

Attachment 1: Subdivision and Development Analysis of Out of District Areas

There are approximately 1.3 million acres of privately owned property in Humboldt County within the SRA that are not located within the boundaries of a district. Approximately 640,000 acres outside the boundaries of a fire related district are relatively remote industrial timberlands or grazing lands with limited population that fire departments do not identify as part of their regular response area. Approximately 200,000 acres receive fire protection services from non-district fire companies, and approximately 450,000 acres benefit from out of district goodwill responses provided by fire-related districts. The remaining area consists of state and federal park land and Tribal land. Approximately 85 percent of the population in the unincorporated area resides within fire related districts.

The services provided to these areas from fire related districts, volunteer fire companies not associated with districts or by CAL FIRE are not recognized by the Subdivision Map Act as adequate fire protection. For that reason, most of these areas cannot be subdivided. Given that no other local agency is responsible or obligated to provide such service, the Subdivision Map Act makes Humboldt County responsible for ensuring structure fire protection services are available for new subdivisions before they are approved.

Approximately 98 percent of land outside of fire related districts is planned for agricultural and timber use, and about two percent planned for residential use (most would be considered rural residential and a small fraction would be considered suburban or urban residential). The County General Plan and Zoning Regulations would allow a new single family unit on land planned for residential uses and, in most cases, would allow single-family residential uses on land planned for timber agricultural and timber uses. A new state law (Senate Bill 229 and Assembly Bill 494 which took effect in January 2018) allows accessory dwelling units in areas zoned to allow single-family residential uses. Land zoned exclusively for agricultural and timber production use may not be affected by new accessory dwelling unit regulations.

As shown in the table below, there are nearly 8,000 developed parcels and over 4,500 parcels with development potential located outside fire related districts and cities. All of the parcels with development potential could accommodate a new housing unit and many could be developed with an accessory dwelling unit. Although many have subdivision potential, these parcels are located outside fire related district boundaries and cannot be subdivided.

Response Area Type	Acres	Parcels	Developed Parcels	Developable Parcels
Fire Related District	448,241	57,593	**	**
Out of District Response	451,231	4,925	3,969	1,088
Volunteer Fire Companies	196,161	3,180	1,526	828
No identified response	640,148	3,062	19	2,384
Park and Tribal Land	563,782	3,626	2,405	297
Total	2,299,563	72,386	7,919	4,597

** Many parcels within fire related districts are within cities and the development status of parcels within cities is not known and parcels within fire related districts are not the focus of this report.

The central focus of this agenda item is to identify options that will help ensure sustainably funded local fire and rescue services to areas outside fire related districts because there is a current and growing demand for that service. To further exacerbate this problem; these out of district areas are predominantly located within High and Very High Fire Hazard Severity Zones. CAL FIRE is responsible for suppressing wildfires in these areas, but local fire departments are often first at scene to initiate the initial attack, are very often called to support CAL FIRE's sustained suppression operations, and are also asked to back-fill CAL FIRE stations during extended operations. According to the proceedings of the National Academy of Sciences "Rapid growth of the US wildland-urban interface raises wildfire risk" (2018), when houses are built close to forests or other types of natural vegetation, they pose two problems related to wildfires. First, there will be more wildfires due to human ignitions. Second, wildfires that occur will pose a greater risk to lives and homes, they will be hard to fight, and letting natural fires burn becomes impossible.

In response to the problems highlighted above, the Planning Commission considered a new standard related to development outside fire related district boundaries (IS-S5 Other Development Outside of Fire District Boundaries) as part of the General Plan update. This standard would have required that new industrial, commercial, and residential development, not located within the boundaries of a fire protection district, be responsible to obtain emergency response and fire suppression service by contract or written agreement from a fire service provider. Permitted development would have been required to record a notice and acknowledgement that the development was not within a fire protection district and an adequate level of service was not the permanent responsibility of a fire protection agency. The proposed standard would have required a written agreement from a fire service provider, prior to project approval, as well as the recordation of notice and acknowledgement that the development was not within a fire protection district. Agreements would likely have included annual payments to cover the cost of providing the service.

Public comment during Planning Commission review resulted in a revision to this proposed standard to require that the applicant obtain acknowledgement from an appropriate local fire service provider of the availability of emergency response and fire suppression services and place a note on the building permit. In addition, discretionary actions require the recordation of acknowledgement if no service is available. ***The revised standard allows development without a local fire service provider and does not require a written agreement for service.***

As the table above indicates, there are a substantial number of developable parcels in areas where fire districts respond outside of district boundaries, within the response area of volunteer fire companies (these areas, like out of district response areas do not pay for the ongoing delivery of fire protection services as part of their annual tax bill) and where there is no identified response. It should be noted that the State Department of Finance projected in March 2017 that countywide, the Humboldt County population will grow by an average of approximately 270 persons per year (approximately 117 new housing units per year assuming the current countywide average household size of 2.31 persons per unit) between 2018 and 2035, increasing by a total of 4,580 persons, and will begin to decline thereafter. This growth will be shared between the unincorporated area and the seven incorporated cities. Approximately 53 percent of the total County population is located within the unincorporated area. Therefore, approximately 2,427 additional persons (or 1,051 housing units) could be located within the unincorporated area, some percentage of which in areas outside fire related district boundaries.