

CHANGE OF ORGANIZATION OR REORGANIZATION APPLICATION FORM

(Updated January 2023)

Proposal Description

1. Ty	ype of proposal:			
	Subject Agen (Cities and/or Specio		Related Jurisdictional Changes (Annexation, Detachment, Sphere Amendment, etc.)	
1.	Kneeland Fire Protection I	District	Annexation	
2.				
3.				
4.				
2. Ti	tle of proposal:			
	eland Fire Protection Distric	ct Goodwill Resp	oonse Area Annexation	
a Ic	pplication adopted by c	in affected cit oters of the aff	roposals may be initiated by resolution of y, county or special district, or by petition of ected area. In both cases, a notice of intent	
×	ne following is attached t Agency Resolution of A Landowner Petition Registered Voter Petition	oplication	ion form:	
S(W		it from each p	onsent of all property owners? (If so, please property owner to process the application	
5. A	pplicant:			
	//District/Chief tioner	Kneeland Fire	Protection District	
Stre	et Address	6201 Greenwo	6201 Greenwood Heights Drive	

City/State/Zip	Kneeland, CA 95549
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6. Designated Contact Person:

Name	Lindsay Green
Telephone	(707) 616-7667
E-mail	board@kneelandfire.org

General Information

1. Explain in detail the reasons for the proposal and why it is necessary.

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.

Describe any terms and conditions that are requested as part of the proposed action by LAFCo.

Kneeland FPD requests that the Kneeland FPD special tax, as authorized by Measure D (November 2024), be extended to all properties within the annexation area to fund the delivery of fire protection services, consistent with the purposes for which the special tax was approved.

3. Describe the general location and physical features of the subject territory.

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 FPD boundary; and Upper Fickle Hill Road between District boundary and the Arcata FPD boundary.

4. What is the current population of the subject territory?

The population of the proposed annexation area is approximately 237 and there are approximately 118 housing units, based on a ratio share of Census 2020 Blocks that are within the proposed annexation area.

5. If the proposal includes development, what is the estimated population of the subject territory?

The Kneeland FPD annexation does not include development of any sort and there are no known proposed plans for development by others. There would be no change in population resulting from the proposed annexation and consolidation.

6. Number of registered voters within the subject territory.

Estimated number of registered voters within Proposed Annexation Area:

Precinct 2BV-1 = 2

Precinct 3JCM = 2

Precinct 3KL = 67

Precinct 5MC = 15

Precinct 5MCK = 7

Total estimated number of registered voters within the Annexation Area = 93

7. Number of parcels within the subject territory.

There are five hundred and three (503) individual Assessors Parcels within the subject territory.

Proposal Boundaries

1. A map and geographic description of the proposal area meeting State Board of Equalization requirements must be submitted.

The following is attached to this application form:

- Boundary Map
- Boundary Description
- 2. Describe how the boundaries of the proposal were determined.

The Kneeland FPD identified areas to which they provide service outside their District boundaries and the district boundaries and service areas of adjacent fire service providers (Arcata, Blue Lake, and Bridgeville FPDs). The Kneeland FPD is proposing to annex the area between the current southern District boundary and the Bridgeville FPD boundary, given that the Bridgeville FPD boundary was established as part of its formation in 2012 and was intended to match its service area. The northern boundary along Maple Creek Road is the general mid-point between the Kneeland and Blue Lake FPD response areas, and the Blue Lake FPD is not proposing to annex any out-of-district response areas. The Kneeland FPD and the Arcata FPD engaged in a cooperative decision-making process that identified the proposed annexation area as a means to fill the "gap" between the two district boundaries. The Arcata FPD has recently annexed the remaining area along upper Fickle Hill Road and the "Goodwill Response Area".

3. Would this proposal create an island of non-agency territory? If yes, please explain.

No. This proposal will not create an island of non-agency territory. There are two parcels located between the Arcata FPD boundary that are not within either district. This annexation will add these two parcels to the Kneeland FPD, removing two islands of non-agency territory.

4. Total land area included in proposal:

61,846 Acres

Land Use Information

1. What is the total assessed value of properties (land and improvements) within the subject territory? (Note: you are encouraged to provide this information along with any existing assessments in a separate spreadsheet).

Subject Territory	Land	Improvement	Fixtures	Total
Total Proposed Annexation Area Assessed Value	\$26,917,383	\$20,932,196	\$1,548,471	\$49.398.050

2. Describe the existing uses within and surrounding the subject territory. Be specific regarding existing commercial corridors, residential communities, relevant structures, etc.

The following tables displays the Assessor's Use Code for property within the proposed annexation area by count of parcel and total acres for each use. The proposed annexation area is comprised of rural residences and farm dwellings interspersed among timbered and grazing lands. There are no defined residential communities or commercial areas.

Description of Assessor's Use Code	Count of APNs	Sum of Acres
100% TPZ, Rdwd, Improved	4	88.61
100% TPZ, Rdwd, Vacant	9	3,122.49
100% TPZ, Wwd, Improved	26	1,886.32
100% TPZ, Wwd, Vacant	137	13,898.74
Ag Preserve, Misc Imps	1	246.59
Ag Preserve, Res Imps	2	186.57
Ag Preserve, Vacant	14	2,783.51
Improved Single Family Residential	16	36.46
Improved, Rural Residential, 10 to 20 ac	2	32.05
Improved, Rural Residential, 1 to 5 ac	6	16.72
Improved, Rural Residential, 20+ to 40 ac	6	201.79
Improved, Rural Residential, 40+ac	7	439.55
Improved, Rural Residential, 5+ to 10 ac	2	16.84
Improved, Rural Residential, up to .99 ac	3	1.63
Improved, Subject to Exemption	1	31.93
Portion TPZ, Mix Rdwd&Wwd, Improved	3	1,046.58
Portion TPZ, Mix Rdwd, Wwd, Vacant	4	1,169.41
Portion TPZ, Rdwd, Improved	4	212.79
Portion TPZ, Rdwd, Vacant	3	925.08
Portion TPZ, Wwd, Improved	57	11,780.31
Portion TPZ, Wwd, Vacant	99	19,562.98
Public Land, Schools, Non Taxable Entities	20	1,397.51
Public Utilities	1	3.14
Rural - Improved	7	137.73
Rural - Vacant	10	160.11
Rural w/ Timber Infl - Improve	8	327.35
Rural w/ Timber Infl - Vacant	20	1,078.05
Rural, Agricultural, Misc Imps, Unrestricte	1	135.25
Rural, Agricultural, Residence, Unrestricte	2	230.15
Vacant Land, Subject to Exemption	3	3.28
Vacant Rural Residential, 1-5 ac	1	0.86
Vacant Single Family Residential	9	15.51
Vacant, Rural Residential, 20+ to 40 ac	5	139.48
Vacant, Rural Residential, 40+ ac	5	322.88
Vacant, Rural Residential, 5+ to 10 ac	2	16.93

Description of Assessor's Use Code	Count of APNs	Sum of Acres
Vacant, Rural Residential, to .99ac	1	0.46
Vacant, Rural, Agricultural, Unrestricted	2	142.80
Total	503	61,798.44

3. What is the current land use and zoning designation(s) within the subject territory?

Response Area & General Plan Land Use Designation	Acres
"RA5-20" Residential Agriculture-one dwelling per 5-20 acres	140.2
"RA10-20" Residential Agriculture-one dwelling per 10 -20 acres	40.5
"RA40" Residential Agriculture-one dwelling per 40 acres	1,546.1
"RA40-160" Residential Agriculture-one dwelling per 40 -160 acres	71.8
"RA160" Residential Agriculture-one dwelling per 160 acres	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
Total	61,848.7

Zone Classification	Acres
AG-B-5(5) - Agriculture General -5-acre minimum lots	10.4
FR-B-5(40) - Forestry Recreation -40-acre minimum lots	527.0
AE - Agriculture Exclusive	6,630.1
AE-B-5(160) - Agriculture Exclusive - 160 acre minimum lots	14,477.6
AE-B-6 - Agriculture Exclusive – no further subdivision	1,178.0
TPZ - Timberland Production Zone	36,925.9

TPZ-B-6 - Timberland Production Zone – no further subdivision	1,358.3
U - Unclassified	741.4
Total	61,848.7

4. Describe any proposed change in land use or zoning as a result of the proposal. (For city annexations, attach a copy of the adopted pre-zoning ordinance).

There are no proposed changes in land use or zoning as part of this reorganization or that the Kneeland FPD is aware of following annexation approval.

5. Is the proposal consistent with city or county general plans, specific plans, and or other adopted land use policies?

The Humboldt County General Plan strongly supports the annexation of lands outside of fire related district boundaries that are served by districts and the establishment of districts for non-district fire departments. Community Infrastructure and Services Element Policy IS-P 15, Expanded Fire Protection Services, specifically encourages the expansion of existing special district boundaries to provide fire protection services to areas outside of fire district boundaries. To further encourage this, on April 9, 2019, the Board of Supervisors approved a property tax sharing arrangement to support fire related district annexations, which further implements the General Plan policy encouraging the expansion of district boundaries.

6. Will the proposal result in development of property now or in the near future? Describe the type of development proposed (type of business or industry, single-family or multifamily residential, etc., and the number of units or facilities).

There are no developments proposed as part of this reorganization or contemplated following approval.

7. If development is proposed, what discretionary approvals are needed? Be specific regarding subdivision maps, conditional use permits or other entitlements.

The Kneeland FPD annexation does not include development of any sort and there are no known proposed plans for development by others.

8. What is the effect of this proposal on agricultural or open-space lands within and adjacent to the subject territory? If the subject territory is subject to a Williamson Act contract, please provide a copy of the contract(s) along with any amendments.

The proposed Kneeland FPD annexation does not involve the conversion of agricultural, timberland, or open space land and does not propose to change land use patterns. The subject territory includes the following lands subject to the Williamson Act.

Ranch ID	Ranch Name	Acres
124	Eleanor Edsall	922.3
133	J. Erwin Fredrickson	927.9
136	Fort Baker Ranch - Leland Rice	6,120.3
186	Edra Moore Ranch	5,381.9
198	Leo Pawlus Ranch	493.6
251	Carrington Ranch	2,827.8
258	Mather Preserve	634.4
259	Mather/Garcia Preserve	628.3
260	Garner Ranch	521.0
	Total	18,457.4

Agricultural, timberland, and open space resources within the proposed district boundaries will not be affected by the proposed district formation for the following reasons:

- (1) It is common throughout Humboldt County that rural populations are dispersed within and around agriculture and timberland and logical boundaries for fire protection districts would include such resource lands.
- (2) Approximately 25 percent of the land within existing fire protection district boundaries in Humboldt County is zoned TPZ or TC (coastal zone), 25 percent is zoned AE, and between five and ten percent is zoned AG, which totals to over 50 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.
- (3) 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 Humboldt Bay Fire (Humboldt No. 1 FPD), have approximately 62 percent and 59 percent agriculture and resource zoned lands, respectively, within their district boundaries.
- (4) 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://humboldtgov.org/DocumentCenter/View/1428/Agricultural-Resources-and Policies-Full-Report-PDF) prepared in August 2003 for the Humboldt County General Plan Update.
- (5) The Cortese-Knox-Hertzberg Local Agency Reorganization Act requires that special districts first receive written approval from LAFCo prior to providing service outside their district boundaries. Therefore, service must be provided within district boundaries so for fire

protection services to be provided to resource lands, developed or otherwise, such lands must be located within the boundaries of a fire related district.

- (6) Land within the proposed district boundaries is within the State Responsibility Area and CAL FIRE is obligated to continue to provide wildland protection to State Responsibility Area at current levels of protection. CAL FIRE relies upon Kneeland FPD to support its response to wildland fires within the proposed annexation area.
- (7) The Kneeland FPD currently responds to calls for service throughout the proposed annexation area on a good-will basis, when available, and has done so for many years. The weight of response and levels of service after the proposed Kneeland FPD annexation would be substantially similar to current levels and would therefore not significantly influence owners of resource land in their decisions to convert such land to other uses.
- (8) Voters within the Kneeland FPD recently approved a new special tax, repealing and replacing the previously existing taxes, that allows the owners of vacant contiguous parcels under identical ownership to be treated as one for purposes of the calculation of the special tax amount due. This contiguous parcel exemption will reduce the tax burden on owners of open space land within the existing District and proposed annexation area.

Public Services

1. List which agencies presently provide public services to the subject territory, and which are proposed to provide service. If not applicable or no change, please indicate accordingly.

	Present Provider	Proposed Provider
Sewer	None	No change
Water	None	No change
Fire	No Fire District. Kneeland Goodwill Response Area. CAL FIRE provides seasonal wildland fire protection within the State Responsibility Areas.	Kneeland Fire Protection District
Police	Humboldt County Sheriff's Office	No change

Roads	Humboldt County Public Works	No change
Recreation	None	No change
Drainage	Humboldt County Public Works	No change
Street Lighting	None	No change
Other	North Coast EMSA Ambulance services provided by City Ambulance (Eureka) - west/central/south -Arcata Ambulance -North	No change

2. How would the proposal affect the type or level of services within the subject territory?

The proposed annexation area is adjacent to the Kneeland FPD and because the Kneeland FPD is the nearest fire resource, the District has provided "goodwill" response services to this area for many years when requested and when available. The demand for service in the annexation area by Kneeland FPD has increased over time as additional development has been approved by Humboldt County. The approval of this annexation would enable the district to apply its existing funding sources within the annexation area to help sustain and improve service delivery. In addition, the establishment of new district boundaries would clearly define service responsibilities for the benefit of neighboring fire service providers, land use authorities, the public and other service providers.

No facility or equipment improvements are proposed as part of this annexation. The Kneeland FPD would continue to provide service to the annexation area from its existing fire station on Greenwood Heights Drive and using its current volunteers, equipment and apparatus. It is hoped that the additional revenue, and possibly additional volunteers from the annexation area, will allow the Kneeland FPD to sustain and improve its capacity to provide service and the level of service provided.

3. If, as a result of this proposal, increased service demand exceeds the existing capacity, describe what will be done by the service provider to increase capacity of services.

The proposed annexation would not result in increased service demand. See 2 above for a description of how the proposed annexation is intended to support and improve the level of fire protection services within the communities included.

4. Will the future delivery of services by any other public agency or service provider be affected by this proposal? If yes, list the agencies and indicate any comments received from these agencies. (Note: applicants must contact affected agencies prior to filing an application with LAFCo)

As described above, the proposed annexation will support and improve the level of service of the fire districts and emergency responders involved. The proposed annexation will not affect other public agencies or service providers.

5. For proposals submitted by resolution of application by a local agency, a plan for providing services within the affected territory must be prepared pursuant to Government Code Section 56653.

A PI	an for	Services	is	attached	to	this	application	form:
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⊠ Yes

□ Not applicable

Financial Information

1. How will public services be financed? List any assessments, taxes, fees or other charges to be levied as part of this proposal, or levied in the near future. (Note: a fiscal analysis and/or budget may be required).

Kneeland FPD has recently passed a new special tax, repealing and replacing previous special taxes, that would be applied to the annexation upon approval. Kneeland FPD is also seeking an agreement for 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 portion of 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.

2. Does any affected agency have existing bonded indebtedness for which the subject territory will become/remain liable? If so, please indicate taxpayer cost.

Maple Creek School is within the proposed annexation area and the portion of the annexation area east of the Mad River is within the Maple Creek School District. The voters of Maple Creek School District approved "Measure A" in November 2024, to facilitate school facility and safety improvements and modernization improvements. However, the proposed annexation will have no effect on this bond or payments relating thereto. The addition of Maple Creek School to the Kneeland FPD should support the safety related benefit enhancements funded through the bond. The Eureka Unified High School 2002 General Obligation Bonds, the Eureka Unified School 2015 and 2020 General Obligation Bonds, and the College of the Redwoods 2005/2007 General Obligation Bonds, to which property within the existing district are subject to will apply to some or all of the annexation area as well. However, the proposed annexation will continue to have no effect on these bond or payments relating thereto.

3. Does the resolution of application by a local agency include documentation that the

agency is in agreement with a standing Master Tax Exchange Agreement, has negotiated a tax exchange agreement pursuant to <u>Section 99</u> of the Revenue and Taxation Code, or has made a determination that the proposal is revenue neutral?

On April 9, 2019, the Humboldt County Board of Supervisors approved a policy providing for the transfer of property tax revenue to fire-related districts who annex their out of district response area, as well as meet other requirements, including increasing local revenue sources. The Kneeland FPD is actively working with Humboldt County to add a small amount of property tax growth as a district revenue source through the provisions of this County policy.

Sphere of Influence

١.	is the subject territory within the existing sphere of influence of the affected agency?
	⊠ Yes
	□No

- 2. If the proposal includes a request for a city or district sphere of influence amendment/update, justify the proposed changes with respect to the five sphere criteria listed in Government Code Section 56425(e):
 - a. "The present and planned land uses in the area, including agricultural and openspace lands."

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.

b. "The present and probable need for public facilities and services in the area."

Although outside fire protection district boundaries, the entire annexation area currently receives "goodwill" fire protection services by the Kneeland FPD, when requested and when available. The proposed annexation area contains rural and remote areas. There has not been significant growth in the proposed annexation area and significant changes in population growth are not anticipated in the future.

c. "The present capacity of public facilities and adequacy of public services that the agency provides or is authorized to provide."

The Kneeland FPD responds to this area on a "goodwill" basis. Kneeland FPD is supported by a recently approved special tax, which repealed and replaced taxes that had been previously approved; the first was approved upon District formation, and the second was approved in 2014. Extending the newly established special tax to the annexation area will provide regular and ongoing revenue sources to these communities to sustain local fire protection services.

d. "The existence of any social or economic communities of interest in the area."

The unincorporated community of Maple Creek is located within the proposed annexation area and includes Maple Creek School. There are no other known social or economic communities of interest within the proposed annexation area based on a review of Humboldt County planning documents.

e. "For an update of a sphere of influence 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."

The proposed annexation would address the critical need for sustained fire protection services for the upper Fickle Hill Rd area and the scattered rural development on the east and south side of the existing Kneeland FPD boundary. Based on the state Office of Environmental Health Hazard Assessment (OEHHA) SB 535 mapping of Disadvantaged Communities (https://oehha.ca.gov/calenviroscreen/sb535) there are no disadvantaged communities within the proposed annexation area and no Legacy Unincorporated Communities as mapped by Humboldt County.

3. If the proposal includes a city sphere of influence amendment/update, provide a written statement that describes whether an agreement on the sphere change between the city and county was achieved pursuant to Government Code Section 56425(b-d). Describe the elements of the agreement (such as, development standards, boundaries, and zoning requirements) and provide a copy of the written agreement.

Not applicable.	
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4. If the proposal includes a special district sphere of influence amendment/update, provide a written statement, pursuant to Government Code Section 56425(i-j), that specifies the following: (a) the functions or classes of services provided by those districts; and (b) the nature, location, and extent of any functions or classes of services provided by existing districts.

The Kneeland FPD provides fire protection services, 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 would continue to be provided throughout the entire annexation area in generally the same manner that they are currently provided.

Environmental Determination

 Copies of environmental documentation, pursuant to the California Environmental Quality Act (CEQA), prepared by the lead agency (including an initial study, technical reports, and written comments or recorded public testimony relative to the environmental documents) should be submitted with the application. Please include a copy of the Notice of Determination/Notice of Exemption showing the date filed with the County Clerk, and the environmental filing fee receipt from the California Department of Fish and Wildlife.

The following environmental document has been prepared:
□ Negative Declaration
☐ Mitigated Negative Declaration
□ Environmental Impact Report
□ Other:

In Resolution 25-02.12.01 Kneeland FPD found that the proposed annexation is not subject to the California Environmental Quality Act (CEQA) per CEQA Guidelines Section 15061(b)3. It can be seen with certainty that there is no possibility that the activity in question will have a significant effect on the environment - where the activity is establishment of a local district boundary to include areas that already receive "goodwill" service from the district, and that

does not involve dev provided.	velopment or a change in	the manner in which an existing service is
	nental documentation (N Co prior to adoption by t	lotice of Preparation/Notice of Intent) he Lead Agency?
Notification		
	nd contact information o equests, staff reports and	of the primary persons or agents who are to d notices:
Name	Telephone	E-mail Address
Lindsay Green	(707) 616-7667	board@kneelandfire.org
Bob Phipps		
	es that all applicants signey agree to indemnify L	n a volunteer indemnification agreement AFCo in the event of litigation concerning
The following is includ	ded with this application	form:
⊠ Signed Volunta	ry Indemnification Agree	ement
Filing Fees		
	trative and staff costs red	dance with LAFCo's adopted fee schedule quired to evaluate proposals. Checks must
The following is includ	ded with this application	form:
□ Check for Filing □ Signed Fee Agr		

Other (please explain):

Filing fees have been requested and allocated as part of the Humboldt County Fire Chiefs Association Measure Z funds to support sustainable fire services.

Certification

The undersigned hereby certifies that all LAFCo filing requirements will be met and that the statements made in this application are complete and accurate to the best of their knowledge.

Secretary
(Title)

2/12/2025
(Date)