and commence operations within the specified travel time. This is to ensure that sufficient personnel and equipment arrive promptly to safely control a fire or mitigate any emergency before substantial damage or injury occurs.

For this analysis, JAG examined the ability of FMBFD and IMFD to assemble multiple resources within 8 minutes or less in their service areas. Since both districts participate in the automatic aid agreement within Lee County, additional maps are provided to illustrate the total resources available when units from surrounding jurisdictions are added. Additional information relating to the automatic aid agreement is included in a separate section of this report.

Fort Myers Beach Fire District

Figure 116 shows the total staff available within an 8-minute coverage area utilizing FMBFD apparatus and vehicles.

Figure 116: 8-Minute ERF Coverage (FMBFD Units Only)

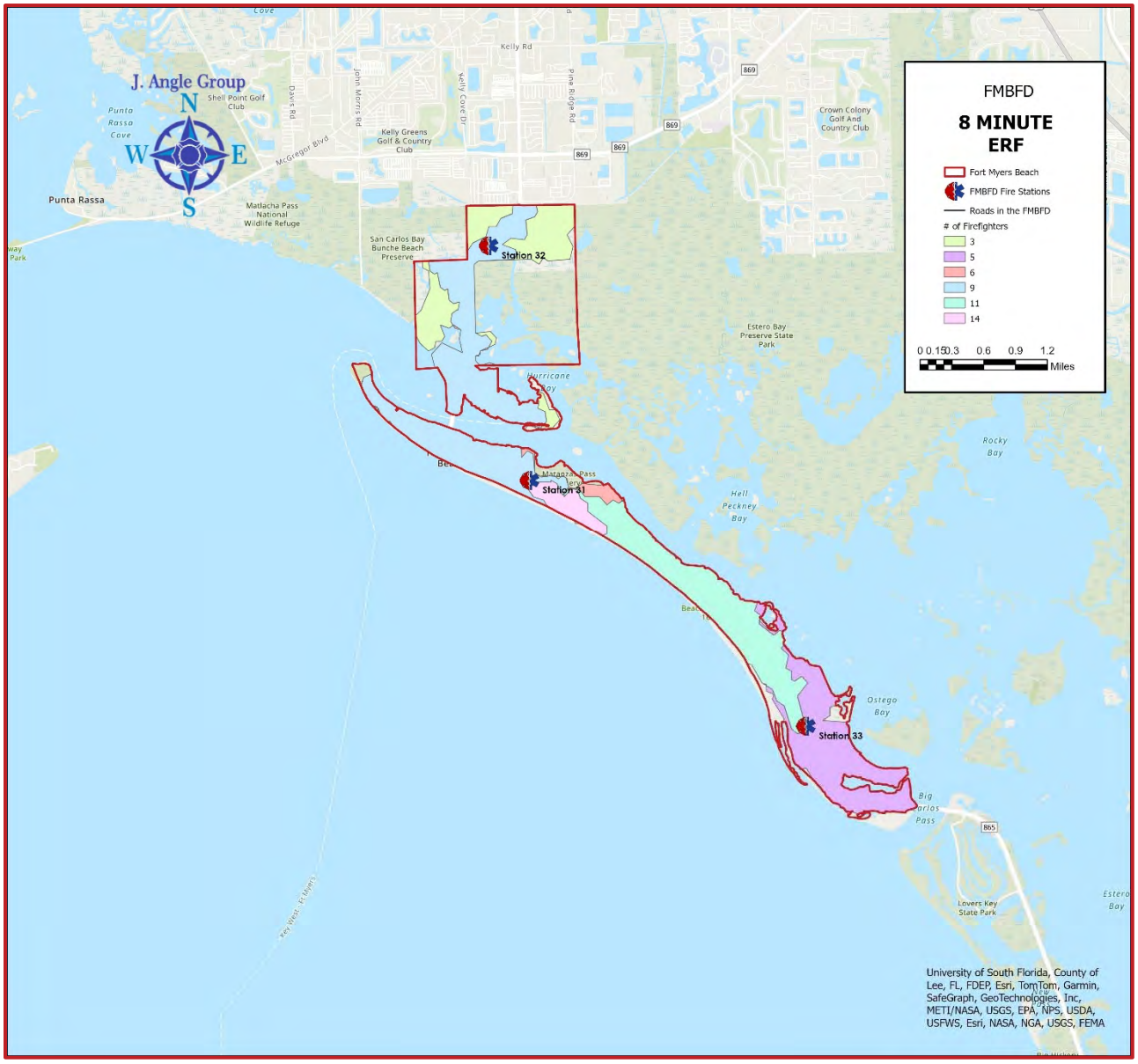
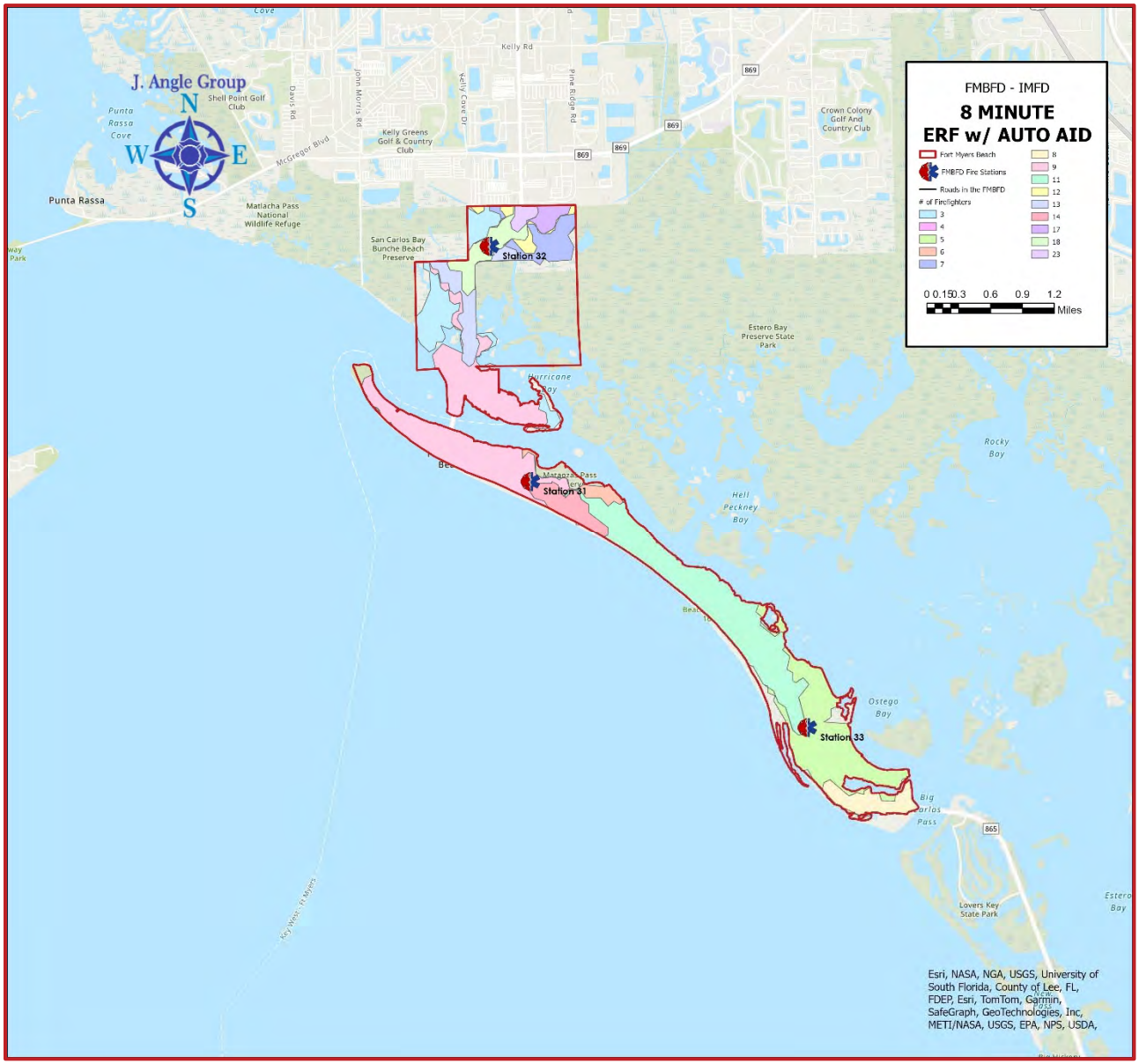


Figure 117 illustrates the increase in total staff available within 8-minute coverage when using the surrounding automatic aid units in FMBFD's service area.

Figure 117: 8-Minute ERF Coverage (FMBFD & Surrounding Automatic Aid Units)



Iona-McGregor Fire District

Figure 118 shows the total staff available within 8-minute coverage utilizing only IMFD units.

Figure 118: 8-Minute ERF Coverage (IMFD Units Only)

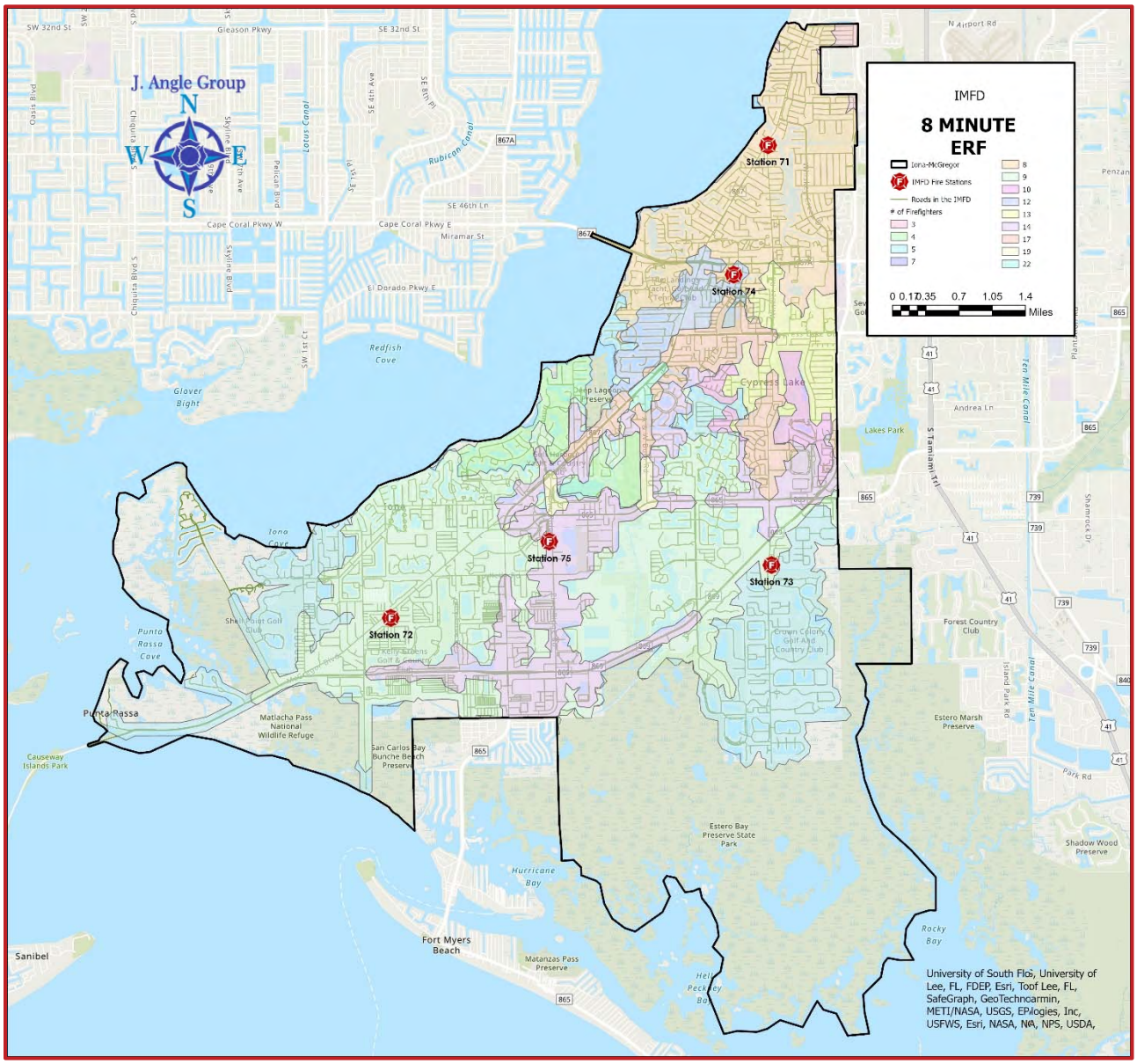
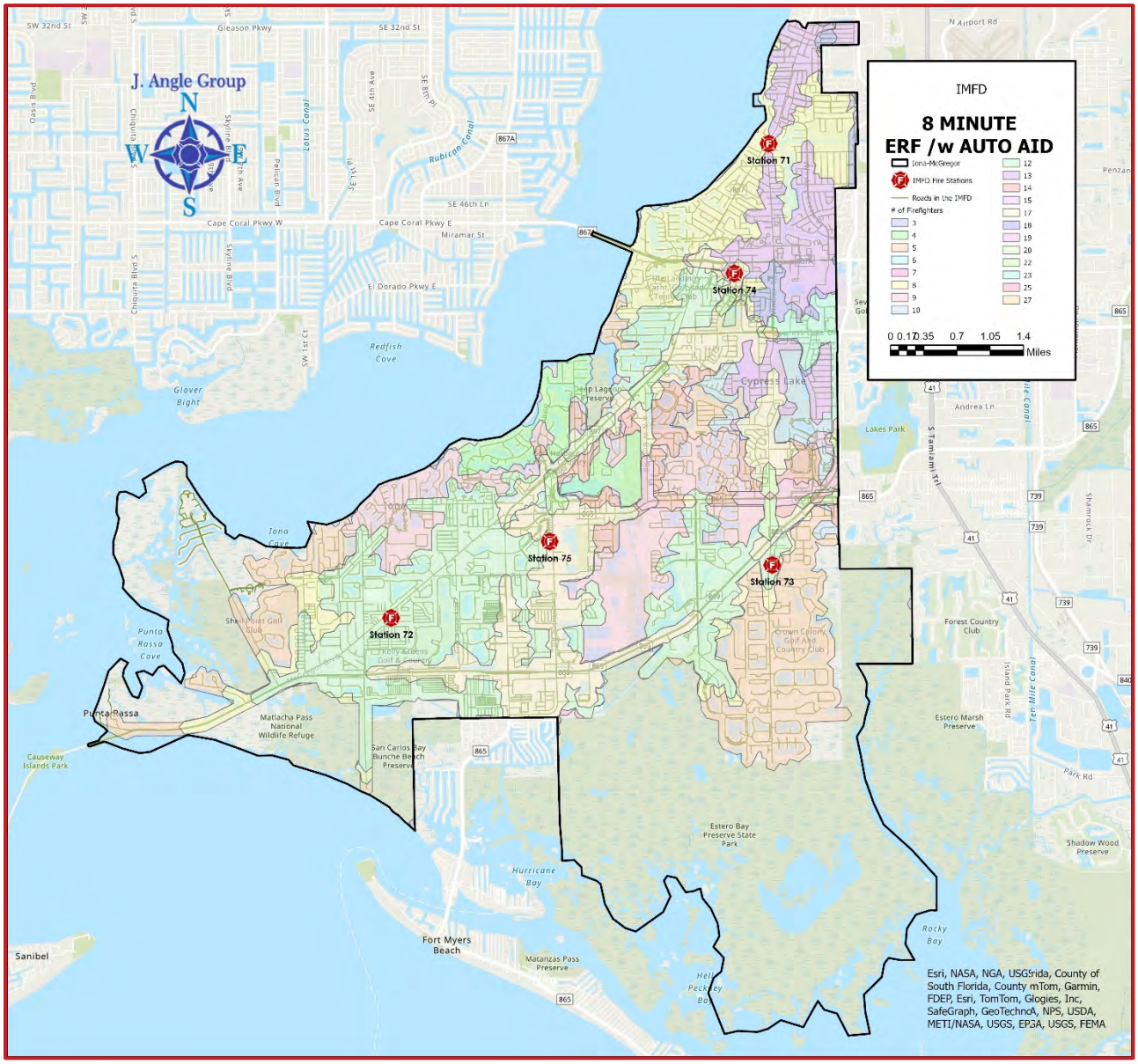


Figure 119 illustrates the increase in total staff available within 8-minute coverage when using the surrounding automatic aid units in IMFD's service area.

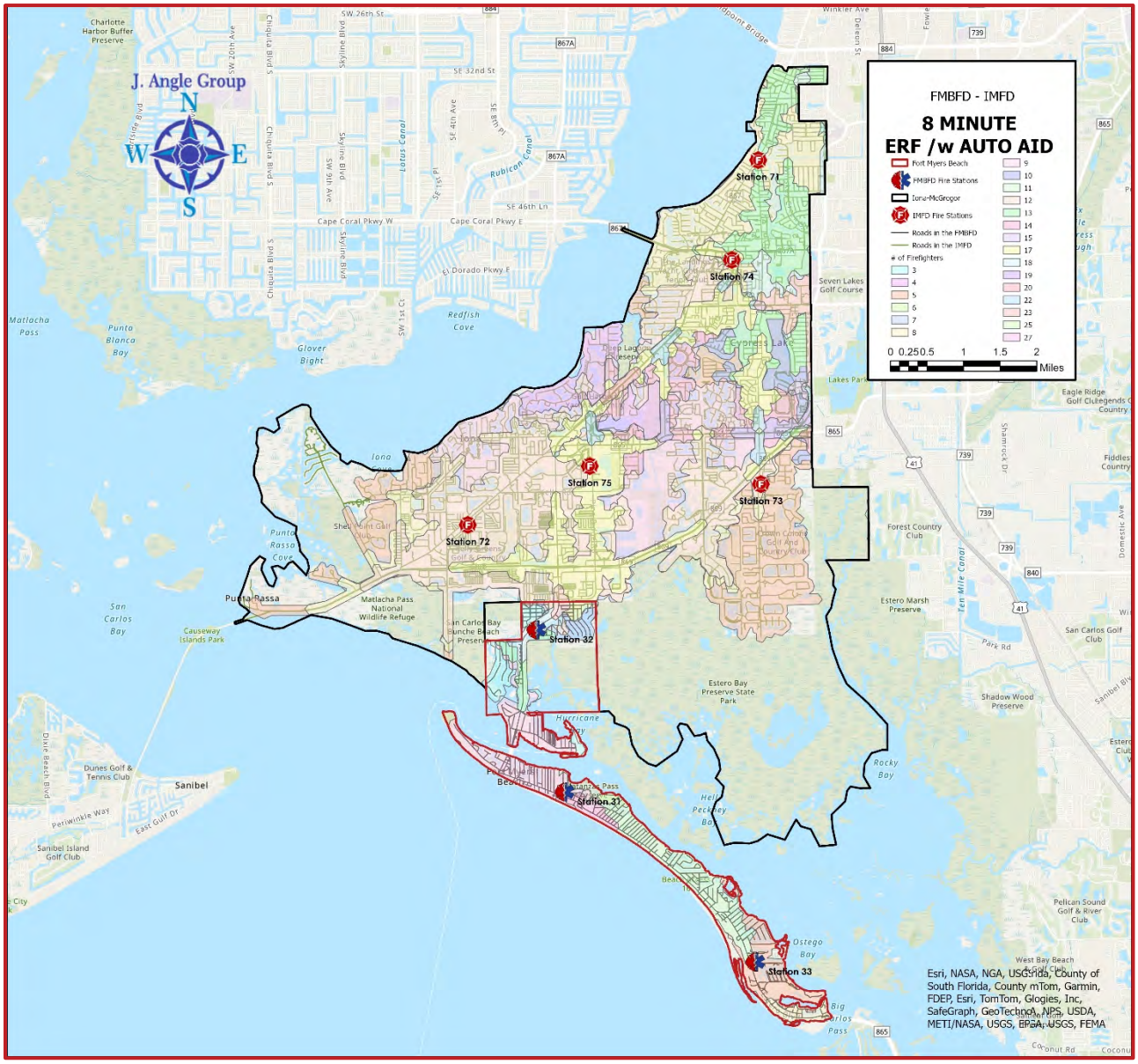
Figure 119: 8-Minute ERF Coverage (IMFD & Surrounding Automatic Aid Units)



Combined ERF Coverage

Figure 120 illustrates the total staff available within 8-minute coverage in the FMBFD's and IMFD's service areas when using the surrounding automatic aid units.

Figure 120: 8-Minute ERF Coverage (FMBFD, IMFD, & Surrounding Automatic Aid Units)



Response Reliability Study

The workload of emergency response units can be a factor in response time performance. If a response unit is unavailable for any reason, then a unit from a more distant station (or mutual/automatic aid agency) must respond. This can increase the overall response time. Although fire stations and units may be strategically distributed to provide quick responses, as previously illustrated in the deployment model, that level of performance can only be achieved when the response unit is available in its primary service area.

Call Concurrency

Concurrent incidents and the time that individual units are committed to an incident can affect a jurisdiction's ability to assemble sufficient resources to respond to additional emergencies. A higher number of simultaneous calls can drastically strain available resources, leading to longer response times for more distant resources.

Figure 121 examines incidents that FMBFD responded to, regardless of which jurisdiction the incident occurred in, from 2019 through 2024, to determine the frequency of multiple calls handled by FMBFD.

Figure 121: FMBFD Incident Concurrency (2019–2024)

Number of Incidents	2019	2020	2021	2022	2023	2024	Average
One Incident	79%	85%	79%	81%	91%	89%	**83%**
Two Incidents	18%	14%	19%	17%	8%	9%	**15%**
Three or More Incidents	3%	1%	2%	2%	0%	2%	**2%**

On average, single incidents accounted for 83% of FMBFD's overall incidents during the preceding six-year period. Two incidents occurred and were handled by the FMBFD 15% of the time, which indicates that 2% of the time (on average), FMBFD was mitigating three or more incidents simultaneously.

Figure 122 examines incidents that IMFD responded to, regardless of the jurisdiction where they occurred, from 2019 through 2024, to determine the frequency of multiple calls handled by IMFD.

Figure 122: IMFD Incident Concurrency (2019–2024)

Number of Incidents	2019	2020	2021	2022	2023	2024	Average
One Incident	69%	67%	71%	68%	68%	65%	**68%**
Two Incidents	25%	27%	24%	25%	26%	27%	**25%**
Three or More Incidents	6%	6%	5%	7%	7%	8%	**7%**

On average, single incidents accounted for 68% of the IMFD's overall incidents handled over the preceding six-year period. Two incidents occurred and were handled by the IMFD 25% of the time, which indicates that 7% of the time (on average), IMFD was mitigating three or more incidents simultaneously.

Commitment Time

Commitment time, also known as unit-hour utilization, is the time a unit is unavailable for response because it has already been committed to another incident. The larger the number, the higher its utilization, and the less available it is for assignment to subsequent calls for service. Commitment rates are expressed as a percentage of the total hours in a year.

Figure 123, Figure 124, and Figure 125 illustrate the total time that FMBFD's primary units were committed to an incident during the preceding six years, calculated from data provided by FMBFD. The commitment times for Engine 31 for CY22 include only the date range from January 1, 2022, through April 28, 2022. Rescue 31's commitment times are from April 16, 2022, through September 27, 2022.

Figure 123: FMBFD Unit Commitment Times (2019–2020)

Unit	2019				2020			
	Count	Total	Average	Com	Count	Total	Average	Com
BC-30	248	73:12:01	0:17:43	0.84%	248	93:56:31	0:22:44	1.07%
Engine 31	1,274	371:53:01	0:17:31	4.25%	1,202	387:18:08	0:19:20	4.41%
Engine 32	1,090	282:59:19	0:15:35	3.23%	1,103	364:23:06	0:19:49	4.15%
Truck 33	723	246:57:11	0:20:30	2.82%	743	260:39:31	0:21:03	2.97%
Rescue 31	—	—	—	0.00%	—	—	—	0.00%
Rescue 32	1,395	1077:59:39	0:46:22	12.31%	1,437	1117:24:43	0:46:39	12.72%
Rescue 33	868	782:20:57	0:54:05	8.93%	761	705:34:13	0:55:38	8.03%

Figure 124: FMBFD Unit Commitment Times (2021–2022)

Unit	2021				2022			
	Count	Total	Average	Com	Count	Total	Average	Com
BC-30	310	115:31:43	0:22:22	1.32%	298	114:13:59	0:23:00	1.30%
Engine 31	1,535	467:53:12	0:18:17	5.34%	472	153:29:21	0:19:31	5.47%
Engine 32	1,345	408:00:33	0:18:12	4.66%	1,086	324:39:20	0:17:56	3.71%
Truck 33	819	299:53:34	0:21:58	3.42%	811	252:53:09	0:18:43	2.89%
Rescue 31	—	—	—	0.00%	666	478:52:22	0:43:09	12.17%
Rescue 32	1,807	1407:38:30	0:46:44	16.07%	674	562:00:04	0:50:02	6.42%
Rescue 33	910	855:07:19	0:56:23	9.76%	668	591:51:20	0:53:10	6.76%

Figure 125: FMBFD Unit Commitment Times (2023–2024)

Unit	2023				2024			
	Count	Total	Average	Com	Count	Total	Average	Com
BC-30	125	59:30:00	0:28:34	0.68%	152	78:50:40	0:31:07	0.90%
Engine 31	—	—	—	0.00%	—	—	—	0.00%
Engine 32	1,054	356:41:20	0:20:18	4.07%	1,412	413:19:55	0:17:34	4.71%
Truck 33	490	185:28:10	0:22:43	2.12%	780	265:15:22	0:20:24	3.02%
Rescue 31	—	—	—	0.00%	—	—	—	0.00%
Rescue 32	468	408:29:24	0:52:22	4.66%	—	—	—	0.00%
Rescue 33	345	302:59:06	0:52:42	3.46%	600	513:05:03	0:51:19	5.84%

The average time that each of FMBFD's primary units was committed to an incident during the last full preceding calendar year (CY24) was 30 minutes, 51 seconds. The commitment factors for FMBFD's primary units ranged from a high of 5.84% for Rescue 33 to a low of 0.90% for Battalion Chief 30 in 2024.

Figure 126, Figure 127, and Figure 128 illustrate the total time that the IMFD's primary units were committed to an incident during the preceding six years, calculated from data provided by IMFD.

Figure 126: IMFD Unit Commitment Times (2019–2020)

Unit	2019				2020			
	Count	Total	Average	Com	Count	Total	Average	Com
BC-70	282	94:09:40	0:20:02	1.07%	270	169:49:45	0:37:53	1.93%
Engine 71	624	187:59:18	0:18:05	2.15%	708	311:55:03	0:26:26	3.55%
Engine 72	753	228:31:45	0:18:13	2.61%	866	268:12:02	0:18:36	3.05%
Engine 75	1,386	401:43:48	0:17:23	4.59%	1,398	459:06:37	0:19:43	5.23%
R-72/R-75	1,462	466:16:17	0:19:08	5.32%	1,212	390:18:31	0:19:19	4.44%
Rescue 73	2,319	627:59:54	0:16:15	7.17%	2,105	572:43:12	0:16:20	6.52%
Rescue 74	1,576	471:14:30	0:17:56	5.38%	1,455	465:59:48	0:19:14	5.31%
SQ-73/E-73	836	271:26:18	0:19:29	3.10%	843	253:03:13	0:18:01	2.88%
Truck 74	940	278:06:17	0:17:47	3.17%	1,125	352:44:49	0:18:51	4.02%

Figure 127: IMFD Unit Commitment Times (2021–2022)

Unit	2021				2022			
	Count	Total	Average	Com	Count	Total	Average	Com
BC-70	341	131:51:21	0:23:12	1.51%	426	233:22:18	0:32:52	2.66%
Engine 71	798	272:32:19	0:20:29	3.11%	915	339:51:42	0:22:19	3.88%
Engine 72	833	276:34:14	0:19:57	3.16%	874	313:56:58	0:21:35	3.58%
Engine 75	1,442	445:49:50	0:18:33	5.09%	1,489	537:37:26	0:21:42	6.14%
R-72/R-75	946	321:08:09	0:20:22	3.67%	1,369	488:16:07	0:21:24	5.57%
Rescue 73	1,578	465:09:12	0:17:41	5.31%	1,296	410:22:10	0:19:00	4.68%
Rescue 74	1,306	421:44:18	0:19:25	4.81%	1,506	487:45:18	0:19:26	5.57%
SQ-73/E-73	990	286:19:37	0:17:22	3.27%	1,040	376:09:05	0:21:42	4.29%
Truck 74	1,005	323:11:45	0:19:18	3.69%	1,064	335:44:55	0:18:57	3.83%

Figure 128: IMFD Unit Commitment Times (2023–2024)

Unit	2023				2024			
	Count	Total	Average	Com	Count	Total	Average	Com
BC-70	393	164:46:33	0:25:09	1.88%	406	131:01:54	0:19:22	1.49%
Engine 71	959	359:47:02	0:22:31	4.11%	899	298:27:14	0:19:56	3.40%
Engine 72	1,112	406:52:01	0:21:57	4.64%	1,586	562:51:14	0:21:19	6.41%
Engine 75	789	324:37:23	0:24:47	3.71%	695	223:25:20	0:19:19	2.54%
R-72/R-75	1,271	439:56:32	0:20:47	5.02%	1,284	423:28:45	0:19:47	4.82%
Rescue 73	1,813	562:13:27	0:18:36	6.42%	2,127	669:36:50	0:18:53	7.62%
Rescue 74	1,702	586:30:01	0:20:41	6.70%	1,738	596:04:07	0:20:35	6.79%
SQ-73/E-73	1,025	316:55:47	0:18:35	3.62%	1,079	303:53:16	0:16:54	3.46%
Truck 74	827	253:33:46	0:18:24	2.89%	847	237:48:23	0:16:52	2.71%

The average time that each of IMFD's primary units was committed to an incident during the last full preceding calendar year (CY24) was 19 minutes, 13 seconds. The commitment factors for the IMFD's primary units ranged from a high of 7.62% for Rescue 73 to a low of 1.49% for Battalion Chief 70 in CY24.

JAG has found that commitment rates of 25%–30% for units deployed on a 24-hour shift can negatively impact response performance and possibly lead to personnel burnout issues. Commitment rates above 30% tend to cause system failures in other areas, such as degraded response time performance and reduced effective response force (ERF) delivery.

When commitment times approach or exceed 30%, it implies that units are available only 70% of the time in their first-due areas. Notably, this analysis includes only incident activity and does not measure time dedicated to training, public education programs and events, station duties, or additional duties as assigned.

In May 2016, the Henrico County, VA, Division of Fire published an article regarding the department's EMS workload.[30] JAG calculated the commitment factors for FMBFD and IMFD as described in the Henrico County article. As a result of the study, Henrico County developed a general commitment factor scale for its department.

Figure 129 summarizes these findings in relation to commitment factors.

Figure 129: Commitment Factors

Source: Henrico County, VA, Division of Fire (2016)

Factor	Indication	Description
0.16–0.24	Ideal Range	Personnel can maintain training requirements and physical fitness while consistently achieving response-time benchmarks. Units are available to the community more than 75% of the day.
0.25	System Stress	Community availability and unit sustainability are not questioned. First-due units respond to their assigned community 75% of the time, and response benchmarks are rarely missed.
0.26–0.29	Evaluation Range	The community served will experience delayed incident responses. Just under 30% of the day, first-due ambulances are unavailable; thus, neighboring responders will likely exceed goals.
0.30	"Line in the Sand"	Not Sustainable: Commitment Threshold. The community has a less than 70% chance of timely emergency service, and immediate relief is vital. Personnel assigned to units at or exceeding 0.3 may show signs of fatigue and burnout and may be at increased risk of errors. Required training and physical fitness sessions are not completed consistently.

[30] *How Busy Is Busy?* From www.fireengineering.com/articles/print/volume-169/issue 5/departments/fireems/how-busy-is-busy.html.

Response Performance Analysis

In this analysis, JAG examined emergency incident response time performance within the FMBFD and IMFD service areas using data provided by the districts' units. The data used for this analysis is from emergency responses extracted from the districts' data from January 2019 through December 2024. Mutual and automatic aid incidents outside the service areas, data outliers, and invalid data were removed from the dataset whenever possible. Response performance was measured from the time the fire apparatus is dispatched until the first fire department unit arrives on the scene.

To analyze response performance, percentile measures of response time for FMBFD and IMFD were generated. Using percentile calculations for response performance follows industry best practices and is considered a more accurate performance measure than "average" calculations. The "average" measure is commonly used as a descriptive statistic, also called the mean of a dataset.

The reason for not using averages for performance standards is that they may not accurately reflect the performance of the entire dataset and may be skewed by data outliers. One particularly good or bad value could skew the average for the entire set. Percentile measurements are more accurate, as they indicate that most of the dataset has achieved a particular level of performance.

Fire service best-practice documents, such as those from the Center for Public Safety Excellence (CPSE)[31] and NFPA 1710, recommend measuring emergency response time performance at the 90th percentile, meaning that 90% of emergency responses occur in the stated value or less.[32] In basic terms, the 90th percentile means that 10% of the values are greater than the stated value, while the remaining 90% are at or below it. This can then be compared to the desired performance objective to determine the degree of success in achieving the goal.

Industry best practices recommend measuring total response performance from the time an emergency call is received at a dispatch center to the time the first emergency response unit arrives and initiates action or intervenes to control the incident.

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[31] Center for Public Safety Excellence (CPSE) *Quality Improvement for the Fire and Emergency Services* (2020).

[32] NFPA 1710: *Standard for the Organization & Deployment of Fire Suppression Operations, Emergency Medical Operations, & Special Operations to the Public by Career Fire Departments* (NFPA, 2020).

Tracking the individual components of the total response time allows for identifying deficiencies and areas for improvement. While progressing through the performance analysis, it is important to understand that each component of response performance is not cumulative. Each is analyzed as an individual component, and the point at which the "fractile" percentile is calculated exists in a set of data unto itself.

The response time continuum, spanning the time between a caller dialing 9-1-1 and assistance arriving, comprises several key components. Figure 130 lists the individual components analyzed by JAG with the NFPA 1710 benchmark of 90%. Figure 131 shows the response time measurements.

Figure 130: Response Time Continuum Definitions

Alarm Processing Time: The time interval between when a dispatcher answers a 9-1-1 call and resources are dispatched.

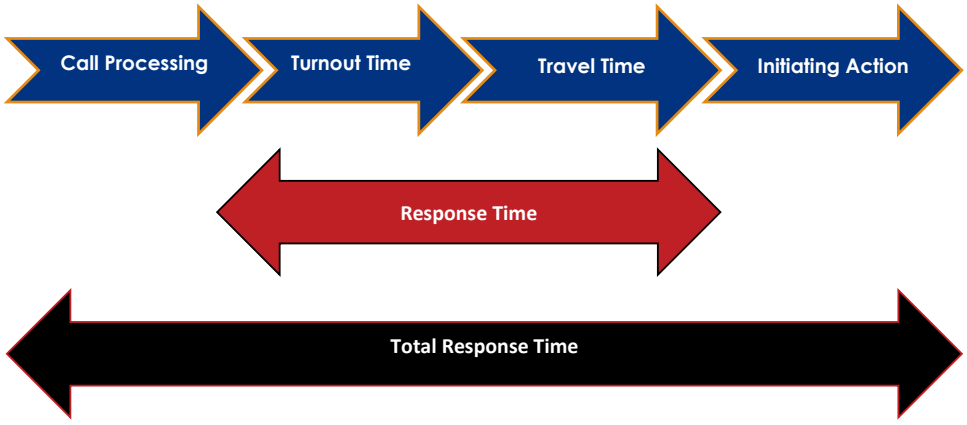
Turnout Time: The interval between the time that an emergency response facility (ERF) and emergency response unit (ERU) are notified (by an audible alarm, visual annunciation, or both) and the time a unit begins to respond.

Travel Time: The time a responding unit spends driving to an incident.

Response Time: The combination of turnout time and travel time. This measurement may indicate a system's capability to staff, locate, and deploy response resources adequately. It may also indicate the responding personnel's knowledge of the area or dispatcher instructions for efficient travel. This is often utilized as the measure of fire department response time performance.

Total Response Time: The NFPA 1710 definition of total response time is the interval between receiving an alarm at dispatch and the arrival of a unit on the scene to initiate an action or intervene to control an incident. This is the true measure of response time performance.

Figure 131: NFPA 1710 Response Time Measurements



Total response time is the time a resident or business waits for resources to arrive at the scene of an emergency from the moment they first call 9-1-1. This process begins for FMBFD and IMFD once a call is dispatched from the regional 9-1-1 communications center (Lee Control).

Although ISO does not specify these particular numbers under its "Fire Department" section of the FSRS PPC® review, it does describe the expectation under "Deployment Analysis." Specifically, ISO states, "The timing is in accordance with the general criteria in NFPA 1710."

Fort Myers Beach Fire District

Alarm Processing

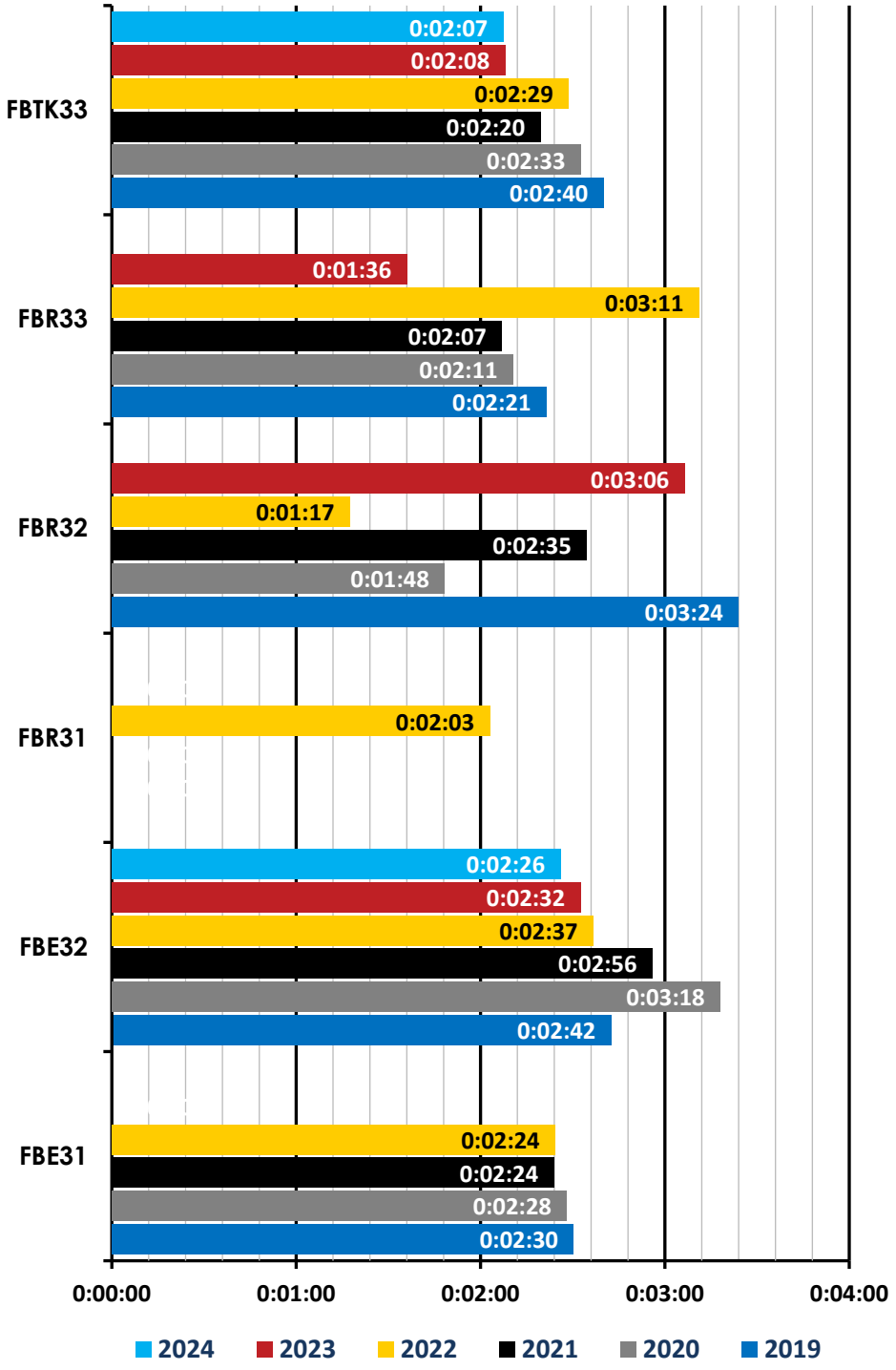
The alarm processing component includes the time the Lee County Emergency Dispatch Center receives a call and when resources are dispatched. It should be noted that FMBFD has no direct control over the operations of the Lee County Emergency Dispatch Center (Lee Control). Based on this, alarm processing was not evaluated in this report.

Turnout Time

The turnout time component begins when emergency personnel are notified to respond by a dispatch center and ends when an apparatus begins to respond. Turnout time is a crucial component of total response performance and can be influenced by factors such as station design, apparatus staffing, and the performance of assigned personnel. Because of this, turnout time is one area of the overall response time that field personnel can influence.

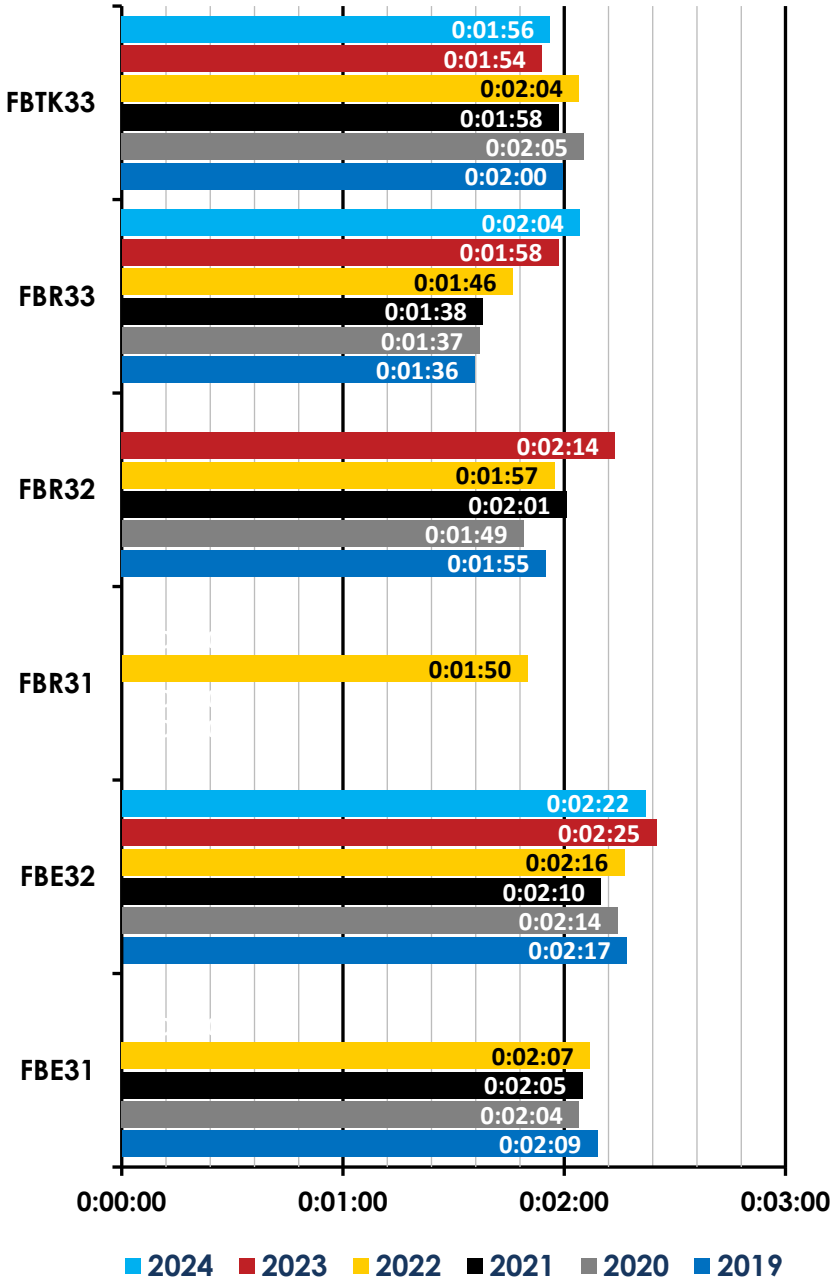
Figure 132 summarizes FMBFD's 90th percentile turnout time performance for fire-related incidents.

Figure 132: FMBFD Turnout Times—Fire-Related Incidents (2019–2024)



For calendar year 2024, the turnout times for FMBFD's units to fire-related incidents—fires and fire alarms—ranged from a 90th percentile high of 0:02:26 for Engine 32 to a 90th percentile low of 0:02:07 for Truck 33. From the perspective of emergency fire suppression incidents, FMBFD's turnout performance exceeded the NFPA benchmark of 0:01:20 for all frontline units. Figure 133 shows FMBFD's turnout time performance for EMS-related calls.

Figure 133: FMBFD Turnout Times—EMS-Related Incidents (2019–2024)



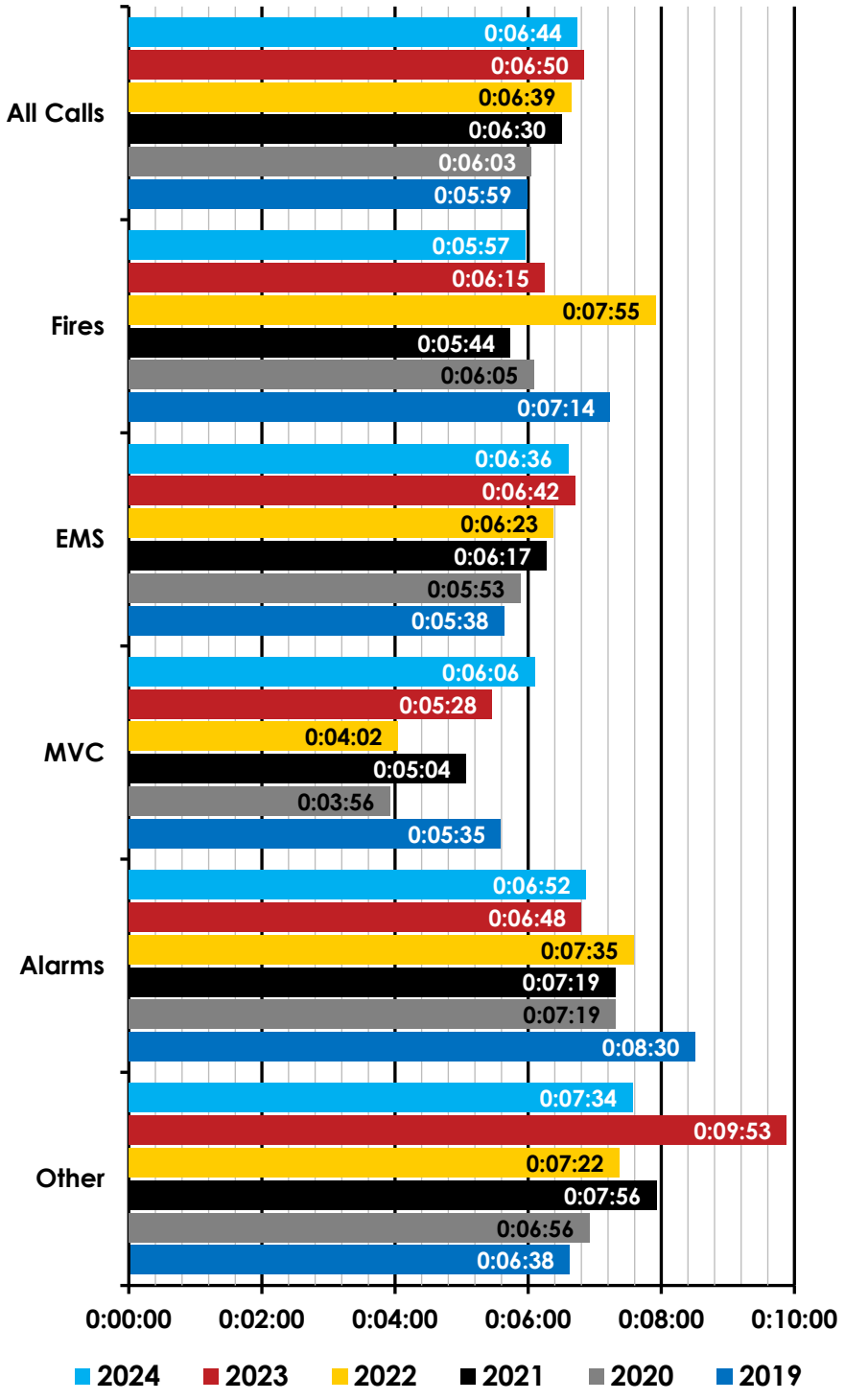
For calendar year 2024, the turnout times for FMBFD's primary units responding to rescue and EMS incidents—medical and motor vehicle crashes (MVC)—ranged from a 90th percentile high of 0:02:22 for Engine 32 to a 90th percentile low of 0:01:56 for Rescue 32. From an EMS incident perspective, FMBFD's turnout performance exceeded the NFPA benchmark of 00:01:00 seconds for EMS incidents.

Travel Time

Travel time starts when an apparatus leaves a station and when it reaches the scene of an emergency. Travel time is one component of total response time that is rarely under the control of fire department personnel. The existing road network, traffic congestion, geographic barriers, and the size of the service area all play critical roles in travel time performance.

Figure 134 illustrates travel time performance for the first-arriving FMBFD unit throughout FMBFD's service area at the 90th percentile.

Figure 134: FMBFD Travel Times (2019–2024)



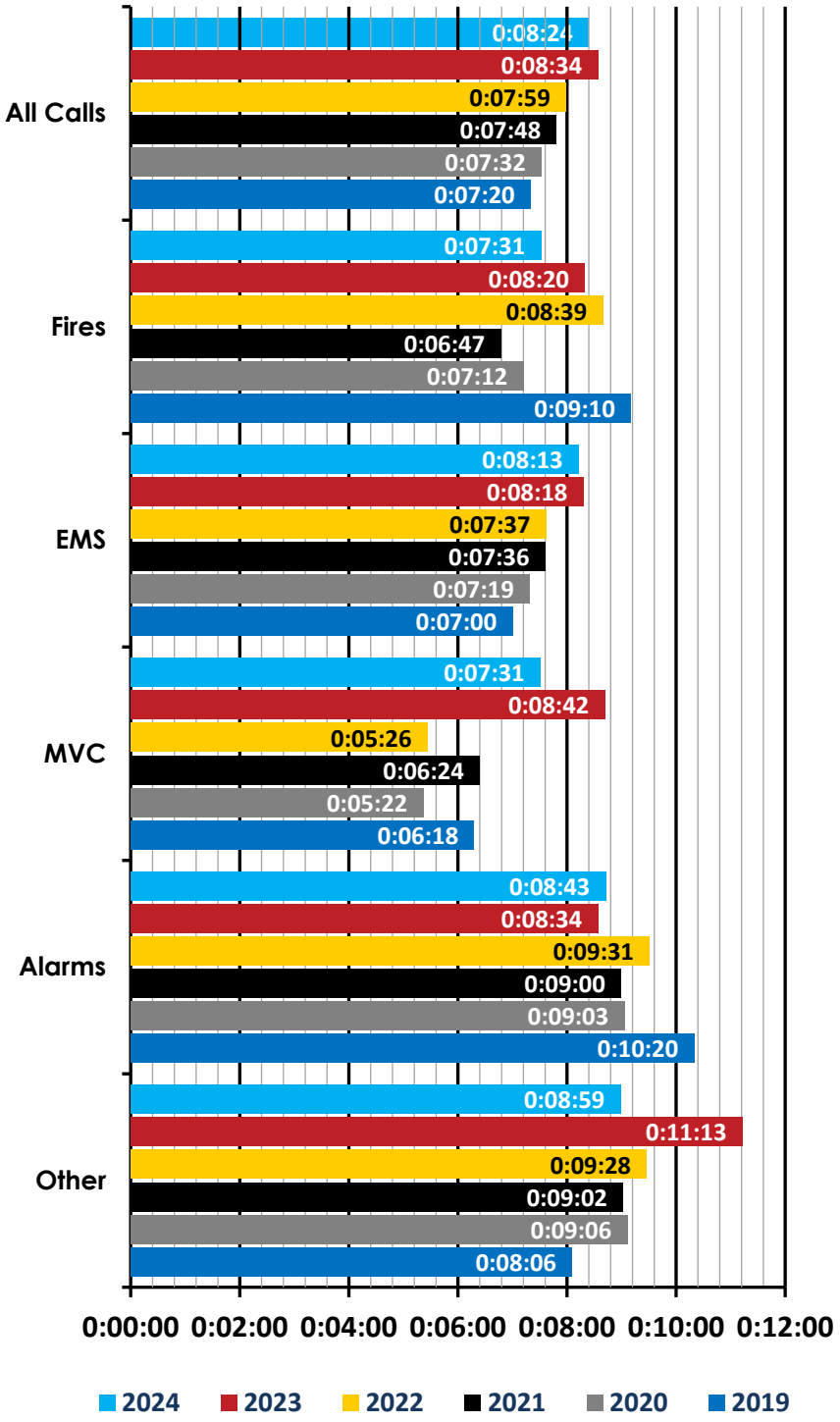
FMBFD's performance exceeded the NFPA recommendations in all noted categories. On average, for all incident types over the past six years, travel time performance exceeded the NFPA benchmark of 0:04:00 by 2 minutes, 28 seconds (+0:02:28).

Response Time

As previously discussed, the most utilized measure of fire district response performance is a combination of turnout time and travel time, referred to as response time or response performance. This is the period that starts when fire personnel are notified of an incident by dispatch and ends when the first apparatus arrives on the scene.

Figure 135 illustrates response time performance for FMBFD's service area at the 90th percentile.

Figure 135: FMBFD Response Times (2019–2024)



As expected, given the previously illustrated performance on turnout and travel times, FMBFD exceeded the NFPA recommendations in all categories. On average, for all incident types over the past six years, the FMBFD response time performance exceeded the NFPA benchmark of 0:05:00 by 2 minutes, 56 seconds (+0:02:56).

Total Response Time

Total response time was not analyzed for this report due to data limitations.

Flame Spread

Several methods exist for measuring fire spread performance. One is fire-related property loss, which is presented in the "Community Risk Reduction" section of this report. Another is fire spread, which is the extent to which the flame has spread. The extent of flame damage is the area burned or charred and does not include the area receiving only heat, smoke, or water damage.

In combination with other information, this element describes the magnitude or seriousness of a fire. It can be used to evaluate the effectiveness of built-in fire protection features or fire suppression forces under specific conditions.

Many factors influence the confinement and extinguishment of a fire. Fire spread indicates the combined effect of these conditions. Furthermore, analyzing fire spread across multiple fires can reveal the effects of individual factors on fire behavior.

Figure 136 illustrates the extent of fire spread during working incidents in FMBFD's service area since 2019. Also provided is the reported fire spread for the United States, the State of Florida, and Lee County for the 2023 calendar year, sourced from the NFIRS records for comparison purposes.

Limiting fire spread is an effective way to limit property damage and minimize the risk to civilians and firefighters. Since 2019, most fires have been confined to the building of origin by the Fort Myers Beach Fire District.

Figure 136: FMBFD Summary of Fire Spread (2019–2024)

Fire Spread	2019–2024	National	Florida	Lee County
Confined to object of origin	21.43%	18.96%	22.11%	29.22%
Confined to room of origin	26.19%	31.10%	36.06%	38.25%
Confined to floor of origin	14.29%	8.67%	7.10%	6.33%
Confined to building of origin	35.71%	32.90%	27.53%	20.48%
Beyond building of origin	2.38%	8.37%	7.20%	5.72%
N=	**42**			

Iona-McGregor Fire District

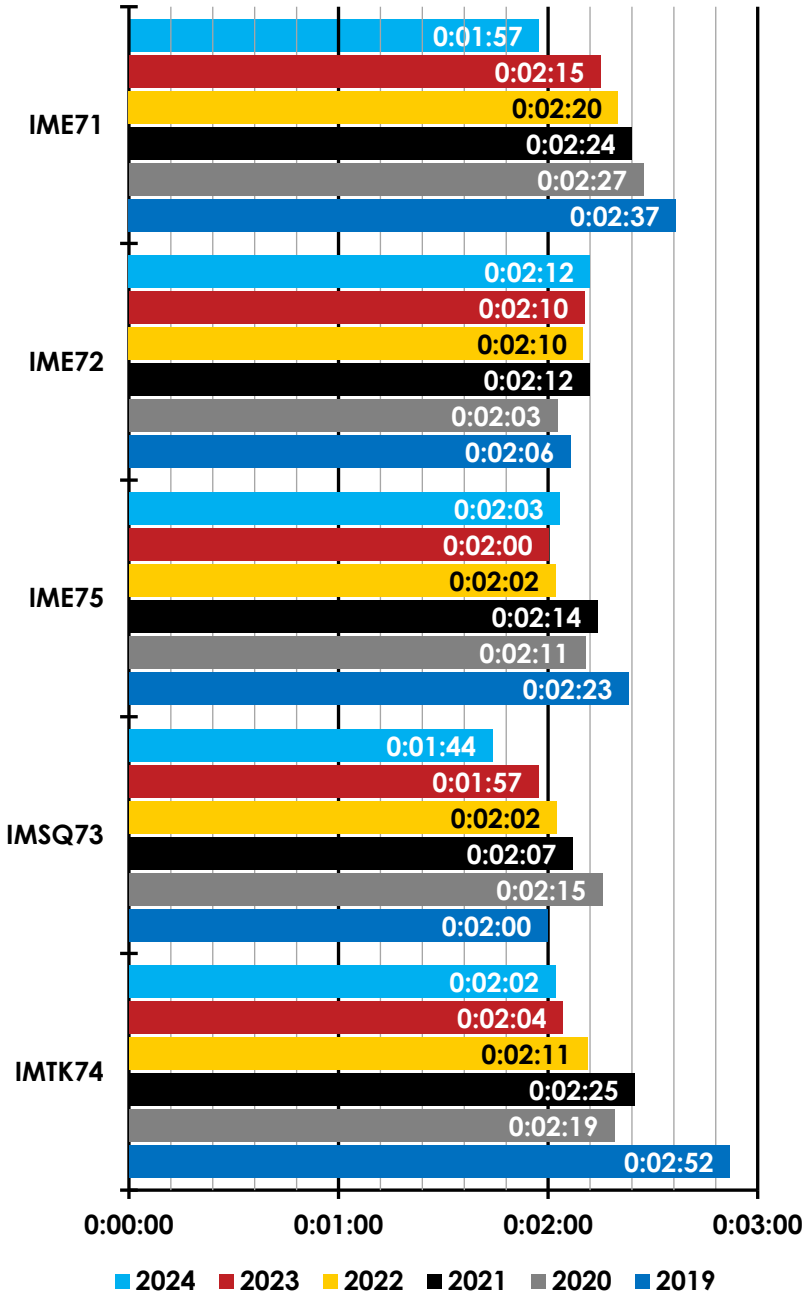
Alarm Processing

As with FMBFD, IMFD has no direct control over the operations of the Lee County Emergency Dispatch Center.

Turnout Time

Figure 137 summarizes IMFD's 90th percentile turnout time performance for fire-related incidents.

Figure 137: IMFD Turnout Times—Fire-Related Incidents (2019–2024)



For calendar year 2024, the turnout times for IMFD's units to fire-related incidents—fires and fire alarms—ranged from a 90th percentile high of 0:02:12 for Engine 72 to a 90th percentile low of 0:01:44 for Squad 73. From the perspective of emergency fire suppression incidents, IMFD's turnout performance exceeded the NFPA benchmark of 0:01:20 for all frontline units. Since IMFD's rescue units are not initially alerted to fire-related incidents, they were not included in this analysis.

Figure 138 and Figure 139 summarize IMFD's 90th percentile turnout time performance for EMS-related incidents.

Figure 138: IMFD (Rescue Units) Turnout Times—EMS-Related Incidents (2019–2024)

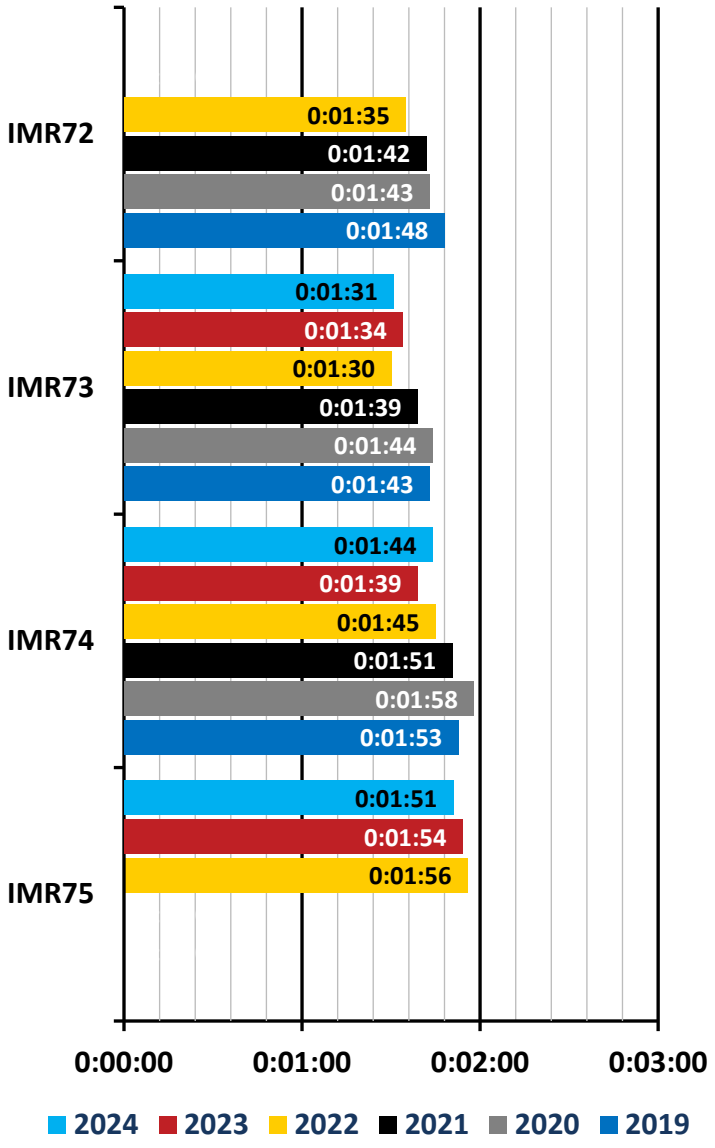
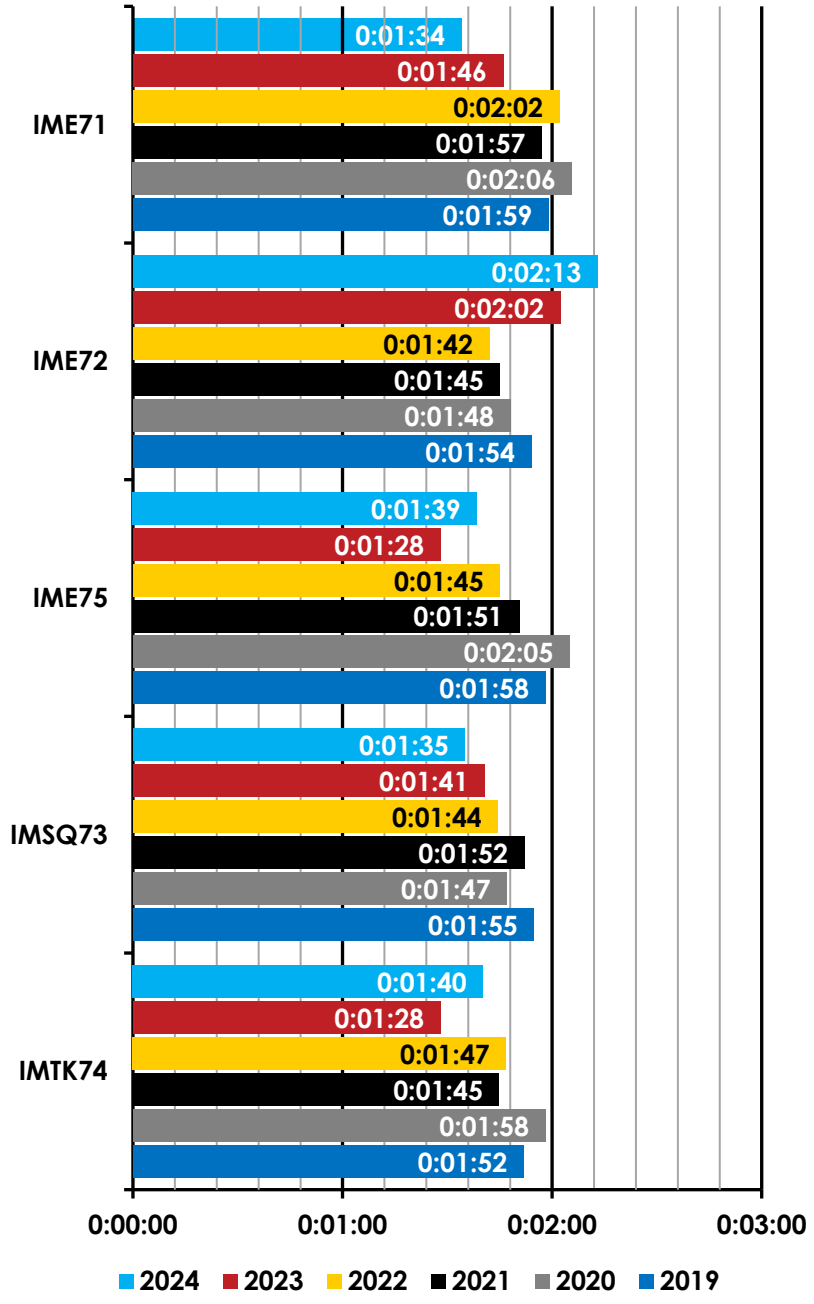


Figure 139: IMFD (Fire Units) Turnout Times—EMS-Related Incidents (2019–2024)

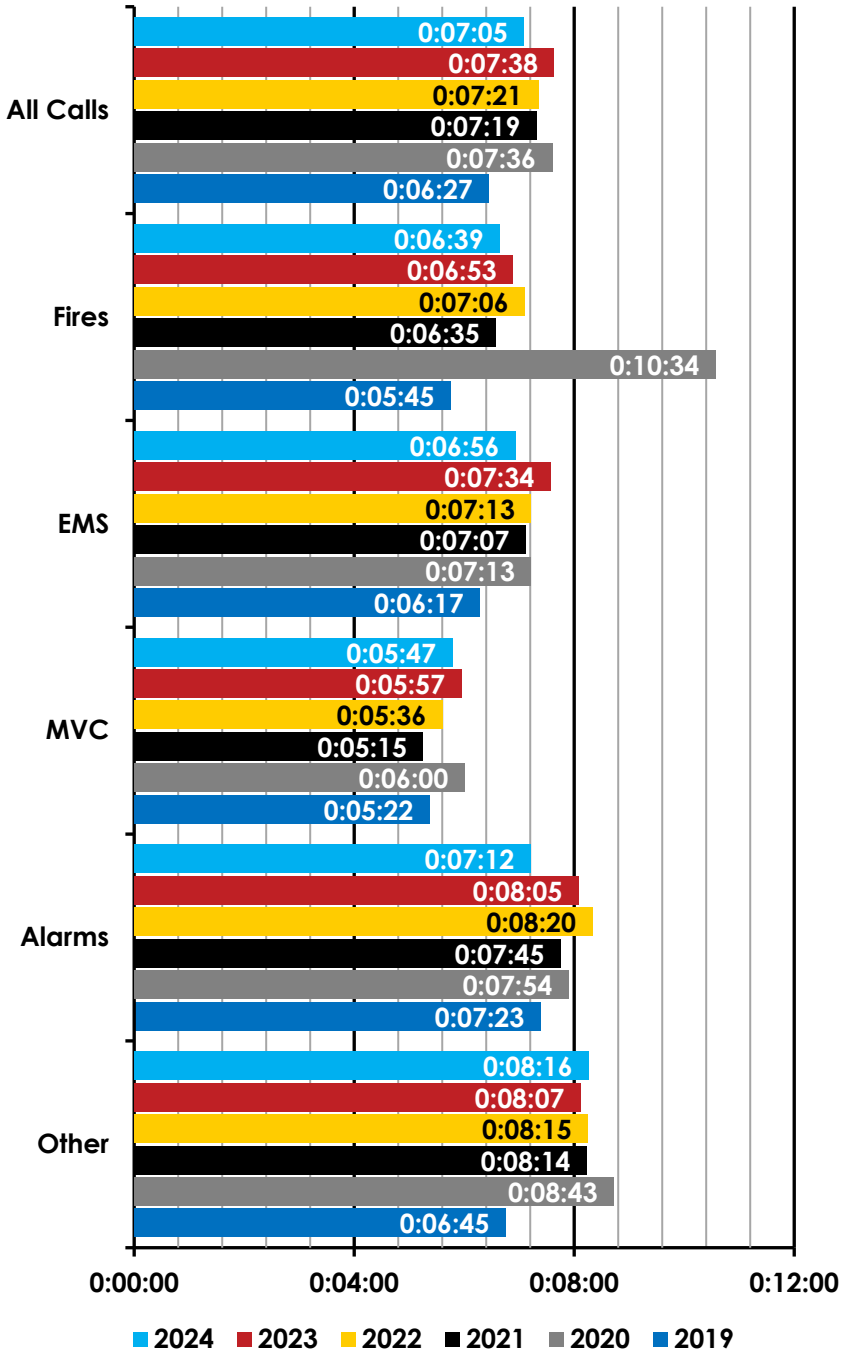


For the calendar year 2024, the turnout times for IMFD's primary units responding to rescue and EMS incidents—medical and motor vehicle crashes (MVC)—ranged from a 90th percentile high of 0:02:13 for Engine72 to a 90th percentile low of 0:01:31 for Rescue 73. From an EMS incident perspective, IMFD's turnout performance exceeded the NFPA benchmark of 00:01:00 seconds for EMS incidents.

Travel Time

Figure 140 illustrates travel time performance for the first-arriving IMFD unit throughout the IMFD's service area at the 90th percentile.

Figure 140: IMFD Travel Times (2019–2024)

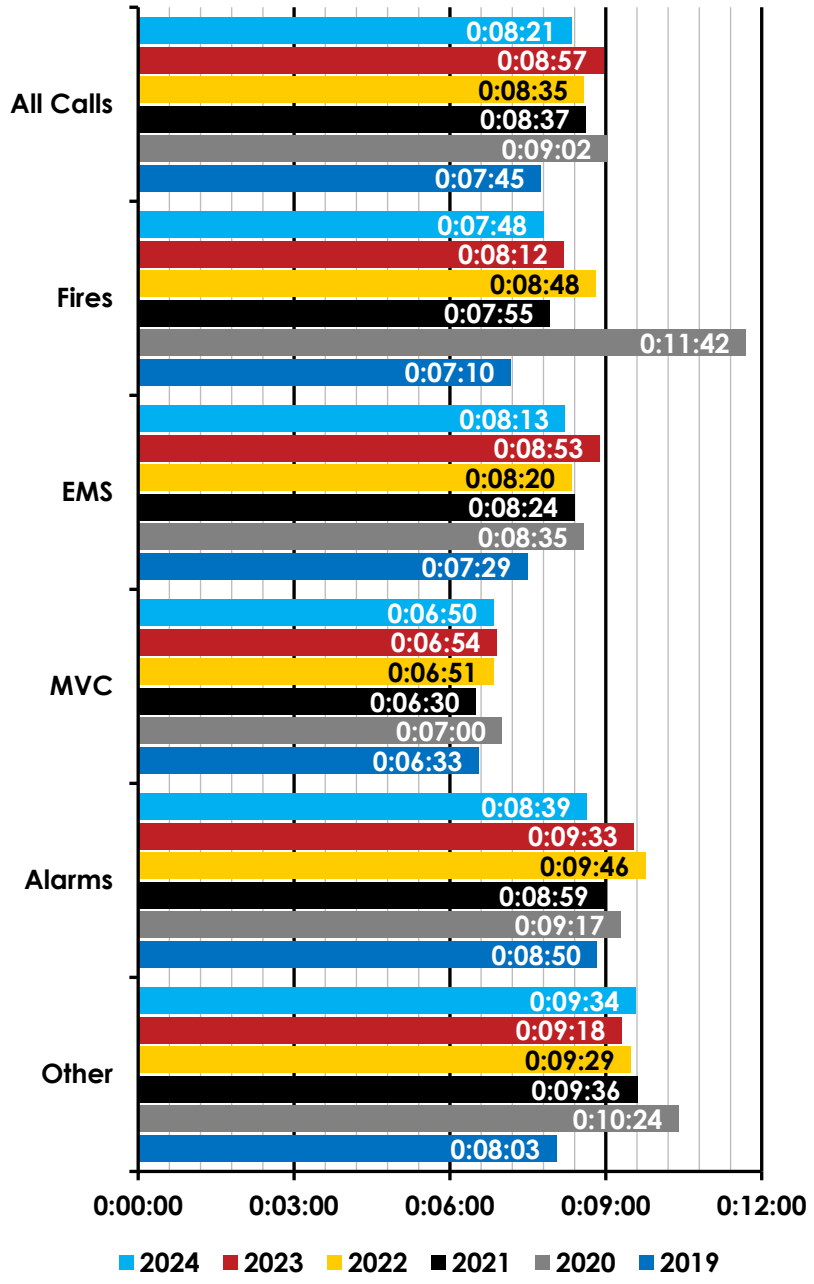


IMFD's performance exceeded the NFPA recommendations in all categories. On average, for all incident types over the past six years, travel time performance exceeded the NFPA benchmark of 0:04:00 by 3 minutes, 15 seconds (+0:03:15).

Response Time

Figure 141 illustrates the response time performance for the IMFD's service area.

Figure 141: IMFD Response Times (2019–2024)



As expected, given the previously discussed performance on turnout and travel times, IMFD exceeded the NFPA recommendations in all noted categories. On average, for all incident types over the past six years, IMFD response time performance exceeded the NFPA benchmark of 0:05:00 by 3 minutes, 35 seconds (+0:03:35).

Total Response Time

Total response time was not analyzed for this report due to data limitations.

Flame Spread

Figure 142 illustrates the extent of fire spread during working incidents in the IMFD's service area since 2019. Since 2019, most fires have been confined to the room of origin by IMFD.

Figure 142: IMFD Summary of Fire Spread (2019–2024)

Fire Spread	2019–2024	National	Florida	Lee County
Confined to object of origin	27.10%	18.96%	22.11%	29.22%
Confined to room of origin	39.25%	31.10%	36.06%	38.25%
Confined to floor of origin	4.67%	8.67%	7.10%	6.33%
Confined to building of origin	28.04%	32.90%	27.53%	20.48%
Beyond building of origin	0.93%	8.37%	7.20%	5.72%
N=	**107**			

Mutual Aid & Automatic Aid Systems

Mutual aid is typically employed as needed, with units specified by the Incident Commander. Automatic aid differs from mutual aid in that, under certain mutually agreed-upon criteria, resources from an assisting agency are automatically dispatched as part of the initial response.

These agreements ensure that the necessary personnel and appropriate equipment are available to respond to specific incidents. Automatic aid response resources are often defined in the dispatch run cards for the participating agencies. Mutual aid and automatic aid operations are integral parts of emergency operations.

Lee County fire departments have a robust automatic aid agreement in place. FMBFD's closest partners are IMFD and Bonita Springs Fire Control District. For IMFD, their closest partners include FMBFD, Fort Myers Fire Department, San Carlos Park Fire District, and South Trail Fire District.

Additionally, IMFD has a mutual aid agreement with the Cape Coral Fire Department. Figure 143 illustrates the closest aid partners to FMBFD and IMFD.

Figure 143: Mutual & Automatic Aid Partners

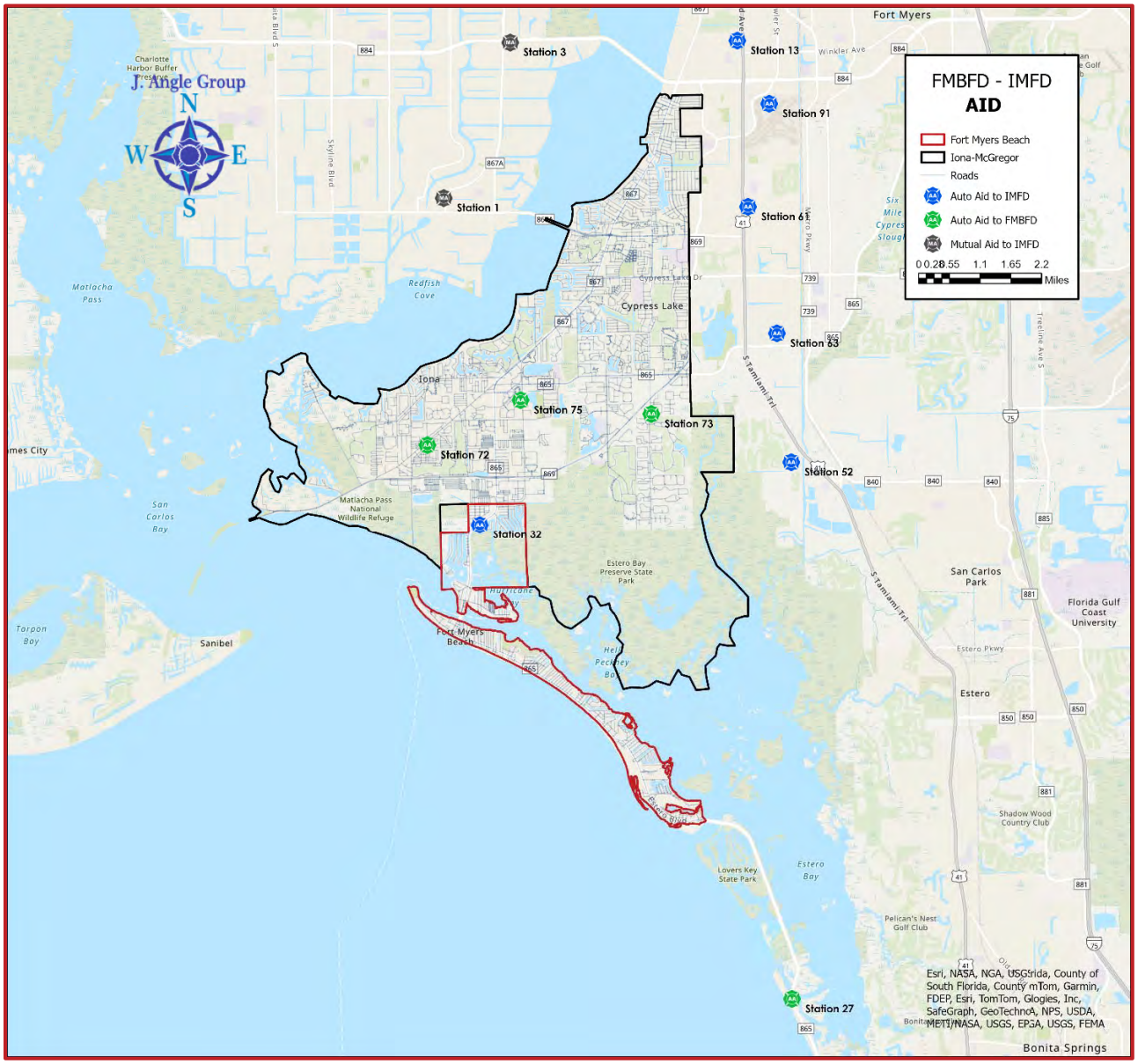


Figure 144 summarizes the mutual and automatic aid given and received by FMBFD for the 2019–2024 period. The source of this information was NFIRS response data provided by the Fort Myers Beach Fire District.

Figure 144: FMBFD Mutual/Automatic Aid Summary (2019–2024)

Automatic Aid/Mutual Aid	2019	2020	2021	2022	2023	2024
Mutual Aid Received	18	17	21	17	5	4
Automatic Aid Received	122	137	270	204	212	477[A]
Mutual Aid Given	41	32	19	17	6	23
Automatic Aid Given	487	587	942	494	642	444
Other Aid Given	3	3	6	2	1	1
Net (Given/Received):	**391**	**468**	**676**	**292**	**432**	**-13**

[A] Just over 200 of the 2024 Automatic Aid Received are a result of Lee County EMS providing a transport unit. FMBFD reports LCEMS medic units as Aid Received because FMBFD is the transport provider.

Figure 145 summarizes the mutual and automatic aid given and received by IMFD during 2019–2024. The source of this information was NFIRS response data provided by IMFD.

Figure 145: IMFD Mutual/Automatic Aid Summary (2019–2024)

Automatic Aid/Mutual Aid	2019	2020	2021	2022	2023	2024
Mutual Aid Received	14	4	48	55	56	35
Automatic Aid Received	37	26	170	221	184	136
Mutual Aid Given	69	89	91	75	71	95
Automatic Aid Given	580	567	734	662	668	736
Other Aid Given	3	16	20	31	28	13
Net (Given/Received):	**601**	**642**	**627**	**492**	**527**	**673**

All aid agreements should be reviewed and modified as necessary to ensure that all parties receive the maximum benefit of providing optimal service to customers without compromising coverage within each jurisdiction. Mutual and automatic aid operations are an integral part of emergency operations for FMBFD and IMFD, as they increase the concentration of resources available to mitigate incidents.

The best use of mutual and automatic aid depends on districts working together effectively. FMBFD and IMFD, and their mutual/automatic aid partners, should consider the following to be most effective:

- Fireground operations must be conducted similarly and in accordance with common standard operating guidelines (SOGs). FMBFD and IMFD use the Lee County Common Fireground Guidelines.
- Firefighters must be able to work in concert with personnel from other agencies, utilizing common training programs and procedures.
- Dispatch procedures should clearly define which response types and locations are to receive automatic aid responses.
- Procedures for requesting and providing mutual aid should be established in the mutual and automatic aid agreements.
- Personnel should be fully trained in mutual and automatic aid practices and remain informed about any changes.

Projected Population Growth & Future Service Demand

Fort Myers Beach Fire District

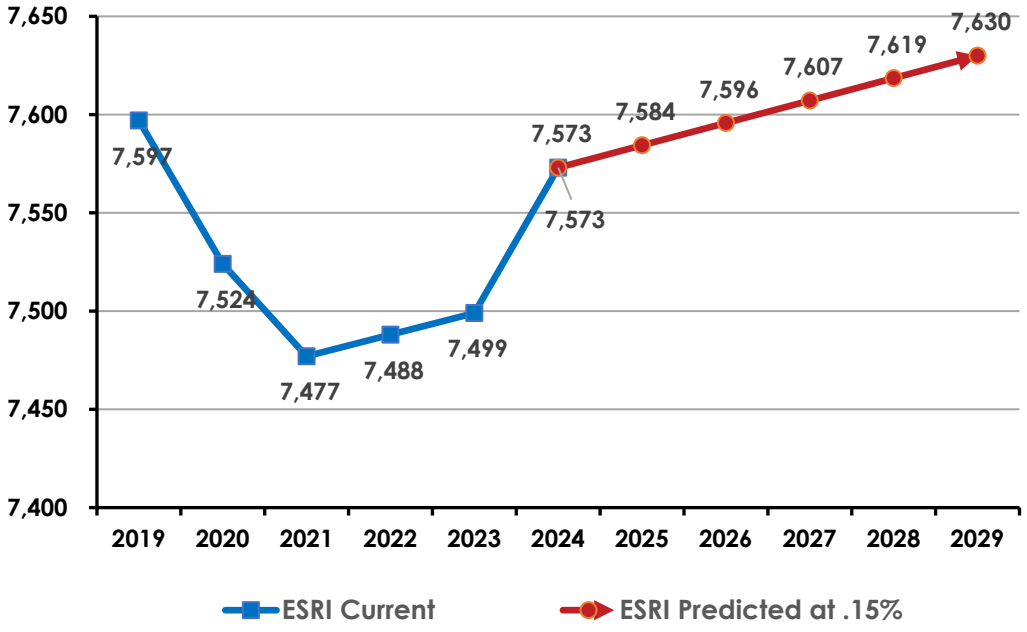
Population Growth Projections

According to the U.S. Census Bureau, the FMBFD service area had a population of 7,573 in 2024. Over the past six years, the population has decreased by approximately 0.05% per year. The overall effects of the COVID-19 pandemic in 2020 and the impacts of Hurricane Ian in 2022 on future population growth remain to be fully understood at this time.

For this analysis, projections are based on historical data. Two separate population projections were performed for the FMBFD service area. The first used Esri data and the second used Excel forecasting.

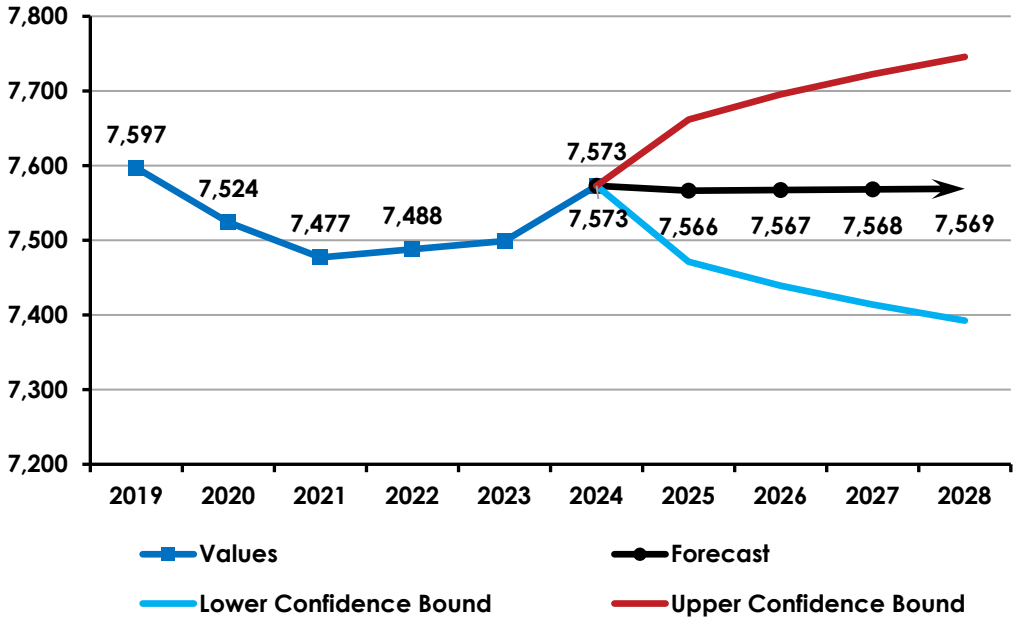
Based on the Esri analysis in Figure 146, the FMBFD service area is expected to experience a population increase of 0.75% by 2029. However, as previously mentioned, this conservative estimate does not account for potential population trends resulting from the COVID-19 pandemic or Hurricane Ian.

Figure 146: FMBFD Service Area Esri Population Projections (2024–2029)



Based on the preceding analysis in Figure 147, the FMBFD service area is expected to experience a population decrease of 0.05% by 2029. Therefore, the lower confidence bound for this analysis was -2.6%, and the upper confidence bound was 2.5%.

Figure 147: FMBFD Service Area Excel Population Projections (2024–2029)



Service Demand Projections

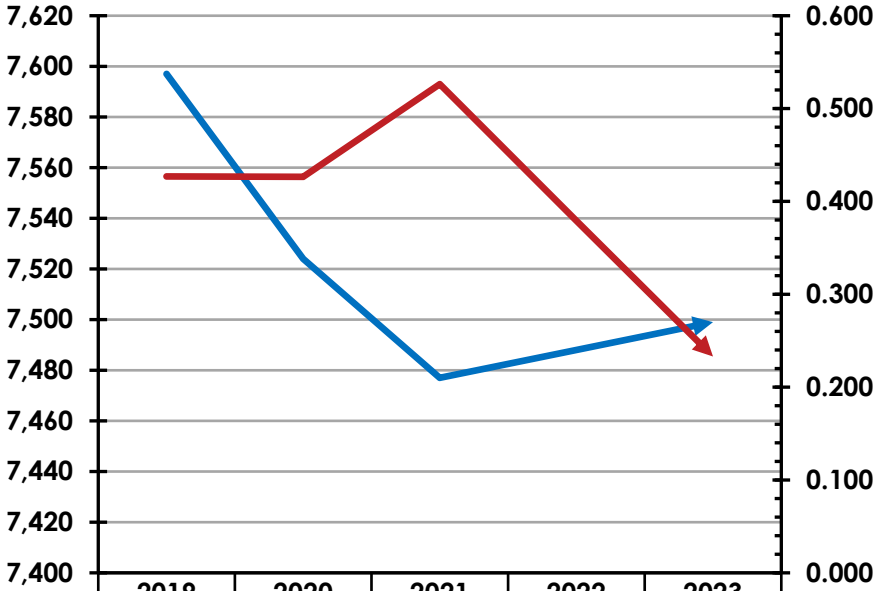
JAG used average Esri and Excel population projections for the FMBFD service area to forecast future service demand. Population tends to be a relatively good indicator of service demand, and current service demand per population can serve as a benchmark for future demand. Normally, the assumption is made that changes in future demographics will follow historical trends of current demographics. However, in this case, the normal assumption may not be as reliable given the effects of Hurricane Ian on the district's population and the number of incidents handled by FMBFD.

Although the following information may be useful as a planning tool, it should be pointed out that, regardless of the accuracy of the projections of service demand, either FMBFD as a single district or units from a combined district will still have to respond to the service request. As hurricane recovery continues and the storm's effects normalize, future population changes and service demand can be better analyzed.

The current service demand per 1,000 population is calculated by dividing the annual number of responses by the population in thousands. This historical data includes the effects of the COVID-19 pandemic and Hurricane Ian.

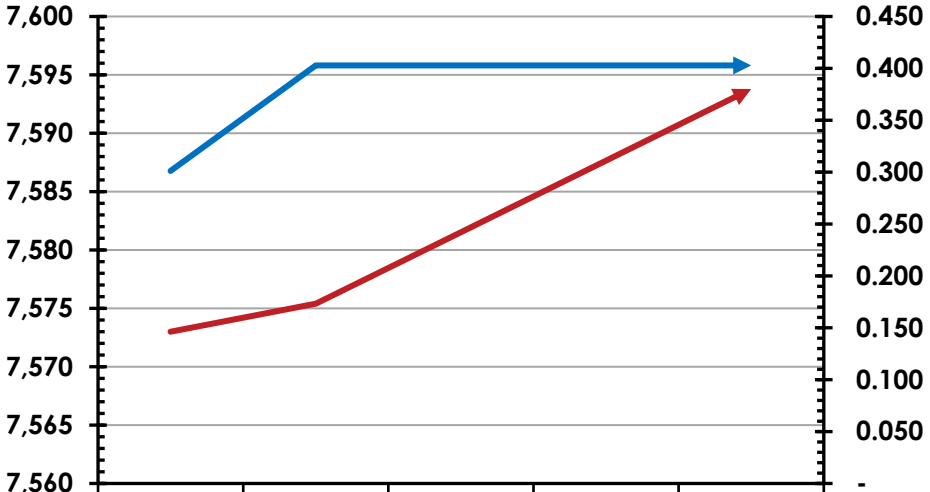
Based on historical data and as illustrated in Figure 148, FMBFD has had an average incident rate per capita of 0.403 since 2019. This rate is used for future projections, as shown in the next two figures.

Figure 148: FMBFD Historical Incident Per Capita (2019–2023)



	2019	2020	2021	2022	2023
Population (ESRI)	7,597	7,524	7,477	7,488	7,499
Incident per Capita	0.427	0.427	0.526	0.379	0.233

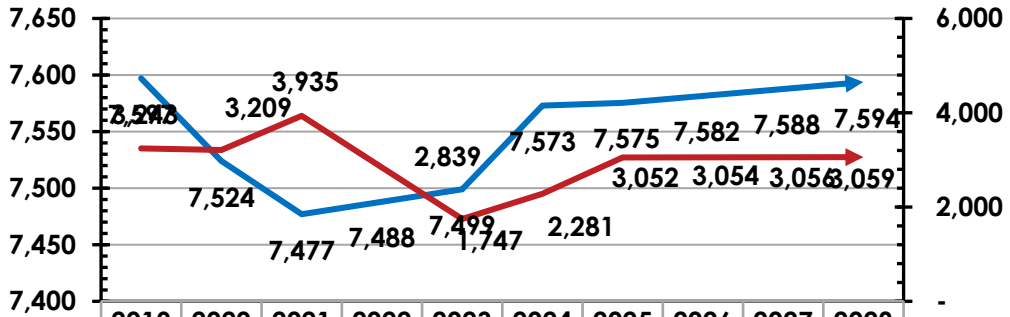
Figure 149: FMBFD Future Incident Per Capita Prediction Rate (2024–2028)



	2024	2025	2026	2027	2028
Population (ESRI)	7,573	7,575	7,582	7,588	7,594
Incident per Capita	0.301	0.403	0.403	0.403	0.403

FMBFD has a projected service demand increase of 34% by 2028, as shown in Figure 150.

Figure 150: FMBFD Projected Population & Service Demand



	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028
Population (ESRI)	7,597	7,524	7,477	7,488	7,499	7,573	7,575	7,582	7,588	7,594
Incident per Capita	3,243	3,209	3,935	2,839	1,747	2,281	3,052	3,054	3,056	3,059

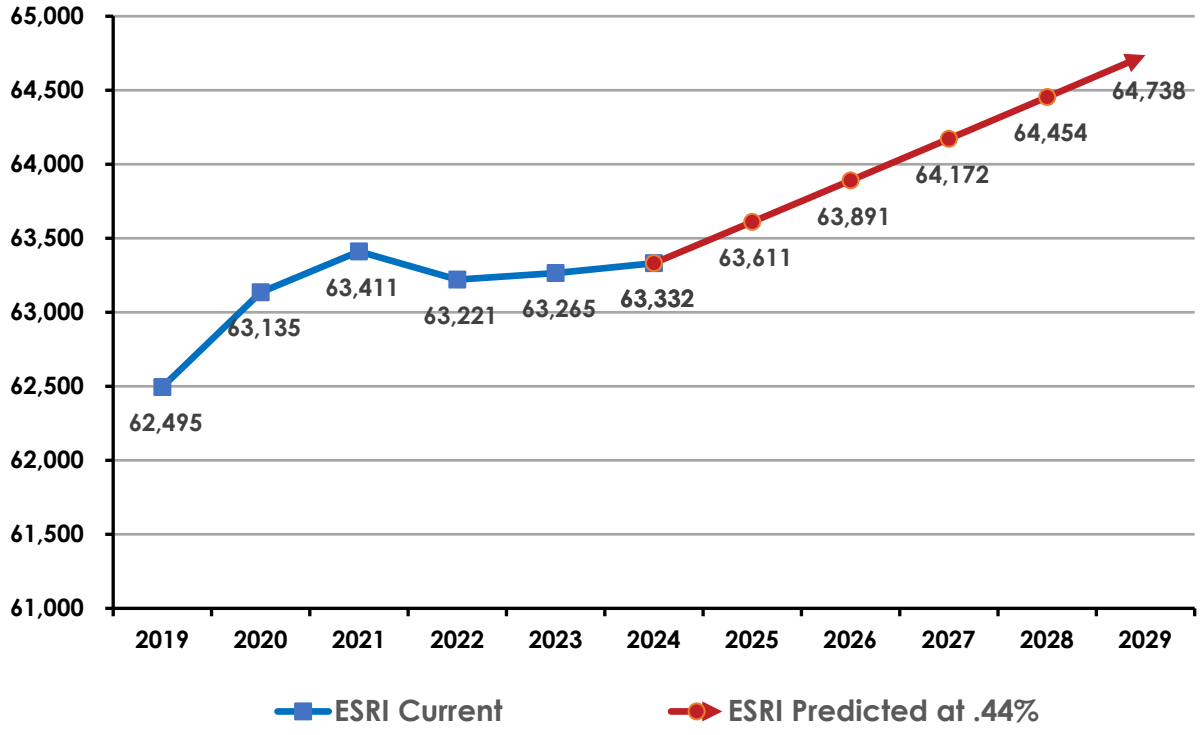
Iona-McGregor Fire District

Population Growth Projections

According to the U.S. Census Bureau, the IMFD service area had a population of 63,332 in 2024. Over the past six years, the population growth rate has been approximately 0.22% per year. However, as with FMBFD, the COVID-19 pandemic in 2020 and Hurricane Ian's impacts in 2022 on future population growth remain to be fully understood.

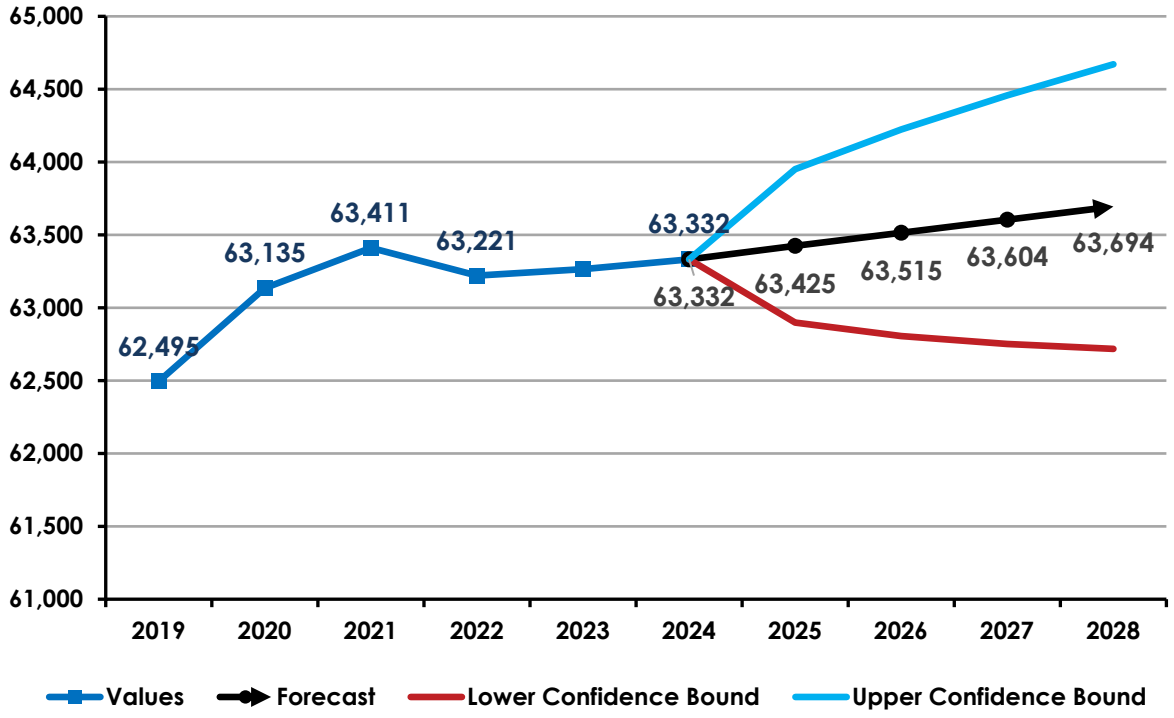
Based on the Esri analysis in Figure 151, the IMFD service area is expected to experience a population increase of 2.22% by 2029. However, as previously mentioned, this conservative estimate does not account for potential population trends resulting from the COVID-19 pandemic or Hurricane Ian.

Figure 151: IMFD Service Area Esri Population Projections (2024–2029)



Based on the following analysis in Figure 152, the IMFD service area is expected to experience a population increase of 0.57% by 2029. Therefore, the lower confidence bound for this analysis was -1.0%, and the upper confidence bound was 2.4%.

Figure 152: IMFD Service Area Excel Population Projections (2024–2029)



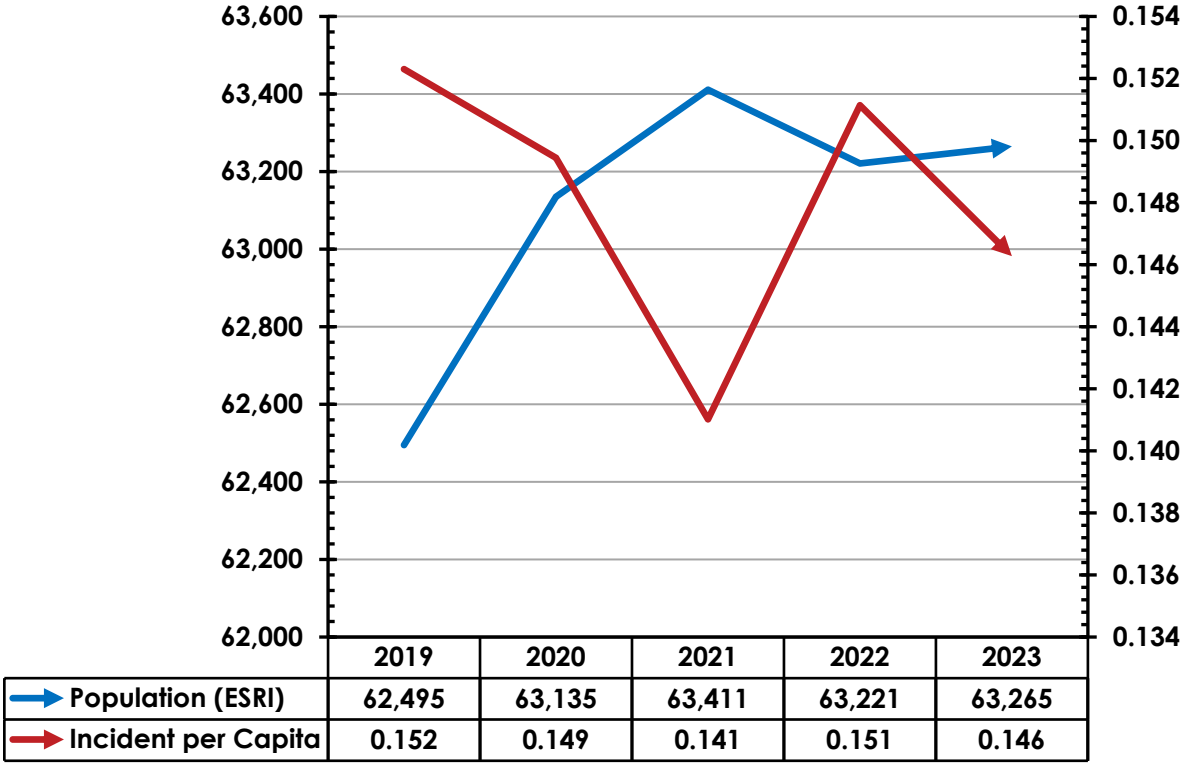
Based on the preceding analysis, the IMFD service area is expected to experience a population increase of 0.57% by 2029. Therefore, the lower confidence bound for this analysis was -1.0%, and the upper confidence bound was 2.4%.

Service Demand Projections

As with FMBFD, JAG used average Esri and Excel population projections for the IMFD service area to forecast future service demand.

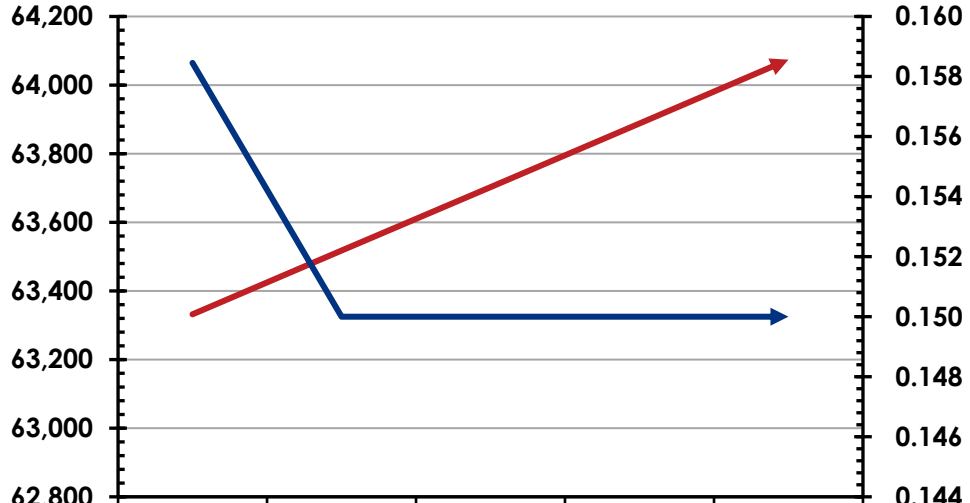
Based on historical data and as shown in Figure 153, IMFD has had an average incident per capita of 0.150 since 2019. This was utilized for future projections, as shown in Figure 154.

Figure 153: IMFD Historical Incident Per Capita (2019–2023)



	2019	2020	2021	2022	2023
Population (ESRI)	62,495	63,135	63,411	63,221	63,265
Incident per Capita	0.152	0.149	0.141	0.151	0.146

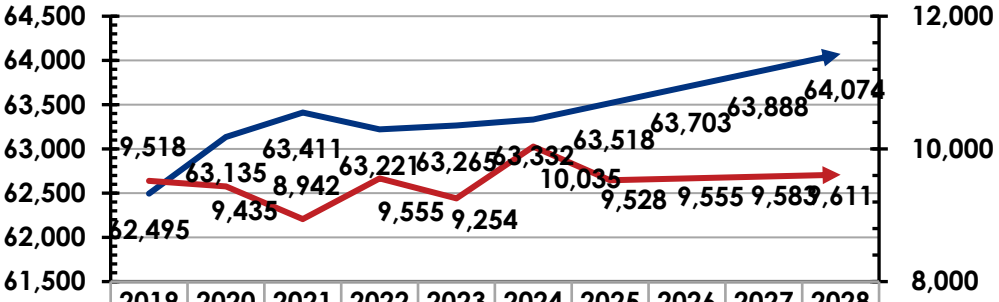
Figure 154: IMFD Future Incident Per Capita Prediction Rate (2024–2028)



	2024	2025	2026	2027	2028
Population (ESRI)	63,332	63,518	63,703	63,888	64,074
Incident per Capita	0.158	0.150	0.150	0.150	0.150

IMFD is projected to experience a 4.2% decrease in service demand by 2028, as shown in Figure 155.

Figure 155: IMFD Projected Population & Service Demand



	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028
Population (ESRI)	62,495	63,135	63,411	63,221	63,265	63,332	63,51	63,70	63,88	64,07
Incident per Capita	9,518	9,435	8,942	9,555	9,254	10,03	9,528	9,555	9,583	9,611

Overall Service Delivery & Performance Comparisons Summary

Figure 156 displays the service demand for the project area, along with the percentage of overall demand for FMBFD and IMFD.

Figure 156: Combined Historical Service Demand of the Fire Districts (2022–2024)

Fire District	2022	2023	2024	Total	% of Total[A]
Fort Myers Beach Fire District	2,839	1,747	2,281	**6,867**	**19%**
Iona-McGregor Fire District	9,555	9,254	10,035	**28,844**	**81%**
Annual Totals:	**12,394**	**11,001**	**12,316**	**35,711**	

[A] Represents the percentage of the combined totals of 2022, 2023, and 2024.

Figure 157 provides an overall comparison of service delivery and performance between FMBFD and IMFD.

Figure 157: Service Delivery & Performance Comparisons Summary

Service Delivery & Performance	FMBFD	IMFD	Comments
Highest Demand Incident Type	EMS (70%)	EMS (59%)	2019–2024
Highest Demand Property Type	Residential	Residential	2019–2024
Highest Demand (Month)	March	March	2019–2024
Highest Demand (Day)	Saturday	Monday	2019–2024
Highest Demand (Time)	2 p.m.	11 a.m.	2019–2024
ISO 5-Mile Coverage	100%	100%	SA*=100%
ISO 1.5-Mile Coverage	83%	60%	SA=67%
ISO 2.5-Mile Coverage	36%	29%	SA = 30%
NFPA 1710 4-Minute Coverage	78%	59%	SA=65%
NFPA 1710 8-Minute Coverage	100%	98%	SA=99%
Average Commitment Time	30:06	19:13	CY2024
Incident Concurrency (percent of single incident)	83%	68%	Average 2019–2024
Turnout Time—Fire-Related (2024 average all units)	0:02:17	0:02:00	At 90%
Turnout Time—EMS-Related (2024–average all units)	0:02:07	0:01:43	At 90%
Travel Time—All Calls (2024)	0:06:44	0:07:05	At 90%
Response Time—All Calls (2024)	0:08:24	0:08:21	At 90%
Automatic/Mutual Aid (net given/received)	374	594	Annual Average (2019–2024)
Projected Population—2028	7,594 (+0.28%)	64,074 (+1.17%)	SA=71,668
Projected Call Volume—2028	3,059 (+34%)	9,611(-4.2%)	SA=12,670

* SA = Study Area.

Section II:
SUPPORT PROGRAMS

Emergency Medical Services

The presence of proper EMS resources, administration, oversight, quality management, and equipment and supplies is key to effectively delivering care to the citizens and visitors of the FMBFD and IMFD service areas. Providing EMS has become an essential component of the fire service in the United States. A critical reason for this is that the American fire service, including FMBFD and IMFD, is strategically and geographically well-positioned to deliver rapid, time-critical responses and effective patient care.

Another advantage of a fire-based EMS model is that firefighters are trained in multiple disciplines, providing a comprehensive approach to emergency care. Thus, a single person can perform multiple functions, eliminating the need for a separate person for each function. In addition to being trained to handle fires and medical emergencies, firefighters can also mitigate hazardous materials incidents, perform complex technical rescues, and provide fire prevention and education services.

The following section provides an overview of the EMS program within each participating district. Although each district provides Medical First Responder (MFR) services up to the advanced life support (ALS) level, FMBFD also handles ground emergency medical transport (GEMT), with IMFD relying primarily on LCEMS for GEMT within its district.

FMBFD and IMFD have access to air medical transport through LeeFlight, a public-private partnership between the Lee County Department of Public Safety and Air Methods.[33] EMS service delivery and performance information is provided in a separate section of this report.

As recognized and licensed EMS agencies by Florida, FMBFD and IMFD are governed by Chapter 401, Florida Statutes, and Chapter 64J-1, Florida Administrative Code. Requirements of the statute and code include having a system Medical Director (licensed Florida physician), a Department of Justice Drug Enforcement Administration (DEA) registration (required for ALS only), vehicle liability insurance, trauma transport protocols, and an approved radio communication system.

[33] www.leegov.com/publicsafety/emergencymedicalservices/leeflight.

Fort Myers Beach Fire District

As previously discussed, FMBFD provides MFR services up to the ALS level, including ground emergency medical transport (GEMT). LCEMS also provides GEMT upon request from FMBFD. From a GEMT perspective, most patients are transported to HealthPark Medical Center. FMBFD also has one response unit that operates at the basic life support (BLS) level.

FMBFD does not have a separate EMS division, nor is there an officer or other individual assigned to manage and administer EMS. By integrating with fire records, the ESO software supports EMS reporting compliant with NEMSIS, NFIRS, and HIPAA. Using the Operative IQ software system, EMS inventory controls are in place, along with daily checks of equipment and supplies to ensure optimal utilization.

Controlled medications are secured in double-locked storage boxes. Local EMS system oversight is provided by the Lee County Division of Public Safety and local medical control through the EMS Medical Director, Dr. Caroline Periera, who is board-certified in emergency medicine. Dr. Periera provides services to FMBFD under a $48,000 annual contract. The Medical Director interacts with the crews every month through in-service training and completes field responses and EMS “ride-alongs” periodically.

FMBFD’s quality assurance/management plan identifies areas for improvement. System performance has established criteria and objectives that are also evaluated. Key performance indicators (KPIs) have been established from a clinical perspective. An internal quality management and improvement committee has been established in which the Medical Director actively participates. Feedback is provided to individual EMS field personnel. Additionally, the current quality management plan provides for the review of all patient care reports (PCRs), including refusals of care. Patient outcomes can be tracked by utilizing ESO software.

Clinical skills are documented electronically for each member using the Vector Solutions™ software system, while continuing medical education (CME) and training are accomplished through online (Vector Solutions™) and in-person formats, which meet State of Florida recertification guidelines.

FMBFD does not currently have an EMS public information and education program. This program was suspended following the impacts of Hurricane Ian.

FMBFD Patient Transport & EMS Incident Analyses

FMBFD provides EMS delivery through one ALS ambulance (rescue unit), which will increase to two after the Station 31 rebuild, as well as several dual-purpose fire and EMS units at both BLS and ALS levels. The rescue units are staffed with a minimum of one firefighter/paramedic and one firefighter/EMT. At the time of this report, FMBFD had eight members trained at the EMT-Basic level and 28 at the EMT-Paramedic (EMT-P) level.

EMS Incident Data

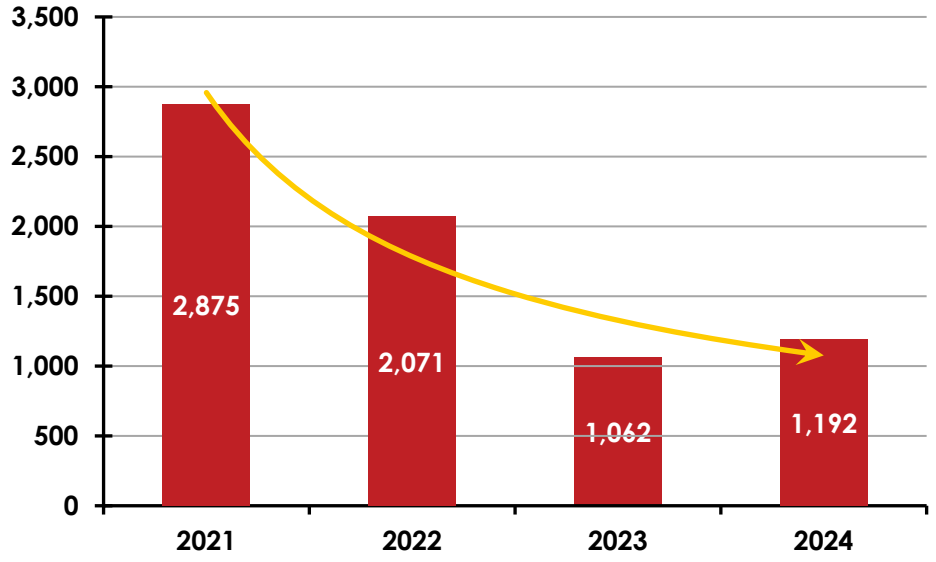
The EMS incident data analyzed by JAG included 7,200 individual records for calendar years 2021 through the end of 2024. When evaluating the EMS incident dataset provided by FMBFD, it was noted that some individual records shared the same run numbers but were different EMS incidents.

It must be noted that the FMBFD EMS records provided did not include seconds in the timestamps of various datasets. This can affect time accuracy by up to 59 seconds. In some analyses, 2021 data were excluded due to limitations in the records management system (RMS), where correct date timestamps were unavailable. Other issues with timestamps made it difficult to determine some performance benchmarks.

EMS Service Demand & Deployment

Figure 158 illustrates FMBFD EMS service demand during 2021–2024, for which an EMS report was provided. There was a significant decline in EMS calls each year after Hurricane Ian.

Figure 158: FMBFD EMS Incidents (2021–2024)



During 2021–2024, EMS records indicated a nearly 59% decline in EMS service demand.

Figure 159 illustrates a significant decline in service demand for each rescue unit over the 48-month study period. It shows the service demand for each unit from 2021 to 2024.

Figure 159: FMBFD EMS Call Volumes by Unit (2021–2024)

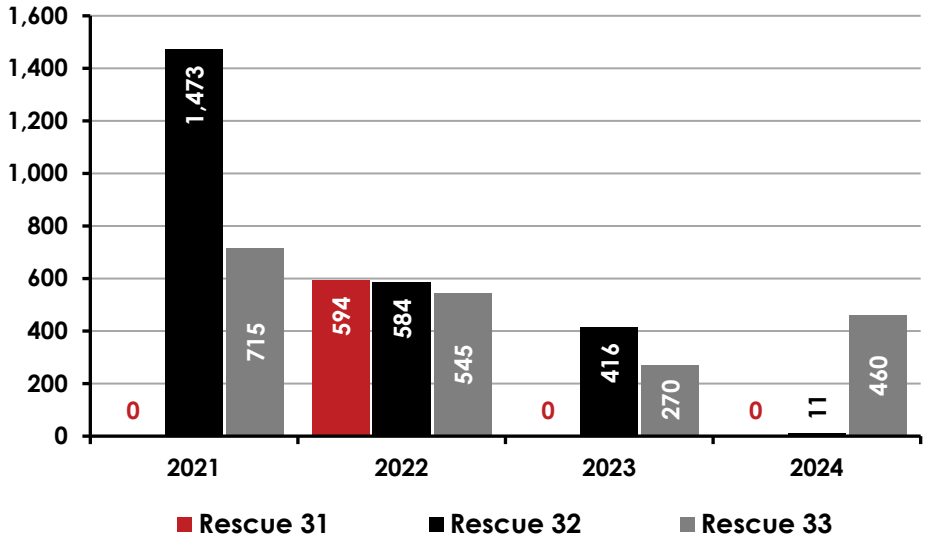


Figure 160 lists the number of calls and the percentage of EMS responses for each FMBFD unit. The highest number of calls were assigned to Rescue 32.

Figure 160: FMBFD EMS Call Volumes by Unit (2021–2024)

Unit	No. of Calls	% of Total
Engine 31	363	5%
Engine 32	1,525	21%
Engine 33	18	Less than 1%
Rescue 31	594	8%
Rescue 32	2,484	35%
Rescue 33	1,990	28%
Truck 33	174	2%
All Others Combined	61	Less than 1%

Of the 7,200 total EMS calls during the study period, FMBFD units responded 7,060 times (98%) in an emergent mode (lights and siren) and 125 times (2%) as non-emergent. In contrast, dispatch priority was assigned by Lee Control in 4,912 incidents as follows (24 Priority 4 calls were excluded):

- Priority 1 (Critical)—18%
- Priority 2 (Emergent)—63%
- Priority 3 (Lower Acuity)—19%

Patient Characteristics & Dispositions

During the 48-month study period, FMBFD reported that 40% of its patients were male, 33% female, and 27% not reported. Patient age was documented in 5,223 cases and ranged from less than 1 year to 124 years. Eight patients were listed as aged 120 or older. Likely, these were errors, and the oldest patients were probably 104 (two patients).

Patient Impressions

The primary patient impression, as documented by FMBFD EMS providers, was recorded in 5,138 (71%) cases. The top 20 patient impressions were as follows:

1. Injury—17%
2. Syncope/Fainting—8%
3. Generalized Weakness—6%
4. Head Injury—5%
5. Alcohol Use—4%
6. Chest Pain/Discomfort—4%
7. Abdominal Pain—4%
8. Anxiety/Emotional Upset—3%
9. Dyspnea—3%
10. Altered Mental Status—3%
11. Back Pain—2%
12. Pain (non-traumatic)—2%
13. No Complaints or Injury/Illness Noted—2%
14. Cardiac Arrest—2%
15. Dehydration—2%
16. Dizziness—2%
17. Cardiac Arrhythmia/Dysrhythmia—1%
18. Seizures—1%
19. Laceration/Abrasion/Hematoma—1%
20. Stroke—1%

FMBFD reported 112 cases of cardiopulmonary arrest during the study period. Six of these occurred after the arrival of FMBFD, with the remainder occurring before arrival. EMS personnel did not achieve—or at least report—a return of spontaneous circulation (ROSC) in any of these cases.

A secondary impression was documented in 1,642 cases. The five most common secondary impressions included:

- Generalized Weakness—9%
- Alcohol Use—7%
- Altered Mental Status—6%
- Anxiety/Emotional Upset—6%
- Dehydration—5%

Patient Dispositions

Excluding those documented as "Transported No Lights/Siren," "Transported Lights/Siren," and transports that were either upgraded or downgraded, FMBFD documented patient/incident disposition in 3,141 cases that did not result in a transport.

- Treated, released AMA—27%
- Cancelled on scene/no patient—23%
- Canceled prior to arrival—13%
- Unit assist—12%
- Care given to other EMS units—8%
- Refused evaluation/care—6%
- Canceled (no patient contact)—5%
- Deceased, no resuscitation—2%
- No treatment/transport required—1%
- Public assist—1%

Access to Patients

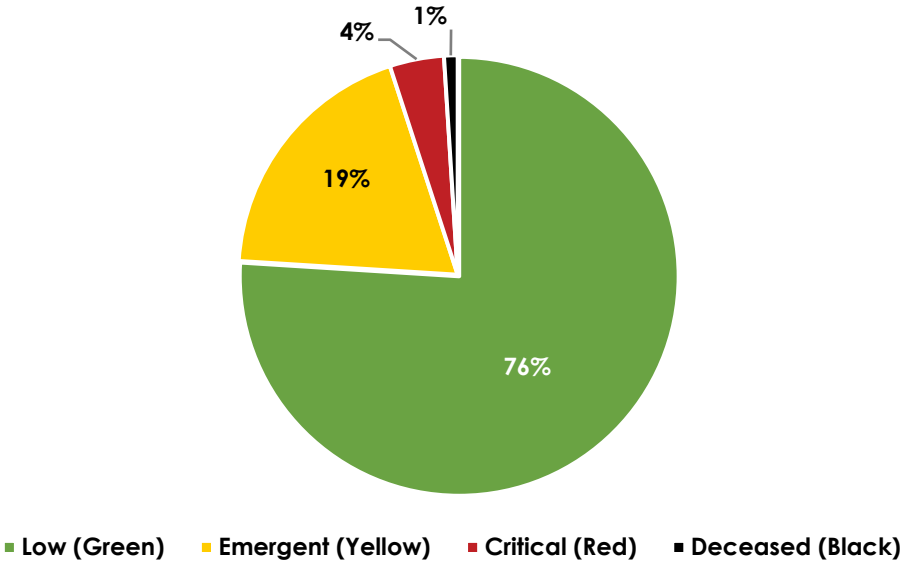
To its credit, FMBFD documents the "At Patient" time. This is defined as the interval between arriving at the scene and actual patient contact. The on-scene time does not always mean immediate access to the patient. For example, while the rescue unit may arrive at the scene, accessing a patient on a fifth floor may take several more minutes.

From 2022 through 2024, FMBFD documented "At-Patient" times in 3,197 cases. Access to the patient averaged 2 minutes, 6 seconds; and 3 minutes, 0 seconds at the 90th percentile.

Levels of Patient Acuity

As shown in Figure 161, FMBFD documented the patient acuity levels in 2,562 (63%) patients.

Figure 161: FMBFD Patient Acuity Levels (2021–2024)



Patient Transportation Analysis

Between 2021 and the end of 2024, FMBFD transported 3,824 (53%) patients. The five most common facilities to which patients were transported were as follows:

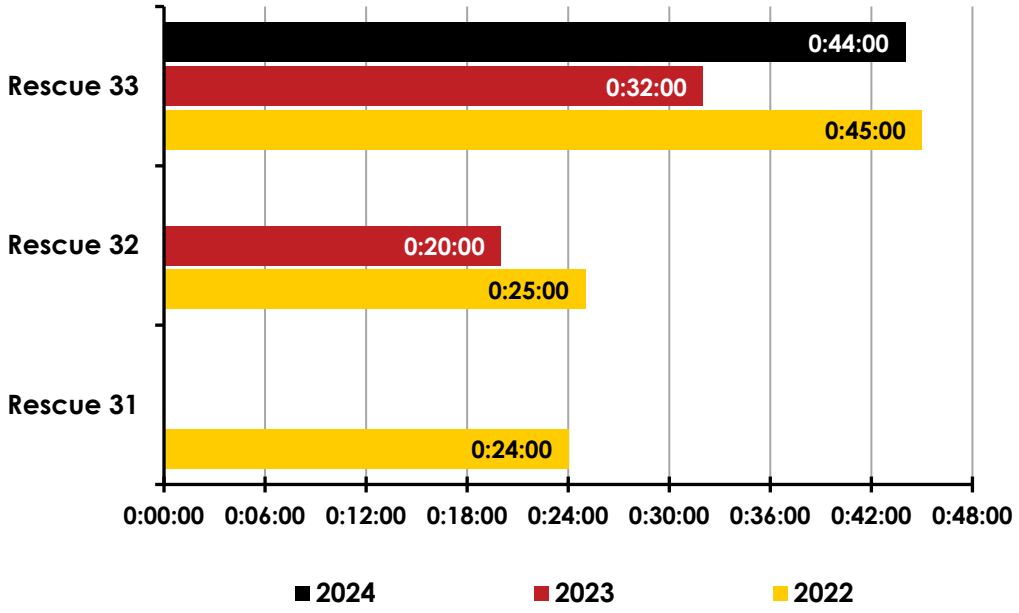
- HealthPark Medical Center—2,942 (78%)
- Gulf Coast Medical Center—379 (10%)
- NCH North Naples Hospital—111 (3%)
- NCH Bonita Springs Emergency Department—79 (3%)
- Golisano Children's Hospital—73 (2%)

An additional 141 (4%) patients were transferred to a Lee County EMS unit for transport. In approximately 88% of all patients transported by an FMBFD rescue unit, the transport mode was non-emergent, while 11% required emergency transport.

Transport Times

Transport times were analyzed and defined as the interval between leaving the incident scene and arrival at the hospital or other facility. Figure 162 illustrates the FMBFD patient transport times by rescue unit at the 90th percentile for the period from 2022 to 2024.

Figure 162: Patient Transport Times by Rescue Unit at the 90th Percentile



Note that Figure 162 shows that there was insufficient data for Rescue 31 during 2023 and 2024, and for Rescue 32 in 2024. During the 36-month study period, transport times at the 90th percentile were 25 minutes to HealthPark Medical Center, 40 minutes to Gulf Coast Medical Center, and 43 minutes to NCH North Naples Hospital.

Hospital Turnaround Times

Hospital turnaround time, or "Ambulance Patient Offload Time" (APOT), is defined as the interval between the transport unit's arrival at the hospital or clinical facility and its departure from the facility.

It is essential for EMS transport agencies to consistently monitor these times, as rescue units may be occupied at the hospital for extended periods and therefore unable to respond to other calls. EMS personnel cannot leave a patient at a facility until the patient is transferred to another qualified healthcare professional.

Figure 163 shows the APOT times at the 90th percentile for the top three facilities to which FMBFD transported patients during 2022–2024.

Figure 163: Ambulance Patient Offload Times at the 90th Percentile (2022–2024)

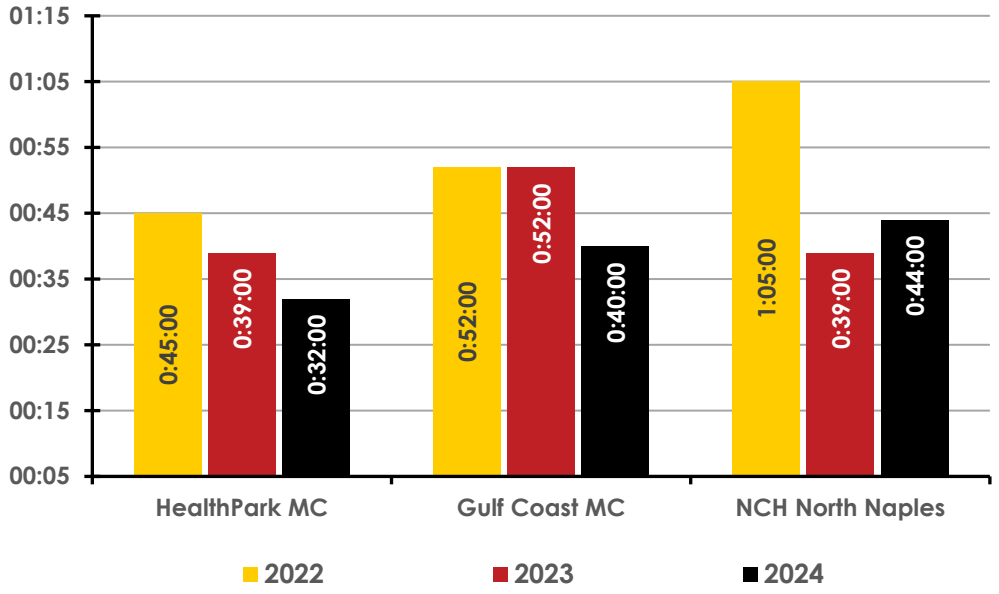


Figure 163 shows that patient offload times at HealthPark Medical Center declined from 45 minutes in 2022 to 32 minutes in 2024, while APOT at Gulf Coast Medical Center remained the same in 2022 and 2023 but declined by 12 minutes in 2024. NCH North Naples had a substantial reduction from 65 minutes in 2022 to 44 minutes in 2024.

Iona-McGregor Fire District

As previously discussed, IMFD provides MFR services up to the ALS level. Ground emergency medical transport (GEMT) services are provided to the district by LCEMS. IMFD has a separate division dedicated to EMS, including a Division Chief of EMS, Health, and Safety, and three EMS Coordinators, all of whom are operational personnel. By integrating with fire records, the ESO software supports EMS reporting compliant with NEMSIS, NFIRS, and HIPAA.

Using the PSTrax™ software system, EMS inventory controls are in place with daily equipment and supply checks. Controlled medications are secured in double-locked storage boxes and signed off daily by oncoming/off-going paramedics.

Local EMS system oversight is provided by the Lee County Division of Public Safety and local medical control through the EMS Medical Director, Dr. Benjamin Abo, who is board-certified in emergency medicine. Dr. Abo provides services to IMFD under a $30,000 annual contract that automatically renews each year. The Medical Director interacts with the crews every month and periodically completes field responses and EMS ride-alongs.

IMFD's quality assurance/management plan identifies areas for improvement. System performance has established criteria and objectives that are also evaluated. From a clinical perspective, an internal quality management and improvement committee has been established in which the Medical Director actively participates. Feedback is provided to individual EMS field personnel. Additionally, the current quality management plan provides for the review of some patient care reports (PCRs), including refusals of care. Patient outcomes can be requested through LCEMS.

IMFD delivers EMS by operating several dual-purpose fire apparatus at the ALS level. All IMFD ALS units are staffed with a minimum of one firefighter/paramedic and one firefighter/EMT (EMT). At the time of this report, IMFD had 23 members trained at the EMT-B level and 63 at the EMT-Paramedic level.

A process is currently being developed to electronically document each member's clinical skills, while continuing medical education (CME) and training are delivered through Vector Solutions™ and in-person formats, in compliance with State of Florida recertification guidelines.

Personnel training and CME records are maintained utilizing several software systems, including Vector Solutions, Fire Rescue 1, and Prodigy. IMFD has an EMS field training and evaluation program, and all personnel are encouraged to attend conferences and other training opportunities.

IMFD has an EMS public information and education program in place, which is the responsibility of the Community Relations Specialist. This program addresses various topics related to community illness and injury prevention, including fall prevention, CPR, fire safety, and the use of fire extinguishers.

Lee County Emergency Medical Services

As mentioned, LCEMS provides ALS-level pre-hospital emergency care, supported by ground and air ambulances throughout Lee County.[34] LCEMS is a third-service, county-based emergency medical services provider licensed by the Florida Department of Health. LCEMS employs emergency medical technicians, paramedics, field supervisors, and administrative staff.

LCEMS has several primary components, including the Office of EMS Operations and the Office of the Medical Director. The Office of the Medical Director provides clinical leadership and oversight, including drafting and administering the Lee County Common Treatment Guidelines, which both FMBFD and IMFD utilize. Dr. Pereira (FMBFD) and Dr. Abo (IMFD) were involved with the development and ongoing review of these guidelines, which were last published in 2024.

Overall EMS Comparisons Summary

Although many similarities exist between the EMS programs currently in place for FMBFD and IMFD, differences are also evident, primarily because FMBFD handles GMET while IMFD relies on LCEMS. The following section highlights the similarities and differences in EMS program delivery between the two participating districts.

[34] www.leegov.com/publicsafety/emergencymedicalservices.

Figure 164 compares the EMS program practices for FMBFD and IMFD.

Figure 164: EMS Programs Comparison Summary

EMS Program	FMBFD	IMFD	Comments
EMS Delivery Level	ALS & GEMT	ALS (MFR only)	FMBFD & IMFD have agreements for GEMT with LCEMS.
Separate EMS Division	No	With Health & Safety	
EMS Reporting System	ESO	ESO	
EMS Inventory Controls	Operative IQ®	PSTrax	
Local EMS Oversight	Lee County	Lee County	
Medical Director	Dr. Periera	Dr. Abo	
EMS Protocols & Guidelines	Yes	Yes	FMBFD & IMFD utilize Lee County treatment guidelines.
EMS Communications Plan[1]	Yes	Yes	FMBFD & IMFD utilize Lee Control.
EMS Quality Management	Yes	Yes	
Clinical Skills Documented	Yes	No	IMFD has a process in development.
Field Training Officers	No	Yes	
EMS Public Information & Education	No	Yes	FMBFD's program suspended since Hurricane Ian (2022).

[1] Includes EMD, pre-arrival instructions, QA/QI, and data collection.

Figure 165 compares the EMS staffing and deployment of the participating districts.

Figure 165: EMS Staffing & Deployment Comparison Summary

Staffing & Deployment Description	FMBFD	IMFD
Staffed with Cross-Trained Firefighters (EMS)	Yes	Yes
Civilian EMS Providers Utilized	No	No
Certified BLS Providers	8	23
Certified ALS Providers	28	63
Primary Agency for 9-1-1 Ambulance Transport	FMBFD	LCEMS
Air Medical Provider	LeeFlight	LeeFlight
No. of Apparatus Utilized for MFR	3[A]	All units ALS
Minimum EMS Personnel on Each Apparatus	1	2
Percent of EMS Incidents vs. All FD Responses	70%	53%

[A] Two ALS and one BLS.

Regarding IMFD's lower percentage of EMS incidents, a discussion with senior staff about the low results led to the conclusion that some EMS incidents may have been incorrectly coded as "Canceled En Route."

Training & Continuing Education Programs

A comprehensive training program is one of the most critical factors in ensuring the delivery of safe and effective emergency services. Firefighters, officers, and EMS providers must acquire and maintain appropriate initial training, ongoing training, and continuing medical education to meet the mission of service effectiveness and safety. Without necessary training, personnel and citizens could be exposed to preventable dangers, and the fire service organization could be exposed to liability. Well-trained personnel can also contribute to improved emergency incident outcomes and community services.

> ***One of the most crucial responsibilities in any department is providing thorough training to personnel. The personnel have the right to demand good training, and the department has the obligation to provide it.***[35]

The initial training provided to personnel is essential and must be followed with regular, ongoing, verifiable training. This is accomplished by ensuring that enough high-quality instructors are available, with access to training grounds and adequate training materials. This is critical in ensuring the acquisition, retention, and competency of skills and knowledge.

All training activities should be formal and follow a prescribed lesson plan that ensures specific objectives are met. A safety message and a dedicated safety officer should be included in all manipulative exercise training sessions.

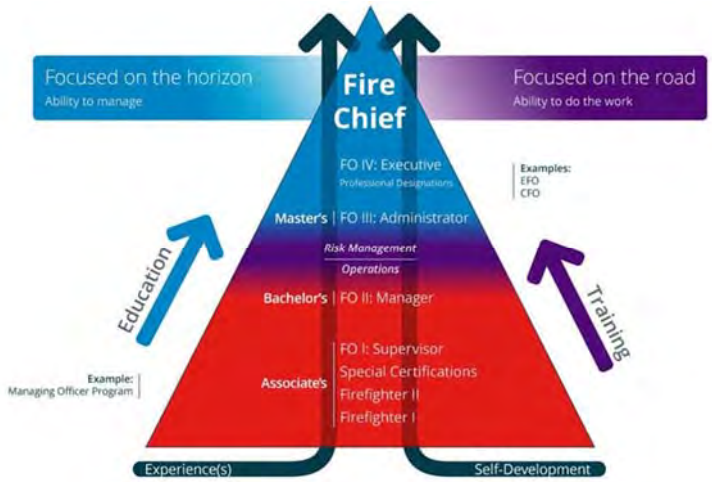
The U.S. Fire Administration's National Professional Development Model for training and education, as shown in Figure 166, illustrates how the four pillars of professional development influence a firefighter's career through the position of Fire Chief.[36]

These four pillars encompass training, academic education, relevant experience, and ongoing professional development. This model can serve as a roadmap to guide firefighters through the various levels of organizations, such as FMBFD and IMFD.

[35] Klinoff, Robert. *Introduction to Fire Protection & Emergency Services*, Jones and Bartlett, 2013. Burlington, MA.

[36] https://www.usfa.fema.gov/nfa/about/feshe/index.html

Figure 166: National Fire Service Professional Development Model



This section reviews and compares FMBFD's and IMFD's training practices to national standards and best practices. Specific information on FMBFD and IMFD was provided to JAG by staff from field visits.

Fort Myers Beach Fire District

The FMBFD training program is under the direction of the Assistant Chief of Operations, with no additional clerical staff support assigned. The FMBFD training program is responsible for a wide range of training, including new-hire training, special rescue (for members of FL-USAR TF6), structural and wildland firefighting, continuing medical education (CME), hazardous materials incident response, vehicle extrication, and emergency vehicle driving. Wildland firefighting training levels are determined by rank, with all personnel completing a minimum of S130 and S190 classes.

Company officers are also required to complete 215 and 330 classes. From a hazardous materials perspective, all FMBFD personnel are trained up to an Operations level. All training evolutions—including live fire, emergency scene operations, respiratory protection, rapid intervention, vehicle operations, and thermal imaging—meet or exceed the requirements of NFPA Standards (1402, 1403, 1410, 1404, 1407, 1451, and 1408), Florida Administrative Code (69A-37.404), and OSHA (1910.134).

Annual training goals and objectives have been identified in the FMBFD's Annual Training Plan and are based on State of Florida and national criteria. Although daily training occurs, other training activities take place throughout the community, including quarterly multi-company drills, monthly inter-station drills, and an annual disaster drill.

FMBFD does not have a dedicated training center but is seeking an adequate site to construct a facility (more than three years out) to meet future goals, as some administration- and training-related facilities were destroyed during Hurricane Ian. However, several training props are also available to FMBFD, including forcible-entry doors, a modular wall assembly, and a Firesled™ System. For live fire training, props are currently unavailable. Training safety procedures are developed, documented in a manual (FMBFD Policy 501 and 502), and implemented, including personnel accountability (Blue Card and NIMS), the use of appropriate personal protective equipment (PPE), and the safe use of equipment.

FMBFD utilizes both in-person and online training delivery methods. Assistant and battalion-level chief officers are responsible for maintaining training records, including daily and company training records, which are available to all personnel as needed. Typically, company officers and higher-level personnel are responsible for entering personnel training records. Training records are currently captured in computerized files utilizing the Vector Solutions software system. Additionally, certifications for fire, EMS, and other services are tracked.

FMBFD has a training budget of $276,000 to accomplish its training goals for both fire and EMS. In the latest year (2023), 39 personnel were trained and completed 15,995 hours of fire and EMS training. FMBFD utilizes certified instructors for all training, with certification types including VFIS EVDT, AHA BLS/ACLS, BFST instructors (Levels 1–3), and BFST Live Fire Training instructors.

Iona-McGregor Fire District

The IMFD fire training program is under the direction of the Division Chief of Training and Special Operations, while the Division Chief of EMS, Health, and Safety handles the EMS training program. No additional clerical staff support is assigned to training functions. The IMFD training program is responsible for a wide range of training, including new-hire training, special rescue, structural firefighting, continuing medical education (CME), hazardous materials incident response, vehicle extrication, and emergency vehicle driving.

From a hazardous materials perspective, all IMFD personnel are trained to the Operations level, with Technician-level certified personnel on each shift supporting the regional team. All training evolutions, including live fire, emergency scene operations, respiratory protection, rapid intervention, vehicle operations, and thermal imaging, meet or exceed the requirements of NFPA Standards (1402, 1403, 1410, 1404, 1407, 1451, and 1408), Florida Administrative Code (69A-37.404), and OSHA (1910.134).

IMFD has identified annual training goals and objectives in accordance with State of Florida and national criteria. Although training occurs daily at IMFD, other activities throughout the community include monthly multi-company drills, infrequent night drills, quarterly multi-agency drills through the Lee County Training Co-Op, monthly inter-station drills, and semi-annual disaster drills.

Additionally, dive and hazmat training occur monthly, with TRT training occurring on the first three Saturdays of each month. IMFD has a dedicated training center, but it lacks live fire training props. The training facility includes a four-story tower, confined-space props, a firefighter-survival prop, forcible-entry doors, and a vertical ventilation prop.

Live fire training evolutions are conducted in partnership with local law enforcement agencies. No formal training guidelines or procedures have been established; however, safety training procedures are in place. Personnel accountability training (a review of IMFD SOG 3.1.2.4) occurs every three years.

IMFD utilizes both in-person and online training delivery methods. Company officers are responsible for training records, including daily and company training records, which are available to all personnel if needed. Typically, company officers and higher-level personnel are responsible for entering personnel training records. Training records are currently captured in computerized files utilizing the Vector Solutions software system. Additionally, certifications for fire, EMS, and other services are tracked.

IMFD has a training budget of $255,530 to accomplish its training goals for both fire and EMS. In the latest year (2023), 81 personnel were trained and completed 66,218.5 hours of fire and EMS training. IMFD utilizes certified instructors for all training, with certification types including instructors (Levels 1–3) and additional special operations instructors.

Comparisons of Training & Continuing Education Programs

Due to several factors, including the common geographical location of the participating districts, many similarities exist between the districts' training programs, which are analyzed in the following section. The basis for all effective training is the utilization of established standards. These standards include those of the National Fire Protection Association (NFPA), the International Fire Service Training Association (IFSTA), and the International Fire Service Accreditation Congress (IFSAC).

Additionally, the Florida State Fire Marshal's Bureau of Fire Standards and Training (BFST) provides criteria, certification, and regulation for fire departments within the State of Florida, including personnel and training facilities.

General Training Competencies

Figure 167 compares the general training topics and certification levels among the participating districts.

Figure 167: General Training Competencies

General Training	FMBFD	IMFD
Incident Command System	Yes	Yes
Accountability Procedures	Yes	Yes (SOG 3.1.2.4)
Formal Training SOGs	Yes (Policy 501)	No
Recruit Academy	External	External
Special Rescue Training	Yes	Yes
Hazmat Certifications	Operations	Technician
Wildland Certifications	Yes	Yes
Vehicle Extrication Training	Technician	Technician
Emergency Driving Program (EVOC)	Yes (VFIS)	Yes (VFIS)
Communications & Dispatch	Yes	Yes

Recruits for both districts train through external academies certified by the Florida State Fire Marshal's Bureau of Fire Standards and Training (BFST). In addition, both districts utilize emergency driving programs from the Volunteer Firemen's Insurance Service (VFIS).

Figure 168 compares the emergency medical training competencies for the participating districts. EMS training and recertification requirements are based on the standards of the Florida Department of Health and the National Registry for both FMBFD and IMFD.

Both fire districts use external programs accepted by the State of Florida (including FSW, Braxton, and SWFPSA) for initial EMS training.

Figure 168: EMS Training Competencies

EMS Training	FMBFD	IMFD
Internal EMT/EMT-P Initial Training	External	External
CME Provided In-House	Yes	Yes
BLS/ALS Skills Training	Yes	Yes

Training Delivery & Scheduling

Figure 169 compares the training methodologies utilized by the participating districts.

Figure 169: Training Methodologies

Training Provided	FMBFD	IMFD
Manipulative Skills & Tasks	Annually	Monthly
Fire Training Requirements	Yes (ISO)	Yes (ISO)
EMS Training Requirements	Yes (FL DOH)	Yes (FL DOH)
Training Hours Tracked	Yes	Yes
Use of Lesson Plans	Yes	Yes
In-house or Commercial	Both	Both
Night Drills	No	Yes
Multi-agency Drills	Yes	Quarterly
Inter-station Drills	Monthly	Monthly
Disaster Drills	Annually	Semi-Annually
Pre-Fire Planning Included	Annually	Monthly
Post-incident Analysis	Yes	Yes

As noted in Figure 169, both FMBFD and IMFD utilize an hours-based approach when setting fire training requirements. Additionally, both districts utilize the Insurance Services Offices (ISO) training requirements as a standard.

The fundamental objective is to deliver 240 hours of training annually per firefighter, a measure used by ISO for purposes of fire district ratings, which will be discussed in greater detail in a separate section of this report. Other minimums include those related to State of Florida certification maintenance and specialized functions such as driver training, officer training, and hazardous materials response training.

Figure 170 presents the results of this approach for FMBFD and IMFD, based on data from the districts, including the most recent final ISO review summary reports.

Figure 170: FMBFD & IMFD Training Goals (Based on ISO)

Training Type	Credit Available	FMBFD EC[1]	IMFD EC[1]
Facility Training			
For maximum credit, each firefighter should receive 18 hours of training per year in structure-fire-related subjects, as outlined in NFPA 1001.	35	27.65	33.95
Company Training			
For maximum credit, each firefighter should receive 16 hours per month in structure-fire-related subjects as outlined in NFPA 1001.	25	15	24.28
Officer Training			
For maximum credit, each officer should be certified in accordance with NFPA 1021's general criteria. Additionally, each officer should receive 12 hours of on- or off-site Continuing Education.	12	5.67	12
New Driver/Operator Training			
For maximum credit, each new driver and operator should receive 60 hours of driver/operator training per year in accordance with NFPA 1002 and NFPA 1451.	5	5	5
Existing Driver/Operator Training			
For maximum credit, each existing driver and operator should receive 12 hours of driver/operator training per year in accordance with NFPA 1002 and NFPA 1451.	5	3.72	5
Hazardous Materials Training			
For maximum credit, each firefighter should receive 6 hours of training for incidents involving hazardous materials in accordance with NFPA 472.	1	0.61	0.91
Recruit Training			
For maximum credit, each firefighter should receive 240 hours of structure-fire-related training in accordance with NFPA 1001 within the first year of employment or tenure.	5	5	5
Pre-Fire Planning Inspections			
For maximum credit, company members should conduct annual pre-fire planning inspections of each commercial, industrial, institutional, and other similar-type building (excluding one–to four–family dwellings). Records of inspections should include up-to-date notes and sketches.	12	12	11.16

[1] EC = Earned credit.

Training & Continuing Education Programs Comparison Summary

Figure 171 summarizes the training and continuing education programs currently being utilized by FMBFD and IMFD.

Figure 171: General Training Programs Comparison Summary

Training	FMBFD	IMFD
Rank of Individual Responsible for Fire Training	AC–Operations	DC of Training & Special Operations
Rank of Individual Responsible for EMS Training	AC–Operations	DC of EMS, Health & Safety
FY24 Budget Allocated to Training	$276,000	$255,530
Training Files RMS	Vector Solutions	Vector Solutions
Annual Training Plan/Objectives	Yes	Yes
Personnel Trained in 2023	39	81
Training Hours in 2023 (Fire & EMS)	15,995	66,218.5
ISO Training Credits (PPC)[1]	6.72 (3/2022)	8.76 (9/2018)
Annual Training Report Produced	Yes	Yes
Lee County Training Co-Op Participation	Yes	Yes
Dedicated ISO-approved Training Facility with Live-Fire Training Props[2]	No	Yes (no live-fire props)

[1] Total available credit = 9.
[2] FMBFD has a facility in the planning phases.

All Lee County fire departments may participate in the co-op training, allowing agencies within the county to interact with each other as they would during an actual emergency incident.

Lee County fire departments contribute fire instructors and subject matter experts to coordinate multiple different fire apparatus from across the region for physical and tabletop training. In addition to cross-training, costs are reduced through cooperative training.

Life Safety Programs

Code Enforcement & Permitting

A primary component of any risk reduction program is to provide a comprehensive fire and life safety inspection and permitting process. The goal is to prevent or mitigate a fire or an injury before it occurs.

Building Plan Review

The review process provides information on how construction may affect access to the building during an incident, the type of construction, the need for fire protection systems, and any change of use.

Plan reviews should begin when the initial concept is presented for permitting. The initial review allows the fire department to provide suggestions before permitting. For example, the site plan should include fire apparatus access, the location of the fire department connection if a sprinkler system is present, the building's size and height, hydrants, and other features that impact emergency responders.

Fort Myers Beach Fire District

FMBFD completes plan reviews through Lee County's Inspection Department. When a plan review is required, Lee County notifies FMBFD after plans are submitted through eConnect. If FMBFD comments on a code discrepancy, they send it back to Lee County staff. They will then process any hold comments and release a rejection letter. A similar process is in place with the Town of Fort Myers Beach, in which FMBFD enters its notes into the town's software for release to the applicant.

The customer can review any comments and upload new plans if revisions are necessary. FMBFD conducts plan reviews for fire alarm, sprinkler, and suppression systems, as well as underground piping for fire sprinklers and pipe pressurization.

FMBFD also provides plan review services for San Carlos Park, South Trail Fire Rescue, Captiva, and Lehigh Acres. The fees charged by FMBFD are the same for all the jurisdictions that contract with FMBFD. Lee County issues final permits.

Iona-McGregor Fire District

Lee County conducts permitting and plan reviews for new construction or alterations to existing buildings. Lee County retains all fees collected to cover the cost of this service. IMFD is involved in the inspection process.

Fire & Life Safety Inspections

Inspections of commercial buildings and properties enable FMBFD and IMFD to mitigate risks by educating the public and business owners about the safety hazards associated with violations. Fire and life safety inspections utilize three of the "Five E's": education, engineering, and enforcement. Each of these provides a method to reduce risks through mitigation or prevention.

However, the State of Florida has no required schedule for inspecting all commercial properties. A defined inspection schedule should ensure that all businesses are inspected regularly. An example of buildings not receiving a periodic inspection is the Ghost Ship fire in Oakland, California, which killed 36 people. The fire occurred in a repurposed warehouse without proper permitting. The building had not been inspected in 30 years and was not listed in the department's RMS.[37] Without these buildings receiving periodic inspections, life-safety violations may exist without the knowledge of code enforcement officials or responding operations staff.

The National Fire Protection Association (NFPA) 1730: *Standard on Organization and Deployment of Fire Prevention Inspection and Code Enforcement, Plan Review, Investigation, and Public Education Operations* establishes minimum inspection frequencies based on risk. Therefore, IMFD should institute an inspection schedule based on NFPA 1730's recommendation, as shown in Figure 172.

Figure 172: NFPA 1730 Inspection Frequency[38]

Occupancy Risk Classification	
High	Annually
Moderate	Biennially
Low	Triennially
Critical Infrastructure	Per AHJ*

*Authority Having Jurisdiction

[37] NFPA Journal, *Ghost Effect*, January/February 2018.

[38] NFPA 1730, *Standard on Organization and Deployment of Fire Prevention Inspection and Code Enforcement, Plan Review, Investigation, and Public Education Operations.*

Figure 173 illustrates how to determine the inspection frequency based on risk and occupancy type, using NFPA 1730 recommendations.

Figure 173: Occupancy Risk Classifications Example

Risk	New York Building Code Group	Examples
High	A-1, A-2	Nightclubs, restaurants, theaters, airport/cruise ship terminals
	A-3, A-4, A-5	Arenas, museums, and religious spaces
	H-1, H-2, H-3, H-4, H-5	Hazardous materials sites (Tier II)
	B	All government and public buildings, other office buildings over two stories
	E	Schools, daycare centers
	I-1, I-2, I-3, I-4	Hospitals, assisted living centers, correctional
	M	Strip malls, closed-air shopping malls, big box stores
	R-1, R-2, R-3	Hotels, motels, dormitories, apartments, board-and-care facilities
	Special Risk	Railroads, interstate highways, airports
	(Target hazard)	Any building with a life safety risk beyond the reach of preconnected hose lines > 200 feet
Moderate	B	Outpatient clinics, general business, offices <3 stories
	F-1	Fabrication or manufacturing of combustible materials
	M	Mercantile, free-standing
	I-2, R-4	Foster group homes, assisted-living homes
	S-1	Storage of combustible materials, car repair facilities, hangars
Low	F-2	Fabrication or manufacturing of non-combustibles
	R	One- and two-family dwellings, foster homes
	S-2	Storage of combustible materials
	U	Barns, silos, and other unclassified buildings

Fort Myers Beach Fire District

FMBFD uses MobileEyes as its records management system to track all properties, buildings, and inspections. It uses the most current edition of the Florida Fire Prevention Code to inspect commercial occupancies in the district. The district has a Fire Official, three Fire Inspectors, and one part-time Plan Reviewer. It uses ESO Fire software for fire investigations.

FMBFD uses NFPA 1730 as a guide for inspecting all commercial occupancies in the jurisdiction and also conducts inspections for new commercial occupancies and are part of the final inspection process with Lee County before issuing a certificate of occupancy. FMBFD inspects short-term rentals annually to ensure code compliance, and issues occupancy placards to assembly occupancies. FMBFD has 3,143 inspectable properties.

Iona-McGregor Fire District

IMFD uses Fire Prevention Mobile (Tyler Technologies) to track occupancies, inspections, violations, and inspection invoicing and follows the Florida Fire Prevention Code, which consists of NFPA 1 (Fire Code) and NFPA 101 (Life Safety Code). Construction inspections are conducted before the issuance of a final certificate of occupancy. Figure 174 provides the staffing allocations for each organization.

Figure 174: Staffing Allocations

Position Title	FMBFD	IMFD
Fire Marshal	1	1
Fire Inspector	3	3
Plan Reviewer	0.5	0

Permitting & Fees

Fire operational permits are issued to ensure that certain activities, operations, or businesses comply with fire safety regulations. They ensure that operations comply with local fire safety standards, thereby reducing the risk of fire hazards. Permits legally authorize specific operations or businesses and ensure adherence to safety regulations. They allow fire officials to inspect and monitor activities that could pose fire risks, ensuring ongoing compliance with safety standards.

By regulating potentially hazardous activities, permits help manage and mitigate fire risks. These permits are crucial for maintaining public safety and preventing fire-related incidents.

Fort Myers Beach Fire District

FMBFD has an adopted fee schedule for plan reviews, final inspections, various tests, inspection of existing buildings, and re-inspections. The fee schedule was last updated in September 2023. FMBFD does all invoicing for the fees.

Iona-McGregor Fire District

A new fee schedule, available on the IMFD website, has been implemented to recover some of the costs associated with fire inspections, effective in March 2024. IMFD charges for all fire code compliance and existing occupancy inspections; invoices are sent via Fire Prevention Mobile after the inspection. IMFD has an internal fee collection process through its District Finance Section. Figure 175 provides an overview of the fee types for each district.

Figure 175: Fee Type Comparison

Fee Type	FMBFD	IMFD
Plan Reviews	Yes	No
Construction Inspections	Yes	Yes
Existing-Occupancy Inspections	Yes	Yes
Nuisance Alarms	Yes	Yes
Inspection, Maintenance, and Testing Reporting	Yes	Yes
Convenience Fee	Yes	Yes
Returned Check Fee	Yes	Yes
Apparatus and Personnel Standby	Yes	No

FMBFD and IMFD plan to meet with the South Trail Fire District to discuss inspection billing and explore more efficient fee-collection methods for each agency.

Fire Investigations

Fire causes may include intentional fires, unintentional fires, equipment failure, an act of nature, or an incident under investigation for which the cause remains undetermined. The National Fire Incident Reporting System (NFIRS) requires documentation of the types of ignition for all fires and is necessary for fire investigations.

Determining the origin and cause of fire allows FMBFD and IMFD to develop prevention programs that reduce future incidents. Any program designed should use data to review the cause of the fire and show trends of potential problems within the community. Data such as name, age, and gender may identify a specific person or group to target prevention programs, such as the Juvenile Firesetter Program.

Each organization has similar fire investigation operations. They both have a certified Fire Investigator and are members of the Lee County Fire Arson Task Force. If the fire is intentional and constitutes a crime, the State of Florida will prosecute.

Fire & Life Safety Education Programs

A fire department's critical function is to prevent or mitigate unintentional injuries or fires. Educational programs provide the best opportunity to reduce fires and injuries in the community.

A fire and life safety program to reduce risks requires a coordinated approach and should include other community partner organizations that may provide similar services. These partnerships enable the organization to become a community partner and foster relationships that reduce risks. Additionally, developing fire and life safety programs requires continuous review of incident data to identify the types and frequencies of responses.

Fort Myers Beach Fire District

Due to the devastating hurricane, Ian, in 2022, FMBFD has been unable to conduct many of its programs. When available, they provide training on automated external defibrillators, CPR, child passenger safety seats, smoke alarm installations, and fire extinguishers.

Iona-McGregor Fire District

The Community Relations Specialist (CRS) for IMFD leads a dynamic community education program that promotes fire and life safety throughout the district. Grounded in the mission of empowering residents through education, the program equips community members with the knowledge and tools to prevent emergencies and respond effectively.

In addition, the CRS serves as the district's Public Information Officer (PIO), ensuring timely and accurate communication with the public during both routine operations and emergencies. The CRS also manages IMFD's digital communications, overseeing the website and social media platforms, and coordinating key community events, such as station open houses and citizen life-saving awards.

IMFD's education initiatives are broad, covering senior citizen fall prevention, residential fire safety, CPR training, fire extinguisher use, and seasonal campaigns like Fire Prevention Month and Summer Safety Outreach. Youth engagement is also a priority, with IMFD personnel and the CRS delivering age-appropriate fire safety education to students at 15 schools and daycares each year.

A flagship program coordinated by the CRS is Camp Brave Heart, an innovative day camp for girls in grades 5–10 that builds leadership, confidence, and teamwork while introducing participants to careers in fire and emergency services, marking the first of its kind in Southwest Florida. Camp Brave Heart has become a model for nearly a dozen agencies across Florida and beyond.

IMFD also maintains a strong CPR education initiative, supported by 18 certified instructors. Each year, several hundred community members receive life-saving CPR training and certification, strengthening the district's overall preparedness and resilience.

Community Risk Reduction Program

Although neither district has adopted a community risk reduction (CRR) program, they do conduct some CRR-type components, such as fire code enforcement, education, and emergency response.

Each of the following is part of an overall CRR program, which is defined as "The identification and prioritization of risks followed by the integrated application of resources to improve public safety and reduce increasing call volumes."[39] The primary objective of community risk reduction is to examine problems and develop prevention or mitigation strategies to reduce hazards. The goal is to incorporate emergency operations with prevention efforts at the fire station level. The station-level approach is preferred because risks vary between stations or within a station's response area.

[39] Vision 20/20, *Community Risk Assessment Guide*.

The data collected for this study should continue to be analyzed, providing an opportunity to determine whether specific hazards are increasing or decreasing in response to incident management. Additionally, risks may shift as new developments or demographic changes occur in the study area, affecting both fire districts.

IMFD provides minimal risk reduction except for fire suppression, EMS, and code enforcement. For risk reduction to succeed, it should focus on a comprehensive and coordinated effort.

When developing their strategies, they use the "Five E's" to develop risk reduction programs, as listed as follows:

- Education—Will education help the public: who, where, when?
- Engineering—What engineering or technology is available to help?
- Enforcement—Is additional or more substantial enforcement needed?
- Economic Incentives—Could incentives increase compliance?
- Emergency Response—Would changes in response make a difference?

When developing a CRR plan, IMFD must determine what strategies have already been implemented in the community to prevent duplication. Additionally, outside resources may be available through partnerships with various community organizations, including law enforcement, nonprofits, health departments, EMS, religious organizations, and local businesses.

These groups may provide staff with a different perspective and offer additional funding and resources to mitigate limitations within IMFD.

Preparing a CRR plan should align with the department's mission and Strategic Plan. Creating a plan at the station level allows personnel to engage in the community they serve. It empowers staff to interact, learn more about their community, and take ownership of the program.

Station personnel will begin to understand the importance of collecting accurate data to support their plan, developing strategies through partnerships, gaining stakeholder input, soliciting community feedback, and prioritizing which risks to address.

Figure 176 illustrates one basic methodology offered by Vision 20/20 for identifying and analyzing risks within a community. In addition, Vision 20/20 includes a coalition of national organizations and experts that exemplify how collaboration, communication, and commitment to data-based solutions can save lives and properties.

Figure 176: The Community Risk Assessment Process

Outcomes

According to the CPSE, one approach to evaluating a district's code enforcement and general inspection activities is to develop specific outcome measures. Some of the recommended outcome measures include:

- Measuring the total value of property losses to fire in inspectable occupancies in relation to assessed value.
- Measuring the changes in the percentage of total fire losses occurring in inspectable occupancies.
- Determining the changes in fire deaths per 100,000 residents in inspectable occupancies.

A summary of Property Saved and Civilian Injuries/Deaths is provided in Figure 177 and Figure 178 for FMBFD and IMFD, respectively.

Figure 177: FMBFD Summary of Property Saved & Civilian Casualties (2019–2024)

Measure	2019	2020	2021	2022	2023	2024	Total
Property Loss	$1,000	$124,049	$806,999	$523,500	$1,250,895	$473,800	$3,180,243
Contents Loss	$8,800	$31,050	$295,099	$914,200	$110,215	$97,810	$1,457,174
Total Loss	**$9,800**	**$155,099**	**$1,102,098**	**$1,437,700**	**$1,361,110**	**$571,610**	**$4,637,417**
Property Value (Exposed to Fire)	**$426,154**	**$4,104,000**	**$6,657,210**	**$13,931,684**	**$28,556,530**	**$1,584,500**	**$55,260,078**
Content Value (Exposed to Fire)		**$106,000**	**$545,000**	**$1,591,000**	**$2,079,000**	**$302,000**	**$4,623,000**
Total Value	**$426,154**	**$4,210,000**	**$7,202,210**	**$15,522,684**	**$32,522,030**	**$1,886,500**	**$61,769,578**
TOTAL SAVED:	**$416,354**	**$4,054,901**	**$6,100,112**	**$14,084,984**	**$31,160,920**	**$1,314,890**	**$57,132,161**
Percent Saved	**98%**	**96%**	**85%**	**91%**	**96%**	**70%**	**92%**
Property Loss N=	5	15	19	14	11	10	74
Contents Loss N=	6	13	18	10	9	9	65
Civilian Injuries	**0**	**0**	**1**	**0**	**0**	**0**	**1**
Civilian Deaths	**0**	**0**	**0**	**0**	**0**	**0**	**0**

Although Figure 177 includes all occupancies within the district, not just inspectable ones, the data provides insight regarding the effectiveness of the FMBFD's overall fire prevention and code enforcement activities.

The total value exposed to fire has varied since 2019, and the percentage of property saved ranged from a low of 70% in 2024 to a high of 98% in 2019. Only one civilian injury occurred during the study period. FMBFD did not have any civilian fire deaths between 2019 and 2024.

Figure 178: IMFD Summary of Property Saved & Civilian Casualties (2023–2024)

Measure	2023[A]	2023[B]	2024
Property Loss	$995,600	$1,094,600	$709,400
Contents Loss	$302,710	$335,210	$171,950
Total Loss:	**$1,298,310**	**$1,429,810**	**$881,350**
Property Value (Exposed to Fire):	**$1,810,000**	**$81,560,000**	**$4,961,795**
Content Value (Exposed to Fire):	**$141,010**	**$173,510**	**$1,045,150**
Total Value:	**$1,951,010**	**$81,733,510**	**$6,006,945**
TOTAL VALUE SAVED:	**$652,700**	**$80,303,700**	**$5,125,595**
Percent Saved:	**33%**	**98%**	**85%**
Property Loss N=	48	N/A	49
Contents Loss N=	45	N/A	49
Civilian Casualty:	**0**	**N/A**	**1**

[A] As provided in the 2023 RMS (NFIRS Records).

[B] Updated (new totals) to reflect property values for multi-unit and commercial structures that were not properly recorded at the time of incident reporting. Steps have been taken to ensure the accuracy of the reporting of this data in the future.

Figure 178 includes all occupancies within the district, not just inspectable ones, and provides insight regarding the effectiveness of the IMFD's overall fire prevention and code enforcement activities. However, due to data limitations, information was not available for 2019–2022. IMFD has had one civilian casualty between 2023 and 2024.

Special Operations

Fire and EMS agencies must be prepared to respond to unique rescue situations and uncontrolled releases of hazardous materials. Due to the limited number of such incidents, it can become impractical for all agencies to staff, equip, and maintain the necessary resources to mitigate these complex situations. In many cases, a regional approach to hazardous materials responses and technical rescue operations is more appropriate due to specialized equipment requirements and the training needed to mitigate such situations.

Hazardous Materials Responses

As explained by the Federal Emergency Management Agency[40], hazardous materials can be found in every community. They are readily available in nearly every occupancy, including homes, hospitals, and factories. In addition, they are shipped daily via multiple pathways, including land, air, sea, and pipelines. Due to the potential for release via accident, malicious actor, fire, or weather-related event, fire and EMS agencies must be prepared to mitigate potential harm to people, the environment, critical infrastructure, and property.

Fort Myers Beach Fire District

FMBFD does not have a dedicated hazardous materials response program and relies on assistance from regional partner agencies to respond to and mitigate hazardous materials incidents. FMBFD response units carry minimal hazardous materials-related equipment, including basic decontamination supplies and gas monitoring meters for red zone and perimeter analysis.

Iona-McGregor Fire District

IMFD does not have a dedicated hazardous materials response program and relies on assistance from regional partner agencies to respond to and mitigate hazardous materials incidents. IMFD response units carry minimal hazardous materials-related equipment, including basic decontamination supplies and gas monitoring meters for red zone and perimeter analysis.

[40] www.fema.gov

Region 6 Hazmat Team

FMBFD and IMFD receive hazardous materials response assistance from the Region 6 Hazmat Team, operated by the Fort Myers Fire District. The Region 6 Hazmat Team is classified as a Type 1 and Type 2 team capable of identifying, stabilizing, and mitigating hazardous materials incidents, including events involving weapons of mass destruction (WMD). The team trains monthly and has an average assembly time of one hour for Level A offensive entry. All Region 6 Hazmat Team members are trained as Hazmat Technicians.

Technical Rescue & Water Rescue Operations

Technical rescue operations can include vehicle/machinery extrication, high-angle and low-angle rope rescue, confined-space rescue, surface and swiftwater rescue, trench collapse, and structural collapse rescue. These situations require a comprehensive mix of specialized equipment, training, standard operating procedures, policies, guidelines, and human resources.

Fort Myers Beach Fire District

FMBFD does not have a dedicated technical rescue response program and relies on assistance from regional partner agencies to respond to and mitigate technical rescue incidents, except for surface water rescues. The Southwest Florida Urban Search and Rescue Team handles technical rescue incidents in the district. FMBFD has members assigned to the Southwest Florida Urban Search and Rescue Team, who are on a monthly call rotation.

FMBFD has an annual operating budget of approximately $43,800 dedicated to technical rescue services provided by the Southwest Florida Urban Search and Rescue Team. Technical rescue services-related training certifications are obtained through the Florida State Fire Marshal's Bureau of Fire Standards and Training (BFST). Standard operating guidelines (SOGs) are in place for each technical rescue discipline (SOG 603) and potential technical rescue incident response (SOG 603).

Iona-McGregor Fire District

IMFD offers a range of technical rescue services, including vehicle/machinery extrication, high-angle and low-angle rope rescue, confined-space rescue, and surface and swiftwater rescue. Squad 73 is fully equipped with technical rescue equipment and is cross-staffed with operational personnel from IMFD Station 73. Although many technical resources are handled internally, IMFD also maintains partnerships and provides personnel to the Southwest Florida Urban Search and Rescue Team.

IMFD members assigned to the Southwest Florida Urban Search and Rescue Team operate on a 24/48-hour work schedule, with a minimum of five technicians on duty daily. IMFD and FMBFD contribute funding annually to technical rescue services. Technical rescue services-related training certifications are obtained through the Florida State Fire Marshal's Bureau of Fire Standards and Training (BFST). Standard operating guidelines are in place for each technical rescue discipline (IMFD SOG 3.3) and for potential technical rescue incident responses (IMFD SOGs 3.3.9–3.3.11). IMFD maintains records for all life safety ropes. Annual confined space training complies with the Occupational Safety and Health Administration (OSHA) standard 1910.146.

IMFD has a robust water rescue program that operates a 32-foot Metal Shark rescue vessel capable of fire suppression, EMS, and rescue services to the waterways within the district and beyond. At the time of this report, 16 members had obtained Boat Operator Search and Rescue (BOSAR) certification from the National Association of State Boating Law Administrators (NASBLA).

IMFD also offers a rapid dive and traditional dive program, operated by 30 certified divers, covering the National Association of Underwater Instructors (NAUI) Open Water, Advanced Diver, and Dive Rescue levels at the time of this report. All first-out fire suppression apparatus carries a rapid diver pack, and Dive 70, operated out of Station 74 with cross-trained personnel, carries traditional dive equipment.

Southwest Florida Urban Search & Rescue Team

The Southwest Florida Urban Search and Rescue team is designated as Florida USAR Task Force 6 (FL-USAR TF 6).[41] FL-USAR TF 6 is a multi-agency, multidisciplinary search-and-rescue task force that can respond to various incidents within the region and the State of Florida. Personnel from FMBFD and IMFD are members of FL-USAR TF 6, along with personnel from the City of Cape Coral Fire Department and City of Fort Myers Fire Department; Lee County Public Safety; and the South Trail, San Carlos Park, Estero, Bonita Springs, Tice, Lehigh Acres, Fort Myers Shores, and North Collier fire districts.

[41] https://swfusar.org

Overall Special Operations Programs Comparison Summary

Figure 179 provides an overview of the current special operations programs for FMBFD and IMFD.

Figure 179: Special Operations Programs Comparison Summary

Special Operations	FMBFD	IMFD	Comments
Hazardous Materials	Limited	Limited	Utilization of the Region 6 Hazmat Team.
HM Awareness Personnel	—	—	—
HM Operations Personnel	40	86	—
HM Technician Personnel	0	23	—
Technical Rescue	Yes	Yes	Members assigned to Task Force 6.
Technical Rescue Budget	$43,800	$20,800	—
Water Rescue	Surface	Surface, Swift, Dive, Fire Suppression, EMS	—

Section III:
OPTIONS & RECOMMENDATIONS

General Partnering Strategies & Merger Options

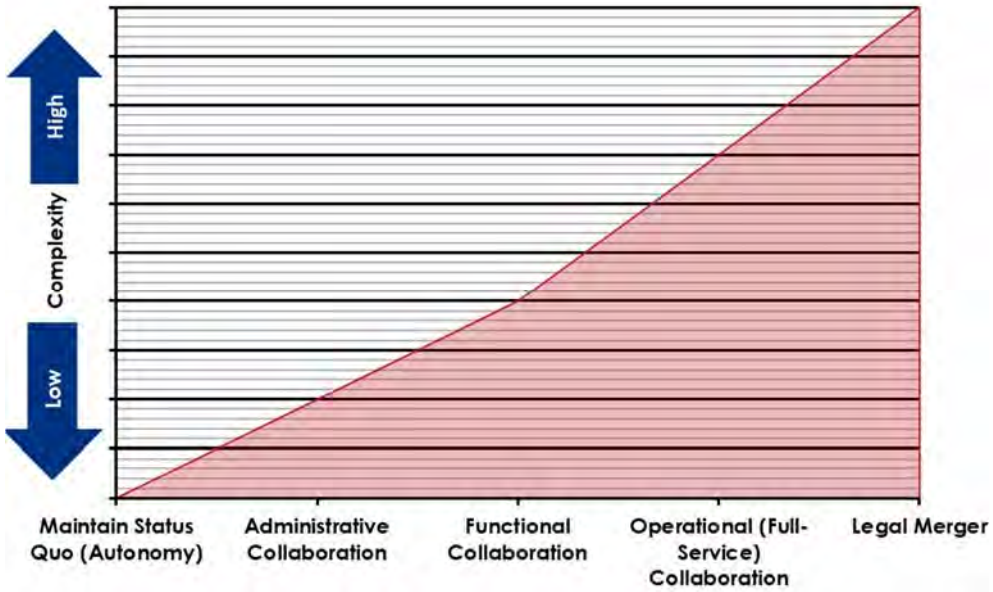
Sections I and II of this report consist of a baseline assessment of the current conditions of the various components of the Fort Myers Beach Fire District and the Iona-McGregor Fire District. Based on this comprehensive analysis, JAG was able to evaluate the potential opportunities for shared service delivery between the two fire districts in the region.

Fire districts can collaborate in various ways, ranging from simple, fundamental sharing of resources and programs to a legal merger of two agencies into a single organization, which may take multiple forms. The following options have been identified as potentially feasible:

- Maintain status quo (autonomy)
- Interlocal Cooperation Agreements (contract for services)
  - Administrative collaboration
  - Functional collaboration
  - Operational collaboration
- Special districts merger

As illustrated in Figure 180, the complexity of the potentially feasible options increases as the options move toward a full merger.

Figure 180: Complexity Comparison of Partnering Strategies & Merger Options



The balance of this section examines the options available to the two fire districts and provides insight and guidance where appropriate.

Often, the assumption is that a legal merger is the only available alternative. However, in general, more than one strategy is available to FMBFD and IMFD when considering a merger of services. This begins with a "do-nothing" approach and ends with the complete unification of the organizations. A summary of the available methodologies will be addressed in the following sections.

Strategy A: Maintain Status Quo (Autonomy)

In some cases, maintaining the *status quo* (existing system) is the most desirable approach. The two fire districts participating in this study may choose to continue as separate entities and not pursue any further partnering opportunities. Under this strategy, remaining separate may prove advantageous, as it provides each jurisdiction with the most organizational control (autonomy) since the districts would continue to make decisions considering only unilateral issues. This strategy perpetuates the status quo and serves as a useful benchmark for measuring the effectiveness of other strategies.

The disadvantage of this approach is that any challenges facing the participating fire districts remain unchanged. Any opportunities for efficiency, either financial or service-level, through greater collaboration are not realized and some duplication and overlap may persist.

In today's environment, taxpayers typically hold their elected officials accountable for delivering a quality service at an affordable rate and expect creative thinking to solve problems or achieve those ends.

Strategy B: Interlocal Agreements to Collaborate

An *interlocal cooperation agreement* (ICA) or contract for services is a legal agreement between agencies that can take various forms. These agreements are enabled through the Florida Interlocal Cooperation Act.[42] Examples may include two fire districts developing a joint operating agreement (JOA) to provide fire protection services, or a simple interlocal service contract in which one jurisdiction provides emergency services to another.

[42] Florida Interlocal Cooperation Act of 1969, Section 163.01, Florida Statutes.

These agreements are sometimes referred to as "*functional collaborations.*" The following section outlines three types of collaborative options that can be achieved through the implementation of an interlocal cooperation agreement (ICA). Any of these options can be adopted independently or combined into a single strategy. Many forms of these agreements exist among fire districts and fire departments throughout the United States.

Administrative Collaboration

An *administrative collaboration* can occur when two or more fire agencies maintain their separate legal status and separate operational elements but combine some or all administrative functions. Examples include combining administrations under a single Fire Chief and combining clerical, human resources, legal, financial, and other functions while maintaining separate operational and other activities. An administrative collaboration can be accomplished legally through an ICA.

Advantages

The advantages of administrative collaboration include at least:

- Reduced overhead costs by eliminating administrative duplication.
- A gradual alignment of otherwise separate operations and other functions under a single administrative head. There is less resistance to change by the affected employees in the operational elements that typically occur in other collaborative options.
- Singularity of purpose, focus, and direction at the governance level of the participating organizations.

Administrative collaboration lends itself well to a gradual move toward a single, consolidated fire district, where differences in attitude, culture, and/or operations are otherwise too great to overcome in a single merger process.

The success or failure of this type of collaboration is heavily dependent on identifying and hiring the right leader who can clearly define and support the desired direction for multiple fire agencies while avoiding the political issues that inherently arise from simultaneously serving the interests of multiple groups.

Disadvantages

The disadvantages of an administrative collaboration can include:

- Possible conflicts in policy direction between the two fire district boards.
- Potentially untenable working conditions for the Fire Chief ("one-person, multiple bosses").
- An increased potential for personnel conflicts as individual employees and other groups vie for power and control.

Inherent management inflexibility can result from the political complexity of the agreement. An administrative team that must answer to two or more political bodies might be pulled in different directions by these entities, leading to conflicting priorities and disagreement on crucial issues and resulting in limited ability to manage the organizations effectively.

Another disadvantage relates to funding operations. Contractual consolidations (mergers) cannot change jurisdictional or taxing boundaries, requiring the participating fire districts to define a fair and equitable method of funding the joint operations.

In contrast, a legal merger typically has a more predictable funding stream and is less susceptible to the political challenges that can arise when funding depends on agreements between different entities.

To sustain a long-term alliance, this approach requires close governance collaboration and agreement when drafting the contract terms, as well as trust in the administrative team to manage the alliance. Many interlocal cooperation agreements are in effect throughout the United States, having successfully centralized the administrative functions of fire districts and fire departments.

Functional Collaboration

A *functional collaboration* is when the participating fire agencies continue to exist as separate organizations but combine certain functions into a common resource, such as combining fire and EMS training, fire prevention, public education, support services, purchasing, and/or apparatus maintenance. Implementing this option may require aligning standard operating guidelines, policies, procedures, and certain operational aspects to ensure the collaborative processes function properly.

A structure of shared administrative decision-making is typically created for collaborative efforts. This requires policymakers and administrators to voluntarily forfeit or delegate their authority to unilaterally change actions, activities, or direction in the common functional areas in favor of a collaborative approach.

Like an administrative collaboration, a functional collaboration could be accomplished legally through an ICA between the fire districts. In some cases, functional collaboration is all that is required to achieve the collective goals of fire agencies and their respective leaders, without considering other forms of full legal integration.

Advantages

Such agreements primarily aim to share resources, improve service, and reduce costs at the program level. The advantages of this option are greater opportunities for efficiency and an opportunity to reallocate redundant available resources to those areas lacking in resources (e.g., transferring redundant training officers back to an operational function and increasing operational strength, assigning them to address training deficiencies or special programs, etc.) and a closer working relationship between members of the fire agencies, which can spill over to other unrelated activities in otherwise separate organizations.

This type of collaboration may evolve into more extensive levels of cooperation. Additionally, this option typically offers the advantage of being a low-cost and low-risk improvement strategy that can serve as a foundation for fire districts to build the experience and trust necessary to implement other collaborative strategies and programs.

Disadvantages

The disadvantage of this approach is that the functional option requires much greater collaboration between the participating fire districts than the other partnering options. Another disadvantage is that interactions among operational personnel across the different agencies increase the potential for friction.

Numerous details must be worked out in advance of such a contract, including but not limited to work rules, employee assignments, volunteer opportunities, office location, logos, asset allocation, authority, funding (see the preceding discussion under “Administrative Collaboration”), and even the name of the program.

Operational (Full-Service) Collaboration

The *operational collaboration* partnering option represents the next step in the continuum of closer collaboration, with the potential for a full merger. In this option, all operations are consolidated under a single organization that serves all participating jurisdictions. FMBFD and IMFD would remain independent organizations from a legal, political, and taxing standpoint. However, the fire districts would operate as a single public safety organization. The result features a single organizational structure and chain of command. Operational collaboration is also legally accomplished through an ICA between the participating organizations.

Depending on the form of the agreement(s) establishing the organization, personnel may remain with their original agencies or be transferred to the other agency or an entirely new entity. One Fire Chief oversees a blended organization.

To be successful, this option should be considered only in the context of a formal and comprehensive agreement, along with substantial movement toward a full merger between the FMBFD and IMFD policymakers and administrations. The level of trust required to implement an operational collaboration is very high since independence and autonomy have been willingly relinquished in favor of the preferred future state of a full merger.

Advantages

One of the primary advantages of this form of collaboration is its potential to maximize organizational flexibility and efficiency. This is typical of the operational option, in which services are delivered to communities, and the level of trust and cooperation required for successful implementation implies near-readiness to take the next step toward a total merger.

Disadvantages

The disadvantage is that administrators and policymakers must share power and gain consensus where they once had unilateral authority to control and implement policies and processes. If there are multiple bargaining units' (unions) agreements, they must be aligned. If so, it could be challenging to determine which agency would serve as the contractor.

Finally, as discussed in the preceding section under "Administrative Collaboration," funding remains an issue for a complete merger. Long-term funding for an operational collaboration can be challenging, as each participating fire district must contribute from its own revenues.

Strategy C: Legal Merger

A voluntary *legal merger* involves dissolving the existing fire districts (special districts) and forming a new, single organization that serves the combined communities. Such a merger is authorized under Florida Statutes, which enable the governing bodies of two or more contiguous, independent special districts, by joint resolution, to endorse a proposed joint merger plan and commence proceedings to merge the fire districts.[43]

Some key points in considering a legal merger include:

- **Legislative Approval:** Fire district mergers require approval from the Florida Legislature.
- **No Tax Increase:** A merged district cannot increase taxes solely because of the merger.
- **Initiating Merger:** Merger proceedings can be initiated by the governing body of the fire district or by a petition signed by a certain percentage of property owners or residents within the district.
- **Review and Approval:** The process requires legislative action and approval as well as a local referendum.
- **Special Districts:** Florida allows for the creation of special districts to provide services not offered by municipalities or counties, including fire control districts.

However, the main challenges lie in navigating the legal processes and obtaining approval from the Florida Legislature and voters, which may require extensive public relations efforts. A merger offers both fire districts the most comprehensive integration.

The importance of comprehensive planning and stakeholder engagement in addressing potential challenges and ensuring a smooth transition cannot be overstated. The specific processes for initiating a legal merger are described in detail in Appendix C of this report.

[43] Florida Statutes, Title XIII, Chapter 191.014.

Collaboration Considerations

District: FMBFD & IMFD

Recommendation E-1: Study the possibility of a joint training center.

Description: Both districts are in various planning stages for the construction of a training ground. Given the proximity of the two districts, there may be an opportunity to partner on this undertaking.

Outcome: Partnering between the two fire districts to develop a shared training center offers a range of strategic, operational, and financial advantages that can significantly enhance service delivery and organizational efficiency. As is already in place with the county training cooperative, a joint facility strategically promotes standardized training across jurisdictions, ensuring consistency in tactics, terminology, and safety protocols—especially critical during automatic and mutual aid responses. It also may allow for a broader curriculum by combining instructional talent and specialized equipment from both districts, fostering improved interoperability and stronger working relationships during multi-agency incidents. The presence of a permanent, well-equipped center enables more frequent, realistic training, thereby directly enhancing operational readiness.

Financially, collaboration reduces capital costs by allowing districts to share expenses for land acquisition, construction, and outfitting. It also creates economies of scale, lowering per-unit costs for props, simulators, and maintenance services. Joint efforts may improve eligibility for State of Florida and federal grants, such as those offered by FEMA, and help avoid duplicative investments in separate facilities, ultimately saving taxpayer dollars.

Administratively, such a partnership encourages the development of interlocal agreements and shared governance models that can be extended to other collaborative efforts. It also demonstrates fiscal responsibility and regional cooperation. From a personnel standpoint, a modern training center can support recruitment and retention by offering high-quality training and professional development opportunities.

The training center should be designed and operated to meet ISO requirements for facility training.

Cost Estimate: This would require further study with input and needs analysis from both districts. Therefore, the initial cost estimate would be staff time for the study.

District: **FMBFD & IMFD**

Recommendation E-2: Study the possibility of merging administrative support functions.

Description: As a fire district, both agencies have to perform various administrative functions. After further analysis and position task analysis, it may be possible to consolidate some of these functions or contract administrative roles to the other district.

Outcome: By consolidating administrative roles such as finance, human resources, procurement, and IT support, districts can eliminate duplication and streamline operations. This often leads to cost savings through shared staffing, joint purchasing agreements, and reduced overhead. Additionally, unified administrative systems can enhance data consistency, improve reporting accuracy, and ensure compliance with state and federal regulations.

Additionally, it may facilitate improved succession planning and create new opportunities for future positions. A successful outcome could lead to additional merger options or contracting for senior leadership roles.

Cost Estimate: Staff time.

District: **FMBFD & IMFD**

Recommendation E-3: Study the possibility of shared support functions.

Description: As fire districts, both agencies have personnel in place for various support functions. These include EMS, training, fire prevention, and logistics. Given the proximity of the districts and the close operational relationships between the two, there may be opportunities in this area.

Outcome: Merging fire district support functions—such as EMS management, training, fire prevention, and logistics—may offer strategic, operational, and financial advantages.

In EMS, unified protocols and shared oversight can ensure coordinated training and treatment between the two districts. Joint purchasing of medical supplies and equipment could also lead to significant cost savings.

Consolidating training functions ensures consistent standards across the districts, streamlines the use of instructors and facilities, and expands professional development opportunities through cross-district collaboration.

In fire prevention, a merged approach allows for uniform code enforcement, centralized inspection data, and coordinated public education campaigns that enhance community risk reduction.

Logistics integration further strengthens operations by centralizing inventory management and enabling bulk purchasing. These combined efforts can reduce administrative overhead, increase grant competitiveness, and create scalable systems that support future growth. Additionally, it may facilitate improved succession planning and create new opportunities for future positions.

Again, success may lead to additional merger options or the contracting for senior leadership roles.

Cost Estimate: Staff time.

District: FMBFD & IMFD

Recommendation E-4: Review agreements with third-party vendors for opportunities to combine.

Description: Both agencies have in place several software use contracts and other third-party service contracts. This recommendation is to review these agreements and consult with the vendors to determine if there are opportunities to combine the licensing or services provided between the two districts, leading to the outcomes described next.

Outcome: Combining software contracts and vendor services between two fire districts may offer a path to cost savings. As both districts already use platforms such as Vector Solutions and ESO, consolidating contracts could reduce licensing costs, streamline user management, and improve data integration across agencies. Shared software environments also support joint training, standardized reporting, and easier compliance with state and federal mandates such as NERIS and NFIRS.

Beyond software, aligning third-party vendor services—such as SCBA testing, hose testing, ladder inspections, and pump testing—can yield significant financial and logistical benefits. By scheduling these services simultaneously with the same vendor, districts can often negotiate volume discounts, reduce travel and setup fees, and minimize apparatus downtime. This approach may simplify recordkeeping and ensure consistent adherence to NFPA standards across both organizations. Several Florida districts have already demonstrated success with this model, utilizing coordinated vendor scheduling to reduce costs and enhance service continuity.

Cost Estimate: Staff time for the review.

Considerations in Shared Services

Shared services agreements are supported under Florida's Interlocal Cooperation Act (Chapter 163, Florida Statutes), which allows local governments—including independent fire control districts—to jointly exercise powers and share resources. These agreements can encompass administrative functions, operational support, and specialized services, including EMS, training, logistics, and fire prevention. Key components of the agreements should include:

- Scope of Services
  - Define which functions are shared (e.g., EMS oversight, training facilities, fleet maintenance, fire inspections).
  - Clarify whether services are fully merged or jointly staffed.
- Governance Structure
  - Establish a joint oversight committee or designate a lead agency to oversee the plan's implementation.
  - Include dispute resolution mechanisms and performance review timelines.
- Financial Arrangements
  - Outline cost-sharing formulas (e.g., per capita, call volume, assessed value).
  - Include provisions for grants, capital investments, and asset ownership.
- Personnel and Operations
  - Address staffing models, supervision, and cross-training.
  - Ensure compliance with labor laws and collective bargaining agreements.
- Data and Reporting
  - Standardize data collection and performance metrics.
  - Align reporting with the Florida Fire Incident Reporting System (FFIRS) and NERIS as applicable.

Implementation suggestions for consideration:

- Start with a pilot program for one or two functions (e.g., joint training or logistics).
- Use Memoranda of Understanding (MOUs) to formalize informal collaborations.
- Engage stakeholders, especially elected officials, labor representatives, and community leaders.

General Recommendations

Management Components

District: **FMBFD & IMFD**

Recommendation A-1: Prepare for and update the current Strategic Plans.

Description: Although both districts have taken the proactive step of completing a Strategic Plan, both are nearing completion (FMBFD in 2025 and IMFD in 2026). The districts should make formal plans to ensure an updated Strategic Plan is in place. A community-driven Strategic Plan should be modeled per the Center for Public Safety Excellence. This will support IMFD's continued accreditation status and would support FMBFD should the district ever consider fire service accreditation. A Strategic Plan serves as one of the three foundational elements required. Upon completion of the Strategic Plan document, it should be formally adopted by the districts' Board of Fire Commissioners, who should receive periodic updates on progress.

Outcome: A three-to-five-year planning document that is designed to meet the needs of the community in which the districts serve.

Cost Estimate: Staff time if completed in-house; approximately $25,000-$30,000 if contracted to a third party. Potential cost savings if both districts contract with the same third party.

District: **FMBFD**

Recommendation A-2: Conduct regularly scheduled staff meetings with administrative staff.

Description: Communication within an organization is a critical component in achieving an effective, efficient, and responsive fire service organization. Internal members have an expectation of strategic, frequent, responsive, and transparent communication. This process begins at the top of an organization and regularly scheduled administrative staff meetings can aid in this endeavor, ensuring the organization reaches its ultimate potential.

Outcome: Increased communication within the command staff, enabling better information to be shared with the entire organization.

Cost Estimate: Staff time.

District: **FMBFD**

Recommendation A-3: Provide monthly operational reports.

Description: Although quarterly operational reporting is occurring, the best practice would be monthly reporting to the board. A comprehensive operational report should include critical metrics such as incident volume, training program outcomes, fire prevention program outcomes, and performance indicators (e.g., response times, turnout times, etc.).

Outcome: Comprehensive and regular operational reporting enables elected officials to provide constituents with accurate information and make informed, data-driven decisions.

Cost Estimate: Staff time.

District: **FMBFD & IMFD**

Recommendation A-4: Consider developing and adopting a Long-Range Master Plan.

Description: Having a Master Plan helps align the district's services with current and future community needs. It evaluates risks, analyzes service demand, and outlines staffing, equipment, and facility requirements. The plan supports data-driven decision-making, long-term financial planning, and compliance with NFPA standards and Florida Statutes. Based on data gathered from this report, the performance reviews mandated by the State of Florida, and the districts' community risk assessments and Standards of Cover, much of the information needed to develop a Master Plan has already been gathered and analyzed.

Outcome: A long-term planning document that will help ensure that the fire districts operate efficiently, adapt to growth, and continuously improve performance to protect the communities they serve.

Cost Estimate: Staff time only if done in-house.

District: **FMBFD**

Recommendation A-5: Develop and adopt a Succession Plan.

Description: A Succession Plan for the fire district ensures leadership continuity, preserves institutional knowledge, and supports long-term strategic goals. Ultimately, it is a proactive tool for stability, growth, and resilience.

Outcome: When key personnel retire or leave, a well-structured Succession Plan prevents operational disruptions and maintains compliance with certifications, vendor contracts, and interlocal agreements. It also boosts morale by providing clear career pathways and professional development opportunities while safeguarding partnerships and service quality.

Cost Estimate: Staff time only if done in-house.

Health, Wellness, & Safety

District: IMFD

Recommendation B-1: Develop a Risk Management Plan.

Description: Ensure the development and implementation of a Risk Management Plan to ensure compliance with NFPA 1550. The plan should be updated and monitored annually. Recommendations and revisions should be based on annual accident and injury data, significant incidents, and feedback from district staff and personnel. Per NFPA 1550, the plan should be evaluated by an independent source.

Outcome: Compliance with NFPA 1550, Chapter 6, and a safe and healthy work environment for all district employees.

Cost Estimate: Staff time and the cost of an independent review.

District: IMFD

Recommendation B-2: Install apparatus-mounted filtration systems on diesel apparatus.

Description: Although Station 71 has equipment installed in the apparatus bays to reduce the exposure to diesel exhaust, the remaining fire stations do not have diesel exhaust mitigation features. As new vehicles are purchased, it is recommended to move to an apparatus-mounted filtration system.

The advantages of an apparatus-mounted filtration system are numerous, including that it is fully automated and requires no human intervention while also protecting the public and apparatus operators when the units are outside the fire stations. Therefore, this approach should be prioritized for all units not currently assigned to Station 71, given the lack of diesel exhaust mitigation features.

Outcome: Better protection for firefighters and the public from the carcinogens caused by diesel exhausts, which the EPA classifies as “likely to be carcinogenic to humans.”

Cost Estimate: $8,000 to $10,000 per vehicle, including installation.

District: FMBFD

Recommendation B-3: Consider implementing a chaplain program.

Description: With a notable increase in diagnosed post-traumatic disorders and suicide rates in first responders nationwide, chaplain programs are another tool to combat the negative effects of the profession. Chaplain programs have been developed to provide spiritual and emotional support to first responders, playing a complementary role alongside mental health professionals and peer support personnel.

Outcome: Provide an additional resource for personnel to use to avoid and/or navigate a mental health emergency.

Cost Estimate: Typically, there is no direct cost associated with chaplain services. FMBFD should consider a partnership with IMFD, which already has a similar program in place.

District: **FMBFD**

Recommendation B-4: Ensure regularly scheduled safety committee meetings.

Description: As required by Florida Administrative Code 69A-62.042, the district's safety committee should meet quarterly. Additionally, FMBFD should review all requirements of Florida regulations and NFPA 1550 to ensure compliance with these standards.

Outcome: A comprehensive and joint process between labor and management to ensure a safe and healthy working environment while also ensuring compliance with Florida Administrative Code 69A-62.042.

Cost Estimate: Staff time and overtime cost for committee members not on duty during scheduled meetings.

Service Delivery & Performance (Data Analysis)

District: **FMBFD & IMFD**

Recommendation C-1: FMBFD and IMFD should continue preparing for the implementation of the National Emergency Response Information System (NERIS).

Description: Preparing for the National Emergency Response Information System (NERIS) implementation is about setting the fire district up for a smooth transition from NFIRS to a more modern, data-driven system. Key steps to prepare for NERIS include:

- Identify the required implementation timeline (onboarding in June or in 2025 in Florida).
- Designate a NERIS lead.
- Evaluate the current records management system (RMS).
- Identify the fire district's reporting method.
- Engage district members on the value and need for data collection.
- Educate and train the members on the new system and changes.
- Identify a date to go live.

Outcome: Improved accuracy and availability of incident data, better insight into operational performance.

Cost Estimate: Primarily staff time but possibly expenses from the RMS vendor.

District: FMBFD & IMFD

Recommendation C-2: FMBFD and IMFD should consider developing a Data Outlier Management Policy to help ensure the accuracy of incident records.

Description: In fire district data analysis, an outlier is a data point that significantly deviates from other observations in the dataset. These outliers can arise for various reasons, such as data entry errors, unusual events, or genuine data variability. Addressing outliers is crucial for maintaining data integrity and ensuring statistical accuracy. Examples of outliers in fire department data can include:

- **Unusual Incident Counts:** For example, if a particular fire station reports an exceptionally high or low number of incident volume compared to historical data or other stations, this could be an outlier.
- **Response Times:** Extremely short or long response times compared to the average can be considered outliers.
- **Damage Estimates:** Very high or low fire damage estimates might be outliers, especially if they differ significantly from typical values.
- **Casualty Numbers:** Anomalously high or low numbers of injuries or fatalities in incidents can also be outliers.

Outcome: The outcome would better reflect the districts' performance. Handling outliers is crucial for maintaining data integrity and ensuring statistical accuracy. A sample outlier policy is presented later in Appendix D.

Cost Estimate: Staff time only.

District: **FMBFD & IMFD**

Recommendation C-3: As part of the implementation of NERIS, adopt a system and written policy for incident data review and quality improvement.

Description: FMBFD and IMFD should consider developing a quality improvement (QI) system for regular review of completed incident reports. Reports should be evaluated for timely completion, accuracy, and thoroughness. This should include feedback to the report authors. Both districts should have a written policy describing the minimum requirements for completing an incident report.

Outcome: Ensures that all incident reports completed using the NERIS standard are accurate, complete, and timely, resulting in a more comprehensive and accurate understanding of operational performance.

Cost Estimate: Staff time only.

District: **IMFD**

Recommendation C-4: IMFD should review the use of NFIRS Incident Type Code 611, "Dispatched and Canceled En Route" code (and/or the NERIS equivalent).

Description: During the data analysis for this study, it was noted that incidents were being coded as Incident Type 611, "Dispatched and Canceled En Route," when the unit did have a timestamp for arrival. This incident type should be used only when the fire department is dispatched to an incident but does not arrive on the scene because the incident is canceled before arrival. Fire agencies that arrive on the scene should code the incident type based on the actual situation found upon arrival and should not use Incident Type 611.

Outcome: Ensures all incident reports completed using the NERIS standard are accurate, complete, and timely. Results in better knowledge of performance and demand.

Cost Estimate: Staff time.

Life Safety Programs

District: **FMBFD & IMFD**

Recommendation D-1: Consider closer collaboration between the two districts as it relates to community risk reduction.

Description: Specifically, this recommendation suggests the possibility of the two districts sharing the resources that apply to a comprehensive community risk reduction (CRR) program.

Outcome: Working together also enables districts to pool resources, such as personnel, data systems, and grant funding, to implement more robust prevention programs. For example, they might co-host safety workshops, share inspection staff for high-risk occupancies, or jointly apply for Fire Prevention and Safety Grants to retrofit homes with fire-safe technology. The U.S. Fire Administration emphasizes that CRR is most effective when it integrates emergency response, prevention, and community involvement into a comprehensive strategy.

Cost Estimate: Staff time.

District: IMFD

Recommendation D-2: IMFD should consider reinstating plan reviews from Lee County within the district.

Description: Currently, Lee County conducts the permitting and plan reviews for new construction or alterations of existing buildings. Lee County retains all fees collected to cover the cost of this service. IMFD is involved in the inspection process. This recommendation is for IMFD to consider bringing these functions in-house.

Outcome: When a fire district performs its own construction plan reviews, it benefits from greater local control and responsiveness. Internal staff can coordinate more efficiently with inspection teams and fire operations personnel. Local personnel are familiar with local ordinances, amendments, and district-specific risk reduction goals, which enhances the quality and relevance of the reviews. Additionally, direct engagement with developers and architects fosters stronger relationships and provides opportunities for education on fire code compliance. An in-house model also allows for valuable feedback between field crews and prevention staff.

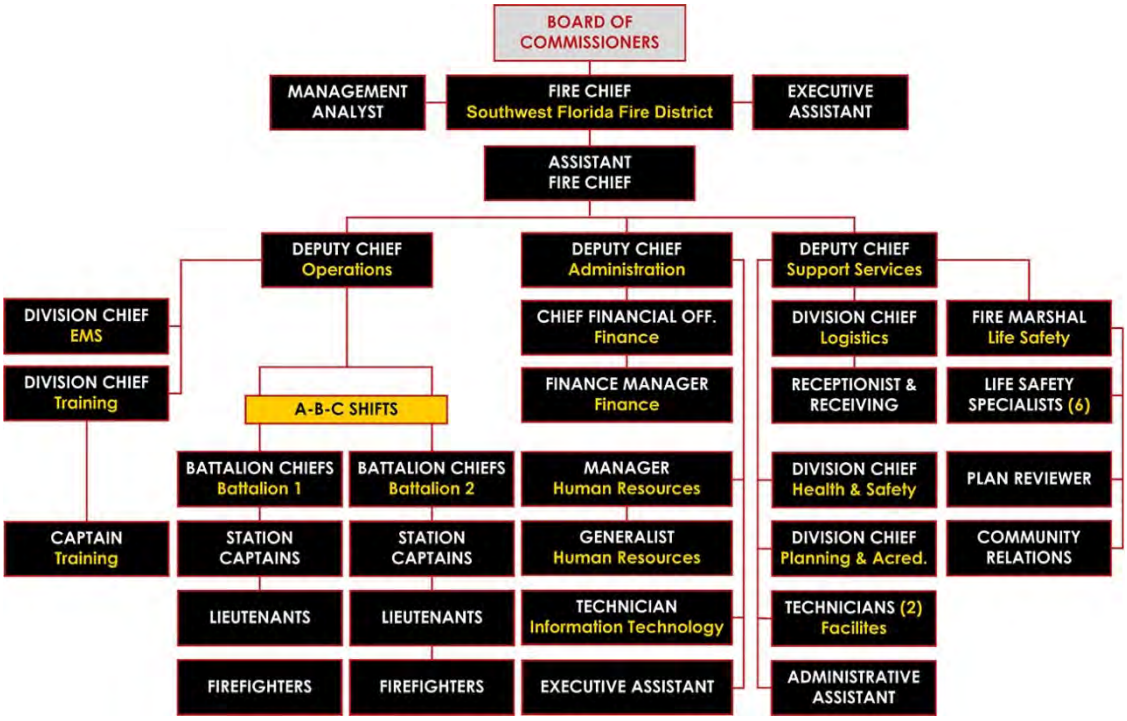
Cost Estimate: Staff time.

Potential Organizational Structure in a Merger

In this section, JAG has developed an infrastructure configuration for a potential merger of FMBFD and IMFD. These are presented for discussion, as the fire districts will ultimately need to determine the infrastructure if they decide to pursue a merger of the organizations.

Figure 181 illustrates a possible organizational structure that combines the operations personnel and administrative support staff of the fire districts. The figure uses a fictitious name for illustration purposes. The figure does not exceed the current combined total of 160 FTEs for both organizations.

Figure 181: Potential Consolidated Organization



As shown, a single Fire Chief would oversee three Deputy Chiefs, each responsible for operations, administration, and support services. In this scenario, the Operations Division has been apportioned into Battalion 1 and Battalion 2.

Figure 182 shows that, without increasing the total number of FTEs, the positions of Management Analyst and Training Captain have been added. In addition, this model only requires one Fire Chief and one Assistant Fire Chief.

Figure 182: Proposed Staffing for a Consolidated Organization

	— Current Totals —			
Position Title	**FMBFD**	**IMFD**	**Totals**	**NEEDED[A]**
Fire Chief	1	1	2	**1**
Assistant Fire Chiefs	2	0	2	**1**
Deputy Chiefs	1	2	3	**3**
Division Chiefs	0	4	4	**5**
Fire Marshal	1	0	1	**1**
Management Analyst[A]	1	0	1	**1**
Life Safety Specialists	3	3	6	**6**
Community Relations Specialist	0	1	1	**1**
Chief Financial Officer	0	1	1	**1**
Finance Manager	0	1	1	**1**
Executive Assistants	1	1	2	**2**
Administrative Assistant	1	0	1	**1**
Receptionist/Receiving	0	1	1	**1**
IT Technician	1	0	1	**1**
Human Resources Manager	0	1	1	**1**
Human Resources Generalist	1	0	1	**1**
Facilities Technicians	1	1	2	**2**
Battalion Chiefs (Shift)	3	3	6	**6**
Training Captain[A]	0	0	0	**1**
Captains (Ops)[B]	3	0	3	**8**
Lieutenant/Paramedics[C]	2	13	15	**16**
Lieutenant/EMTs	4	2	6	
Engineers/Paramedics	6	10	16	**24**
Engineers	3	5	8	
Firefighter/Paramedics[D]	26	29	59	**54**
Firefighter/EMTs	1	19	16	
Relief Firefighter/EMT/Paramedics			21	**21**
TOTALS:	**62**	**98**	**160**	**160**

[A] New position. B Need 5 additional Captains. [C] Have 5 more Lieutenant/Paramedics than needed.

[D] Have 21 Firefighter/Paramedics that can be used for relief.

If a merger of the fire district occurs, JAG recommends that the existing fire stations be re-numbered as shown in Figure 183.

Figure 183: Proposed Station Numbering Re-Assignment in a Merger

Current Station No.	New Station No.
FMBFD Station 31	Station 31
FMBFD Station 32	Station 32
FMBFD Station 33	Station 33
IMFD Station 71	Station 34
IMFD Station 72	Station 35
IMFD Station 73	Station 36
IMFD Station 74	Station 37
IMFD Station 75	Station 38

Each battalion in the Operations Division would be assigned four fire stations. Using the new fire station numbers, these would be as follows:

- **Battalion 1:** Stations 31, 32, 33, 35.
- **Battalion 2:** Stations 34, 36, 37, 38.

Figure 184 lists the suggested apparatus and staffing at each fire station within the two battalions. Battalion 1 would have seven apparatus and a daily minimum of 18 operations personnel (and one Battalion Chief) housed at its four fire stations. Battalion 2 would have a minimum of six apparatus and 16 personnel (including one Battalion Chief) at its four fire stations each day.

In Figure 184, there would be a total of 13 frontline apparatus and a minimum of 36 operations staff per day. The assignments in this figure are consistent with the current apparatus and staffing of each fire district.

Figure 184: Proposed Apparatus & Staffing Assignments

New Station (Previous)	Apparatus Assigned[A]	Daily Staffing	TOTAL REQUIRED
BATTALION 1		1	**3**
Station 31 (FMBFD #31)	Engine 31	3	**9**
	Rescue 31	2	**6**
Station 32 (FMBFD #32)	Engine 32	3	**9**
Station 33 (FMBFD #33)	Truck 33[B]	3	**9**
	Rescue 33	2	**6**
Station 35 (IMFD #72)	Engine 35	3	**9**
	Rescue 35	2	**6**
Battalion 1 Totals:	**7 Apparatus**	**18**	**54**
BATTALION 2		1	**3**
Station 34 (IMFD #71)	Engine 34	3	**9**
Station 36 (IMFD #73)	Squad 36	3	**9**
	Rescue 36	2	**6**
Station 37 (IMFD #74)	Truck 37[B]	3	**9**
	Rescue 37	2	**6**
Station 38 (IMFD #75)	Engine 38	3	**9**
Battalion 2 Totals:	**6 Apparatus**	**16**	**48**
Total Daily Apparatus/Staff:	**13 Apparatus**	**36/Day[A]**	**102 STAFF**

[A] Count of the apparatus does not include two Battalion Chief command units.

Figure 185 and Figure 186 illustrate the organizational structure of the proposed Operations Division, showing the composition of each battalion by station, apparatus, and assigned personnel.

Figure 185: Proposed Operations Division—Battalion 1 Infrastructure

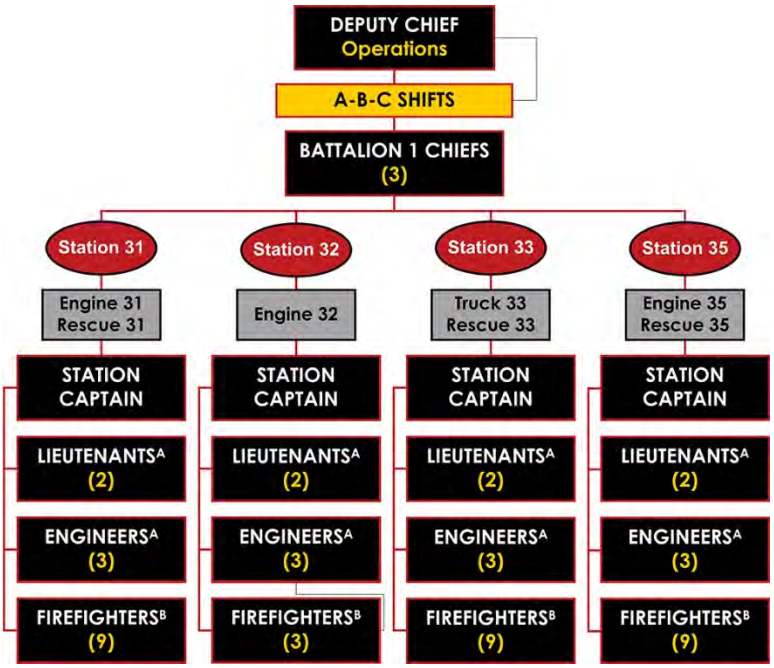
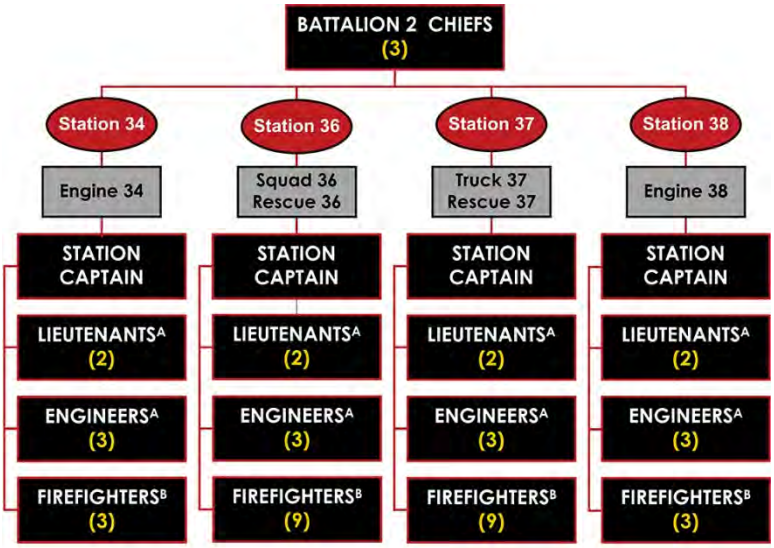


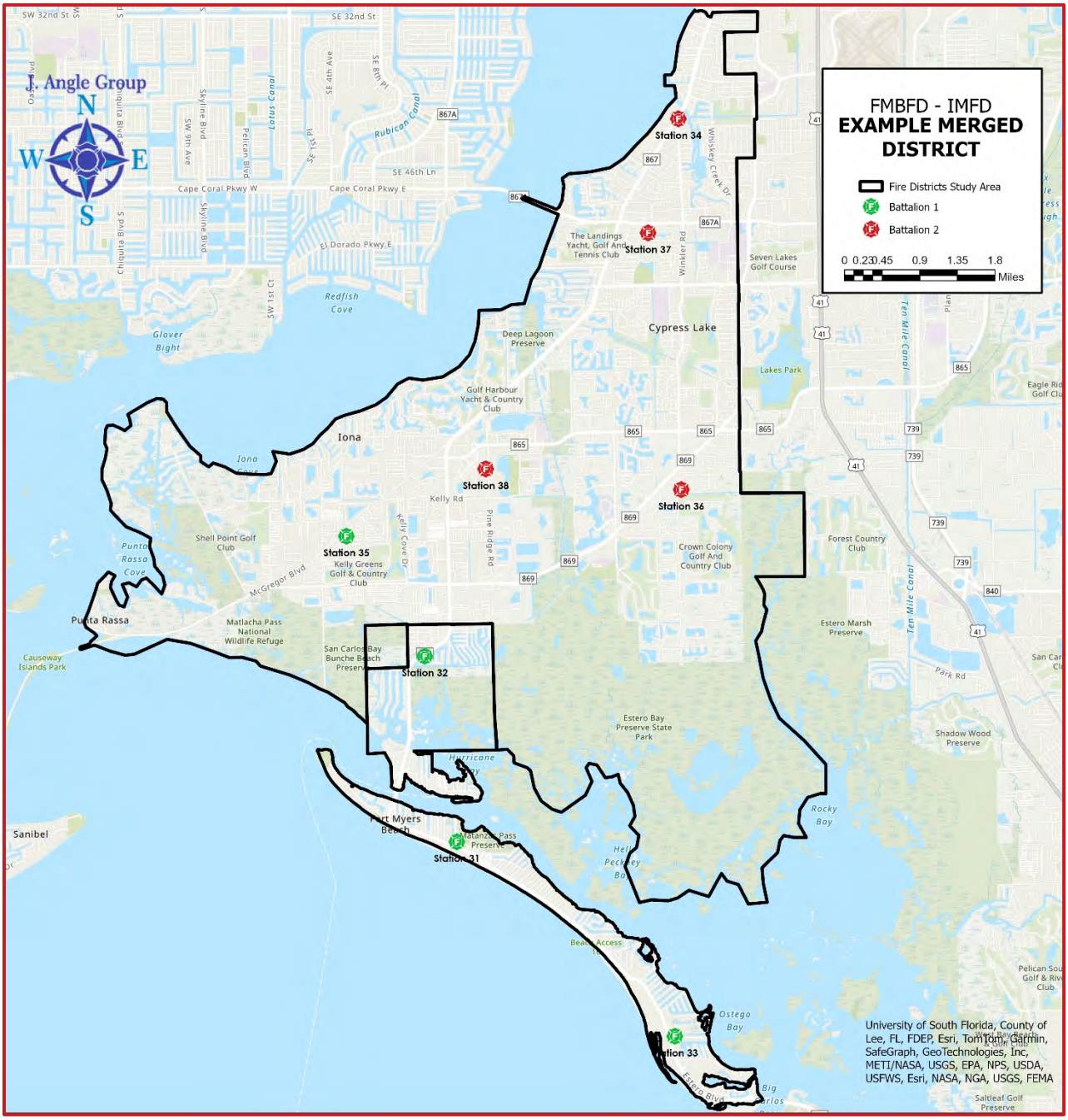
Figure 186: Proposed Operations Division—Battalion 2 Infrastructure



[A]Lieutenants and Engineers may be an EMT or Paramedic.
[B]May be an EMT as long as there is at least one Paramedic on the other apparatus.

Figure 187 shows an example of a single merged fire district with the suggested re-numbered fire stations.

Figure 187: Example of a Merged Fire District



Financial Impact of the Recommendations

Although many variations of cooperation could be pursued between the two fire districts, each with financial implications, quantifying those is difficult, if not impossible, given the unknowns surrounding their structure. Therefore, only the two end-member models—status quo (two separate districts) and a complete merger (one district) with a common millage rate—are discussed herein and compared from a financial perspective. Even then, a significant number of assumptions must be made regarding revenue, expenditures, and fund balance for each model.

A five-year forecast with calculated millage rates for taxpayers in each district is provided for both models, allowing a comparison of the high-level financial impact of each. Absent other information, the basis for the assumptions used in the forecasts is trending from the five-year historical overviews previously provided in this study. Proposed FY26 budgets for each district became available late during the review stage of this study and are incorporated into the assumptions and forecasts.

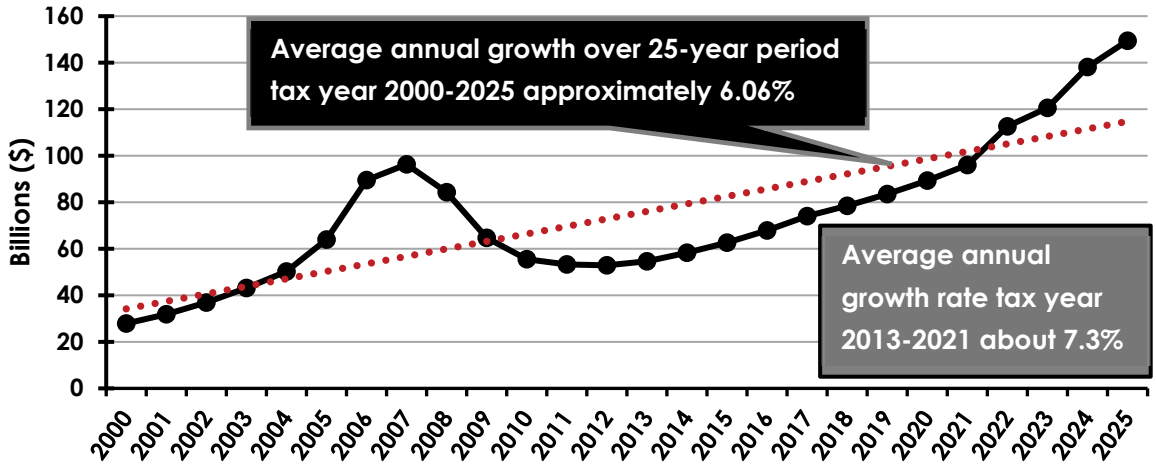
Status Quo Model: Fort Myers Beach Fire District

The following discussion identifies key revenue, expense, and fund balance assumptions used to project a calculated millage rate necessary to sustain FMBFD over the next five years. The calculated millage rate may differ from the final adopted rate. It is calculated using adopted or projected taxable value (for example, the preliminary taxable value obtained from Form DR420, or the final value from Form DR422 if available), less approximately 5%, divided by the tax revenue needed to fund total expenditures and fund balance levels based upon district policy and considering other projected revenues, both recurring and non-recurring, as well as a total fund balance carried forward each year. The same process is used for each district in the status quo model, as well as for the single district in the merger model, to ensure a consistent comparison.

Revenue Assumptions

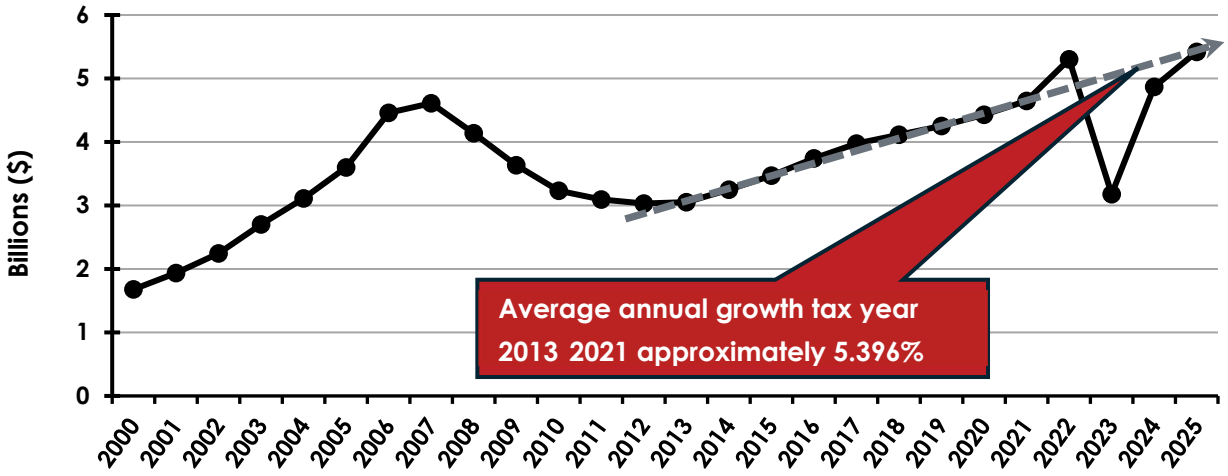
The primary source of funding for FMBFD is ad valorem tax revenue; therefore, the district's total taxable value over the forecast period is a key variable in the model. Given the spikes in property values (2004–2007 and 2021 to present) and the significant damage from Hurricane Ian (September 2022) to Florida's southwestern coastal communities, which have led to pronounced non-linear behavior, predicting future trends based on the most recent five-year historical taxable value and resulting ad valorem revenue is problematic. Figure 188 shows the total taxable value for Lee County between Tax Years 2000 and 2025.

Figure 188: Lee County Total Taxable Value (Tax Years 2000–2025)



The average annual growth over 25 years has been 6.06% (assuming a linear trend), with little impact from Hurricane Ian. A relatively consistent average annual increase of 7.3% has been observed from Tax Year 2013 through 2021, with another spike in total taxable value beginning in tax year 2022. Although little impact from Hurricane Ian has been observed countywide on total taxable value, Figure 189 presents a different picture for the Fort Myers Beach Fire District.

Figure 189: FMBFD Total Taxable Value (Tax Years 2000–2025)



As with Lee County overall, the fire district shows a consistent rise in taxable value from tax year 2013 to 2021, with district values rising at a lower rate than the county's, which began to rise rapidly in tax year 2022, impacting FY23. The FMBFD's average annual increase through tax year 2021 (FY22) is lower than the county's overall rate at just under 5.4%. However, Hurricane Ian's impact on property values is evident in the tax year 2023 (FY24), marking a departure from the county trend. Total taxable values for the district are rebounding in tax year 2024–2025 (FY25–26), nearly reaching the level projected by the 5.4% annual trend by 2025.

Florida estimates the total taxable value for each county for public education funding purposes.[44] The Department of Revenue acknowledges the spike in taxable values in Lee County with year-over-year increases subsequently declining from tax year 2024 through 2030 as follows; 10.54% (2024), 8.15% (2025), 7.54% (2026), 6.4% (2027), 5.79% (2028), 5.48% (2029), and 5.17% (2030).

The status quo and single-district models use DOR year-over-year estimates for Tax Years 2026 (FY27) through 2029 (FY30). The basis for the future projection is Tax Year 2025 (FY26).

The total increase from tax years 2024 to 2025 (FY26) for FMBFD, based upon final taxable values from Form DR422, is 11.323%, or approximately 3.2% higher than the State of Florida figure of 8.15% for the county over the same period. District staff have indicated that, although reconstruction of lost and damaged properties is continuing throughout the district, taxable value is unlikely to continue rising at the rates seen over the last few years.[45] State estimates acknowledge the spike observed in county values but do show values still increasing, albeit at lower rates, through Tax Year 2030. Based on this trend, the forecast model uses the State of Florida figures for tax years 2026 through 2030, with the DR422 value for tax year 2025 (FY26) as the basis for the projection. A millage rate, kept within the statutory cap of three mills, is then projected using the estimated total taxable value and ad valorem revenue.

The forecast model varies the required ad valorem revenue based on the estimated beginning total fund balance target, as well as other recurring and non-recurring revenues

[44] Florida Department of Revenue, *Revenue Estimating Conference Ad Valorem Assessments*, March 5, 2025.
[45] Personal communication with Chief Wirth, October 24, 2025.

forecasted to offset estimated recurring expenses and capital expenses, as outlined in the district's Capital Improvement Plan.

Other recurring revenues are comprised of ambulance fees, intergovernmental revenues, permits/fees, and interest. The model uses the adopted or estimated amounts for each of these and increases them as follows:

- **Ambulance Fees:** Assumes second unit is fully online in FY26, with revenue increasing from $375,000 in FY26 by 3% annually thereafter.
- **Intergovernmental Revenue:** Assumes FY26 proposed increases by 3% annually.
- **Permits/Fees**: Based upon a slowing rate of growth/construction, FY26 proposed amount increases by 10% in FY27, 6% in FY28, and 3% thereafter.
- **Interest**: Based upon spending down carryforward, the FY26 proposed amount of $525,000 is decreased to $200,000 in FY27, and in subsequent years at $125,000.

Non-recurring revenues comprise impact fees, grants, sales of surplus equipment, and miscellaneous income. These sources are modeled as follows:

- **Impact Fees:** Based on expected construction trends, will continue at the FY26 proposed amount of $10,000 through FY30.
- **Grants:** Although the proposed FY26 shows grant funding of only $5,000, the model assumes the district will be successful in obtaining future grant funding. An annual amount of $110,000 is shown for FY27–30 based upon historical performance.
- **Surplus Equipment/Property Sales:** The model uses the proposed amount of $10,000 but increases it to $50,000 for FY27–30 based upon the historical average.
- **Miscellaneous:** The model uses a $5,000 value for FY27–30.

Expense Assumptions

Personnel services are a significant recurring expenditure comprising salary and benefits, which were modeled separately and then combined in the following forecast. Since there was a large increase in compensation components in the adopted FY25 budget and another in the proposed FY26 budget, and future increases are tied to contract negotiations between the district and the IAFF, the model assumes a consistent annual increase based upon the anticipated annual rate of inflation plus approximately 1–1.5%.

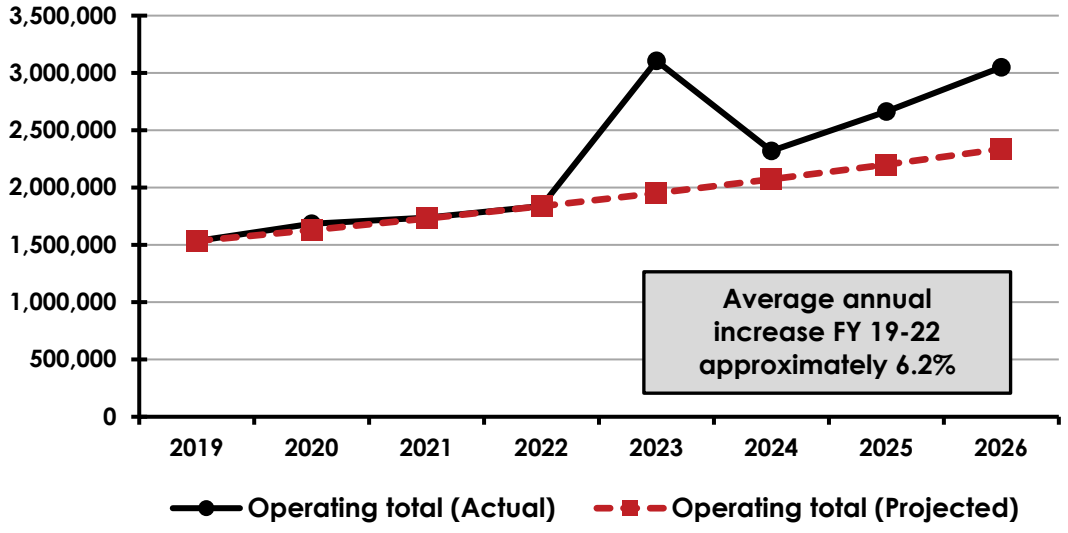
According to the U.S. Bureau of Labor Statistics' modeling, the annual rate of inflation is expected to continue trending downward from its current rate of nearly 2.5%, to 2.3% by

2027. The model assumes an annual increase in total personnel services of 3.5% over the prior year for each forecast year. It is also assumed that no additional staff will be added.

Operating expense categories are combined in the model and comprise professional and contractual services, communications/freight, utilities/insurance, repairs/maintenance, miscellaneous expenses, operating supplies/tools, education/training, and other service expenses. Due to variability and often non-linear behavior over the historical period, these categories were treated as a composite in the forecast. District staff have stated that increases in total operating costs were abnormally above historical rates observed through FY22, driven by replacement costs resulting directly from Hurricane Ian.[46]

Replacement costs include non-capital tools and equipment, uniforms and protective equipment for additional personnel, onboarding and training costs, and additional facility operating costs, among other items. Historical composite operating expenses from FY19–22 have increased at an average annual rate of approximately 6.2% as shown in Figure 190. Total operating expenses were projected through FY26 using this rate of increase and projected forward through FY30 using a lower projected amount of $2.34 million for FY26.

Figure 190: FMBFD Total Operating Expenses (FY19 Adopted–FY26 Proposed)



Debt service, comprising approximately $166,678 in principal and interest, continues through FY27, after which no debt is assumed. Non-recurring expenses include land,

[46] Personal communication with Chief Wirth, October 24, 2025.

buildings/improvements/FF&E, equipment, and apparatus. The district's adopted Capital Improvement Plan (CIP) is used to model each of these categories.

The district uses a 5% inflation factor in the CIP, which is incorporated in the model. The district's fund balance policy also requires a CIP reserve, with an annual replacement figure based on future costs and replacement timing projected for various capital categories. The CIP reserve portion of the fund balance is somewhat flexible and can be adjusted based on the actual timing of large-scale capital expenditures.

Fund Balance Assumptions

The total fund balance is presented in two ways in the model. The first is a calculated target amount based upon district policy. The second is based upon modeled revenue plus total fund balance forward minus all expenditures.

The forecast model allocates the total fund balance based on the timing of CIP expenditures, as currently adopted or discussed with staff, to calculate a millage rate. Should the district wish to take a different approach to capital expenditure timing, the millage rate may differ significantly from the modeled rate. This model illustrates one possible approach and is used for consistent comparison with the merged single district.

FMBFD Status Quo Forecast

Figure 191 illustrates the FY25 adopted amounts and the five-year forecast based on the previous assumptions.

Figure 191: FMBFD Five-Year Financial Forecast

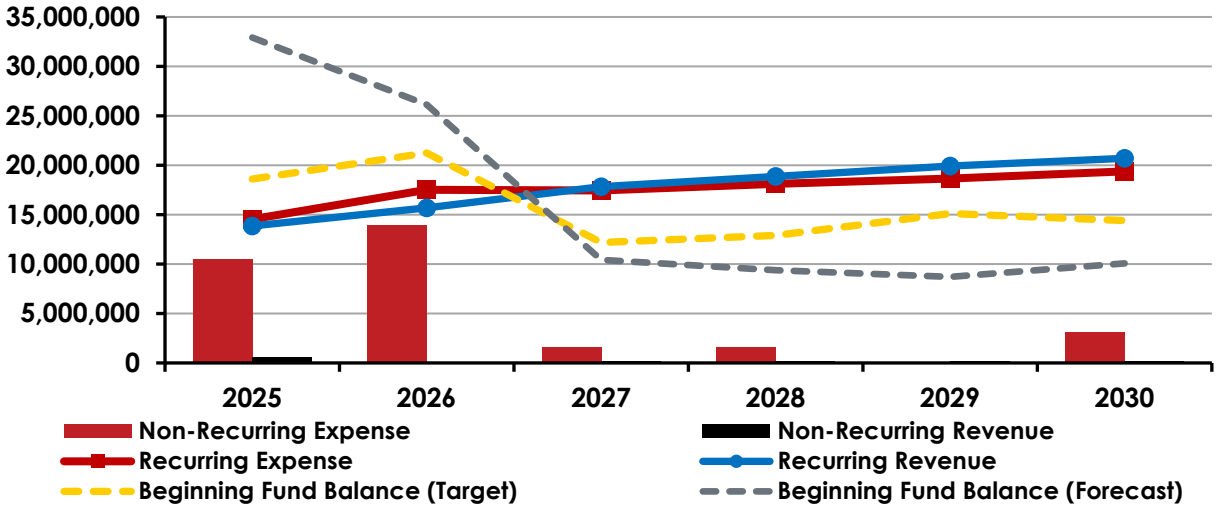
Revenue & Expenses	FY2025 Adopted	FY2026 Forecast	FY2027 Forecast	FY2028 Forecast	FY2029 Forecast	FY2030 Forecast
Taxable Value (DR420):[A]	**4,642,975,363**	**5,419,778,863**	**5,828,430,189**	**6,201,449,721**	**6,560,513,660**	**6,920,029,809**
Calculated Mill Rate:	**2.8000**	**2.7600**	**3.0000**	**3.0000**	**3.0000**	**2.9579**
Taxes	12,350,314	14,210,660	16,610,841	17,673,934	18,697,255	19,445,146
Other Revenue	1,506,000	1,476,400	1,218,442	1,192,145	1,224,160	1,257,134
Recurring Revenue:	**13,856,314**	**15,687,060**	**17,829,283**	**18,866,080**	**19,921,415**	**20,702,280**
Non-Recurring Revenue:	**531,000**	**25,000**	**175,000**	**175,000**	**175,000**	**175,000**
TOTAL REVENUE:	**$14,387,314**	**$15,712,060**	**$18,004,283**	**$19,041,080**	**$20,096,415**	**$20,877,280**
Personnel Services	11,706,320	14,297,700	14,798,120	15,316,054	15,852,116	16,406,940
Operating Expenses	2,663,390	3,048,960	2,481,616	2,635,476	2,798,876	2,972,406
Debt Service	166,690	166,680	166,678	166,677	—	—
Recurring Expenses:	**14,536,400**	**17,513,340**	**17,446,413**	**18,118,207**	**18,650,991**	**19,379,346**
Land	—	—	—	—	—	—
Bldgs./Improve./FF&E	9,008,500	13,066,283	818,205	26,308	—	186,469
Equipment	407,500	135,803	123,306	164,551	81,508	883,779
Apparatus	1,092,500	698,385	660,991	1,407,202	—	1,972,567
Non-Recurring Expenses:	**10,508,500**	**13,900,471**	**1,602,502**	**1,598,061**	**81,508**	**3,042,815**
TOTAL EXPENSES:	**$25,044,900**	**$31,413,811**	**$19,048,915**	**$19,716,268**	**$18,732,499**	**$22,422,161**
Net Change Fund Bal.:	**-10,657,586**	**-15,701,751**	**-1,044,633**	**-675,188**	**1,363,916**	**-1,544,881**
Beginning Fund Bal.:	**32,919,712**	**26,126,126**	**$10,424,375**	**$9,379,743**	**$8,704,555**	**$10,068,470**
Ending Fund Bal.:	**26,126,126**	**$10,424,375**	**$9,379,743**	**$8,704,555**	**$10,068,470**	**$8,523,590**

[A] Taxable value for FY25 is preliminary value from Form DR420, while figure for FY26 is final taxable value from Form DR422 which is used as the basis for the future forecasts.

Figure 192 summarizes the data from the preceding tables in graphical form. With the substantial completion of Station #31 proposed in FY26, the district's total fund balance will fall below its target in FY27. Although the target is projected to be missed by almost $6 million in FY29, the gap is projected to begin to close in FY30 as recurring revenue exceeds recurring expenses, thereby contributing to the fund balance. Total fund balance, while below the district target (which includes additions to CIP reserves), is still more than the district's requirement for a three-month recurring expenditure and one-month emergency reserve. As previously mentioned, variation in the timing of CIP expenditures significantly impacts modeled fund balances.

This is a simple scenario based on assumptions consistent across both the status quo and consolidated district models, allowing staff and elected officials to compare and contrast the relative impacts of the two models on district taxpayers.

Figure 192: FMBFD Revenue/Expense & Fund Balance Projection (FY25–30)



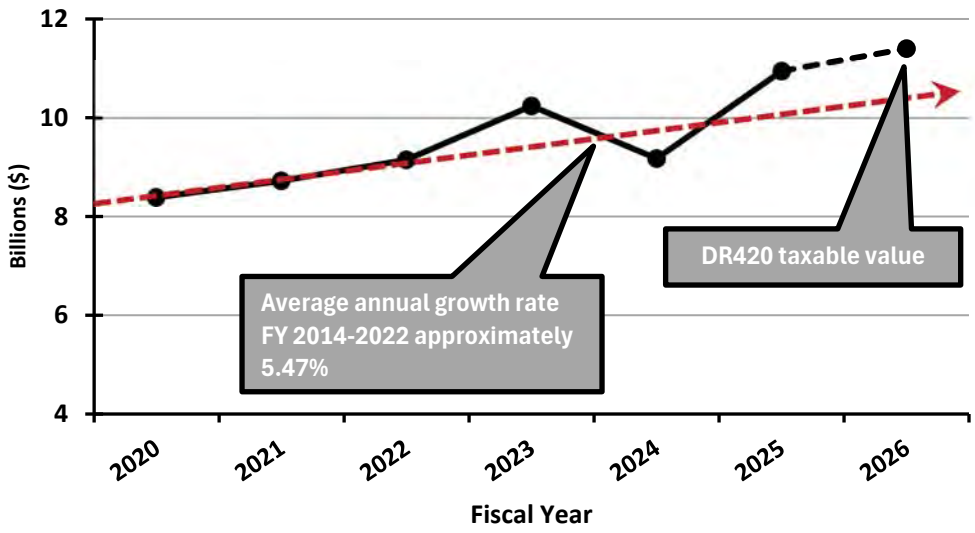
Status Quo Model: Iona-McGregor Fire District

The following discussion outlines key revenue, expense, and fund balance assumptions used to calculate the millage rate necessary to sustain the IMFD over the next five years. The calculated millage rate may differ from the final adopted rate. It is calculated using the adopted or projected taxable value (for example, the preliminary taxable value obtained from the Form DR420), less approximately 5%, divided by the tax revenue needed to fund total expenditures and total fund balance based upon district policy and considering other projected revenues, both recurring and non-recurring, as well as a total fund balance carried forward each year.

Revenue Assumptions

Since IMFD's primary source of funding is ad valorem revenue, the district's total taxable value over the forecast period is an important variable in the model. Given the significant damage from Hurricane Ian (September 2022) to Florida's southwestern coastal communities, predicting future trends based on the five-year historical taxable value and resulting ad valorem revenue is problematic. Although little impact from Hurricane Ian has been observed countywide on total taxable value, as discussed earlier, it presents a different picture for the Iona-McGregor Fire District, as shown in Figure 193.

Figure 193: Total Taxable Value IMFD



As in Lee County overall, both fire districts showed a consistent rise in taxable value from FY14 to FY22, with district values mirroring the trend in county values as they began to rise rapidly, impacting FY23. The IMFD average annual increase through FY22 was lower than the county's overall rate at approximately 5.47%.

However, Hurricane Ian's impact on property values is evident by FY24, marking a departure from the county trend. Total taxable values for the district are rebounding by FY25, exceeding the 5.47% annual trend, although the increase into FY26 from the preliminary value indicates that values are back on trend.

As previously discussed, the State of Florida estimates the total taxable value for each county to fund public education.[47] The Department of Revenue acknowledges the spike in taxable values in Lee County with year-over-year increases subsequently declining from Tax Year 2024 through 2030 as follows; 10.54% (2024), 8.15% (2025), 7.54% (2026), 6.4% (2027), 5.79% (2028), 5.48% (2029), and 5.17% (2030). However, the FY26 total taxable value (preliminary estimate from Form DR420) for the district has increased at a higher rate than the county. The total increase for FY26 is 11.82% over the DR420 value for FY25, or approximately 3.67% higher than the State of Florida figure for the county during the same period. Since the rate of change is falling back to historical levels, the forecast uses the State of Florida figures for the annual increase in value from tax year 2026 (FY27) through 2029 (FY30), with FY26 taxable value as the basis for the projection.

The status quo and single-district models use DOR year-over-year estimates for Tax Year 2026 (FY27) through 2029 (FY30). The basis for the future projection is Tax Year 2025 (FY26).

The forecast model varies the required ad valorem revenue based on the estimated beginning total fund balance target, as well as other recurring and non-recurring revenues forecasted to offset estimated recurring expenses and capital expenses, as outlined in the district's Capital Improvement Plan. A millage rate, kept within the statutory cap of 2.5 mills, is then projected using the estimated total taxable value and ad valorem revenue.

Other recurring revenues comprise intergovernmental revenues, permits/fees, rents, and interest. The model uses the adopted or estimated amounts for each of these and increases them as follows:

- **Intergovernmental Revenue:** Assumes the proposed FY26 and increases by 6.4% annually thereafter.
- **Permits/Fees:** Assumes the FY26 proposed amount and increases by 7% thereafter.
- **Rent:** None assumed from FY26 adopted forward.
- **Interest:** Based upon FY26 adoption of $850,000, which increases at 3% annually thereafter.

[47] Florida Department of Revenue, *Revenue Estimating Conference Ad Valorem Assessments*, March 5, 2025.

Non-recurring revenues are comprised of impact fees, grants, CARES Act funds, surplus equipment sales, insurance proceeds, and miscellaneous income. Although the FY26 budget, as proposed, only shows $43,427 in miscellaneous revenue based upon historical trending, these sources are modeled as follows:

- **Impact Fees:** Average for FY19–25 is $106,000. Assume $100,000 from FY27–30.
- **Grants:** Average for FY19–25 is $50,000 annually. Assume successful acquisition of future grant funding at $50,000 annually from FY27–30.
- **CARES Act Funds:** No additional funding.
- **Surplus Equipment/Property Sales:** Average for FY19–25 is approximately $50,000 annually. The model assumes $50,000 per forecast year, FY27–30.
- **Insurance Proceeds**: None forecast.
- **Miscellaneous Income**: Average for FY19–25 approximately $57,000. Forecast assumes $55,000 for FY27–30.

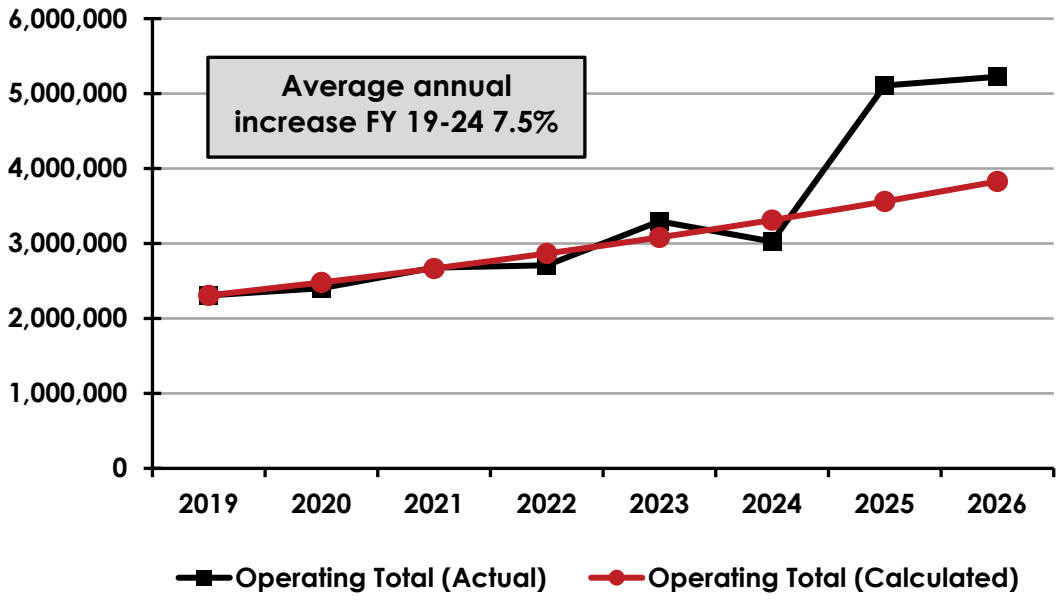
Expense Assumptions

Personnel services are a significant recurring expenditure comprising salary and benefits, which were modeled separately and then combined in the following forecast. Since future increases are tied to contract negotiations between the district and the IAFF, the model assumes a consistent increase based upon the anticipated annual rate of inflation plus approximately 1–1.5%. According to the U.S. Bureau of Labor Statistics as discussed previously, modeling suggests that the annual rate of inflation will continue to trend downward from its current rate of nearly 2.5%, to 2.3% by 2027. The model assumes an annual increase in total personnel services of 3.5% over the prior year for each forecast year, with the FY26 proposed budget serving as the basis for the projection. It is also assumed that no staff will be added.

Operating expense categories are combined in the model and comprise professional and contractual services, communications/freight, utilities/insurance, repairs/maintenance, miscellaneous expenses, operating supplies/tools, education/training, and other service expenses. Due to variability and often non-linear behavior over the historical period, these categories were treated as a composite.

Historical composite operating expenses have increased at an average annual rate of approximately 7.5% through FY24, as shown in Figure 194. Despite a significant increase between FY24 and FY25, likely due to the replacement of non-capital items lost or damaged due to Hurricane Ian, the rate of increase has returned to near the historical rate through FY24. The FY26 proposed operating expense budget serves as the basis for the forecast and is then increased at a 7.5% annual rate through FY30.

Figure 194: IMFD Total Operating Expense (FY19 Adopted–FY26 Proposed)



Non-recurring expenses include land, buildings/improvements/FF&E, equipment, and apparatus. The district's adopted Capital Improvement Plan (CIP) is used to model each of these categories. The district uses an 11.85% inflation factor for large apparatus and a 4% inflation factor for other capital in the CIP. For consistency with FMBFD and to compare the two models, a 5% inflation factor is applied to all capital.

The total district fund balance policy also requires a CIP reserve, with an annual replacement figure based on projected future costs and replacement timing for various capital categories. The CIP reserve portion of the total fund balance is somewhat flexible and can be managed by varying the timing of large-scale capital expenditures.

Fund Balance Assumptions

The total fund balance is presented in two ways in the model. The first is a calculated target amount based upon district policy. The second is based upon modeled revenue plus total fund balance forward minus all expenditures. The forecast model increases ad valorem revenue within the statutory millage cap to offset the declining fund balance, based on the current CIP expenditure timing, resulting in the calculated millage rate shown in the model.

Should the district wish to take a different approach, the millage rate may differ significantly from the modeled rate. This model illustrates one possible approach and is used for consistent comparison with the merged single district model.

IMFD Status Quo Forecast

Figure 195 shows the FY26 proposed budget and the forecast through FY30 under the preceding assumptions.

Figure 195: IMFD Five-Year Financial Forecast Revenue

Revenue & Expenses	FY2025 Adopted	FY2026 Forecast	FY2027 Forecast	FY2028 Forecast	FY2029 Forecast	FY2030 Forecast
District Taxable Value[A]	10,194,240,059	11,398,808,867	12,258,279,056	13,042,808,915	13,797,987,551	14,554,117,269
Calculated Mill Rate:	**2.5000**	**2.5000**	**2.5000**	**2.5000**	**2.5000**	**2.4886**
Taxes	24,689,600	27,581,022	29,688,212	31,588,258	33,417,218	35,088,079
Other Revenue	1,168,323	1,253,540	1,306,916	1,362,984	1,421,900	1,483,832
Recurring Revenue:	**25,857,923**	**28,834,562**	**30,995,128**	**32,951,241**	**34,839,118**	**36,571,911**
Non-Recurring Revenue:	**529,500**	**43,427**	**255,000**	**255,000**	**255,000**	**255,000**
TOTAL REVENUE:	**$26,387,423**	**$28,877,989**	**$31,250,128**	**$33,206,241**	**$35,094,118**	**$36,826,911**
Personnel Services	21,470,294	23,702,001	24,531,571	25,390,176	26,278,832	27,198,591
Operating Expenses	5,107,321	5,223,975	5,615,773	6,036,956	6,489,728	6,976,457
Debt Service	—	—	—	—	—	—
Recurring Expenses:	**26,577,615**	**28,925,976**	**30,147,344**	**31,427,132**	**32,768,560**	**34,175,049**
Land	—	—	—	—	—	—
Bldgs./Improve./FF&E	2,264,498	1,000,000	—	—	—	—
Equipment	297,000	827,000	—	—	—	—
Apparatus	1,906,000	2,282,004	1,230,350	—	—	—
Non-Recurring Expenses:	**4,467,498**	**4,109,004**	**1,230,350**	**—**	**—**	**—**
TOTAL EXPENSES:	**$31,045,113**	**$33,034,980**	**$31,377,694**	**$31,427,132**	**$32,768,560**	**$34,175,049**
Net Change Fund Bal.:	**-4,657,690**	**-4,156,991**	**-127,567**	**1,779,109**	**2,325,558**	**2,651,862**
Beginning Fund Bal.:	15,193,063	10,535,373	$6,378,382	$6,250,815	$8,029,925	$10,355,483
Ending Fund Bal.:	10,535,373	$6,378,382	$6,250,815	$8,029,925	$10,355,483	$13,007,345

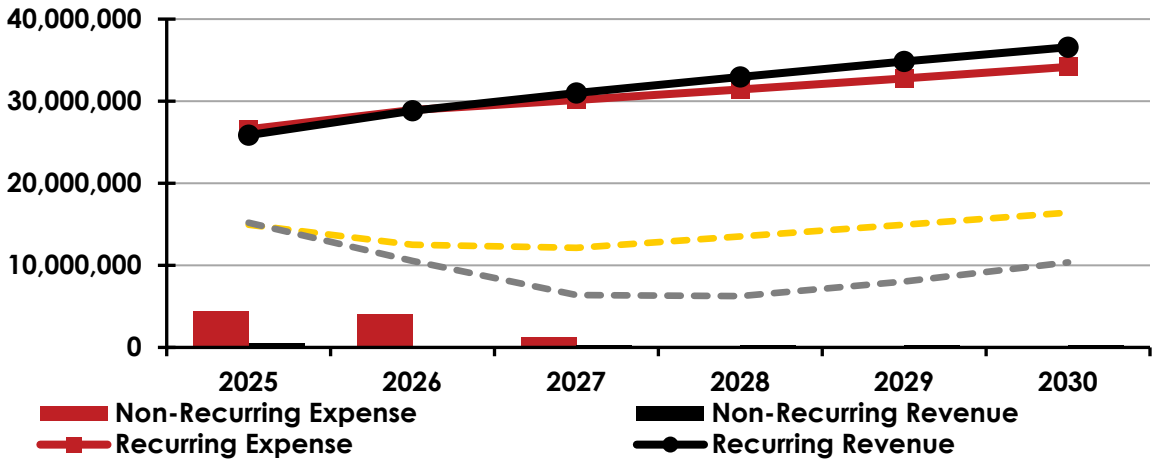
[A] Preliminary taxable value from Form DR420 shown for FY25 adopted and FY26 proposed budgets.

Figure 196 summarizes the data from the preceding figure in a graphical format. Although recurring revenue exceeds recurring expenses in FY27–30, the timing of capital expenditures, as currently proposed in the CIP, is projected to bring the total fund balance well below district targets in FY27.

The forecast suggests that the total fund balance will fall below four months of recurring expenses (the district's reserve goal related to recurring expenses and disaster funding) by $3.5-4 million in FY27–28, before beginning to recover in FY29. Total fund balance will still be less than four months of recurring expenses by just under $1 million in FY30.

As mentioned previously, this scenario is based on a set of assumptions consistent across both the status quo and consolidated district models, allowing staff and elected officials to compare and contrast the relative impacts of the two models on district taxpayers.

Figure 196: IMFD Revenue/Expense & Fund Balance Projection (FY25–30)



Consolidated Single District Model

In the consolidated single district model, the forecast build begins with the FY26 proposed budgets for each district. As with any merger, numerous issues need to be negotiated between the parties, particularly regarding how capital, debt service obligations, total fund balance, OPEB obligations, and any other outstanding financial matters are to be addressed. Although there is one union local (IAFF Local 1826), there are separate bargaining units for firefighters and chief officers in each district. Therefore, mandatory bargaining on pay and benefits, among other items, will be required as part of any merger discussion.

Given the financial impact of these unknowns, some key assumptions must be made before a high-level comparison of the tax impacts for both the status quo and consolidated models can be made.

The following discussion outlines the key assumptions incorporated into the model. As with the separate district status quo forecasts, these are just one possible set of assumptions for a consolidated single district, and many other variations can be used to arrive at forecast millage rates.

Revenue Assumptions

The consolidated single district model combines the taxable values for FY26 as proposed for each district and forecasts them through FY30. Forecast millage rates are calculated as in the status quo models.

Other revenues for each district are increased as in the single district status quo models above and combined with no change as in the status quo models, except that ambulance revenue is excluded from the combined model. It is anticipated that Lee County would not grant a Certificate of Public Convenience and Necessity (COPCN) for ambulance service to the successor district. The consolidated forecast model varies the required ad valorem revenue based on the estimated beginning total fund balance, combined with forecasted and estimated recurring and non-recurring revenues to offset forecasted and estimated recurring and capital expenses, as outlined in the combined Capital Improvement Plans. Non-recurring revenues are combined from the status quo forecast amounts for each district.

Expense Assumptions

Another major impact on the forecast involves the assumptions surrounding the major expense categories: personnel, operating, debt service, and capital. Each is subsequently discussed separately.

Given the caveat that items such as the treatment of OPEB and other personnel liabilities must be negotiated between the parties and there are mandatory items of negotiation with the union, several assumptions must still be made to arrive at personnel costs for the forecast.

Figure 197 compares average pay and benefits by position for each district for FY25, based on a detailed study of all employees by position. The model assumes that the higher average pay and benefits for each position will be incorporated into any merger, which may or may not be the outcome.

Figure 197: FY25 Average Pay/Benefit Comparison by Position (FY25)

Fort Myers Beach Fire District				Position Title	Iona-McGregor Fire District			
Ct..	Pay	Benefits	Total		Ct.	Pay	Benefits	Total
1	180,960	112,600	**293,560**	Fire Chief	1	231,131	137,803	368,934
1	166,192	105,506	**271,698**	Deputy Chief	1	208,169	117,768	325,937
2	162,718	100,751	**263,470**	Assistant Chief	No position			
No position				Division Chief	4	180,495	109,314	**289,808**
1	162,448	117,139	**265,126**	Fire Marshal	No position[1]			
3	79,227	50,245	**119,730**	Inspector	3	98,617	54,507	153,124
3	146,003	102,466	**234,941**	Battalion Chief	3	174,724	111,898	286,622
3	157,342	109,469	**252,640**	Captain	No position			
2	146,714	103,920	**237,066**	Lieutenant/Medic	13	147,760	94,714	242,475
4	132,034	96,257	**215,554**	Lieutenant	2	141,847	93,501	235,348
6	122,942	91,509	**202,230**	Engineer/Medic	10	130,197	82,924	213,121
3	113,131	86,386	**187,853**	Engineer	5	119,837	86,471	206,308
26	95,961	77,422	**162,693**	Firefighter/Medic	33	110,210	75,621	185,830
1	76,132	67,069	**133,635**	Firefighter/EMT	15	94,202	61,718	155,920
No position				Chief Financial Officer	1	188,541	73,947	**262,488**
1	168,168	56,476	**224,644**	Director Finance/Admin.	No position			
No position				Finance Manager	1	98,530	47,283	**145,813**
1	73,403	43,936	**117,339**	Executive Assistant	1	85,764	50,753	136,517
1	70,491	33,378	**103,869**	Administrative Asst.	No position			
No position				Receptionist	1	57,332	45,262	**102,594**
No position				Human Resources Mgr.	1	88,760	40,990	**129,750**
1	65,000	41,759	**106,759**	HR Generalist	No position			
1	121,264	56,337	**177,601**	IT Technician	No position			
No position				Community Relations Sp.	1	96,252	23,085	**119,337**
No position				Facilities Maintenance	1	89,308	35,430	**124,738**
1	60,778	40,664	**101,442**	Facilities/Log. Coord.	No position			
Total: 62 Personnel				**— Total Staff Count —**	**Total: 98 Personnel**			

[1] One of the Division Chiefs has been assigned the duties of the Fire Marshal.

Another assumption is that a certain number of FTEs will be required in various positions. Figure 198 illustrates the recommended positions by title within the consolidated single district model.

Using the number of recommended positions multiplied by the highest average compensation across districts for each position, as shown in Figure 197, yields a total FY25 personnel cost of $33,400,174. It should be noted that these compensation figures also include accrued unpaid sick leave where the IMFD average compensation is used. This is included because the forecast compares the notional single district with the adopted FY26 district budgets, and the IMFD budget includes this budget item.

Since the proposed FY26 budgets have been presented publicly, the total cost for personnel services in a single district case must be increased for FY26, the first year of a notional combined budget. An additional $30,000 has been added to the total personnel services budget (total of $33,430,174) to account for a five-person elected Board of Commissioners for a successor district.

The FY25 combined total for personnel services is $33,176,614. The difference between the two models, using FY25 figures, is $253,560, or 0.76%, of the total personnel services budget. Applying that figure to the combined district total FY26 proposed personnel services budget of $37,999,701 would give a single district FY26 cost of $38,290,122.

The model further assumes that there are sufficient additional personnel already in each uniformed job category per shift position to cover sick leave and vacation time. Personnel services combined costs are forecasted to increase annually in the status quo models at a rate of 3.5%. For consistency in comparing the two models, the single district model forecast also projects an annual increase of 3.5% in total personnel services through FY30.

Figure 198: Consolidated District Staffing Cost by Position (FY25 Estimate)

Position Title	Positions Needed[A]	Combined Total Cost
Fire Chief/Administrator	1	$388,282
Assistant Chief	1	$263,470
Deputy Chief	3	$1,030,053
Division Chief	5	$1,524,462
Fire Marshal	1	$265,126
Management Analyst	1	$224,644
Life Safety Specialist	6	$963,310
Community Relations Specialist	1	$126,111
Chief Financial Officer	1	$275,754
Finance Manager	1	$152,744
Human Resources Manager	1	$135,984
Human Resources Generalist	1	$106,759
Executive Assistant	2	$285,259
Administrative Assistant	1	$103,869
Receptionist & Receiving	1	$106,591
Information Technology Technician	1	$177,601
Facilities Technicians	2	$262,166
Battalion Chief (Shift)	6	$1,779,661
Station Captain	8	$2,021,123
Training Captain	1	$252,640
Lieutenant/Paramedics	16	$3,964,246
Engineers/Paramedics	24	$5,247,918
Firefighter/Paramedics	59	$11,202,535
Firefighter/EMTs	16	$2,539,868
TOTALS:	**160**	**33,400,174**

Although some efficiencies may be expected in the merged model, JAG's experience suggests that, at least during the first year, operating expenses in certain categories are higher than in the status quo model due to various one-time non-capital expenditures.

There are typically additional legal and other professional costs incurred along with equipment standardization, restriping/lettering of apparatus, various legacy costs, and other items that cannot be accounted for here. Therefore, the various categories of operating expenses have been increased over the combined status quo costs as follows for the initial FY26 year in the forecast:

- **Professional/Contractual**: An increase of 10% over the combined amount.
- **Communications/Freight**: No change.
- **Utilities/Insurance**: No change.
- **Repairs/Maintenance:** An increase of 10% over the combined amount.
- **Miscellaneous:** An increase of 10% over the combined amount.
- **Operating Supplies/Tools:** An increase of 10% over the combined amount.
- **Education/Training:** No change.
- **Other Services:** An increase of 10% over the combined amount.

The forecast then assumes that total operating expenses will decrease in the following year. The single district forecast then assumes that the single district will at least be comparable to the combined status quo in the second year, after which it should begin to experience some economies of scale while still increasing annually.

The average annual increases in total operating costs for FMBFD and IMFD from FY19 to FY24 have been 9.64% and 7.5%, respectively. However, as discussed in the FMBFD status quo forecast, staff stated that significant increases in operating expenses post Hurricane Ian (2022) created an abnormally higher annual rate of increase that should return to a lower rate. Specifically, operating expense totals and annual rates of change post-FY 22 are related to replacement of non-capital tools, equipment, and supplies lost or damaged during Hurricane Ian. Further, with the addition of personnel in FY 26, a significant increase in operating costs is related to training and equipping new hires. Staff indicates that the annual rate of change in the future should revert to the trend observed from FY 19-22, or approximately 6.2% annually. The single district forecast assumes that, while still experiencing increased annual costs, those increases will be 7.5% or less.

Debt service would be another item for negotiation, but it is included in the model at the full amount. Capital expenses are based upon the combined CIP amounts for each district as modeled in the status quo case previously.

Fund Balance Assumptions

Fund balance is also a subject of negotiation. However, the combined model assumes that the total fund balances carried forward by each district into FY26 are combined in the consolidated model. The forecast is based on a target total fund balance derived from assumptions similar to those used by each district. The target maintains a minimum fund balance equal to three months of recurring expenditures plus a one-month disaster reserve. Further, a capital reserve is maintained based on the combined CIPs.

Consolidated Single District Forecast

Figure 199 displays the proposed figures for FY26 and the forecast through FY30 for the consolidated single district model based on the previous assumptions.

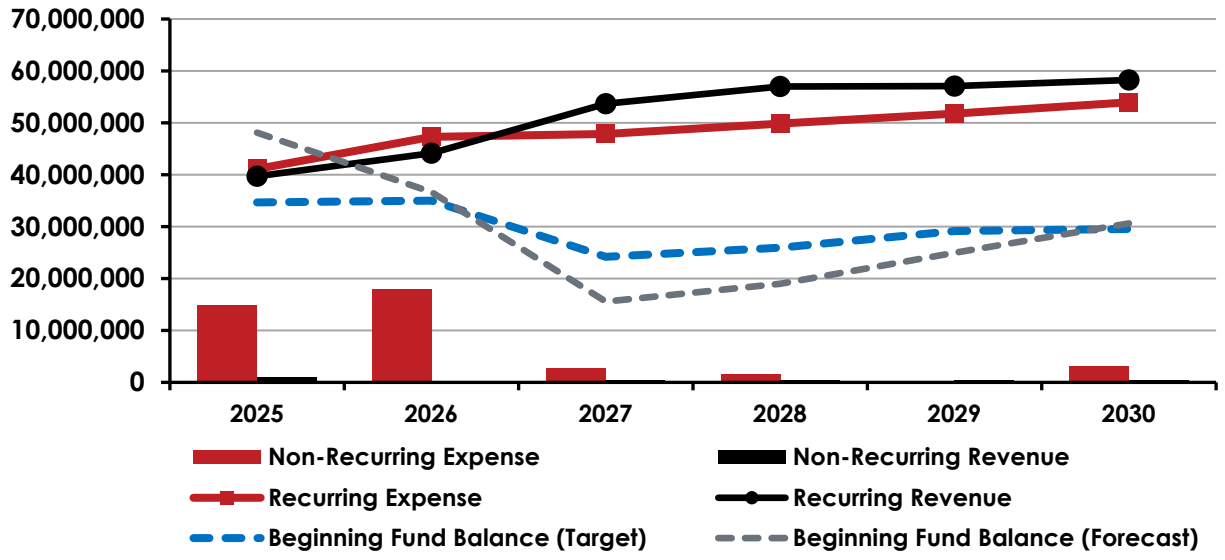
Figure 199: Consolidated Single District Five-Year Financial Forecast

Revenue & Expenses	FY2026 Forecast	FY2027 Forecast	FY2028 Forecast	FY2029 Forecast	FY2030 Forecast
District Taxable Value	**16,818,587,730**	**18,086,709,245**	**19,244,258,637**	**20,358,501,212**	**21,474,147,078**
Calculated Mill Rate	**2.6156**	**3.0000**	**3.0000**	**2.8358**	**2.7422**
Taxes	41,791,682	51,546,279	54,845,241	54,845,241	55,942,145
Other Revenue	2,354,940	2,139,108	2,157,291	2,236,287	2,318,901
Recurring Revenue	**44,146,622**	**53,685,386**	**57,002,532**	**57,081,528**	**58,261,046**
Non-Recurring Revenue	**68,427**	**430,000**	**430,000**	**430,000**	**430,000**
TOTAL REVENUE	**$44,215,049**	**$54,115,386**	**$57,432,532**	**$57,511,528**	**$58,691,046**
Personnel Services	38,255,761	39,594,713	40,980,528	42,414,846	43,899,366
Operating Expenses	8,881,932	8,097,389	8,704,693	9,357,545	10,059,361
Debt Service	166,680	166,678	166,677	-	-
Recurring Expenses	**47,304,373**	**47,858,780**	**49,851,898**	**51,772,391**	**53,958,727**
Land	—	—	—	—	—
Buildings/Improv./FF&E	14,066,283	818,205	26,308	—	186,469
Equipment	962,803	123,306	164,551	81,508	883,779
Apparatus	2,980,389	1,891,341	1,407,202	—	1,972,567
Non-Recurring Expenses	**18,009,475**	**2,832,852**	**1,598,061**	**81,508**	**3,042,815**
TOTAL EXPENSES	**$65,313,848**	**$50,691,632**	**$51,449,959**	**$51,853,899**	**$57,001,542**
Net Change Total Fund Bal.	**-21,098,799**	**3,423,754**	**5,982,573**	**5,657,629**	**1,689,504**
Beginning Fund Balance	**$36,661,499**	**$15,562,700**	**$18,986,455**	**$24,969,028**	**$30,626,656**
Ending Fund Balance	**$15,562,700**	**$18,986,455**	**$24,969,028**	**$30,626,656**	**$32,316,160**

Figure 200 summarizes the data from the preceding figures in graphical format. Recurring revenue exceeds recurring expenses from FY27–30, as the total fund balance is below the target in each of those years. However, the total fund balance is only slightly less than four months of recurring expenses in FY27 (a minimum goal) and approaches the fund balance target (including the CIP reserve level) by FY30.

As mentioned previously, this scenario is based on a set of assumptions consistent across both the status quo and consolidated district models, allowing staff and elected officials to compare the relative impacts of the two models on district taxpayers.

Figure 200: Consolidated Single District Revenue/Expenses (FY25–30)



Tax Impact & Projections of a Legal Merger

Figure 201 compares the estimated potential property tax impacts for taxpayers in each district, projected through 2030, under both the status quo and full legal merger scenarios. The rates are based on assumptions for both revenues and expenditures as discussed previously in the section on financial implications. As shown in the last two rows, FMBFD would see a slight reduction in the tax rate in the first, fourth, and fifth years of a complete merger (using FY26 as the initial year for comparison), while IMFD would see a higher tax rate each year of the forecast.

The difference between the two models is significantly smaller for FMBFD, ranging from no change in FY27/28 to slight decreases of 0.14 to 0.21 mills in FY26 and FY30, respectively. On the other hand, taxpayers in the IMFD will see increases over the status quo every year of the projection, from a high of 0.5 mills in FY27/28 to 0.12 mills above the status quo in Fiscal Year 2026.

The overall trend is toward a full merger possibly saving money over the status quo at some point in the future beyond FY30. However, modeling suggests that IMFD taxpayers would experience an increase in millage, while those in the FMBFD might see a slight reduction.

A great deal rests upon both revenue and expense assumptions. First, the assumption that fund balances are shared may not be valid and is a major subject of negotiation. Second, debt service and personnel legacy costs must be accounted for. Third, given the disparate impacts on taxpayers across districts from a full consolidation, FMBFD and IMFD may want to consider alternative strategies that still offer cost efficiencies while providing an opportunity to improve service.

Figure 201: FMBFD & IMFD Tax Rate Projections

District	2026 Forecast	2027 Forecast	2028 Forecast	2029 Forecast	2030 Forecast
Status Quo—Separate Fire Districts					
FMBFD	2.7600	3.0000	3.0000	3.0000	2.9579
IMFD	2.5000	2.5000	2.5000	2.5000	2.4886
Consolidation—Single Fire District					
FMBFD	2.6156	3.0000	3.0000	2.8358	2.7422
IMFD					
Millage Difference (Consolidated Model—Status Quo Model)					
FMBFD	**-0.1444**	**0.0000**	**0.0000**	**-0.1642**	**-0.2157**
IMFD	**0.1156**	**0.4999**	**0.4999**	**0.3357**	**0.2536**

Conclusions

From an operational perspective, JAG found no compelling reasons to merge the two districts into a single new independent fire district. Based on JAG's findings, some recommendations were made to increase collaboration between the two districts. JAG did not find that a merger would provide any significant operational benefits. When considering the industry-standard travel time for first arriving units of 4 minutes, the critical response force needed for various emergencies, and a 1.5-mile travel distance, the current fire station locations and staffing levels are appropriate. Units and staffing would not change in a merged organization.

Two operational concerns mentioned in feedback across both internal and external surveys were the loss of the CFAI fire accreditation that IMFD currently holds and the potential loss of EMS transport by FMBFD.

From a financial perspective, there were again no compelling reasons to recommend a merger. JAG projected, with various assumptions, revenue and expenses for a notional merged organization using existing personnel and service delivery levels. It was found that the merged district would experience additional costs and therefore not be beneficial. Further, although FMBFD taxpayers would experience similar millage rates to those forecast in the status quo model, IMFD taxpayers would likely see increases in millage of up to 0.5 mills over the next five years, compared to the status quo model.

The internal and external feedback results in this document also provide valuable insights into the perspectives shared by the respondents. Again, the feedback does not point to a compelling desire to merge the districts.

Like many fire service organizations, FMBFD and IMFD continually improve and evolve their operations. This report provides a snapshot of FMBFD and IMFD as of the time the information was gathered in late 2024 and early 2025. It was not possible to capture all changes that may have been made during the report's development.

Section IV:
APPENDICES

Appendix A: Stakeholder Input

Face-to-Face Meetings

Face-to-face meetings were conducted during JAG's site visit on February 18–20, 2025. A small number of stakeholders who were unable to be scheduled for these three days subsequently participated in a virtual conference call following the site visit.

Summary of Internal Face-to-Face Meetings—Key Benefits
• **Increased Funding:** A merger could create additional funding opportunities. This includes the potential for additional legislative funding and exploring new funding sources.
• **Enhanced Training:** A merger could create more training opportunities. This includes consistent and improved training across the consolidated entity.
• **Efficiencies and Resources:** A merger could yield efficiencies and improved resource utilization. This includes available resources, different knowledge bases, and the potential tax base resulting from current developments in Fort Myers Beach.
• **Improved Service Delivery:** A merger could increase service delivery and provide financial benefits. This includes better unit placement, improved response times, and better overall service for citizens.
• **Standardization:** A merger could lead to standardized equipment and procedures. This includes consistent dispatch procedures, standard operating procedures, standardizing equipment such as air packs, and consistent patient transport rules.
• **Promotional Opportunities:** A merger could provide more promotional opportunities for personnel. This includes opportunities with more specialized teams and overall career growth.
• **Logistics and Administrative Merger:** A merger could improve coordination and administrative operations. This includes addressing logistical challenges, filling positions, and administrative mergers.
• **Community and Public Education:** A merger could enhance these programs. This includes consistent plan reviews, Public Information Officer roles, and specific programs like Slumber Safe.
• **County-Wide Benefits:** A merger could benefit both agencies and their employees. This includes overall effectiveness and the potential for improved benefits, pay, and purchasing power.

Summary of Internal Face-to-Face Meetings—Key Concerns
• **Hurricane Recovery:** Concerns exist about how a merger might affect hurricane recovery efforts. This includes the ability to respond effectively to natural disasters and the potential strain on resources.
• **Legislative Challenges:** Future funding is a concern. This includes concerns about securing adequate funding for the consolidated entity and navigating the complexities of legislative processes.
• **Loss of Community Identity:** There is concern that a merger could erode community identity. This includes concerns about how individual communities' unique characteristics and needs might be overlooked in a larger, consolidated entity.
• **Funding Sources:** Additional funding sources are needed to support the merger. This includes identifying new revenue streams and ensuring the consolidated entity's financial stability.
• **Cultural Integration:** There are concerns about integrating the diverse cultures of the consolidating entities. This includes integrating existing cultures.
• **Workload and Staffing**: There are concerns about the additional workload and staffing needs that a merger might bring. This includes the need for additional administrative staff and the potential strain on existing personnel.
• **Communication and Logistics:** There are concerns related to communication and logistics. This includes the need for better district-wide communication and for addressing logistical challenges, such as merging technologies and standardizing equipment.
• **Accreditation and Leadership:** There are concerns about the potential loss of accreditation and about differences in leadership styles across the consolidating entities. This includes ensuring that the consolidated entity meets accreditation standards and effectively manages leadership differences.
• **Public and Community Perception:** Selling the idea of a merger to the public and addressing concerns about how the community will receive it are challenges. This includes the need for clear communication and addressing the concerns of residents and business owners.

Community Meetings

Two community forums, one in each district, were scheduled for the week of the JAG site visit to gather feedback and answer community questions. Attendance at these forums varied, but each included staff and elected officials from both districts, as well as members of the public. The venues varied, but the meeting format was generally the same, with an agenda based on the following topic areas:

- Introductions.
- Both districts' descriptions, including services provided, service delivery performance, and financial overview.
- Description of the merger study process.
- The importance of stakeholder feedback in the study process.
- Guided discussion.
  - Community Priorities—Which of the services provided by the fire districts are more or less important to you?
  - Concerns—What concerns might you have when considering merging these two districts?
  - Positives—What positives might you look for regarding the merger of these two districts?
  - Other Thoughts—What other ideas do you have to share regarding a merger of the districts?
- Closing remarks.

Local news and TV news media also attended both meetings. Specifics relating to these meetings are provided in Figure 202.

Figure 202: Summary of Community Meetings

Description	FMBFD	IMFD
Location	Margaritaville Beach Resort 251 Crescent Street Fort Myers Beach, FL 33931	Fire Station 74 6061 South Pointe Blvd. Fort Myers, FL 33919
Venue	Meeting Room, Beach Talk Radio Live Stream	District Meeting Room
Attendance	Six (6) in person, 20–30 on the live stream (10)	Ten (10) in person
Result Summary	In both forums, the Fire Chiefs described their districts per the agenda. The feedback, both in person and on the live stream, focused on questions about the process and when results might be expected. All questions appeared to be answered to the satisfaction of the persons inquiring.	

Online Survey (Internal)

JAG, FMBFD, and IMFD senior staff collaborated to develop an anonymous online survey. The same survey was used for members of both districts and was open from February 26, 2025, to March 14, 2025. At the survey's closing, there were 58 submissions (11 from FMBFD and 47 from IMFD). The survey included 14 items, including open-ended questions, demographics questions, and ranked questions. The responses to the questions are shown as follows.

1. **Which district are you currently employed by?**

District	Count	%
Fort Myers Beach Fire Control District	11	19%
Iona-McGregor Fire Control District	47	81%

2. **Have you ever been employed by the other district in this study?**

Response	Count	%
Yes	4	7%
No	54	93%

3. **What is your current position in your district?**

Response	Count	%
Non-Uniformed Support Staff	6	10%
Uniformed Support Staff	4	7%
Staff Officer (Days)	8	14%
Shift Officer (Shift Company Officers, Shift Commanders)	14	24%
Engineers and Firefighters (Shift)	26	45%

4. **What is your current position in your district?**

Response	Count	%
Less than One Year	3	5%
Between One and Five Years	11	19%
Between Six and Ten Years	10	18%
Between 11 and 15 Years	6	11%
Between 16 and 20 Years	8	14%
Greater than 20 Years	19	33%

5. **Understanding the details of a potential merger of the Fort Myers Beach and Iona-McGregor Fire Districts have not yet been determined, what is your current opinion?**

Response	Count	%
Strongly Oppose	9	16%
Oppose	11	19%
Neutral	17	29%
Support	15	26%
Strongly Support	6	10%

6. **In your opinion, what are the advantages/positives/strengths of the existing emergency service delivery system between the two districts?**

Comments on this question focused on the strengths of emergency service delivery systems in two districts, highlighting that their respective structures better align with their specific demographics.

Comments noted the benefits of mutual aid and closest unit responses, emphasizing the unique capabilities of each district, such as FMBFD's advanced life support and IMFD's specialized teams. The potential for greater opportunities within a larger organization is mentioned, though service delivery is expected to remain largely unchanged.

7. **What are the disadvantages/negatives/weaknesses of the existing emergency service delivery system between the two districts?**

   The responses to this question focus on various weaknesses and challenges faced by the service delivery systems between the two districts. These include operational delays for some specialized needs, such as marine rescues; differing contracts and operational standards; divergent needs; staffing challenges; and training disparities.

8. **In your opinion, what are the advantages/positives/strengths of how the two districts currently interact with each other?**

   Responses to this question focus on how the two districts collaborate effectively through established protocols, mutual aid, and a shared approach to emergency responses. Specifically mentioned was that the districts frequently run calls in each other's areas, fostering good relationships among line staff and utilizing similar equipment. Also mentioned was that, while there are minor differences in medical protocols, overall interaction is characterized by effective teamwork and reliable service delivery.

9. **What, if any, do you believe would be the advantages to merging with the other district?**

   The responses to this question focus on improving staffing, services, and operational efficiency. Specifically mentioned were improved services, operational efficiency, career advancement opportunities, financial benefits, and administrative efficiency.

10. **What, if any, do you believe would be the disadvantages to merging with the other district?**

    The concerns expressed included cultural integration issues, service changes, and operational challenges that could arise from the merger of the fire districts, as well as loss of identity, pride, and community. Responses note the potential reduction in ambulance services for Fort Myers Beach, which would affect residents and visitors, as well as a decrease in transport units and medical response service levels.

    Additional issues cited include the uncertainty surrounding pay, benefits, and seniority, as well as the increased operational costs of a larger district, which may result in higher taxes.

11. If a merger is deemed to be feasible as well as operationally and financially beneficial to the districts, what are the critical issues that you believe will need to be addressed prior to moving forward with a merger?

The responses to this question highlighted critical issues surrounding the potential merger of the fire districts, emphasizing the need for operational and financial alignment, cultural integration, standardized policies, confirmation of pay structures, and open communication. Also highlighted was the importance of addressing union contracts, insurance costs, job descriptions, seniority, and merging health benefits.

12. If a full merger of the two districts is deemed impractical or not advantageous in terms of operation or finances, what potential system improvements, shared services, or operational collaborations between the districts should be explored?

Responses to this question include potential improvements and collaborations between the two fire districts. Key suggestions include enhancing marine services, merging logistics, and improving staffing. The goal is to improve efficiency and consistency.

13. Based on your opinion, please rank the following statements.

Statement	Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree	No Opinion
The merger will improve overall response times and operational efficiency.	17.2%	17.2%	25.9%	17.2%	19.0%	3.4%
I feel confident that my job and role within the district are secure in the event of a merger.	3.4%	3.4%	19.0%	24.1%	44.8%	5.2%
The merger will have a positive impact on community safety and services.	10.3%	13.8%	20.7%	27.6%	25.9%	1.7%
I am adequately informed about the merger process and its implications for our department.	6.9%	13.8%	29.3%	27.6%	19.0%	3.4%
I believe that the merger will create new opportunities for career growth and development within the department.	3.4%	10.3%	20.7%	37.9%	24.1%	3.4%
Integrating leadership and command structures will improve operational effectiveness.	12.3%	14.0%	22.8%	22.8%	24.6%	3.5%
The merger will enhance teamwork and collaboration among FD members.	10.3%	15.5%	32.8%	20.7%	17.2%	3.4%
I trust that the merger will be managed transparently and fairly.	8.6%	8.6%	29.3%	22.4%	24.1%	6.9%
The merger will provide better access to resources and equipment.	10.3%	19.0%	25.9%	22.4%	17.2%	5.2%
District leadership has provided sufficient support during the merger discovery process.	5.2%	8.6%	32.8%	31.0%	19.0%	3.4%

14. **Please provide any other comments or feedback that you believe might add value to this study.**

    The final question responses contain internal stakeholder feedback regarding a potential merger. Employees expressed pride in their workplaces but a desire for improvements. Concerns about leadership and management practices in a merged district were highlighted. Employees emphasized the importance of addressing communication issues and morale, as well as ensuring fair job descriptions and qualifications for future promotions, to gain staff buy-in.

Online Community Survey (External)

The anonymous community online survey was collaboratively developed by JAG and the senior staff of FMBFD and IMFD. The same survey was used for the communities of both districts and was open from March 28, 2025, to April 16, 2025. At the survey's closing, there were 282 submissions (170 from FMBFD and 112 from IMFD). The survey included six items, including open-ended questions, demographics questions, and ranked questions.

The two districts distributed the online surveys using various methods. FMBFD posted the survey on their website and social media. FMBFD informed the two local media outlets, Beach Talk Radio, Fort Myers Beach Observer, and Bulletin. FMBFD believes most of its residents follow one or both media outlets for local news.

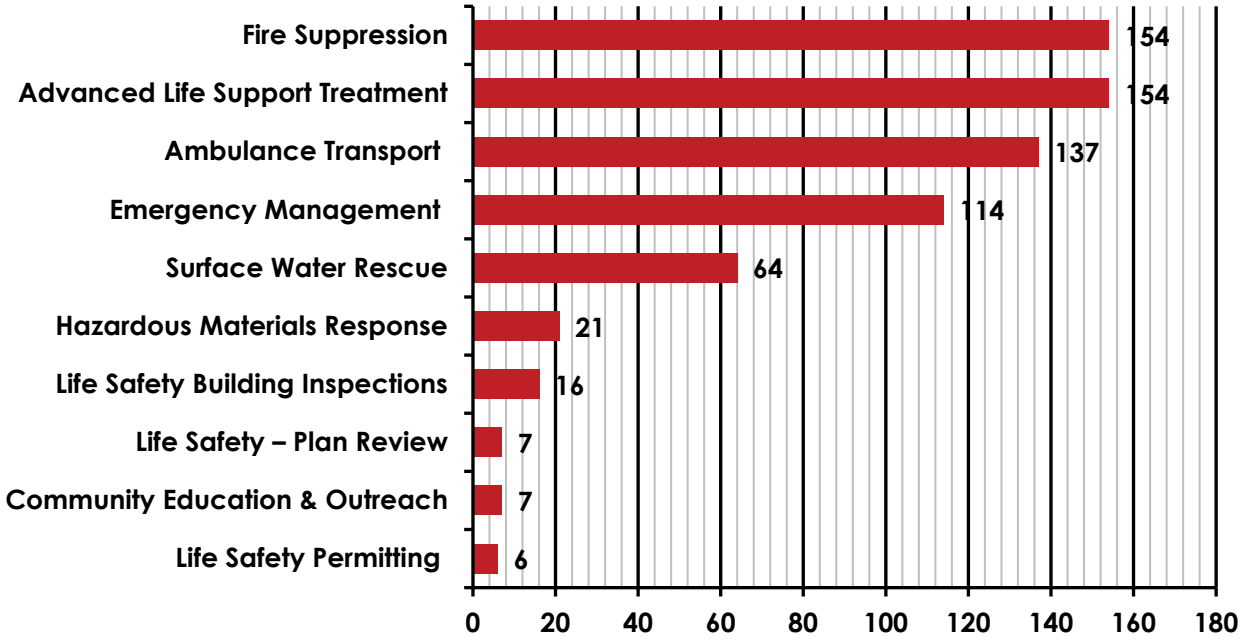
Survey information was also sent to the Fort Myers Beach Chamber of Commerce to reach the business community. The Town of Fort Myers Beach also posted the survey on its website. IMFD communicated the survey through multiple district-wide community email distributions and in-person visits to local stakeholders.

Fort Myers Beach Fire District Responses

1. **In which district are you currently a resident or business owner? (Note: If you live in one district and are a business owner in the other district, please choose the district that you reside in).**

Response	Count	%
FMBFD	170	60%

2. **Below are the services provided by the Fort Myers Beach Fire District. Please select the four that are most important to you.**



3. **Which of the following best describes your relationship with the district?**

Response	Count	%
Resident of the district	142	84%
Business owner in the district	7	4%
Both resident and business owner in the district	14	8%
Other	7	4%

4. **Positives—What benefits might you expect from merging these two districts?**

- **Cost Savings and Efficiency:** Some respondents believe that merging the districts could lead to cost savings, reduced service duplication, and better resource allocation, potentially benefiting taxpayers.
- **Tax and Cost Savings:** A recurring theme in responses is the expectation of lower taxes due to the merger, though some are doubtful of their actual realization.
- **Concerns About Service Quality:** Many participants express skepticism about the merger, stating they see no benefits or expect negative outcomes, including concerns about response times and management efficiency.

- **Shared Resources and Efficiency:** Some respondents mention the potential for shared resources and improved collaboration between districts, which could enhance service delivery during emergencies.

5. **Concerns—What concerns might you have when considering merging these two districts?**
   - **Response Time Issues:** The most frequently mentioned concern is the potential for longer response times, especially during peak tourist seasons. Residents worry that merging districts could lead to delays in emergency services, which are critical for incidents like cardiac arrest, stroke, or trauma.
   - **Loss of Local Control:** Many residents express concerns about diminished control over emergency services and potential bureaucratic inefficiencies resulting from a merger.
   - **Financial Implications:** Concerns were expressed about increased taxes and the costs of maintaining adequate emergency services are prevalent among residents.
   - **Service Availability:** There are fears that essential services currently provided in Fort Myers Beach may be compromised, leading to less effective emergency responses.
   - **Traffic-Related Delays:** The potential for traffic congestion affecting emergency response times is highlighted, especially during busy seasons.
   - **Resource Allocation:** Concerns arise that resources may be unevenly distributed post-merger, leaving some areas underserved.
   - **Fear of Job Losses:** Some residents worry that a merger could lead to job reductions among local emergency personnel.
   - **Skepticism About Efficiency:** Many believe that larger government entities tend to be less efficient, casting doubt on the merger's potential benefits.
   - **Overall Community Safety:** The overarching concern is maintaining high levels of safety and effective emergency services for Fort Myers Beach residents.

6. **Other Thoughts—What other ideas do you have to share regarding a merger of the districts?**
   - **Opposition to Merger:** Many respondents strongly oppose the merger, citing concerns over efficiency and the effectiveness of the current fire district. They believe that merging would lead to a loss of local control and potentially worsen response times.
   - **Concerns Over Costs:** There are fears that the merger could lead to higher costs for taxpayers, with some suggesting it could create unnecessary administrative positions rather than benefiting first responders.
   - **Desire for Local Control:** Many residents express a strong preference for maintaining local oversight of fire services, emphasizing the importance of familiarity with the community and its needs.
   - **Potential Benefits:** Some respondents acknowledge that a merger could provide opportunities for cost savings and improved services, but caution that it requires careful planning to avoid negative impacts on response times and coverage.
   - **Call for Research:** Consider researching response times and service effectiveness in other districts to inform the decision.
   - **Need for Communication:** Respondents emphasize the importance of transparent communication and stakeholder involvement in the merger decision-making process.
   - **General Sentiment:** Overall, the feedback reflects strong opposition to the merger, with many residents valuing the current fire district's service and expressing distrust of the proposed changes.

7. **Would you like to be contacted about this survey, the merger study, or other district related subject?**

Response	Count	%
Yes	31	18%
No	139	82%

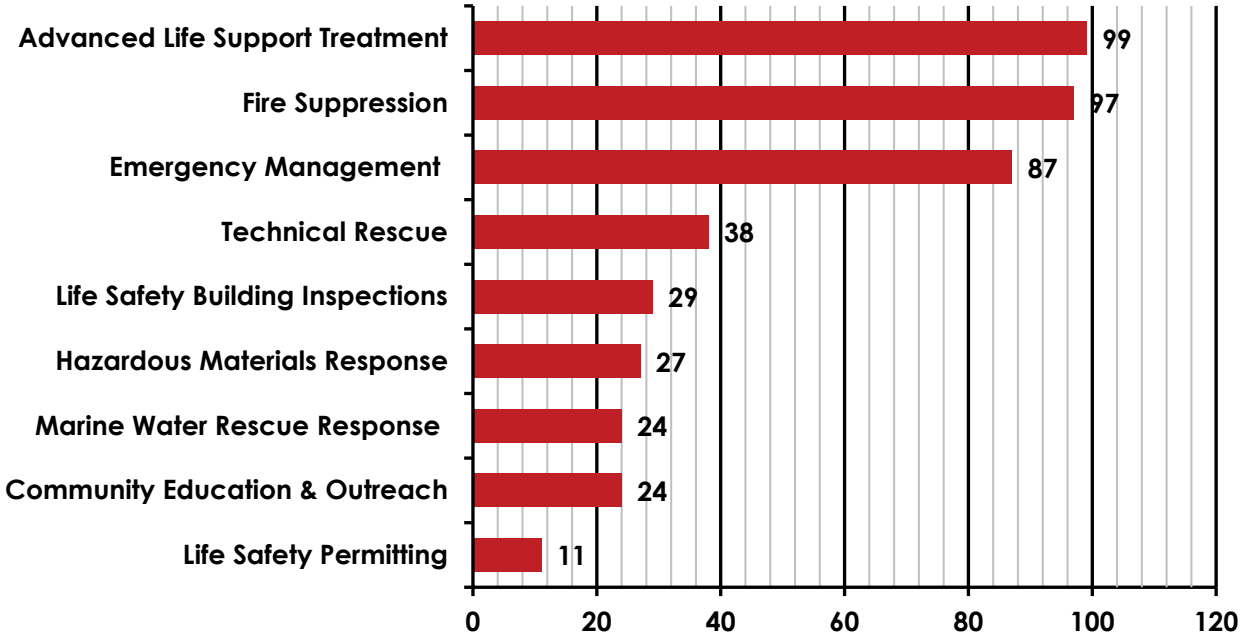
Contact information for the “Yes” submissions was provided to FMBFD staff.

Iona-McGregor Fire District Responses

1. In which district are you currently a resident or business owner? (Note: If you live in one district and are a business owner in the other district, please choose the district that you reside in).

Response	Count	%
IMFD	112	40%

2. Below are the services provided by the Iona-McGregor Fire District. Please select the four that are most important to you.



3. Which of the following best describes your relationship with the district?

Response	Count	%
Resident of the district	84	78%
Business owner in the district	10	9%
Both resident and business owner in the district	10	9%
Other	4	4%

4. **Positives—What benefits might you expect from merging these two districts?**
   - **Support for Merging:** Many respondents believe merging could lead to lower taxes, faster response times, and greater service efficiency through shared resources and economies of scale. They cite potential benefits such as faster permitting processes and improved collaboration between districts.
   - **Concerns About Merging:** A significant number of individuals expressed skepticism, arguing that merging may complicate emergency responses and dilute service quality. Some feel that existing mutual aid agreements already provide sufficient support without the need for a merger.
   - **Administrative Efficiency:** Suggestions for reducing overhead costs and streamlining operations were common, with respondents advocating eliminating duplicate services and implementing more effective management structures.
   - **Mixed Opinions:** Although there are advocates for the merger, many respondents remain unconvinced about its benefits, with some stating there are no positives to merging the districts at all.

5. **Concerns—What concerns might you have when considering merging these two districts?**
   - **Tax Implications:** Many respondents expressed concerns about higher taxes resulting from the merger, citing historical trends from previous fire district mergers.
   - **Response Time Issues:** There are fears that merging the districts could lead to slower response times, especially during peak tourist seasons or emergencies.
   - **Integration Challenges:** Concerns were raised about integrating personnel and equipment, with potential short-term issues during the transition phase.
   - **Cultural Differences:** Respondents noted significant cultural differences between the districts, which could complicate the merger.
   - **Service Loss:** Some individuals worried that merging could result in the loss of specific services offered by one district but not the other.
   - **Geographical Challenges:** It was noted that the layouts of the districts may pose challenges for emergency responses, particularly regarding traffic and distance.
   - **Compatibility of Districts:** Questions were raised about whether the two districts are compatible and if they genuinely wish to merge.

- **Potential Job Losses:** Concerns about job security arose, with some fearing that merging could lead to job reductions within the districts.
- **Financial Burdens:** Respondents expressed concerns about the financial health of the Fort Myers Beach Fire District and its potential impact on IMFD's finances.
- **Community Identity:** There is apprehension that a merger could dilute local identity and the personal connections residents have with their firefighters.

6. **Other Thoughts—What other ideas do you have to share regarding a merger of the districts?**

- **Support for Collaboration:** Many respondents express hope for improved collaboration between the two districts, emphasizing the benefits of combining resources and expertise to enhance emergency services.
- **Concerns About Efficiency and Costs:** There are significant concerns about whether the merger would lead to increased costs or reduced services, particularly regarding advanced life support transport capabilities. Residents are worried about the potential for longer response times and decreased effectiveness.
- **Cultural and Geographic Differences:** Some feedback highlights cultural and operational differences between the two districts, suggesting that a merger may not be beneficial given their distinct needs and historical contexts.
- **Communication and Transparency:** Respondents stress the importance of clear communication and transparency throughout the merger process to build community trust and ensure residents understand the benefits and implications of the change.
- **Miscellaneous Feedback:** Some respondents suggest exploring technology to optimize emergency response and streamline operations. Others propose initiating a pilot program to test collaboration before fully merging the districts.

7. **Would you like to be contacted about this survey, the merger study, or other district related subject?**

Response	Count	%
Yes	29	26%
No	83	83%

Contact information for the "Yes" submissions were provided to the IMFD staff.

Appendix B: Factors to Consider in a Merger

The following section discusses the various factors to consider in any fire district merger. Factors impacting either or both fire agencies are presented here for consideration.

Motivating Factors

When organizations were asked to list reasons for undertaking strategic restructuring (i.e., merger or consolidation), respondents most often cited internal decisions to increase their organization's effectiveness and efficiency.[48] Notwithstanding many communities' tax limitations, most perceive they have undertaken strategic restructuring to improve service quality and range.

The least frequently mentioned reason for restructuring was funding issues. Unsurprisingly, when funding was judged as a motivator, those involved in developing an intergovernmental alliance were less likely to mention it than those organizations undertaking a complete merger. Collaboration is less threatening to the fire district's autonomy than a merger. Nevertheless, recognizing imminent financial problems can cause some to take a greater organizational risk.

Municipal fire departments and fire protection districts sometimes consider collaboration or merger options when the agencies experience certain events. This may be due to a sudden interruption of the status quo, such as the loss of key leadership, a financial crisis, a rapid change in the community, or a substantial increase in service demand—any or all of which can compel significant change.

Other times, forward-thinking policymakers or fire service leaders may champion the idea. However, these same leaders frequently work against their self-interest—especially in promoting a merger. Lastly, the political or operational climate in which the fire agencies operate may dictate a change in how they do business.

[48] Amelia Kohm, David La Piana, and Heather Gowdy, *Strategic Restructuring, Findings from a Study of Integrations and Alliances Among Nonprofit Social Service and Cultural Organizations in the United States*, Chapin Hall, June 2000, page 15.

Success Factors

The success of fire district mergers depends on many things. However, in JAG's experience with mergers, cooperative agreements, and collaborations, leadership is the most important factor in determining success.

A credible key staff member or board member often champions the concept, garnering support from the various affected groups (political, labor, employees, and community). In addition, good leadership fosters an organizational culture receptive to planning, calculated risk-taking, and flexibility.

Even in the best-planned collaborative efforts, unforeseen issues may arise, errors may be made, and alternative paths may be identified.

Leaders must foster a trusting relationship among all groups and enable respectful, meaningful dialogue. For example, research by Kohm, Piana, and Gowdy identified five factors that often contribute to the successful implementation of a collaboration or merger:

- Leadership that believes strongly in collaborative partnerships demonstrates this belief—often by acting selflessly to maintain it.
- Multiple forms of communication that keep all parties (employees, elected and appointed officials, and community members) informed about plans, problems, and benefits related to the partnership.
- Consistent face-to-face communications with the collaborative partners through meetings, training, and other forums to build trust and understanding among staff.
- Flexibility through an expectation that even the best-planned collaborative efforts and partnerships may have unforeseen issues, mistakes that will be made, and alternative paths that will be identified.
- Early evidence of the potential benefits—such as better service, lower costs, and improved efficiencies—to assure everyone they are on the right track.

Potential Complications

Fire district collaborations or mergers may fail for many reasons. Sometimes, legal constraints prohibit the concept at the outset. Other times, the proposal may be doomed by unfavorable public response or the realities of finance. Aside from these issues, four major pitfalls may cause even the most feasible mergers to fail. Specifically, these are command, communication, control, and culture.

Command

Undertaking any partnership requires demonstrating consistent, courageous, and effective leadership at all levels. Policymakers and leaders must guide their respective fire districts, yet (at the same time) cooperate with the other jurisdiction.

Ineffective or perceived selfish leadership styles may tend to cause passive resistance at best and open conflict at worst. Problems with sharing control and decision-making send the wrong message to firefighters and non-sworn employees of the fire districts, which can unravel even the best proposal.

Communication

Silence or limited information from leaders about potential or upcoming collaborative efforts breeds fear, mistrust, and misinformation among affected persons. Therefore, the leadership of FMBFD and IMFD must agree to communicate actively with all affected groups. Everyone must be provided with the same information at the same time. Most importantly, leaders must demonstrate two-way communication skills by carefully listening to, considering, and strategically acting on the concerns of the affected parties.

Control

Frequently, the collaborative or merger process is compared to a marriage. As the saying goes, "Marriage is when two people become one; the trouble starts when they try to decide which one." As in marriage, merger often fails because of organizational or personal ego issues.

The tenets of leadership require that someone be in charge, but in the interest of the greater good, some in leadership positions must agree to yield power. Some who are used to operating in a control position may have trouble adjusting to new roles that require more collaboration. Unfortunately, personal sacrifice in the interest of community good may not always win out.

Culture

Two schools of thought tend to exist regarding organizational culture. The first camp views culture as implicit in social life, naturally emerging as individuals transform into social groups (tribes, organizations, communities, and nations). The second camp offers a culture that comprises distinct observable forms (language, use of symbols, customs, methods of problem-solving, and design of work settings) that people create and use to confront the broader social environment. This second view is most widely used in evaluating and

managing organizational culture. Still, the first is no less important when considering bringing two or more discrete organizations into a closer relationship.

The general characteristics of a fire district encourage the creation of a culture unique to that organization. The paramilitary structure, reliance on teamwork, and work hazards build strong bonds among members, who tend to share group behaviors, assumptions, beliefs, and values. Bringing two or more such groups together, each with cultures formed by different experiences, usually changes all organizational cultures. If the partnership is successful, no single culture will dominate the other—instead, a new culture will emerge. If the organizational cultures are incompatible, the partnership will likely fail.

Often, merger planners forget about the intangibles in the individual cultures of the affected fire districts. Leaders must be aware of the importance of these and their role in the organization's health. Attempting to eliminate those cultures to create a new culture can prevent the creation of a new organization and disrupt or destroy the positive attributes and morale.

New cultures tend to emerge naturally as firefighters, officers, and employees merge their former cultures into a single one. A new fire district's name, uniforms, patches, logo, and other organizational identifiers can help facilitate a transition to a new culture. However, previous traditions and organizational identifiers must also be recognized and honored.

Other Potential Complications

In addition to the potential issues described previously, J.K. Murphy lists other factors to consider in his article in *Fire Engineering*.[49]

- People (employees)
- Money
- Politics

[49] Murphy, J.K., "Fire Department Mergers, Mergers, and Annexations." *Fire Engineering*: Sept. 4, 2014.

People (Employees)

Culture and communication are closely related to this element. Effective leaders recognize that the most important resource in their fire district is their people. A merger that reduces the salaries and benefits of employees would only produce disgruntled, discontented staff and should be avoided. Firefighter and company officer representatives should be given a voice and role in the merger process.

However, the firefighters and other staff of each fire district have a degree of responsibility toward making a merger successful. Undoubtedly, there will be differences in culture, operational methods, and training among each agency's firefighters and company officers. Nevertheless, it will be important for members to recognize that change is inevitable and to begin developing an attitude of mutual respect.

It will be important for the firefighters and leadership to come together and determine how the members of a potential consolidated fire department or district will be represented. Firefighters are stronger together than divided. By working together and providing constructive suggestions to management, the potential for a successful merger is much greater.

Because many changes can occur in a merger, every effort should be made to ensure that employees (in all positions) are not adversely affected. During the merger, the planners should work diligently to transfer all employees to similar or better positions within the new fire agency.

In some cases, it may be necessary to "grandfather in" a few employees who do not meet the new organization's job standards. It has been JAG's experience that requiring these individuals to work toward attaining the standard will suffice in the long term.

Money

As mentioned, a common misconception in studies such as this one is that a merger will produce major cost savings for individual jurisdictions. Often, this is not the reality. The real objective of a merger is to create and achieve improved efficiencies in delivering emergency services. Efficiencies can also be found in leaner, less top-heavy leadership, increased purchasing power, station mergers, larger sources of revenue, and the ability to pass bonds and levies successfully.

Certainly, there may be ways to lower costs by reducing overhead, eliminating redundancies, merging certain administrative, support, and operational functions, and pursuing other cost-saving measures. However, the primary impetus for a merger should not be the desire to generate major cost reductions.

Politics

Not surprisingly, local politics can be a significant obstacle in collaborative or merger efforts. Political issues can occur at all levels, from firefighters to the elected officials of each fire district. To succeed, the following (and other) political questions must be addressed before moving forward with a full merger.

- Who will be the political/elected leaders of the new organization?
- How will each of the fire districts be represented?
- Do you think the Florida Legislature will approve the merger plan?
- Who will be the Fire Chief?

These may only be a few of the questions that need to be answered. FMBFD and IMFD leadership must consider all the potential political implications.

Appendix C: Initiating the Merger of Special Districts

The following section describes the processes involved in voluntarily initiating the merger of independent Special Districts created by a Special Act.

Joint Merger Plan by Resolution—Initiated by the Governing Body

The following must be included in the proposed joint merger plan:

1. The name of each special district to be merged.
2. The proposed special district's:
   a. Name.
   b. Rights, Duties, and Obligations.
   c. Territorial Boundaries.
   d. Governmental organization, insofar as it concerns elected and appointed officials and public employees, along with a transitional plan and schedule for elections and appointments of officials.
3. A fiscal estimate of the potential cost or savings resulting from the merger.
4. Each special district's assets including real and personal property, along with their current values.
5. Each special district's liabilities and indebtedness, bonded and otherwise, and the current value.
6. Terms for the assumption and disposition of existing assets, liabilities, and indebtedness of each special district (jointly, separately, or in defined proportions).
7. Terms for the common administration and uniform enforcement of existing laws within the proposed merged special district.
8. The times and places for public hearings on the proposed joint merger plan.
9. The times and places for referendums in each special district on the proposed joint merger plan, along with the referendum language, presented for approval.
10. The effective date of the proposed merger.

The resolution endorsing the proposed joint merger plan must:

- Be approved by a majority vote of the governing bodies of each special district.
- Be adopted at least 60 business days before any general or special election.

Within five business days after the governing bodies approve the resolution endorsing the proposed joint merger plan, the governing bodies must:

- Display for public inspection in at least three public places within the boundaries of each special district, or if fewer than three public places exist in any special district, display in all public places:
  - A copy of the proposed joint merger plan.
  - A descriptive summary of the plan.
- Post on a website maintained by each special district—or on a website maintained by the county or municipality in which the special districts are located—the following:
  - The proposed joint merger plan.
  - A descriptive summary of the plan.
  - A reference to the public places where a copy of the plan may be examined.
- Once each week for four successive weeks, there must be published in a newspaper of general circulation within each special district:
  - A descriptive summary of the proposed joint merger plan.
  - A reference to the public places where a copy of the plan may be examined.

The governing body of each special district must schedule one or more public hearings on the proposed joint merger plan. Each public hearing:

- Must be held on a weekday.
- Must be held at least seven business days after the day the first advertisement is published.
- Must be held jointly or separately by the governing bodies of each special district.
- Must give any interested person residing in the respective district a reasonable opportunity to be heard on any aspect of the proposed merger.

The notice of the public hearing:

- Must be published according to the notice requirements in Section 189.015, Florida Statutes: Meetings; Notice; Required Reports.
- Must provide a descriptive summary of the proposed joint merger plan.
- Must reference the public places where a copy of the plan may be examined.

After the final public hearing, the governing bodies of each special district may amend the proposed joint merger plan if the amended version complies with the notice and public hearing requirements previously summarized. Then, the governing bodies may:

- Approve a final version of the joint merger plan (must occur within 60 business days after the final hearing) or
- Decline to proceed further with the merger.

If each governing body approves the final version of the joint merger plan, each governing body must notify the supervisors of elections (in each applicable county where the district is located) of its adoption of the resolution.

The elections supervisors will schedule a separate referendum for each special district. The referenda may be held in each special district on the same or different days, but no more than 20 days apart.

Notice of a referendum on the merger must be provided pursuant to the notice requirements in Section 100.342, Florida Statutes: Notice of Special Election or Referendum. At a minimum, the notice must include:

1. A summary of the resolution and joint merger plan.
2. A statement about where a copy of the resolution and joint merger plan may be examined.
3. The names of each special district to be merged and a description of their territory.
4. The times and places at which the referendum will be held.
5. Such other matters as may be necessary to call, provide for, and give notice of the referendum and to provide for the conduct thereof and the canvass of the returns.

The referenda must be held in accordance with the Florida Election Code and may be held under Section 101.6101–101.6107, Florida Statutes. Each respective special district shall bear all costs associated with the referenda.

The ballot question in such a referendum must be in substantially the following form:

- Shall (name of special district) and (name of special district or special districts) be merged into (name of newly merged independent district)? Yes/No.

If the special districts proposing to merge have disparate millage rates, the ballot question in the referendum must be in substantially the following form:

- Shall (name of special district) and (name of special district or special districts) be merged into (name of newly merged independent district) if the voter-approved maximum millage rate within each independent special district will not increase absent a subsequent referendum? Yes/No.

The ballots must be counted, returns made, canvassed, and results certified, as in other elections or referenda, for the special district.

The merger may not take effect unless a majority of the votes cast in each special district favor it. If one of the special districts does not obtain a majority vote, the referendum fails, and the merger does not take effect. The merger process may not be initiated for the same purpose within two years after the referendum date.

If the merger is approved, the process described in Approval of the Joint Merger Plan or Elector-Initiated Merger Plan will apply.[50]

[50] https://floridajobs.org/docs/default-source/2015-community-development/community-assistance/sdap/florida-special-district-handbook.pdf?sfvrsn=edd52eb0_1

Appendix D: Sample Data Outlier Policy

The fire district has established a series of thresholds for including data in ongoing analyses of fire district operations. The purpose of these thresholds is to identify data outliers and exclude them from analysis designed to assist the organization in discerning trends and operations. Anomalous data makes that process more difficult. These will include, but are not limited to:

- The upper threshold for first-unit emergency response times in the jurisdiction, under normal operating conditions and without staging, is 20 minutes.
- The on-duty Battalion Chief or company officer shall ensure that, for any response time exceeding 10 minutes that meets the criteria above, the stated reason for or explanation of the response time is documented in the report.
- Any response time greater than 15 minutes and meeting the criteria above, including those values outside the 20-minute threshold, shall be documented with an explanation of the response time and a determination as to whether the causes are correctable.
- If the cause of the outlier is correctable, the Battalion Chief or company officer shall determine what action should be taken and who will be responsible.

Appendix E: Lee County Fire Training Center Inventory

As presented in this report, options for collaboration have been presented that might be of value to FMBFD and IMFD. One of the functions that was analyzed was the availability of fire training centers. For this analysis, information from FMBFD was reviewed, and an online survey was developed and deployed to fire departments and training centers in Lee County. The following are the results of this analysis.

Lee County Fire District Training Facility Inventory (Online Survey)

This 25-question survey (the actual number of questions answered depended on how other questions were answered) was developed by the JAG team in collaboration with staff from FMBFD and IMFD. The survey was active for 25 days and had an average completion time of just over 6 minutes across 11 completions.

Fire District/Department/Training Centers

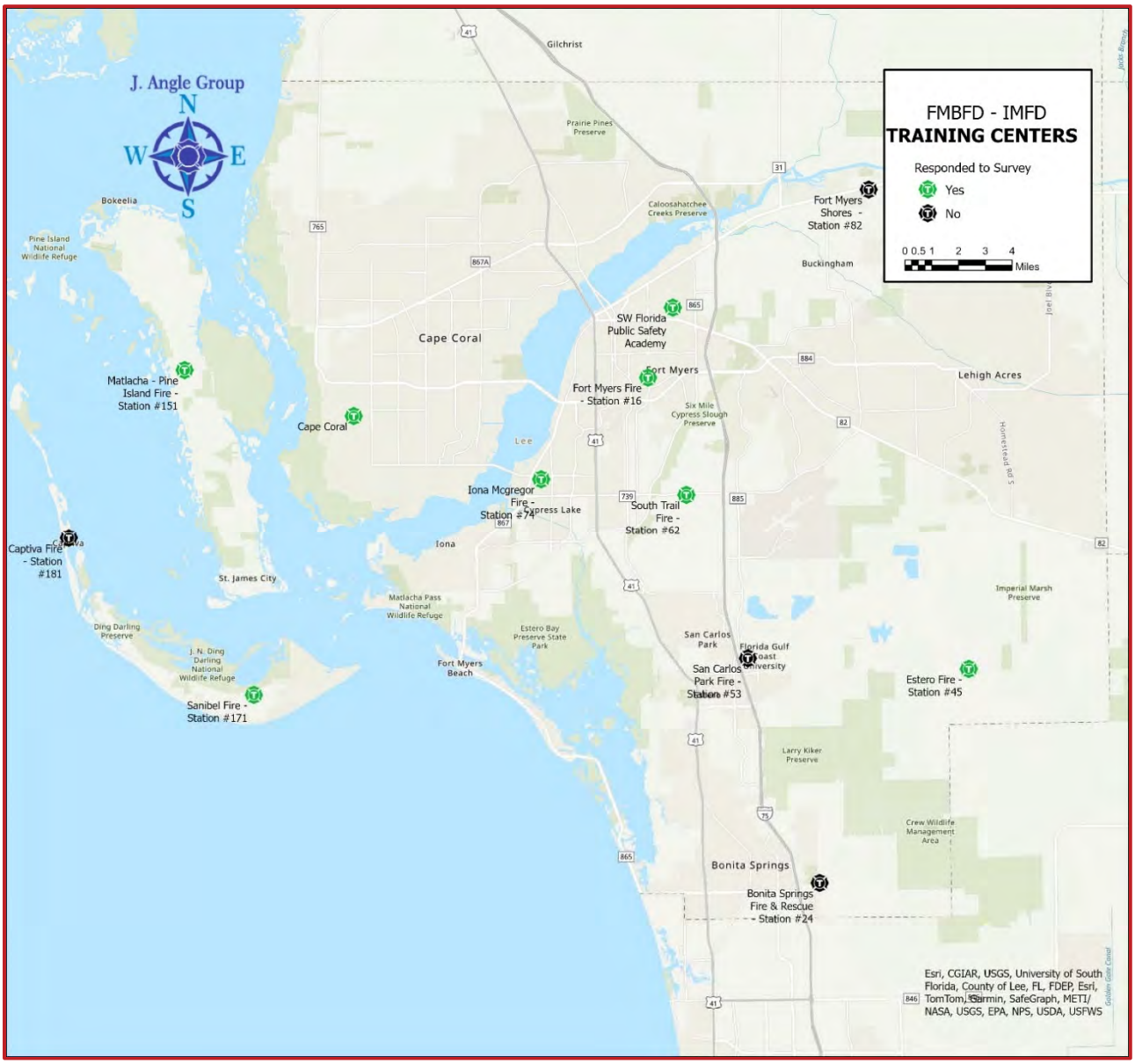
Of the 11 responses, eight agencies reported owning and operating a training center at some level. Figure 203 is a summary of these responses.

Figure 203: Survey Participants

Agency Name	Operates a Training Center
City of Cape Coral	Yes
City of Fort Myers	Yes
Estero Fire Rescue District	Yes
Fort Myers Beach Fire Control District	No
Iona-McGregor Fire Protection and Rescue Service District	Yes
Lehigh Acres Fire Control and Rescue District	No
Matlacha/Pine Island Fire Control District	Yes
Sanibel Fire and Rescue District	Yes
South Trail Fire Protection and Rescue Service District	Yes
Southwest Florida Public Safety Academy	Yes
Useppa Island Fire Control District	No

In addition to the survey responses, information from FMBFD identified four additional training centers. Figure 204 summarizes the training centers identified and whether they responded to the survey.

Figure 204: Fire Training Centers in Lee County (2025)



Existing Training Center Capabilities

Each of the training centers that responded to the survey or were identified in the FMBFD data has some level of capabilities at its center. This ranged from basic props to full live-fire training capabilities.

Figure 205 describes the capabilities while Figure 206 summarizes the capabilities of each training center.

Figure 205: Training Capabilities

Structural Props (SP): Simulated buildings or rooms that replicate residential, commercial, or industrial spaces. Fire-resistant walls, ceilings, and doors to mimic real-life conditions.
Vehicle Props (VP): Cars, trucks, or even aircraft replicas for vehicle-related fire training. Includes setups for rescue and extrication scenarios.
Live Fire Props (LF): Burn chambers or controlled fire setups designed to simulate fire conditions safely. This can include propane or natural gas-fed fire props for repeatable training. NFPA Complaint as applicable.
Smoke Simulation Props (SS): Smoke generators or fog machines to create low-visibility environments.
Technical Rescue Props (TR): Mannequins for rescue and evacuation drills. Props simulating confined-space, below-grade, or high-rise rescue scenarios.
Hazmat Props (HP): Tools for hazardous material spill simulations and containment exercises. Includes chemical containers and leak simulation setups.
Wildfire Props (WP): Outdoor setups for simulating brush or forest fire conditions. This can include controlled environments for practicing containment lines.
Electrical and Gas Fire Props (UP): Simulated electrical panels and gas valves for practicing fire suppression in utility-related scenarios.
Computer-Based Incident Simulation Classroom (CB): An incident simulation classroom is a specialized training environment designed to prepare individuals for managing emergency situations through realistic, computer-generated scenarios.
Driving Pad (DP): A large, paved area for heavy and light emergency vehicle driver training.
Marine/Water Rescue (MR): Specialized equipment designed to simulate real-life rescue scenarios in aquatic environments.
Meets Requirements for ISO Facility Training: A fire training facility should include a **three-story training tower** on at l**east two acres of property**. The facility must include features such as a **burn room**, a **smoke room, or burn props** to simulate realistic fire scenarios.

Figure 206: Training Centers & Capabilities

Agency	SP	VP	LF	SS	TR	HP	WP	UP	CB	DP	MR	ISO
City of Cape Coral	X		X	X	X			X		X		X
City of Fort Myers	X		X	X	X	X						X
Estero Fire Rescue District	X	X	X	X	X			X				X
Iona-McGregor Fire Protection & Rescue Service District	X			X	X	X			X			
Matlacha/Pine Island Fire Control District	X											
Sanibel Fire & Rescue District	X			X					X	X		
South Trail Fire Protection & Rescue Service District	X			X								
Southwest Florida Public Safety Academy	X	X	X	X	X	X	X	X				X

Of the eight training centers, four meet the requirements for ISO facility training. None of the training centers reported having marine/water rescue props.

In addition to the centers and capabilities listed in Figure 206, the Bonita Springs Fire Control and Rescue District operates a training center that includes live fire capabilities, hazardous materials training, and special operations training. The facility is available and is used by other districts in the region.[51]

Future Training Center Capabilities

Based on the surveys, two districts plan to build training centers within the next three years. These agencies and the planned capabilities are summarized in Figure 207.

Additionally, IMFD is exploring rezoning the five acres owned by the district behind Station 73 to accommodate a training facility with live burn capabilities. Hurricane Ian halted the planning for the time being. Potentially, rezoning would also have been a challenge.

[51] www.bonitafire.org/

Figure 207: Future Training Centers & Their Capabilities

Agency	SP	VP	LF	SS	TR	HP	WP	UP	CB	DP	MR	ISO
Fort Myers Beach Fire Control District	X		X	X					X			
Lehigh Acres Fire Control & Rescue District	X	X	X	X	X			X		X		X

Upon completion of these facilities, there will be five training centers that meet the ISO facility training requirements, or six if the Bonita training center is ISO-compliant.

Other Survey Questions

- The types of live fire props for structural fire simulation are:
  - Two are fixed buildings.
  - Two are Conex-type boxes arranged to simulate a building.
- Are you willing to allow other districts to utilize the facility? If yes, under what terms?
  - Yes.
  - Yes, but this would be determined on a case-by-case basis.
  - Yes, has to be coordinated and follow all safety policies.
  - Yes, times must be scheduled, and instructors from those departments must be provided.
  - Yes, we commonly allow others to use it upon request. We typically have liability waivers signed.
  - Yes.
  - Yes. Signed release of liability.
- Which district's training center do you use if your facility lacks certain capabilities or if you do not have a facility at all?
  - Five agencies in the survey reportedly use Bonita Springs Fire Control and Rescue District.
  - One agency in the survey reportedly uses Estero Fire Rescue District.
  - Two agencies in the survey reportedly use Iona-McGregor Fire Protection and Rescue Service District.

  - Four agencies in the survey reportedly use Southwestern Florida Public Safety Academy.
  - One agency in the survey reportedly uses the City of Fort Myers.
- How do you manage district coverage when on-duty units are out of the district for training?
  - Backfill/OT or work with neighboring mutual aid agencies.
  - Unit is OOS.
  - Various methods, depending on the nature of the event and the level of interagency cooperation.
  - We have enough units to take some out of service just for training. We need no mutual aid coverage.
  - We call in staff for overtime.
  - We have moved the apparatus for coverage of the station that is being sent.
  - OT/Backfill.
  - One station stands by to cover calls for service.
  - We are usually able to cover our district with one to two units out for training.

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