



## AGENDA ITEM 6A

**MEETING:** May 21, 2025  
**TO:** Humboldt LAFCo Commissioners  
**FROM:** Colette Santsche, Executive Officer  
**SUBJECT:** **Proposed Annexation of the Goodwill Response Area to the Kneeland Fire Protection District**

The Commission will consider a proposal submitted by resolution of application by the Kneeland FPD for an annexation of approximately 61,846 acres (503 parcels) of land located outside the boundaries that is currently served by the Kneeland FPD as part of their goodwill response area. This item is considered exempt under CEQA Guidelines Section 15061(b)3 as it can be seen with certainty that there is no possibility that the activity in question will have a significant effect on the environment.

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LAFcos are responsible under the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000 to regulate the formation and development of local governmental agencies and their municipal services. This includes approving or disapproving proposed changes of organization, such as district annexations, consistent with adopted policies and procedures pursuant to Government Code (G.C.) Section 56375. LAFcos are authorized with broad discretion in amending and conditioning changes of organization as long as they do not directly regulate land use, property development, or subdivision requirements.

### A. BACKGROUND

Proceedings for this annexation were initiated by the Kneeland Fire Protection District (Kneeland FPD). The proposal includes annexation of approximately 61,486 acres (503 parcels) located outside the current district boundaries, including portions of Butler Valley, Maple Creek, Mtn View Road, Kneeland Road, Showers Pass Road, and Upper Fickle Hill Road (see figure). The proposed annexation area is generally within Kneeland FPD's adopted Sphere of Influence and is currently served by Kneeland FPD on a "goodwill" basis, with no defined responsibility or sustainable funding. Annexation would formalize Kneeland FPD's service responsibilities, establish reliable funding mechanisms, and clearly define fire service coverage between adjacent agencies.

The principal reasons for the proposed annexation are as follows:

"The Kneeland Fire Protection District has provided fire protection services to what it considers its "goodwill out-of-district response area" for many years and now proposes to annex this area into its boundaries. The proposed annexation would establish district boundaries that clearly define service responsibilities for the benefit of land use authorities, the public, and other service providers within this area.

The annexation would support the continued delivery of essential fire protection services to the Butler Valley, a portion of Maple Creek, Mtn View, Kneeland Rd, Showers Pass, and Upper Fickle Hill. It will also allow the Kneeland Fire Protection to collect special tax revenue from this area. This area currently receives services from the Kneeland Fire Protection District on a “goodwill” basis with no defined responsibility or funding because there is no other available fire protection service provider. A successful annexation would make Kneeland FPD responsible for service, establish ongoing funding, and define a contiguous fire district coverage between the Kneeland FPD, Arcata FPD, and Bridgeville FPD.”

The proposed annexation does not involve proposed service expansions to accommodate new development. The proposed annexation is intended to provide sustainable funding for fire services and officially designate a fire services agency responsible for coverage in the area.

A public hearing notice was mailed to all landowners and registered voters within and adjacent to the annexation area 21 days prior to the hearing. The notice disclosed that upon annexation, the affected territory would become subject to all previously authorized charges, fees, assessments, and taxes lawfully enacted by the Kneeland FPD. The affected territory would also become subject to the rates, rules, regulations, and ordinances of the District. Specifically, the annexation would extend the Kneeland FPD special tax—authorized by Measure D (Nov 2024)—to all properties within the annexation area. Revenues from the special tax would be used to fund the delivery of fire protection services, consistent with the purposes for which the tax was originally approved

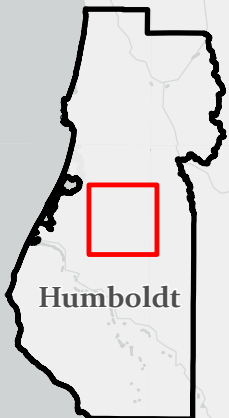
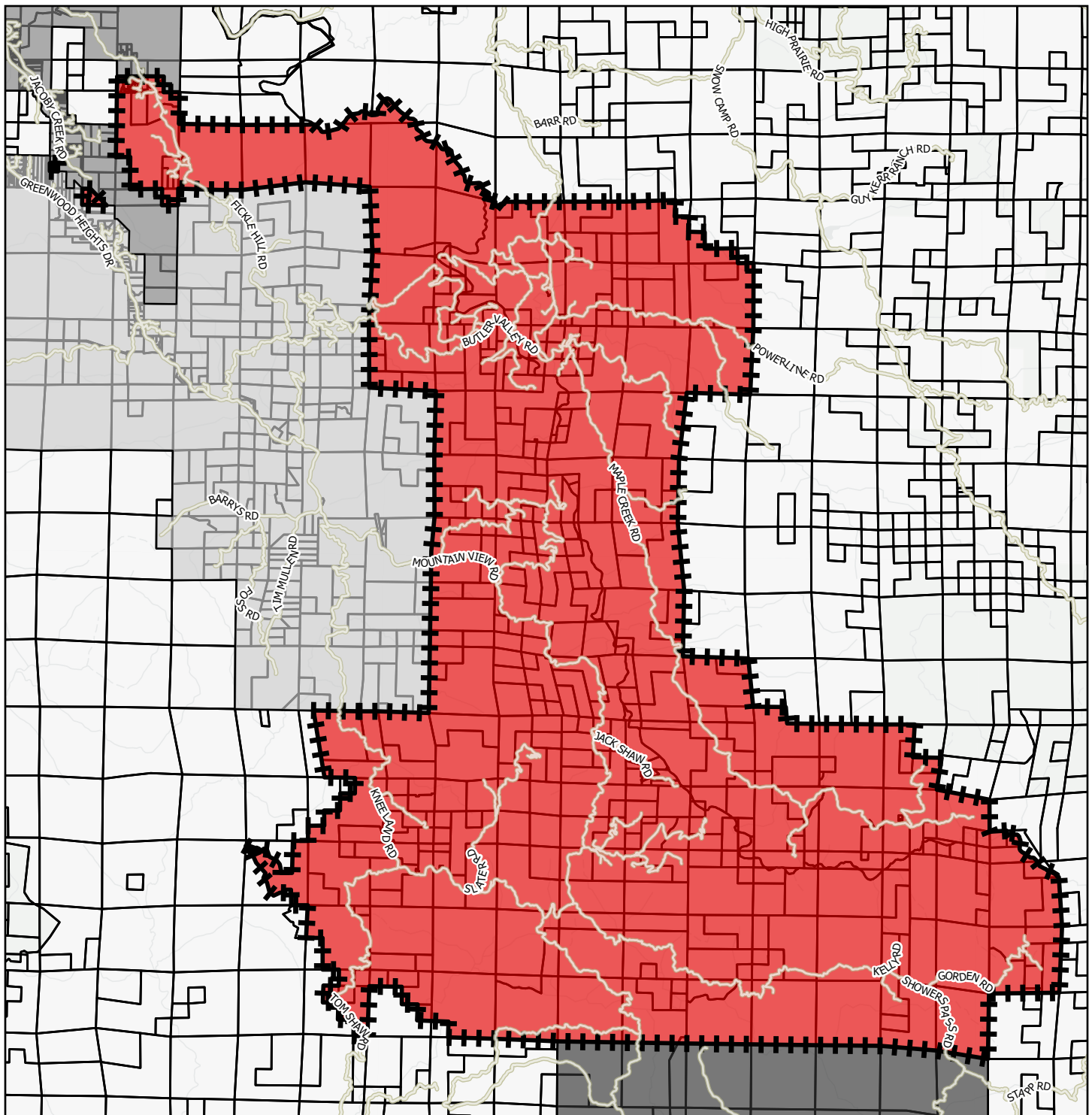
In addition to the mailed notice, the Kneeland FPD hosted a special community Q&A session on May 14, 2025, to provide information about the proposed annexation. During the meeting, residents had the opportunity to ask questions about the proposed service area, the implications of the annexation, and how it would affect their properties. Topics of discussion included concerns about response times for more remote areas such as Maple Creek and Nature Lane, the rural nature of the annexation area, the potential benefits for undeveloped properties, an overview of the Firewise program, and details about the special tax, including the amount property owners would be expected to pay.






LAFCo staff has responded to numerous inquiries from community members regarding the proposed annexation. The majority of questions and concerns have been resolved through ongoing coordination with the District and its proactive public outreach efforts. To date, only one letter of written opposition has been received. In accordance with applicable procedures, a protest hearing will be conducted if the Commission approves the annexation.

## **B. DISCUSSION**

### Description of Annexation Areas

The proposed annexation area is located on the north, east, and south sides of the Kneeland FPD and includes the Butler Valley area; a portion of the Maple Creek area; the Mtn View Road area between the existing District and Jack Straw Road; Kneeland Road and Showers Pass Road between the existing District boundary and the Bridgeville



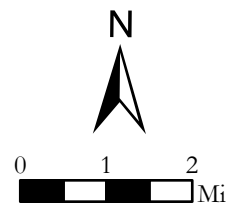
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|  Kneeland FPD Proposed Annexation |  Arcata FPD Existing Boundary      |  Parcels |
|  Kneeland FPD Existing Boundary   |  Bridgeville FPD Existing Boundary |   |

## Kneeland FPD Proposed Annexation

Sources: Arcata FPD Boundary, Bridgeville FPD Boundary, Kneeland FPD Boundary, Kneeland Proposed Annexation: Humboldt LAFCo, Parcels, Roads: Humboldt County GIS,

1/28/2025

Coordinate System: NAD 1983 UTM Zone 10N



FPD boundary; and Upper Fickle Hill Road between District boundary and the Arcata FPD boundary (see Figure 1). Of the 61,846 acres proposed for annexation, 777 acres are designated improved residential, 18,996 acres are 100% timber production zone, 34,697 acres are partially timber production zone, and the rest is various improved and unimproved uses.

### Commercial Timberlands

As part of the annexation planning process, LAFCo staff notified commercial timberland owners within the Kneeland FPD goodwill response area. Fire protection districts are obligated to respond to calls-for-service within commercial forest lands that are included in their boundaries. If these lands are within a fire protection district, land can be subdivided, subject to zoning requirements, and in some cases are subject to fire suppression taxes and assessments. In addition, if annexed into a fire protection district, the district may be eligible to receive a portion of the property tax already paid by landowners and received by Humboldt County.

However, State law prevents fire protection districts from including "commercial forest lands which are timbered lands declared to be in a state responsibility area" within new district formations or annexations ([Health and Safety Code Section 13811](#)). Most fire protection districts in Humboldt County were likely formed before this requirement was established and over 35 percent of the land within existing fire district boundaries is zoned Timber Production Zone (TPZ). In fact, the two fire districts that have the most career/professional firefighters and that ostensibly provide the highest level of fire protection service in the County, Arcata FPD and the Humboldt No. 1 FPD, have approximately 62 percent and 59 percent agriculture and resource zoned lands, respectively, within their district boundaries. It's also interesting to note that this law does not apply to commercial forest lands located within other types of special districts that provide local fire and rescue services. In Humboldt, these include county service area and community services districts (CSDs) such as the Carlotta, Fieldbrook Glendale, Miranda, and Orick CSDs and the Shelter Cove Resort Improvement District No. 1.

Both Green Diamond Resource Company and Humboldt Redwoods Company own commercial timberland within the Kneeland goodwill annexation area. Green Diamond includes 42 parcels (12,294 acres total) and Humboldt Redwood Company include 17 parcels, which are vacant, zoned 100% or portion TPZ, and located within the SRA. The Measure Z fire services planning team worked with Kneeland FPD to exclude where feasible commercial forest lands zoned entirely TPZ, but ultimately the annexation boundary includes commercial forest lands that abut roads and have the potential to demand local services or would create an illogical or problematic annexation boundary if excluded. This includes avoiding creating overly complicated boundary changes that include holes or islands and multiple "areas" as it becomes costly when the annexation is filed with the State Board of Equalization, which bases their filing costs on the acreage of each separate subarea.

Within the SRA, CAL FIRE is responsible for preventing and suppressing wildfire and does not have responsibility for community fire protection services. CAL FIRE will respond to all fires in SRA during fire season that represent a threat to the wildland and will respond to medical incidents when available; however, structure fire protection and rescue services

are local responsibilities and not a CAL FIRE responsibility. Almost all fire departments in Humboldt County are dispatched by CAL FIRE and the command center will dispatch the nearest local fire department to incidents, regardless of district boundaries. As a result, a local fire department will be dispatched to almost all fire and non-fire incidents on commercial forest lands. Any local response will continue to be provided by goodwill in the absence of annexation.

#### Funding Sources

Kneeland FPD has requested that the proposed annexation be subject to the following condition to ensure a consistent and sustainable funding source for the delivery of fire protection and emergency services:

1. The extension of the previously authorized Kneeland FPD special tax (Measure D) to all land within the proposed annexation area to fund the delivery of fire protection services, consistent with the purpose for which the funding source was approved.

In November 2024, voters within the Kneeland FPD approved Measure D, a comprehensive special tax that repealed and replaced two earlier voter-approved special taxes from 1990 and 2014. Measure D includes a contiguous parcel exemption, which allows owners of vacant parcels under identical ownership to be treated as a single parcel for taxation purposes. This exemption is intended to reduce the financial burden on landowners with open space or undeveloped lands, both within the existing District and the proposed annexation area.

The current Measure D annual special tax rates are as follows:

- Vacant: \$100 per year
- Improved: \$180 per year
- Vacant contiguous parcels under identical ownership: \$220 per year
- Commercial/Industrial: \$300 per year
- Multi-family: \$250 per year

Measure D also includes a hardship waiver process, allowing low-income property owners to apply for exemption from the special tax. Upon completion of the annexation, the special tax will be extended to all parcels within the expanded District boundary in accordance with these provisions.

### **C. ANALYSIS**

The analysis of the proposal is organized into two sections. The first section considers the proposal relative to the factors mandated for review by the Legislature anytime LAFCos review boundary changes. The second section considers issues required by other applicable State statutes in processing boundary changes, such as environmental compliance with the California Environmental Quality Act.

### **Required Factors for Review**

G.C. Section 56668 requires the Commission to consider 17 specific factors anytime it reviews proposals for a change of organization or reorganization involving special districts. The majority of the prescribed factors focus on the impacts of the proposed boundary changes on the service and financial capacities of the affected agencies. No single factor is determinative. The purpose in considering these factors is to help inform the Commission in its decision-making process.

A summary of key statements and conclusions generated in the review of the mandated factors for the proposal follows, with a complete analysis provided in Attachment A.

- The annexation area contains approximately 237 residents and 118 housing units.
- Total assessed value of properties (land and improvements) is \$49,398.
- Land uses within the annexation area are comprised of rural residences and farm dwellings interspersed among timbered and grazing lands.
- The annexation does not involve changes to the type or level of services provided, would not convert agricultural land or open space uses, and does not propose to change land uses or land use patterns. There are no plans for land use or zoning changes or future development that are part of the proposed Kneeland FPD annexation.
- The Kneeland FPD has provided “goodwill” fire protection services to the annexation area for many years because this area is adjacent to the district boundary and Kneeland FPD is the nearest fire protection service provider.
- This out-of-district response area is not supported by a sustainable or reliable source of ongoing revenue to support the provision of fire protection services. The proposed annexation would extend the Kneeland FPD's special tax revenue to the expanded district boundary, providing regular and ongoing revenue sources to this area, to sustain local fire protection services.

### **Other Considerations**

#### **o Municipal Service Review and Sphere of Influence**

The Commission approved a Humboldt Bay Regional Fire Services Municipal Services Review in 2017, which evaluated the availability and performance of services provided by fire-related districts within the designated study area pursuant to California Government Code Section 56430. As part of the MSR process, sphere boundaries were updated to generally match the non-district goodwill response areas for each fire-related district, including the Kneeland FPD.

The Kneeland FPD proposes to annex land that is generally within its current SOI and established goodwill response area. As discussed previously, some commercial timberlands are not proposed to be annexed. In addition, the Arcata FPD recently completed annexation of areas along Fickle Hill Road and Jacoby Creek Road that will create continuous defined service boundaries in the area. As part of the Kneeland FPD annexation approval, the SOI will be amended to be conterminous with the newly annexed area.

- **Environmental Review**

The proposed annexation is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section 15061(b)3. For the following reasons it can be seen with certainty that there is no possibility that the activity in question, the annexation of the Kneeland FPD goodwill response area and the extension of existing funding sources to support the ongoing delivery of fire protection services, will have a significant effect on the environment:

1. The purpose of the proposed annexation is to expand the jurisdictional boundary to areas outside of any fire protection district that are already served on a goodwill basis by the Kneeland FPD; and
2. The proposed extension of existing special taxes are governmental funding mechanisms which do not constitute a commitment to any specific project that may have a significant effect on the environment.

- **Property Tax Exchange Agreement**

On April 9, 2019, the Board of Supervisors approved staff recommendations for a funding allocation strategy to help address service gaps that involves the exchange of property tax revenue, including base property tax revenue, in exchange for fire protection districts improving other sources of revenue, improving administrative capacity, and pursuing consolidation.

The Kneeland FPD was formed after Proposition 13 and therefore does not currently receive a share of property taxes. Based on offers specified in the April 9, 2019 staff report, tax exchange agreement Offer Number 4 would be eligible for Kneeland FPD and would require the District to meet the following expectations:

The annexing district does not currently receive property tax and is willing to:

- Establish new and/or update revenue sources;
- Pursue reorganization/consolidation;
- Annex realistic out-of-district response area; and
- Commit to planning for the future.

If the above expectations are met the county will:

- Transfer county property tax revenue to the district in an amount equal to the application of a 3% tax allocation factor (TAF) to the growth (no base) in property tax revenue within the annexation area as well as the existing district area.

Pending approval of the annexation proposal by the Commission, LAFCo staff will work with County staff to proceed with a property tax exchange agreement to be approved by both the Board of Supervisors and Kneeland FPD Board in accordance with Section 99.01 of the California Revenue and Taxation Code.

- **Conducting Authority Proceedings**

All boundary changes approved by the Commission are subject to conducting authority proceedings—commonly referred to as a protest hearing—unless waived pursuant to the

criteria set forth in Government Code Section 56663. Because written opposition has been received from one landowner within the annexation area, a protest hearing is required.

In accordance with Commission policy, the authority to conduct protest proceedings has been delegated to the Executive Officer. Upon Commission approval of the annexation, LAFCo staff will schedule the protest hearing to be held at the Kneeland Fire Protection District station. Notice of the hearing will be mailed to all landowners and registered voters within the affected area no less than 21 days in advance of the scheduled date, consistent with the requirements of Government Code Section 57025.

#### **D. RECOMMENDATION**

The proposed SOI amendment and annexation to the Kneeland FPD appears appropriate relative to the factors required by statute for consideration. It is recommended the following conditions of approval be applied with delegation to the Executive Officer to determine when the requested actions have been sufficiently satisfied before proceeding with a recordation.

- a) Completion of the 30-day reconsideration period provided under G.C. Section 56895.
- b) Completion of conduction authority proceedings by Executive Officer.
- c) Submittal of a final map and geographic description of the affected territory conforming to the requirements of the State Board of Equalization.
- d) Payment of any outstanding fees as identified in the Commission's adopted fee schedule.
- e) Upon the effective date of the annexation, all parcels within the affected territory shall be subject to Kneeland FPD's existing special tax along with all applicable charges, fees, rates, rules, regulations, and ordinances lawfully enacted by the District for the provision of fire protection and emergency response services.

#### ***Alternatives for Commission Action***

Staff has identified three options for Commission consideration with respect to the proposal. These options are summarized below.

- Alternative Action One (Recommended):  
Adopt the draft resolution identified as Attachment B, approving the CEQA exemption and the proposal with the recommended conditions along with any desired changes as requested by the Commission.
- Alternative Action Two:



Continue consideration of the item to the next regular meeting and provide direction to staff for additional information as needed.

- Alternative Action Three:  
Disapprove the proposal. Disapproval would statutorily prohibit the initiation of a similar proposal for one year unless a request for reconsideration is filed and approved within 30 days of Commission action.

### **Procedures for Consideration**

This item has been agenzized for consideration as part of a noticed public hearing. The following procedures are recommended with respect to the Commission's consideration of this item:

- A. Receive verbal report from staff
- B. Open the public hearing and invite testimony.
- C. Discuss item and – if appropriate – close the hearing and consider action on recommendation:

*"I move to adopt Resolution No. 25-03, approving the Annexation of the Goodwill Response Area to the Kneeland Fire Protection District and associated CEQA exemption under CEQA Guidelines Section 15061(b)3".*

### **Attachments**

Attachment A: Required Factors

Attachment B: Draft Resolution of Approval (No. 25-03)

## **ATTACHMENT A ANALYSIS OF REQUIRED FACTORS**

Government Code Section 56668 requires the Commission to consider 17 specific factors anytime it reviews proposals for a change of organization or reorganization involving special districts. The purpose in considering these factors is to help inform the Commission in its decision-making process.

***1) Population and population density; land area and land use; assessed valuation; topography, natural boundaries, and drainage basins; proximity to other populated areas; and the likelihood of significant growth in the area, and in adjacent incorporated and unincorporated areas, during the next 10 years.***

The proposed annexation includes approximately 61,486 acres of land (503 parcels) located within the good-will response area of the Kneeland FPD. The annexation area contains approximately 237 residents and 118 total housing units. Total assessed value of properties (land and improvements) is \$49,398,050. Land uses within the annexation area are largely Timberland (54%), followed by Agricultural Grazing (36%), Residential Agriculture (4%), Agricultural Exclusive (4%), and Public Lands (2%). There are no plans for land use or zoning changes or future development that are part of the proposed Kneeland FPD annexation.

***2) The need for organized community services; the present cost and adequacy of governmental services and controls in the area; probable future needs for those services and controls; and probable effect of the proposed incorporation, formation, annexation, or exclusion and of alternative courses of action on the cost and adequacy of services and controls in the area and adjacent areas.***

Pursuant to Government Code Section 56653, the District prepared a Plan for Services to evaluate the needs of the proposed annexation. The need for expanded community services within the affected territory includes fire protection services. An analysis of the availability and adequacy of this core municipal service relative to projected needs of the proposal follows.

- Fire Protection

The Kneeland Fire Protection District (FPD) provides fire protection services within the Kneeland FPD boundaries and to mutual aid partners, as enumerated in California Health and Safety Code Section 13862 “a” through “f”, excluding “e” (ambulance services): fire protection services; rescue services; emergency medical services; hazardous material emergency response services; and any other services relating to the protection of lives and property.

Fire protection services are provided from the Kneeland FPD fire station, located at 6201 Greenwood Heights Drive. The Kneeland FPD completed the construction of its new fire station (replacing a small barn that held District apparatus) in 2019 to properly house all apparatus and to provide training and administrative space. There are no public water

providers within the district and no fire hydrants. Water for firefighting is drafted from tanks, ponds, creeks, and pools.

The Kneeland FPD has provided "goodwill" fire protection services to the annexation area for many years because this area is adjacent to the district boundary and Kneeland FPD is the nearest fire protection service provider. As such, services will continue to be provided and there will be no lapse in service for the community.

Similar to a portion of the existing Kneeland FPD boundaries, the proposed annexation area contains rural residences and farm dwellings interspersed among timbered and grazing lands. There are no defined residential communities or commercial areas. The Kneeland FPD provides a level of service consistent with the characteristics of the area that it protects.

Fire protection services in the Goodwill Response Area are not supported by a revenue source. Kneeland FPD is seeking the exchange of ad valorem property tax revenue pursuant to tax exchange agreement Offer Number 4 authorized by the Humboldt County Board of Supervisors on April 9, 2019, which would transfer a small amount of county property tax revenue to the district in an amount equal to the application of a 3% Tax Rate Area Tax Increment Factor to the growth (no base transfer) in property tax revenue within the annexation area as well as the existing district area. Kneeland FPD is currently funded by a special tax that, when extended to the proposed annexation area, and combined with the property tax revenue, would provide regular and ongoing revenue sources to this area to sustain local fire protection services. The annexation would support essential fire protection services to Butler Valley, a portion of Maple Creek, Mtn View Kneeland Rd Showers, and Upper Fickle Hill.

Based on the items discussed above, the proposed annexation to Kneeland FPD would provide the highest level of service to area residents and be the most cost efficient based on economies of scale and the already established funding mechanisms.

**3) *The effect of the proposed action and of alternative actions, on adjacent areas, on mutual social and economic interests, and on the local governmental structure of the county.***

The proposed action would support the mutual social and economic interests of the proposed annexation area by sustaining community-based fire protection services and providing local governance for such services. In addition, the proposed annexation would increase the level of service for the proposed annexation areas by providing a larger base of registered voters that could potentially serve on the Board of Directors and there would also be more dedicated fire personnel available to respond to calls. As described above, the proposed annexation would sustain local fire protection services within the community and provide sustainable financial support for services.

**4) *The conformity of both the proposal and its anticipated effects with both the adopted commission policies on providing planned, orderly, efficient patterns of urban development, and the policies and priorities in G.C. Section 56377.***

Within the proposed annexation area, approximately 62% is zoned Timberland Production, 36% is zoned Agricultural Exclusive, 1% is zoned Unclassified, and less than 1% is zoned for Forestry Recreation, and Agriculture General.

The proposed annexation is largely a rural area. The Kneeland FPD provides a level of service consistent with the characteristics of the area that it protects: rural levels of service in the remote areas of the District due to water availability, extended response times, and terrain. The Kneeland FPD would provide a level of service consistent with the characteristics of the annexation area: maintain rural level of service within the annexation area due to water availability, extended response times, and terrain.

With respect to G.C. Section 56377, portions of the affected territory are substantially unimproved and devoted to open-space use (Timber Production and Agricultural) under the Humboldt County General Plan. However, the annexation does not involve changes to the type or level of services provided, would not convert agricultural land or open space uses, and does not propose to change land uses or land use patterns. Therefore, the proposal does not conflict with G.C. Section 56377. The Kneeland FPD Plan of Service provided a detailed analysis of these requirements and found that it is common within Humboldt County for rural populations to be dispersed within and around agriculture and timber land and that it is logical for fire protection district boundaries to include such resource lands.

**5) *The effect of the proposal on maintaining the physical and economic integrity of agricultural lands, as defined by G.C. Section 56016.***

The annexation proposal does not include land use changes or proposed developments. There is no indication that future development within the annexation area would be influenced by the proposed annexation and growth would be expected to continue to occur at historic rates. Planning and building permit approvals are based on the ability of the proposed project to meet General Plan, Zoning, and Fire Safe Regulations standards, which do not include standards relating to fire protection districts or local fire department capabilities.

Based on the state Subdivision Map Act requirements, the Humboldt County General Plan Open Space Action Program, General Plan Land Use Designations, and Zoning Classifications, parcels that are zoned TPZ or AE and greater than 20 acres in area may be subdivided now, without annexation, but other land may not be subdivided unless within a fire-related district. However, the General Plan requires that any subdivision of zoned TPZ or AE land improve the production of timber, food or fiber and this criterion has limited most if not all Open Space subdivisions. Therefore, the proposed annexation would not enable Open Space land subdivisions within the Kneeland FPD annexation area.

Non-Open Space land may be able to subdivide after the Kneeland FPD annexation, subject to state Fire Safe Regulations relating to access, General Plan, Zoning, and Subdivision requirements. An analysis of minimum parcel size based on land use regulations indicates that one parcel that is zoned AG-B-5(5) and is located behind a parcel fronting Greenwood Heights Drive and two parcels zoned Unclassified and planned RA 5-10 located near Nature Lane on the east side of Fickle Hill Road) are at least twice the minimum parcel size and could potentially be subdivided. In order for a

proposed subdivision of these parcels to be approved, access roads must meet all minimum State Fire Safe Regulations and on-site water and wastewater must meet County Environmental Health Regulations.

In addition, agricultural resources within the proposed district boundaries will not be affected by the proposed annexation for the following reasons:

- It is common throughout Humboldt County that rural populations are dispersed within and around agriculture and timber land and logical boundaries for a fire protection district would include such resource lands.
- 28 percent of the land within existing fire protection district boundaries within Humboldt County is zoned TPZ or TC (coastal zone), 27 percent is zoned AE, and seven percent is zoned AG, which totals to over 60 percent of all land within fire related districts (including cities). Fire related districts within the county routinely respond to calls for service at houses on resource land, barns, warehouses, roads, logging sites, and within farm fields.
- The two fire districts that have the most career/professional firefighters and that ostensibly provide the highest level of fire protection service in the County, Arcata FPD and the Humboldt Bay Fire (Humboldt No. 1 FPD), have approximately 62 percent and 59 percent agriculture and resource zoned lands, respectively, within their district boundaries.
- The provision of fire protection services to land planned for agriculture was not noted as a cause of agricultural land conversion in the Agricultural Resources Report (<https://humboldt.gov.org/DocumentCenter/View/1428/Agricultural-Resources-and-Policies-Full-Report-PDF>) prepared in August 2003 for the Humboldt County General Plan Update.
- Land within the proposed district boundaries is within the State Responsibility Area and CAL FIRE is expected to continue to provide wildland protection at current levels of protection.
- The Kneeland FPD currently responds to calls for service throughout the proposed annexation area and have done so for many years. The weight of response and levels of service after the proposed annexation would be similar to current levels and would therefore not significantly influence owners of resource land in their decisions to convert such land to other uses.

**6) The definiteness and certainty of the boundaries of the territory, the nonconformance of proposed boundaries with lines of assessment or ownership, the creation of islands or corridors of unincorporated territory, and other similar matters affecting the proposed boundaries.**

The proposed annexation area boundaries are drawn to follow Assessor's Parcel boundaries, Public Land Survey boundaries and natural barriers such as major creeks and ridgelines. The proposed annexation generally falls within the existing Kneeland FPD SOI. As such, the proposed annexation would create clearly defined agency boundaries and clearly define the responsible agency for the area.

**7) A regional transportation plan adopted pursuant to G.C. Section 65080.**

The Humboldt Regional Transportation Plan (RTP), VROOM 2022-2042 was last updated in January 2022 and is a long-range transportation planning document for Humboldt County. There is limited mention of the proposed annexation area in the plan.

The proposed annexation does not include any proposed development or other activities that would potentially increase traffic on roadways. The same level of traffic is expected on roadways in all annexation areas.

**8) The proposal's consistency with city or county general and specific plans.**

Land uses within the existing district and proposed annexation area are subject to the Humboldt County General Plan, and the Humboldt County Zoning Regulations (Humboldt County Code Title III, Division 1). There are no plans for land use or zoning changes or future development that are part of the proposed Kneeland FPD annexation.

**9) The sphere of influence of any local agency that may be applicable to the proposal being reviewed.**

The proposed annexation is generally within the existing Kneeland FPD SOI and does not involve proposed service expansions to accommodate new development. The proposed annexation is intended to sustain local fire protection services within the Kneeland FPD goodwill service area and provide benefits based on sources of secure funding. Some commercial timberlands are not proposed to be annexed. Additionally, the proposed boundary is consistent with, and would not overlap with, the recent Arcata FPD annexation just north of Kneeland FPD. As part of the Kneeland FPD annexation approval, the SOI will be amended to be conterminous with the newly annexed area.

**10) The comments of any affected local agency or other public agency.**

LAFCo staff provided a Notice of Filing to interested and subject agencies. To date, no comments have been received. Additionally, Kneeland FPD coordinated closely with Arcata FPD as part of the delineation of response areas and ultimate boundaries between the two agencies, particularly as it relates to Fickle Hill Road. LAFCo staff also followed up with Arcata Fire Chief to inform them of the upcoming public hearing.

**11) The ability of the newly formed or receiving entity to provide the services that are the subject of the application to the area, including the sufficiency of revenues for those services following the proposed boundary change.**

The proposed annexation would extend Kneeland FPD's current special tax revenue source to the expanded district boundary, providing regular and ongoing revenue to sustain local fire protection services within the community.

**12) Timely availability of water supplies adequate for projected needs as specified in G.C. Section 65352.5.**

The proposed annexation does not include any proposed development or increased demands on water supply in the area. There are no public water providers within the district and no fire hydrants. Water for firefighting is drafted from tanks, ponds, creeks, and pools. Since Kneeland FPD has been providing fire services to the goodwill response area for years, it is not anticipated that the annexation will increase water demand in the annexation area.

**13) The extent to which the proposal will affect a city or cities and the county in achieving their respective fair shares of the regional housing needs as determined by the appropriate council of governments consistent with Article 10.6 (commencing with Section 65580) of Chapter 3 of Division 1 of Title 7.**

The proposal would not impact any local agencies in accommodating their regional housing needs. There are no plans for land use or zoning changes or future development that are part of the proposed Kneeland FPD annexation.

**14) Any information or comments from the landowner or owners, voters, or residents of the affected territory.**

The total number of landowner and voter notices was approximately 165 after removing duplicates. Each landowner and registered voter in the proposed annexation area, and those within 300 feet of the annexation area, were sent a mailed notice with a summary of the proposed annexation and contact information for obtaining additional information. To date, one letter of opposition and one letter of support has been received (attached). LAFCo staff also fielded many calls and answered questions received from members of the public.

**15) Any information relating to existing land use designations.**

The existing land uses within the proposed annexation area are as follows:

<b>General Plan Land Use Designation</b>	<b>Acres</b>
"RA5-20" Residential Agriculture	140.2
"RA10-20" Residential Agriculture	40.5
"RA40" Residential Agriculture	1,546.1
"RA40-160" Residential Agriculture	71.8
"RA160" Residential Agriculture	656.8
"AG" Agricultural Grazing	22,401.7
"AE" Agricultural Exclusive	2,333.9
"T" Timberland	33,261.3
"P" Public Lands	1,396.4
<b>Total</b>	<b>61,848.7</b>

"RA" Residential Agriculture – This designation applies to large lot residential uses that typically rely upon on-site water and wastewater systems. Varying densities are reflective of land capabilities and/or compatibility issues. RA5-20 and RA20 are rural residential designations for lands with slopes generally less than 30% and served by individual water and wastewater systems and good road



access. RA40, RA60, and RA160 designations are applied to more remote, steep and high hazard areas or where appropriate to ensure compatibility with adjacent resource production and open space uses.

"AG" Agricultural Grazing – This designation applies to dry-land grazing areas in relatively small land holdings that support cattle ranching or other grazing supplemented by timber harvest activities that are part of the ranching operation, and other non-prime agricultural lands. Residential uses must support agricultural operation.

"AE" Agricultural Exclusive – This designation applies to bottomland farms and lands that can be irrigated; also used in upland areas to retain agricultural character. Typical uses include dairy, row crops, orchards, specialty agriculture, and horticulture. Residential subdivision is not supported. Residential uses must support agricultural operation.

"T" Timberland – This designation is utilized to classify land that is primarily suitable for the growing, harvesting and production of timber. Prairie and grazing lands may be intermixed. Density range is 40 -160 acres/unit.

"P" Public Lands - The Public Lands designation is used to classify land owned by or under the jurisdiction of the federal, state, county or any other district authority or public corporation, or agency thereof.

**16) The extent to which the proposal will promote environmental justice. As used in this subdivision, "environmental justice" means the fair treatment and meaningful involvement of people of all races, cultures, incomes, and national origins, with respect to the location of public facilities and the provision of public services, to ensure a healthy environment for all people such that the effects of pollution are not disproportionately borne by any particular populations or communities.**

The proposal would not result in inconsistencies with environmental justice safeguards. The proposed annexation is intended to bring the Kneeland FPD out of district goodwill response area into the boundary and to provide secure and sustainable revenue to support ongoing services.

**17) Information contained in a local hazard mitigation plan, information contained in a safety element of a general plan, and any maps that identify land as a very high fire hazard zone pursuant to G.C. Section 51178 or maps that identify land determined to be in a state responsibility area pursuant to Section 4102 of the Public Resources Code, if it is determined that such information is relevant to the area that is the subject of the proposal.**

The proposed annexation areas are within moderate to high fire hazard severity zones according to adopted State Responsibility Area Fire Hazard Severity Zone Maps. The proposed annexation area is within State Responsibility Areas (SRA). Kneeland FPD is a party to the countywide mutual aid agreement which includes California Department of Forestry and Fire Protection (CAL FIRE), which may also respond to calls in the annexation area when not committed to state mission activities. CAL FIRE is responsible for wildland fire protection within State Responsibility Area, including the annexation area.



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**Re: Annexation kneeland vid**

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**From** Colette Santsche <colette@humboldtlafo.org>

**Date** Mon 5/12/2025 11:03 AM

**To** Ron Wilson

**Cc** Krystle Heaney <krystleh@humboldtlafo.org>

Hi Ron,

Thank you for reaching out and sharing your perspective. I understand your concern about extended response times and the current limitations in equipment and road access, particularly for more remote areas like yours. These are valid considerations when evaluating the effectiveness of annexation.

The proposed annexation is intended to formalize service expectations within the District's goodwill response area and build toward greater capacity over time. The District has expressed a commitment to improving service, including engaging local volunteers and pursuing funding opportunities to strengthen infrastructure and equipment. There are discussions with local Maple Creek residents who are interested in volunteering once part of the fire district and building local response capacity. This combined with Kneeland's active Firewise efforts that aim to support property owners with wildfire preparedness and mitigation can provide important benefits within the expanded district.

Kneeland FPD is holding a special meeting and Q&A on the annexation this Wednesday, May 14 at 6pm. You can find the meeting details here: <https://www.kneelandfire.org/calendar/events-callendar/eventdetail/184/-/special-meeting-annexation-q-a>

Please don't hesitate to reach out if you have any follow-up questions or comments.

Best regards,

Colette Santsche

*Executive Officer*

Humboldt LAFCo

707.445.7508 office | 530.227.6836 cell



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**From:** Ron Wilson

**Sent:** Sunday, May 11, 2025 9:04 AM

**To:** colette@humboldtlafo.org <colette@humboldtlafo.org>

**Subject:** Annexation kneeland vid

Greetings

As a property owner 10 miles past maple creek school, I cannot support attempts to grab property tax

without any indication of a "rational" level of service. Extended response distances with minimal hope of an effective outcome given the lack of equipment remotely able to attack anything further than hose length from the county road. Not much of a road either.

Thank you

Ron Wilson

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**Re: kneeland fire protection district proposal**

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**From** Colette Santsche <colette@humboldtlafo.org>

**Date** Wed 4/30/2025 10:41 AM

**To** karen Schatz

**Cc** Krystle Heaney <krystleh@humboldtlafo.org>

Hi Karen,

Thank you for providing a letter of support. We will make sure to include this in the annexation record.  
Take care,

Colette

On Apr 30, 2025, at 10:00 AM, karen Schatz <kgschatz@hughes.net> wrote:

Dear Lafco, My husband and I reside in Maple Creek, and we are very much in favor of the proposed sphere of influence amendment and annexation of goodwill response areas to the Kneeland fire protection district. Thank you. Karen and Gordon Schatz 14345 Maple Creek Road Korb, CA 95550



## RESOLUTION NO. 25-03

### **APPROVING A SPHERE OF INFLUENCE AMENDMENT AND ANNEXATION OF GOOD WILL RESPONSE AREAS TO THE KNEELAND FIRE PROTECTION DISTRICT**

WHEREAS, the Humboldt Local Agency Formation Commission, hereinafter referred to as the "Commission," is responsible for regulating boundary changes affecting cities and special districts pursuant to the Cortese-Knox-Hertzberg Local Government Reorganization Act of 2000; and

WHEREAS, the Kneeland Fire Protection District, hereinafter referred to as "Kneeland FPD" or "District," filed an application with the Commission by resolution of application; and

WHEREAS, the proposal seeks Commission approval for annexation of approximately 61,846 acres (503 parcels) within the good-will response area of the Kneeland FPD; and

WHEREAS, the subject territory is inhabited as defined in Government Code Section 56046; and

WHEREAS, the Executive Officer has given notice of the public hearing by the Commission on this matter at the times and in the form and manner provided by law; and

WHEREAS, the Executive Officer has reviewed available information and prepared a report and recommendations on the proposal, which has been presented to the Commission in the manner provided by law; and

WHEREAS, the Commission heard and fully considered all the evidence presented at a public hearing held on May 21, 2025; and

WHEREAS, the Commission considered all the factors required by law under Government Code Section 56668 and adopted local policies and procedures.

**NOW, THEREFORE, BE IT RESOLVED** by the Humboldt Local Agency Formation Commission as follows:

1. The Commission's determinations on the proposal incorporate the information and analysis provided in the Executive Officer's written report.
2. The Commission, as Responsible Agency, hereby determines that the sphere of influence amendment and annexation is exempt from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines Section

15061(b)3. For the following reasons it can be seen with certainty that there is no possibility that the activity in question, the annexation of out-of-district goodwill response areas into the boundaries of the Kneeland FPD and extension of existing funding sources to support the ongoing delivery of fire protection services, will have a significant effect on the environment:

- The purpose of the proposed annexation is to expand the jurisdictional boundary to areas outside of any fire protection district that are already served on a goodwill basis by the Kneeland FPD; and
- The extension of existing taxes are governmental funding mechanisms which do not constitute a commitment to any specific project that may have a significant effect on the environment.

3. The Commission approves the sphere of influence amendment and annexation of fire service areas served by Kneeland FPD as part of their goodwill response area, contingent upon the satisfaction of the following terms and conditions as determined by the Executive Officer:

- a) Completion of the 30-day reconsideration period provided under G.C. Section 56895.
- b) Completion of conducting authority proceedings by Executive Officer.
- c) Submittal of a final map and geographic description of the affected territory conforming to the requirements of the State Board of Equalization.
- d) Payment of any outstanding fees as identified in the Commission's adopted fee schedule.
- e) Upon the effective date of the annexation, all parcels within the affected territory shall be subject to Kneeland FPD's existing special tax along with all applicable charges, fees, rates, rules, regulations, and ordinances lawfully enacted by the District for the provision of fire protection and emergency response services.

4. The proposal is assigned the following distinctive short-term designation:

Kneeland FPD Annexation 25-03

5. The Sphere of Influence boundary is hereby amended to be coterminous as depicted on the final map. Future amendments and/or updates to the sphere shall be conducted in accordance with Government Code Sections 56425 and 56430.

6. The effective date shall be the date of recordation of the Certificate of Completion. The Certificate of Completion must be filed within one calendar year from the date of approval unless a time extension is approved by the Commission.

**PASSED AND ADOPTED** at a meeting of the Humboldt Local Agency Formation Commission on the 21<sup>st</sup> day of May 2025, by the following roll call vote:

AYES:

NOES:

ABSENT:

ABSTAIN:

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Steve Madrone, Chair  
Humboldt LAFCo

Attest:

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Colette Santsche, Executive Officer  
Humboldt LAFCo