

12.0 Public Services

This section of the EIR assesses the effects of the project on the capacity of public service providers and whether that effect would result in substantial adverse physical impacts associated with providing capacity to meet the demand created by the project. Unless otherwise stated, the discussion and analysis in this section is based primarily on information from the following sources:

- California Department of Education - DataQuest;
- Arcata Fire Protection District; and
- Email communications with the County Sheriff.

In addressing public service demand issues under CEQA, the appropriate focus is on the environmental effects of implementing actions that may be needed to ensure that a project's demand for a public service does not exceed the capacity of a service provider to deliver that service. For example, if a new development project would increase demand for school services, the associated CEQA analysis should inquire as to whether new or expanded school facilities may be required to provide such service. The "impacts" addressed under CEQA are the physical effects of providing the new or expanded service, not the potential inability of the service provider to deliver adequate service.

Responses to the Notice of Preparation

There were no comments on the NOP regarding the public services scope of analysis.

12.1 Environmental Setting

Fire Protection

Fire protection services for McKinleyville are provided by the Arcata Fire Protection District (AFPD). The AFPD is one of the largest fire departments in Humboldt County, serving 36,000 residents in the City of Arcata and the communities of McKinleyville, Bayside, Manila, and Jacoby Creek. The AFPD operates three fire stations with two firefighters on-duty at each location (Captain and Engineer); the Arcata Station, the Mad River Station, and the McKinleyville Station. Each station is equipped with special apparatus to respond to target hazards within its response area (Arcata Fire Protection District 2024a).

The AFPD has an average response time of three to four minutes. On calls that require additional resources, mutual aid support is provided primarily the Westhaven Volunteer Fire Department, Fieldbrook Volunteer Fire Department, Blue Lake Fire District, and Humboldt Bay Fire (Alyssa Alvarez, telephone call with consultant, May 21, 2024).

In 2023, the AFPD responded to 3,540 calls, most of which were emergency medical services calls (Arcata Fire Protection District 2024b). The district has an Insurance Services Office (ISO) classification rating of 3/3Y, which is a split classification; the first number is the class that applies to properties within five road miles of the responding fire station and 1,000 feet of a creditable water supply, while the second number is the class that applies to properties within five road miles of a fire station but beyond 1,000 feet of a creditable water supply. Class 1 represents an exemplary fire suppression program and a Class 10 indicates that the community's fire suppression program does not meet ISO's minimum criteria. The AFPD jurisdictional area is 62 square miles, much of which is rural with limited water supply, but within five road miles of one of the three stations (Arcata Fire Protection District 2024c).

The McKinleyville Station is located at 2149 Central Avenue within the Town Center site boundary. It houses a Type 1 Fire Engine and a 4350 truck. The Fire Chief, Assistant Fire Chief, and Deputy Fire Chief are stationed at this location, as it is the AFPD headquarters (Alyssa Alvarez, call with consultant, May 21, 2024).

CAL FIRE also provides structural fire protection through an annually renewable contract with the County for County Service Area No. 4. This service area covers an area along U.S. Highway 101 from the southern boundary of the Orick Community Service District to the northern boundary of the AFPD. CAL FIR is also under contract with the County and AFPD to provide local fire dispatch services.

Law Enforcement

Law enforcement services within Humboldt County are provided by the Humboldt County Sheriff's Office, which includes four different stations located throughout the county. The station located at 1608 Pickett Road in McKinleyville is owned by the McKinleyville Community Services District and operated by the Humboldt County Sheriff's Department. The McKinleyville Station serves the residents of McKinleyville, Fieldbrook, Westhaven, Orick, and all other unincorporated areas north of Arcata. This station would serve future development within the project site.

According to the its 2022 Annual Report, the Humboldt County Sheriff's Office responded to a total of 64,667 calls for service and the McKinleyville Station alone responded to a total of 19,516 incidents and had a total of 1,786 cases taken. The Humboldt County Sheriff's Office currently has approximately 300 employees; approximately 100 of them are deputies assigned to the Patrol Division (William Honsal, email message, August 6, 2024).

Schools

Two school districts would serve the school-age children generated from development within the project site: McKinleyville Union School District and Northern Humboldt Union High School District (Humboldt County Office of Education 2024). This section addresses enrollment conditions in the two districts, includes projections of new students that would reside within the project site, identifies potential capacity issues and notes potential general environmental effects from constructing new school facilities should the project contribute to such a need.

McKinleyville Union School District

The McKinleyville Union School District offices are located at 2275 Central Avenue in McKinleyville. The school district operates three schools: Dow’s Prairie (grades TK-2), Morris Elementary (grades 3-5), and McKinleyville Middle (grades 6-8).

As illustrated in [Table 12-1, McKinleyville Union School District Enrollment](#), enrollment in the District has incrementally decreased year-over-year since the 2017-18 school year.

Table 12-1 McKinleyville Union School District Enrollment

School Year	Enrollment
2017-18	1,166
2018-19	1,123
2019-20	1,097
2020-21	971
2021-22	935
2022-23	929
2023-24	923

SOURCE: DataQuest 2024a

NOTE: The California Department of Education DataQuest source does not contain enrollment information prior to the 2017-18 school year.

As illustrated in [Table 12-2, McKinleyville Union School District – Annual Individual School Enrollment](#), enrollment at each school has fluctuated over time.

Table 12-2 McKinleyville Union School District - Annual Individual School Enrollment

School Year	Enrollment		
	Dow’s Prairie Elementary	Morris Elementary	McKinleyville Middle
2017-18	420	368	378
2018-19	390	359	374
2019-20	365	348	384
2020-21	293	334	344
2021-22	280	312	343
2022-23	276	292	360
2023-24	317	268	338

SOURCE: DataQuest 2024b

Table 12-3, [Current McKinleyville Union School District Enrollment and Capacity](#), shows the status of districtwide enrollment and capacity conditions for 2023-24.

Table 12-3 McKinleyville Union School District Enrollment and Capacity

Grades	Capacity	2023-24 Enrollment	Available Capacity
TK-8	125 per grade level	923	327
Total	1,250		

SOURCE: Cade McNamara, email message, September 25, 2024; DataQuest 2024b

Based on the information provided by the McKinleyville Union School District staff and the school year 2023-24 student enrollment (DataQuest 2024b), the McKinleyville Union School District has capacity for about 327 additional students as of 2023-2024.

Northern Humboldt Union High School District

The Northern Humboldt Union High School District office is located at 2755 McKinleyville Avenue in McKinleyville. The school district serves students in grades 9-12 at Arcata High School and McKinleyville High School, Pacific Coast High and Mad River High continuation schools, and Six Rivers Charter High School. High school students residing within the site would attend McKinleyville High School.

As illustrated in [Table 12-4, Northern Humboldt Union High School District Enrollment](#), enrollment has generally increased year-over-year since the 2017-18 school year.

Table 12-4 Northern Humboldt Union High School District Enrollment

School Year	Enrollment
2017-18	1,761
2018-19	1,787
2019-20	1,808
2020-21	1,824
2021-22	1,909
2022-23	1,962
2023-24	1,929

SOURCE: DataQuest 2024d

NOTE: The California Department of Education DataQuest source does not contain enrollment information prior to the 2017-18 school year.

Table 12-5, McKinleyville High School– Annual Enrollment, shows that enrollment has fluctuated over time. The McKinleyville High School is not at capacity and has the ability to house additional students (Tammy Pires, email message, July 18, 2024).

Table 12-5 McKinleyville High School - Annual Enrollment

School Year	Enrollment
2017-18	555
2018-19	529
2019-20	511
2020-21	525
2021-22	538
2022-23	556
2023-24	549

SOURCE: DataQuest 2024e

12.2 Regulatory Setting

This section includes summaries of standards, regulations and/or policies and plans that are relevant to evaluating impacts of the proposed project. Standards, regulations, and/or policies that may serve as uniformly applied development standards that mitigate environmental impacts are included.

State

California Fire Code

The California Fire Code contains regulations relating to construction and maintenance of buildings and the use of premises. Topics addressed in the Code include fire department access, fire hydrants, automatic sprinkler systems, fire alarm systems, fire and explosion hazards safety, hazardous materials storage and use, provisions to protect and assist first responders, industrial processes, and many other general and specialized fire safety requirements for new existing buildings and premises.

California Health and Safety Code

State fire regulations are set forth in Sections 13000 et seq. of the California Health and Safety Code. This includes regulations for building standards (as also set forth in the California Building Code), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training.

Senate Bill 50

The “Leroy F. Greene School Facilities Act of 1998,” also known as Senate Bill No. 50 or SB 50 (Chapter 407, Statutes of 1998), governs a school district’s authority to levy school impact fees. This comprehensive legislation, together with the \$9.2 billion education bond act approved by the voters in November 1998 known as “Proposition 1A”, reformed methods of school construction financing in California.

SB 50 established a process for determining the amount of fees that developers may be charged to mitigate the impact of development on school facilities. Under this legislation, a school district could charge fees above the statutory cap only under specified conditions, and then only up to the amount of funds that the district would be eligible to receive from the State. According to Government Code Title 7, Section 65995, the development fees authorized by SB 50 are deemed to be “full and complete school facilities mitigation.” SB 50 provides that a state or local agency may not deny or refuse to approve the planning, use or development of real property on the basis of a developer’s refusal to provide mitigation in amounts in excess of that established by SB 50.

Local

Humboldt County General Plan

IS-P3. Requirements for Discretionary Development. The adequacy of public infrastructure and services for discretionary development greater than a single family residence and/or Accessory Dwelling Unit shall be assessed relative to service standards adopted by the Board of Supervisors, local service providers, and state and federal agencies. Such discretionary development may be approved if it can be found that:

- A. Existing services are adequate;
- B. Adequacy will be attained concurrent with project implementation through project conditions;
- C. Adequacy will be obtained over a finite time period through the implementation of a defined capital improvement or service development plan; or
- D. Evidence in the record supports a finding that approval will not adversely impact health, welfare, and safety or plans to provide infrastructure or services to the community.

IS-P4. Fiscal Impact Assessment. The fiscal impacts of discretionary development (i.e. projects that require the preparation of an Environmental Impact Report that may have significant impacts on existing and planned public infrastructure and services) shall be considered during the project review process. Significant adverse effects shall be mitigated to the extent feasible.

IS-P6. Infrastructure and Services Capacity. In coordination with service providers, the County shall periodically monitor the capacities of infrastructure and services in relation to existing and planned demand.

IS-P25. Fire Service Impacts from New Development. During review of discretionary permits within fire related district boundaries or identified response areas, utilize recommendations from the appropriate local fire chief as feasible mitigation measures to reduce impacts to emergency response and fire suppression services from new development.

Humboldt County Municipal Code

Fire District Development Impact Fees

Title III, Division 2, Chapter 10 of the Humboldt County Code allows the Board of Supervisors to adopt a Fire District Development impact fee for all non-exempt Development within the unincorporated areas of the County and within the boundaries of a Fire District. The Board of the fire district must adopt certain findings of need and submit those to the County for consideration. This has not yet been accomplished by the Arcata Fire Protection District. Once this fee is established, new development is required to pay impact fees to support capital facility costs for maintaining fire protection service capacity. The fee is paid to and collected by Humboldt County on or before the time of issuance of a building permit.

Section 324-7, Dedication of Land for Schools

“Any subdivider, who within three (3) years develops or completes the development of one or more subdivisions comprised of a single parcel or contiguous parcels having more than 400 dwelling units within a single school district which maintains an elementary school, shall dedicate to the school district within which such subdivision is located such land as the board

of trustees of such school district shall deem to be necessary for the purpose of constructing thereon schools necessary to assure the residents of such subdivision of adequate elementary school service.”

12.3 Thresholds or Standards of Significance

CEQA Guidelines Appendix G is a sample initial study checklist that includes a number of factual inquiries related to the subject of public services, as it does on a whole series of additional topics. Lead agencies are under no obligation to use these inquiries in fashioning thresholds of significance on the subject of public services impacts, or on any subject addressed in the checklist. Rather, with few exceptions, CEQA grants agencies discretion to develop their own thresholds of significance. Even so, it is a common practice for lead agencies to take the language from the inquiries set forth in Appendix G and to use that language in fashioning thresholds. The County has done so here. Therefore, for purposes of this EIR, a significant impact would occur if implementation of the proposed project would:

- Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: fire protection, police protection, schools, parks, and other public facilities.

Potential impacts associated with parks and recreation are addressed in Section 16.0, Effects Found to be Less than Significant. Refer to that section for more information. The thresholds for “substantial adverse physical impacts” are presented throughout this EIR for each environmental issue addressed.

12.4 Analysis, Impacts, and Mitigation Measures

This section includes information and data regarding public services that are relevant to the proposed project based on the threshold of significance described above. The information and data are used as a basis for determining impact significance.

Fire Department Services

The project would support about 6,122 new residents and enable construction of significant new commercial and office building square footage, thereby increasing demand for AFD services. According to the AFD Fire Marshal, a key future AFD service need is to extensively remodel and/or replace the Mad River Fire Station. The AFD is planning for a new centrally located fire station with capacity to house two fire engines, a ladder truck, a central classroom

and training facility, and five personnel. The new station would be similar to the McKinleyville Station and would be approximately 5,000 square feet (email message, October 3, 2024).

The project would contribute to the AFPD's need to construct a new fire station, the location of which has not yet been identified. If and when a determination is made that the new station is required, the location and description of the new fire station will be determined by AFPD, who will act as the "lead agency", with the County acting as the responsible agency, in conducting a separate CEQA process for that project. That analysis would identify potential impacts from constructing and operating the station and may include mitigation measures to reduce potential associated impacts.

As described in Section 12.2, Regulatory Setting, the fire district can establish a fee requiring developers of each individual future project within the project site to pay fire protection impact fees to help off-set the cost of their incremental increase in service demand. Payment of such fees would be required by Humboldt County on or before the issuance of a building permit for projects within the Town Center.

Life Plan Humboldt

The Life Plan project would contribute to the overall project demand for increased fire protection services. All Life Plan Humboldt buildings would be designed to meet minimum fire and emergency safety requirements identified in the California Building Code and California Fire Code and would include appropriate fire safety measures and equipment, including emergency water infrastructure (fire hydrants and sprinkler systems), installation of smoke detectors and fire extinguishers, emergency response notification systems, and the provision of adequate emergency access ways for emergency vehicles. Further, adequate right-of-way for emergency vehicles would be provided according to applicable requirements. Consequently, the cumulative contribution to construction impacts associated with providing new or expanded fire protection facilities is addressed as part of the overall project fire protection impact analysis summary provided above. The Life Plan project would have fewer severe fire services impacts than assumed for the project as a whole.

Law Enforcement Service

The proposed project would create new demand for Humboldt County Sheriff services. Two deputies and one sergeant are currently assigned to McKinleyville. To accommodate increased demand, the County Sheriff recommends that four officers be added to serve McKinleyville. This would provide for one additional deputy per shift.

The existing Sheriff's Office facilities can accommodate the additional deputies (William Honsal, email message, May 15, 2024). No new facilities would be needed. Therefore, the project would

have no substantial adverse physical impacts associated with triggering the need to construct new law enforcement facilities.

Life Plan Humboldt

The Life Plan project would contribute to the overall project demand for increased law enforcement protection services. Consequently, the cumulative contribution of the project to construction impacts associated with providing new or expanded law enforcement protection facilities are addressed as part of the overall project law enforcement protection impact analysis summary provided above. The Life Plan project would have no new or more severe law enforcement services impacts than assumed for the project as a whole.

Schools

Both the McKinleyville Union School District and Northern Humboldt Union High School District were contacted for input on the potential impacts the proposed project may have on their system capacities and the potential need to construct new facilities. The following discussion is a compilation of that input.

Table 12-6, Student Generation, provides the projected number of students that could be generated by the project.

Table 12-6 Student Generation

School District	Student Generation Rates	Proposed Dwelling Units	Total Students
McKinleyville Union (Elementary and Middle Schools)	0.5 students per dwelling unit ¹	2,432 ³	1,216
Northern Humboldt Union High (High School)	0.2 students per dwelling unit ²		487
Total			1,703

SOURCE: State Allocation Board 2008; Tammy Pires, email message, July 18, 2024

NOTE:

1. Student generation rate not available from the school district. Average statewide rate taken from California School Facility Program, Office of Public School Construction 2008.
2. The school district staff stated that the Northern Humboldt Union High School District has not identified a student generation rate. Therefore, for the purpose of this analysis, the state’s general high school district student generation rate is used.
3. This value is the total residential unit capacity less the 218 units included in the Life Plan Humboldt project, which would not generate school-age children.

The proposed project could result in a total of 1,703 new school-age children, 1,216 of which would require capacity in the McKinleyville Union School District and 487 of which would require capacity in the Northern Humboldt Union High School District.

As discussed in Section 12.1, Environmental Setting, both Districts have capacity to serve additional students. The McKinleyville Union School District has the ability to house approximately 327 students. Northern Humboldt Union High School District staff indicated that McKinleyville High School has capacity for additional students, but did not provide an available capacity number. It is assumed that at least a portion of the projected 487 high school students from the project could be accommodated, but that number is unknown.

The project will likely be built out over 20 years or more. Therefore, it will take multiple years for the total number of students described in Table 12-6 to be generated in any one school year. A schedule of annual housing production within the project site and corresponding annual student generation over time cannot be known at present. This is common in the context of projecting the rate of development for “plan” projects that would build out over a long period of time. The annual housing construction rate will entirely depend on demand for the housing product types within the project site over time. Myriad variables could affect demand. Consequently, it would be speculative to project annual school-age student generation from the project in any year over time. Similarly, there is no highly reliable mechanism by which to forecast whether or not the school districts will be able to accommodate new students from the project site plus new students from elsewhere within their respective boundaries during any given future year or period.

Over time, new students residing within the site may or may not contribute to school overcrowding. It would be speculative to project whether schools in each school district would or would not be overcrowded as new students from the proposed project are generated. Therefore, at this time, it would be speculative to determine whether the proposed project would contribute to or cause overcrowded conditions that would trigger the need to construct new school capacity.

Options for Addressing Future School Overcrowding

If either school district were to identify/anticipate overcrowded conditions due in part to the proposed project and other cumulative development, several options may be available for accommodating new students. These commonly include, but may not be limited to: constructing new schools, adding portable classrooms at existing schools, and/or reorganizing school district boundaries to capitalize on capacity at individual schools. Decisions for housing new students are the sole responsibility of the school districts.

Of the basic capacity expansion options, constructing and operating a new school would have the greatest potential to create new adverse environmental impacts. Significant impacts for every environmental topic typically addressed in a CEQA document could be possible. Adding portable classrooms could potentially result in a narrower range of adverse effects given that portable classrooms are typically manufactured off-site and their installation process does not

require highly intensive site preparation activities. CEQA Guidelines section 15314, Minor Additions to Schools, describes a class of actions that are exempt from CEQA review. Class 14 consists of minor additions to existing schools within existing school grounds where the addition does not increase original student capacity by more than 25 percent or 10 classrooms, whichever is less. Adding a portable classroom is included in this exemption. Reorganizing school boundaries could be a “project” under CEQA if it were to have reasonably foreseeable effects, such as increasing vehicle miles traveled and associated increases in criteria air and greenhouse gas emissions.

In any of the above noted scenarios for adding school capacity, or any other that might be considered by either school district, each district would act as the lead agency for preparing CEQA documentation where the capacity expansion project qualifies as a “project” under CEQA. At the time a specific project is defined, the respective school district would prepare CEQA documentation as needed to identify significant impacts and adopt mitigation measures to substantially lessen or avoid the impacts. In this case, addressing the environmental impacts of expanding school capacity and mitigating those impacts is the responsibility of each district, not Humboldt County.

Per communications with the Humboldt County Planning and Building Department, McKinleyville Union School District staff stated school facility expansion will not likely be necessary to accommodate the project, but that modernization of the current facilities will be required (Cade McNamara, email message, September 25, 2024). Modernization of existing facilities typically is not a source of significant environmental impacts. As discussed previously, if and when a determination is made that new facilities must be constructed, the respective district will identify a location and description of the facilities and project specific CEQA analysis would be conducted at that time.

As described in Section 12.2, Regulatory Setting, developers of each individual future residential project within the project site would be required to pay school impact fees consistent with SB 50 requirements. Payment of such fees is considered to be complete mitigation for the impacts of new development on school districts. Payment of such fees would be required by Humboldt County.

Life Plan Humboldt

Life Plan Humboldt is a senior living community project that would not generate school-age children. Therefore, this foreseeable project would not directly contribute to potential impacts associated with constructing new school facilities should new capacity be needed as the Town Center site develops.