

South County Regional Water and Wastewater Municipal Services Review and Sphere of Influence Update



Public Draft

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- Alderpoint County Water District
- Briceland Community Services District
- Garberville Sanitary District
- Miranda Community Services District
- Phillipsville Community Services District
- Redway Community Services District
- Resort Improvement District #1
- Weott Community Services District

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1.0 MSR/SOI BACKGROUND

The Humboldt Local Agency Formation Commission (LAFCo) is preparing this Municipal Service Review (MSR) and Sphere of Influence (SOI) update for water and wastewater service providers in the southern portion of Humboldt County following the requirements of State law and LAFCo policies. LAFCo acts as the countywide oversight agency that coordinates logical and timely changes to local government boundaries. A primary objective for this MSR is to provide a recommendation for the SOI of the following agencies covered in this report:

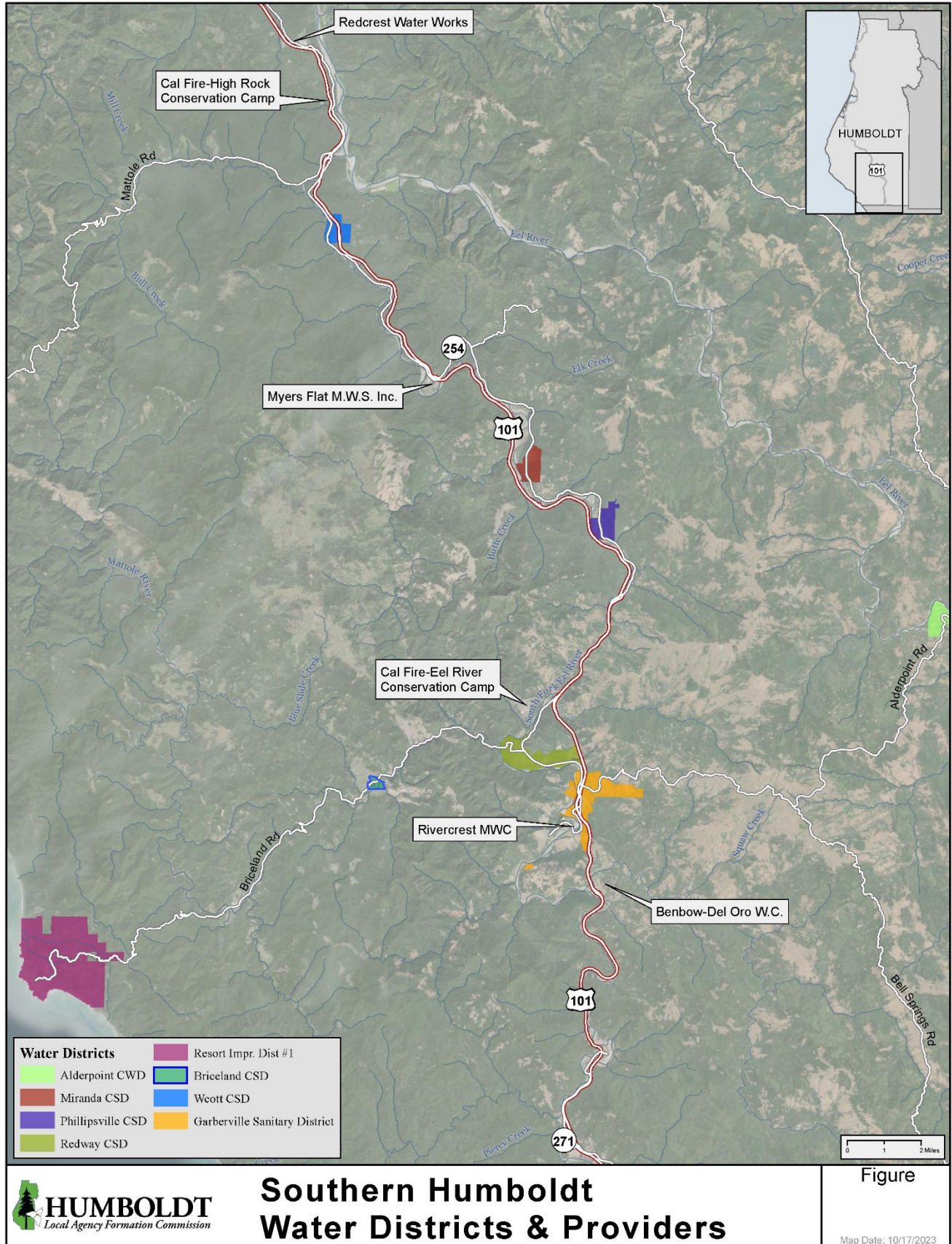
- Alderpoint County Water District
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In addition to the agencies listed above, there are several Community Water Systems in the region that are most often associated with a small water company or mobile home park and not associated with a special district. The State Water Board (Drinking Water Division) oversees water systems that serve 15 or more service connections or 25 people daily for at least 60 days out of the year. Humboldt County Environmental Health (Land Use Division) regulates smaller systems under the State Small Water Systems Program, which serves water to 5 to 14 service connections and fewer than 25 people daily for at least 60 days out of a year. While not covered by this MSR, the following Community Water Systems are located in the South County region:

Table 1-1: Non-District Community Water Systems

Name	Pop. Served	Service Connec.	Primary Source	Water Source
Del Oro Water Company – Benbow District (CA1200671)	399	113	Surface Water	East Branch S. Fork Eel River
Eel River Conservation Camp – CAL FIRE (CA1210800)	180	1	Surface Water	Eel River Infiltration Gallery
High Rock Conservation Camp – CAL FIRE (CA1210801)	80	1	Surface Water	Matthews Creek
Myers Flat Mutual Water System, Inc. (CA1200538)	330	100	Ground Water	2 active wells
Palomino Estates Mutual Water Company (CA1206002)	64	19	Surface Water	Eel River Infiltration Gallery
Redcrest Water Works (CA1200544)	116	35	Surface Water	Chadd Creek
Rivercrest Mutual Water Company (State Small System)	17	7	Surface Water	S. Fork Eel River

Figure 1-1: Water Districts and Providers in Southern Humboldt



Sources: Boundaries - Humboldt County GIS, Roads - US Census TIGER, Rivers - CAFRAP

Water service providers in rural areas often face unique obstacles in the provision of services including remote service areas with limited population, alternative conveyance systems, limited storage capacity for fire response, limited technical staff, lack of funding, aging infrastructure, and more. This MSR will take a systems approach to review the current level of services and identify potential areas of opportunity to increase efficiency and resiliency in the region. This report is organized as follows:

- A background section with additional discussion of LAFCo responsibilities, the legal requirements of MSR and SOI updates, and the methodology and data sources used.
- A summary section with an overview of the County, a brief discussion of current or potential drought, earthquake, and wildfire impacts, and a summary of MSR findings.
- Agency profiles including service reviews for each agency within the study area and recommended SOI changes where applicable.

1.1 ROLE AND RESPONSIBILITY OF LAFCO

LAFCOs are independent regulatory commissions that were established by the State legislature in 1963 to encourage the orderly growth and development of local governmental agencies including cities and special districts. Today, there is a LAFCo in each of California's 58 counties. Humboldt LAFCo is a seven-member commission comprised of two members of the Humboldt County Board of Supervisors, two City Council members, two Special District representatives, and one Public Member-At-Large. The Commission also includes one alternate member for each represented category.

LAFCo is responsible for implementing the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 ("CKH Act") (California Government Code Section 56000 et seq.) for purposes of facilitating changes in local governmental structure and boundaries that fosters orderly growth and development, promotes the efficient delivery of services, and encourages the preservation of open space and agricultural lands. Some of LAFCo's duties include regulating jurisdictional boundary changes and the extension of municipal services. This includes city and special district annexations, incorporations/formations, consolidations, and other changes of organization. LAFCo seeks to be proactive in raising awareness and building partnerships to accomplish this through its special studies, programs, and actions.

The CKH Act outlines requirements for preparing MSRs for periodic SOI updates. MSRs and SOIs are tools created to empower LAFCo to satisfy its legislative charge of "discouraging urban sprawl, preserving open space and prime agricultural lands, efficiently providing government services, and encouraging the orderly formation and development of local agencies based upon local conditions and circumstances" (§56301). CKH Act Section 56301 further establishes that "one of the objects of the commission is to make studies and to obtain and furnish information which will contribute to the logical and reasonable development of local agencies in each county and to shape the development of local agencies so as to advantageously provide for the present and future needs of each county and its communities." SOIs therefore guide both the near-term and long-term physical and economic growth and development of local agencies, and MSRs provide the relevant data to inform LAFCo's SOI determinations.

1.2 PURPOSE OF MUNICIPAL SERVICE REVIEWS

As described above, MSRs are designed to equip LAFCo with relevant information and data necessary for the Commission to make informed decisions on SOIs. The CKH Act, however, gives LAFCo broad discretion in deciding how to conduct MSRs, including geographic focus, scope of study, and the identification of alternatives for improving the efficiency, cost-effectiveness, accountability, and reliability of public services. The purpose of a MSR in general is to provide a comprehensive inventory and analysis of the services provided by local municipalities, service areas, and special districts. A MSR evaluates the structure and operation of the local municipalities, service areas, and special districts and discusses possible areas for improvement and coordination. While LAFCos have no direct regulatory authority over cities and special districts, MSR's provide information concerning the governance structures and efficiencies of service providers – and may also serve as the basis for subsequent LAFCo decisions. The MSR is intended to provide information and analysis to support a sphere of influence update. A written statement of the study's determinations must be made in the following areas:

- (1) Growth and population projections for the affected area.
- (2) Location and characteristics of any disadvantaged unincorporated communities within or continuous to the sphere of influence.
- (3) Present and planned capacity of public facilities, adequacy of public services, and infrastructure needs or deficiencies.
- (4) Financial ability of the agency to provide services.
- (5) Status of and opportunities for shared facilities.
- (6) Accountability for community service needs, including governmental structure and operational efficiencies.
- (7) Any other matter related to effective or efficient service delivery, as required by Commission policy.

This MSR is organized according to these determinations listed above. Information regarding each of the above issue areas is provided in this document.

1.3 PURPOSE OF SPHERES OF INFLUENCE

In 1972, LAFCos were given the power to establish SOIs for all local agencies under their jurisdiction. As defined by the CKH Act, "'sphere of influence' means a plan for the probable physical boundaries and service area of a local agency, as determined by the commission" (§56076). All boundary changes, such as annexations, must be consistent with an agency's SOI with limited exceptions.

Pursuant to Humboldt LAFCo policy, a MSR is conducted prior to or in conjunction with its mandate to review and update each local agency's sphere of influence every five years or as necessary. The MSR process is intended to inform the Commission as to the availability, capacity, and efficiency of local governmental services prior to making SOI determinations.

LAFCo is required to make five written determinations when establishing, amending, or updating an SOI for any local agency that address the following (§56425(c)):

- (1) The present and planned land uses in the area, including agricultural and open space lands.
- (2) The present and probable need for public facilities and services in the area.
- (3) The present capacity of public facilities and adequacy of public services that the agency provides or is authorized to provide.
- (4) The existence of any social or economic communities of interest in the area if the commission determines that they are relevant to the agency.
- (5) For an update of an SOI of a city or special district that provides public facilities or services related to sewers, municipal and industrial water, or structural fire protection, the present and probable need for those public facilities and services of any disadvantaged unincorporated communities within the existing sphere of influence.

Service reviews may also contain recommendations for SOI or government structure changes needed to implement positive service changes. Where more detailed analysis of service options is necessary, service reviews may contain recommendations for special studies where there is the potential to reduce service gaps and improve service levels.

1.4 DISADVANTAGED UNINCORPORATED COMMUNITIES

SB 244 (Chapter 513, Statutes of 2011) made changes to the CKH Act related to disadvantaged unincorporated communities, including mandating the incorporation of an SOI determination focusing on the topic. A disadvantaged unincorporated community (DUC) is defined as an inhabited territory containing 12 or more registered voters, where the median household income of the area is less than 80 percent of the State of California's median household income. Pursuant to Section 56425(c) of the CKH Act, DUCs are acknowledged as social and economic communities of interest for making SOI determinations.

1.5 REVIEW METHODS

The following information was considered in the development of this service review:

- Agency-specific data: responses to LAFCo Requests for Information
- Demographic data: U.S. Census Bureau; Department of Finance; Department of Water Resources
- Finances: budgets and audits; State Controller's Office
- Personal Communications with District staff and Boards

Information gathered was analyzed and applied to make the required determinations. All information gathered for this report is filed by LAFCo for future reference.

1.6 CALIFORNIA ENVIRONMENTAL QUALITY ACT

The California Environmental Quality Act (CEQA) is contained in Public Resources Code §21000 et seq. Public agencies are required to evaluate the potential environmental effects of their actions. MSR's are statutorily exempt from CEQA pursuant to §15262 (feasibility or planning studies) and categorically exempt pursuant to CEQA Guidelines §15306 (information collection). CEQA requirements are applicable to SOI Updates. The CEQA lead agency for SOI Updates is most often LAFCo, unless an agency has initiated an SOI expansion or update.

2.0 REGIONAL CHARACTERISTICS

2.1 TRIBAL LANDS

Humboldt County is rich in tribal history due to its remote, hard to access location and varied topography. Within the geographical boundary of Humboldt County there are ancestral tribal lands for numerous peoples including the Bear River Band, Chilula, Hoopa, Karuk, Lassik, Mattole, Nongatl, Sinkyone, Tsnugwe, Wailaki, Whilkut, and Wiyot. A brief overview of each tribe located in the south county area is given below.

Sinkyone

The Indigenous Peoples of the southern Humboldt region have occupied it for nearly 8,000 years¹. The ancestral tribal lands of the Sinkyone, or “Sinkikok” in the Sinkyone language², extend from the main stem of the Eel River down to the South Fork Eel River, as well as extending from the Eel River in the east to the ocean in the west³. During the summer, the Sinkyone people would travel westward to the ocean. The coast provided cool ocean air, as well as a harvest of fish, seaweed, acorns, roots, seeds, nuts, bulbs, and berries².

The discovery of gold halted much of the Sinkyone's way of life. This forced a new era of extermination and assimilation on the Sinkyone people and other tribes in the region. The Sinkyone land was eventually used by big timber companies to log much of the redwoods and Douglas firs².

In 1997, 3,900 acres of land was sold to the InterTribal Wilderness council. The council, under a conservation easement, established the Intertribal Sinkyone Wilderness Park. The park is used by local Indigenous Peoples for conservation of cultural and natural resources³.

Lassik

The ancestral tribal lands of the Lassik, or “Las'-sik” named after their last chief⁴, are located near the community of Alderpoint. The Lassik People are a part of the Athapascan family, which also includes the Sinkyone and Kuneste People⁵. The Lassik's land extends from Ruth Lake down to the North Fork Wilderness, as well as extending from the North Yolla Bolly Mountains in the east to the South Fork Eel River in the west. Their homes were built in a conical form from the bark of the Douglas spruce⁴. Numerous villages were documented along Dobbyn Creek and the Eel River to the north of Alder Point⁶.

As with most indigenous tribes, contact with European settlers halted the Lassik People's way of life and nearly eliminated them. However, there are a few families that still reside on their ancestral land⁴.

¹ James Roscoe, M.A., A Cultural Resource Investigation Report for Free Range Holdings. Accessed March 29, 2022 from Print.

² Trust for Public Land, Return of the Sinkyone – Land and People. Accessed on March 29, 2022 from <https://www.tpl.org/magazine/return-sinkyone%E2%80%94landpeople>

³ California Department of Parks and Recreation, History: Native People. Accessed on March 29, 2022 from https://www.parks.ca.gov/?page_id=28172

⁴ Access Genealogy, Lassik Tribe. Accessed March 29, 2022 from <https://accessgenealogy.com/california/lassik-tribe.htm>

⁵ Access Genealogy, Athapascan Family. Access March 29, 2022 <https://accessgenealogy.com/native/athapascan-family.htm>

⁶ Baumhoff, Martin A. Anthropological Records 16:5 – California Athabascan Groups. University of California Press Berkeley and Los Angeles, 1958.

Mattole

The Mattole people spoke a dialect of Athabaskan and lived up and down the Mattole River and its tributaries. The people primarily lived in simple family units that moved from location to location depending on food source availability. During certain times of the year they would gather in larger village areas to rely on stored food and hunting. While the Mattole generally stayed close to the river and coastline as salmon was a food staple, hunting and gathering did take place in the nearby hills, especially during the tanoak acorn harvest⁷.

Wailaki

The Wailaki are considered a portion of the greater Athapascan group. They generally occupied the North Fork Eel River valley and the main Eel River valley from Round Valley to Kikawaka Creek⁸. Many villages existed along the edges of the river and its tributaries including dozens of winter homes. People living in these villages would hunt elk, fish the streams, and gather from the abundant natural resources in the area including nuts, seeds, berries, roots, wild vegetables, and more. They had many political factions, each led by a chieftain, and a robust oral history that detailed events of various places such as where a young woman was refused by the man she loved and turned to stone.

Nongatl

The Nongatl (or Nung-kah-hal) occupied portions of the Van Duzen River basin which is a major tributary to the Eel River. The river runs along present day Highway 36 and joins the Eel River just south of Fortuna. The Nongatl utilized fire to harvest grasshoppers, drive game, and enhance the crop of wild grass seed in the area. They utilized two different types of dwellings including conical fir bark homes for the winter months and square brush enclosures for the summer months. They used weirs, traps, eel baskets, and spears to catch fish in the rivers which they dried for use during the winter months⁹. They also gathered acorns, seeds, fruits, and other foods to sustain them through the winter.

2.2 HUMBOLDT COUNTY POPULATION

Humboldt County was established in 1853 and was included in the 1860 census. The area of the county was much smaller at the time and had a recorded aggregate population of 2,694¹⁰. Since the 1970's, the county has seen steady population growth and the current population is approximately 136,463 according to the 2020 decennial census. Like most areas in the state, the highest population growth occurred from 1940 to 1960 (Figure 2-1). During this time the population of the county more than doubled from 45,812 to 104,892. From 2000 to 2010 the county saw a smaller population increase of approximately 6% which further declined to just over 1% from 2010 to 2020.

⁷ Cooskey, L. W. (2004). So... what happened to the Natives here? *The Journal of the Mattole Valley Historical Society*, 6(1), 4-5

⁸ Goddard, P.E.

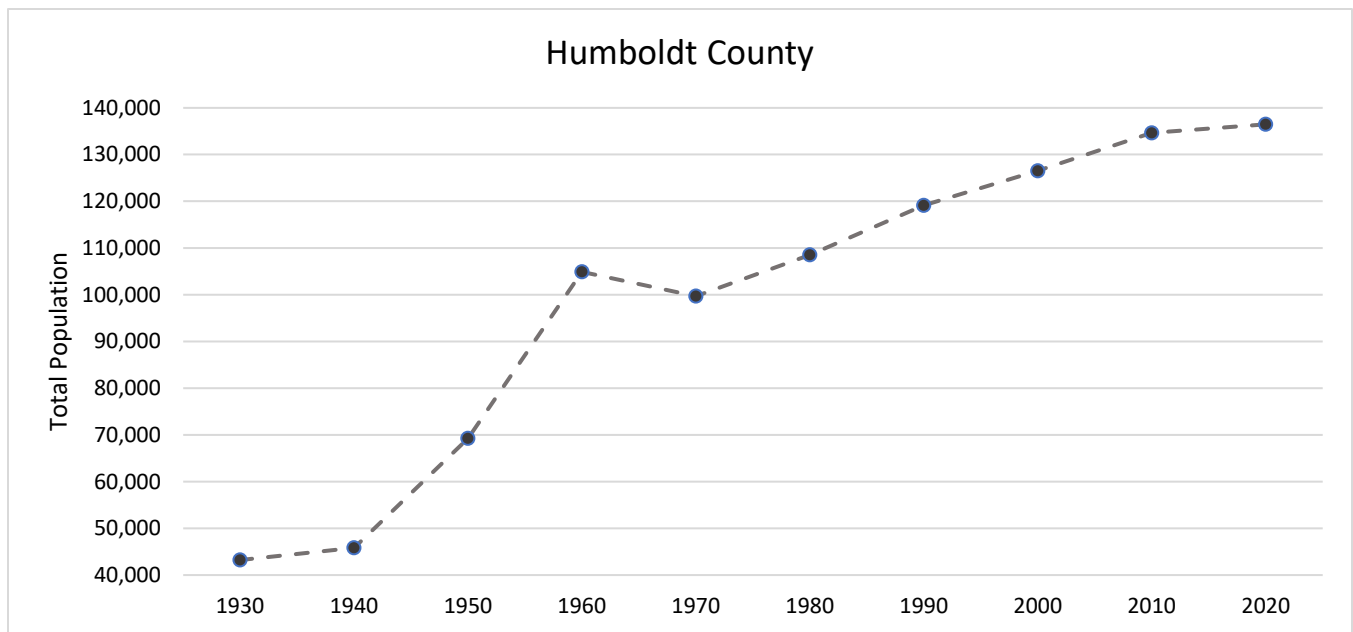
⁹ Weigel, Lawrence E., Pre-Contact Cultural Ecology of the Nongatl Indians of Northwestern California. *Humboldt Journal of Social Relations*, Vo. 4, No. 1, Perspectives on American Society, 1776-1976 (Fall/Winter 1976), pp. 55-63. Accessed from <https://www.jstor.org/stable/44011700> on February 27, 2023.

¹⁰ Kennedy, Joseph C. G. – Superintendent of Census. Population of the United States in 1860 Compiled from the Original Returns of the Eighth Census. State of California Table No. 2 – Population by Color and Condition. Washington Government Printing Office 1864.

Table 2-1: Historical Population Data for Humboldt County & Select CDPs

Year	Humboldt County	Alderpoint CDP	Benbow CDP	Garberville CDP	Leggett CDP	McKinleyville CDP	Miranda CDP	Myers Flat CDP	Phillipsville CDP	Redcrest CDP	Redway CDP	Shelter Cove CDP	Weott CDP
2020	136,463	137	422	818	77	16,262	441	90	124	61	1,247	803	219
2010	134,623	186	321	913	122	15,177	520	146	140	89	1,225	693	288
2000	126,518					13,599					1,188		
1990	119,118					10,749					1,212		
1980	108,514					7,772					1,094		
1970	99,692												
1960	104,892												
1950	69,241												
1940	45,812												
1930	43,233												

Figure 2-1: Decennial Census Data for Humboldt County



Population growth projections are prepared for the state and its counties by the State Department of Finance (DOF) and were last published in July 2023, with a 2019 baseline. The DOF projects that the county population will decline at an average annual rate of approximately minus 0.4 percent per year between 2023 and 2043 and continue to decline thereafter. This decline is based on the County's annual out-migration exceeding its in-migration and having an aging population, combined with annual deaths exceeding new births. However, DOF projections do not include other factors that could influence local or regional population changes, such as the recently reported Covid-19/telework out-migration from urban areas, possible future movements from congested areas such as the San Francisco Bay Area to less populated areas, and movements from rural areas to more urban areas. The DOF

projections also do not reflect potential changes to regional economic conditions, such as the planned growth at Cal Poly Humboldt or wind energy related industrial development on the Samoa Peninsula, which could also influence future population growth.

For the purposes of this review, a minimal growth rate of 0.2 percent will be used which is consistent with the growth rate shown in unincorporated portions of the county from 2010 to 2018¹¹. However, due to the rural and remote nature of many of the agencies in the south county region, it is unlikely that there will be substantial growth in the communities under review.

2.3 HUMBOLDT COUNTY DUCs

Humboldt LAFCo has adopted DUC policy, which identifies 31 inhabited unincorporated “legacy” communities, including many in the south county region, for purposes of implementing SB 244. These legacy communities were defined as part of the Humboldt County 2014 and 2019 Housing Elements for areas not located within the SOI of a city.

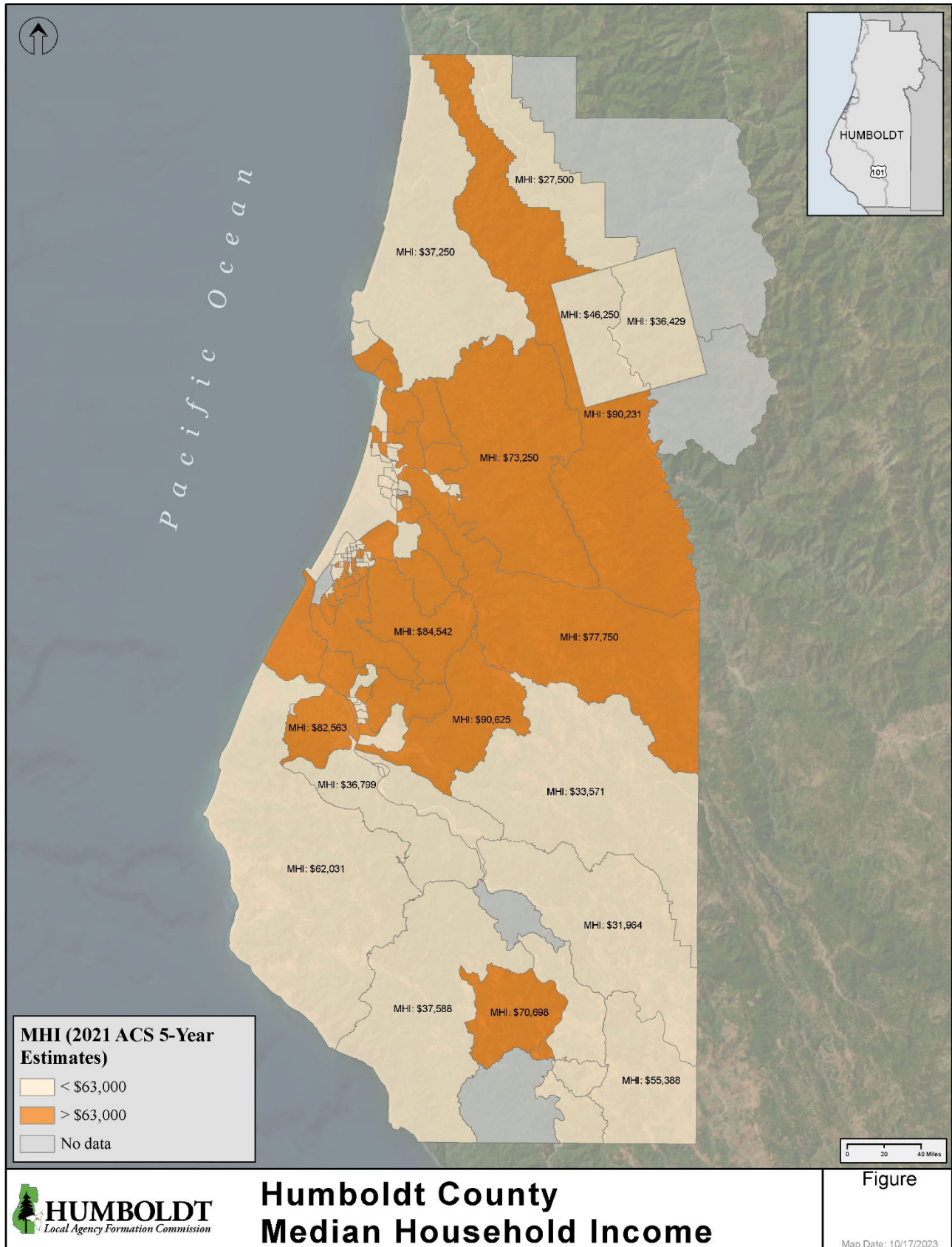
As of the last decennial census in 2020, the California MHI was \$78,672. In order to qualify as disadvantaged, communities would need to have a MHI of less than \$62,937. For the purpose this review, the California Department of Water Resources Disadvantage Community Mapping Tool (DAC Map) will be utilized to identify potential DUCs in and around the agencies being reviewed. The DAC Map relies on the American Community Survey 5-year estimates from 2016 to 2020. Unfortunately, there is no data available for a portion of the south county region. For these areas, the nearest block group or census tract will be utilized as an estimate.

In 2020, Humboldt County was estimated to have 54,120 households and a MHI of \$49,235 which is 62.6 percent of the state MHI¹². Figure 2-2 below shows the MHI for census tracts throughout the county in 2021. Much of the south county region could be considered disadvantaged with two of the south county census tracts having a MHI that is less than 45 percent of the statewide MHI, classifying those areas as severely disadvantaged. The disadvantaged communities in the south county region are shown below in Figure 2-3. Due to the disadvantaged state of the area, it is important to carefully consider important services including water, wastewater, and fire/emergency response and to identify any gaps in service.

¹¹ Humboldt County 6th Cycle Housing Element, Appendix G – Population Characteristics. Adopted August 19, 2019.

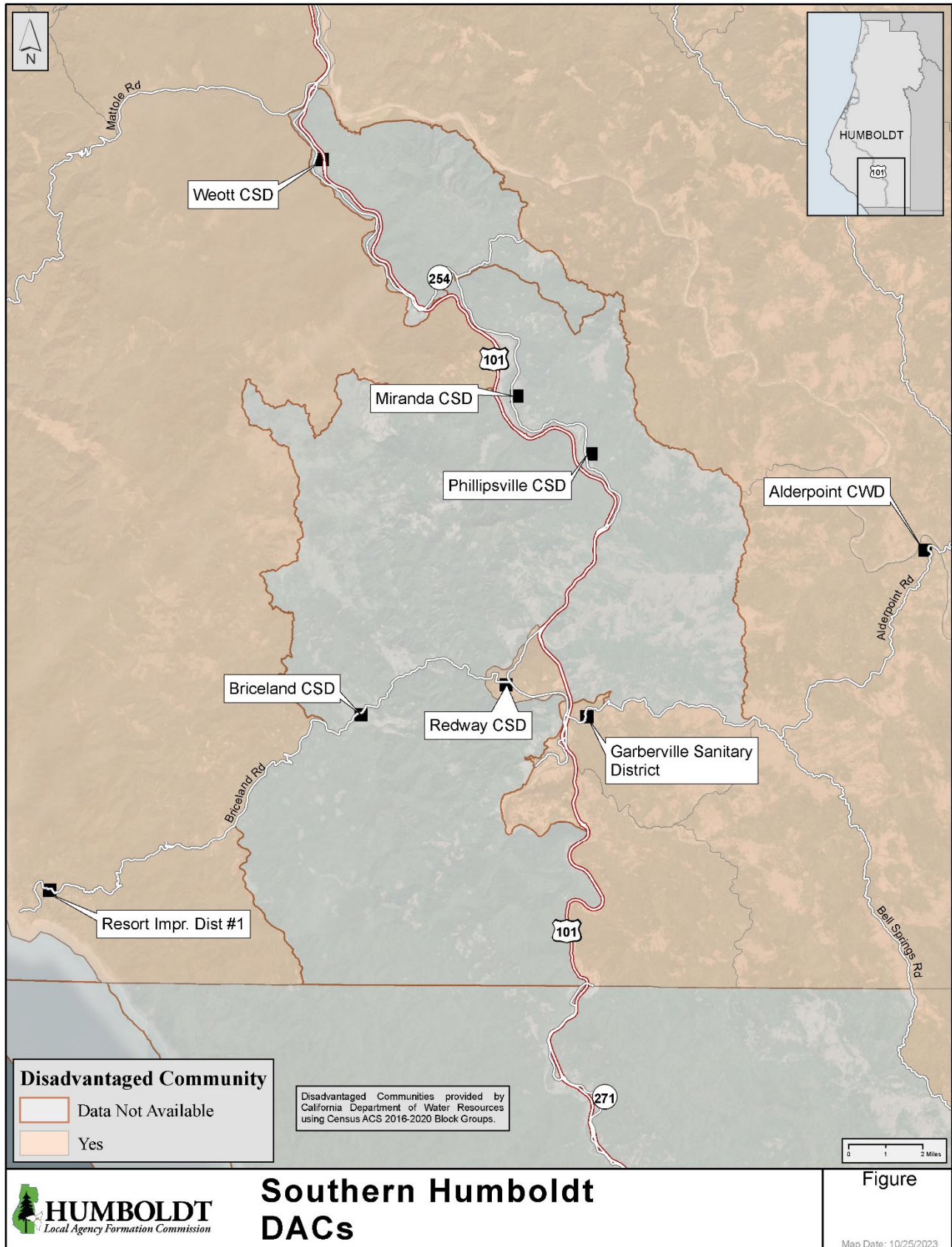
¹² US Census Bureau, 2020 American Community Survey 5-year Estimates, Table S1903 for Humboldt County. Accessed July 17, 2022.

Figure 2-2: Humboldt County MHI



Sources: Boundaries - Humboldt County GIS, Roads - US Census TIGER, Rivers - CA FRAP

Figure 2-3: Southern Humboldt Disadvantaged Communities



Sources: Boundaries - Humboldt County GIS, Roads - US Census TIGER, Rivers - CA FRAP

2.4 WATER RESOURCES

Water resources in southern Humboldt County primarily consist of surface water diversions from rivers, small creeks, or springs. In some areas, wells are utilized to supplement surface water diversions. As with much of the state, surface water resources are becoming more unreliable as drought conditions continue in many areas. On average, creeks and rivers have been running lower which limits the amount of water available for diversion. Surface water also varies naturally throughout the year with less availability in the summer months when there is generally a greater demand for potable water supply.

Several small groundwater basins exist within southern Humboldt County including the Pepperwood Town Area and Weott Town Area basins along the South Fork of the Eel River canyon. Additional basins include the Mattole River Valley and Honeydew Town Area. Groundwater can be obtained on a more limited scale from fractured rock formations throughout the region. Test wells are typically needed to determine how productive an area may be.

Figure 2-4: Southern Humboldt County Groundwater Basins



Due to the fluctuating availability of surface water, it is becoming more important to have additional sources of water or increased water storage to support drier summer and fall months. This can include drilling wells, obtaining additional surface water rights, focusing on conservation, or developing additional raw water storage in reservoirs, ponds, or holding tanks.

2.5 DROUGHT

Traditionally, Humboldt County is one of the wettest counties in California but many areas within the region are still susceptible to the effects of drought. The County formed a County Drought Task Force in 2021 to assist with addressing drought impacts and compliance with Senate Bill 552. SB552 sets forth drought planning standards and regulations, focusing on small water suppliers and rural communities. Small water suppliers and rural communities are increasingly vulnerable to drought and water shortages. Especially in recent years, the County has been experiencing notable effects from drought and large precipitation deficits. These effects include strained water resources, lower river levels, and increased fire potential.

Severe drought has occurred in Southern Humboldt County as recently as 2021. In September 2021, the South Fork of the Eel River flows decreased to below 8 cubic feet per second (cfs) resulting in water restrictions for Garberville, Redway, and Miranda. Due to this, Redway Community Services District issued a Stage 3 drought declaration otherwise referred to as a water shortage emergency¹³. Prior to that in 2014, drought restrictions resulted in a curtailment order for Alderpoint County Water District. These water restrictions are likely to occur again in the future which makes early planning and consistent conservation messaging even more important.

2.6 WILDFIRES

Wildfire is a natural occurrence and an integral feature of Northern California. Humboldt County's landscape has historically been greatly shaped by fire and will continue to be in the future. However, many factors have increased the severity, frequency, and intensity of wildfire such as historic wildfire suppression, timber management, land development, and climate change. As such, wildfire has become increasingly dangerous for communities and has more severe effects on the environment's ecosystems.

Humboldt County has developed a Community Wildfire Protection Plan, which contains information on the fire hazard severity levels of 14 different planning units throughout the County. Alderpoint Water District, Briceland CSD, Garberville Sanitary District, Redway CSD, and Resort Improvement District #1 are located within Planning Unit 13, Southern Humboldt. Planning Unit (PU) 14, Avenue of the Giants, contains Miranda CSD, Phillipsville CSD, and Weott CSD. These two areas have over 80% of their land in a high fire hazard severity zone, as identified by CAL FIRE¹⁴. Planning Units 10 (Eel), 11 (Mad-Van Duzen), and 12 (Mattole-Lost Coast) are in Southern Humboldt County and are adjacent to Planning Units 13 and 14; should these surrounding areas experience wildfire, the agencies being reviewed in this update could be affected by the impacts. A table outlining the fire hazard severity zones in acres and percentage is below. CAL FIRE is in the process of updating its fire hazard severity zones so these percentages may change in the near future.

¹³ Kemp, Kym. Sohum Towns Restrict Water Usage as Eel River Falls to Historic Lows. Redheaded Blackbelt, September 14, 2021.

¹⁴ Humboldt County Fire Safe Council, Community Wildfire Protection Plan, 2019.

Table 2-2: Fire Hazard Severity Zones by Planning Unit in Southern Humboldt County

Planning Unit	Very High	%	High	%	Moderate	%	Other	%
Eel (PU 10)	2	0	133,267	70	24,138	13	65,653	35
Mad-Van Duzen (PU 11)	189,558	62	113,881	37	1,596	1	0	0
Mattole-Lost Coast (PU 12)	13,821	7	180,174	90	6,077	3	716	0
Southern Humboldt (PU 13)	58,028	13	120,897	82	6,780	5	0	0
Avenue of the Giants (PU 14)	19,508	13	120,897	82	6,780	5	0	0

2.7 SEISMIC ACTIVITY

Humboldt County is located in the Mendocino Triple Junction (MTJ) region which is the point where the Gorda, North American, and Pacific tectonic plates meet. The Cascadia subduction zone, San Andreas Fault, and Mendocino Fracture Zone also all meet at the MTJ.

Together, these high seismic activity areas result in the County being especially vulnerable to earthquakes and subsequent damage. The area has historically experienced intense earthquakes and was recently struck by a 6.4 magnitude earthquake at the end of 2022 that caused severe damage to human safety and property. In the event of an earthquake, major concerns relevant to this MSR include water line breaks, damage to control buildings, and slope failure such as landslides and rockfall.

2.8 GOVERNANCE AND STAFFING

Governance and staffing can pose an issue for rural communities, especially when isolated and sparsely populated. Often, many small and rural communities struggle to fill board member and other government roles. Retainment of staff is also a significant issue for rural areas. Due to limited resources, other priorities often must take precedence over the recruitment of personnel and staffing services.

Additionally, small service providers often receive a majority of their funding from service fees which typically do not supply a large enough income to plan ahead and support future capital improvement projects as needed. Due to limited professional service funds and staffing shortages, it can be difficult for a District to maintain transparency through the publication of annual budgets, audits, and other financial reports. However, this exacerbates an agency's financial strain as it is increasingly difficult, many times impossible, to be awarded grants and obtain loans without proper, consistent documentation of financial records.

To assist with meeting financial reporting requirements and conducting successful staff recruitment efforts, rural communities and service providers may want to explore other governance options such as annexations, reorganizations, or shared staffing systems.