

AGENDA ITEM 6.D.

MEETING: February 24, 2026
TO: Trinity LAFCo Commissioners
FROM: Colette Santsche, Executive Officer
SUBJECT: Commercial Timberlands Report

BACKGROUND

Health & Safety Code §13811 allows inclusion of State Responsibility Areas (SRA) within a Fire Protection District (FPD), except for “commercial forest lands which are timbered lands”. The statute, last updated in 1987, does not define what constitutes commercial timberland and does not reflect today’s all risk-emergency service realities in rural counties.

The ambiguity in §13811 was highlighted in Mendocino Redwood Co. v. County of Mendocino (2019), where the appellate court determined that commercial timberlands were excluded from a fire protection district and entitled to refund of parcel taxes previously paid within the statute of limitation period (4 years).

More recently, in Humboldt County, Humboldt LAFCo faced similar issues during the Kneeland FPD annexation of its longstanding goodwill response area. Following Commission approval, LAFCo received a reconsideration request from Humboldt Redwood Company citing §13811. The Commission ultimately removed 17 Humboldt Redwood Company parcels from the annexation area due to risk of litigation. The matter demonstrated the practical challenges LAFCo’s face in administering the statute where districts are operationally responding to these lands but lack clear authority to include them for funding purposes.

DISCUSSION

In Trinity County, significant portions of Middle Trinity and North Lake are classified as SRA (see Attachment A). Approximately 333 parcels or approximately 80,000 acres of TPZ classified lands are located within existing district boundaries.

While CAL FIRE retains responsibility for wildland fire suppression in SRAs, local fire districts routinely respond to medical aids, vehicle accidents (including logging-related incidents), rescues, hazardous materials incidents, and structure protection on timberlands.

The statutory exclusion creates uncertainty for fire districts seeking to align their boundaries with long-standing response areas and improve service levels. It also creates legal and fiscal ambiguity for districts that already include SRA lands within their existing boundaries, calling into question the enforceability of locally approved funding mechanisms applied to those properties.

Over the past several months, staff in coordination with Chair Cox, have coordinated with Rural County Representatives of California (RCRC), Calforests, regional fire service providers, and Sierra Pacific Industries Weaverville District Manager to discuss the issue and possible solutions.

Recent discussions indicate interest in continuing to explore how fire districts may receive proportional compensation for unreimbursed emergency services provided on commercial

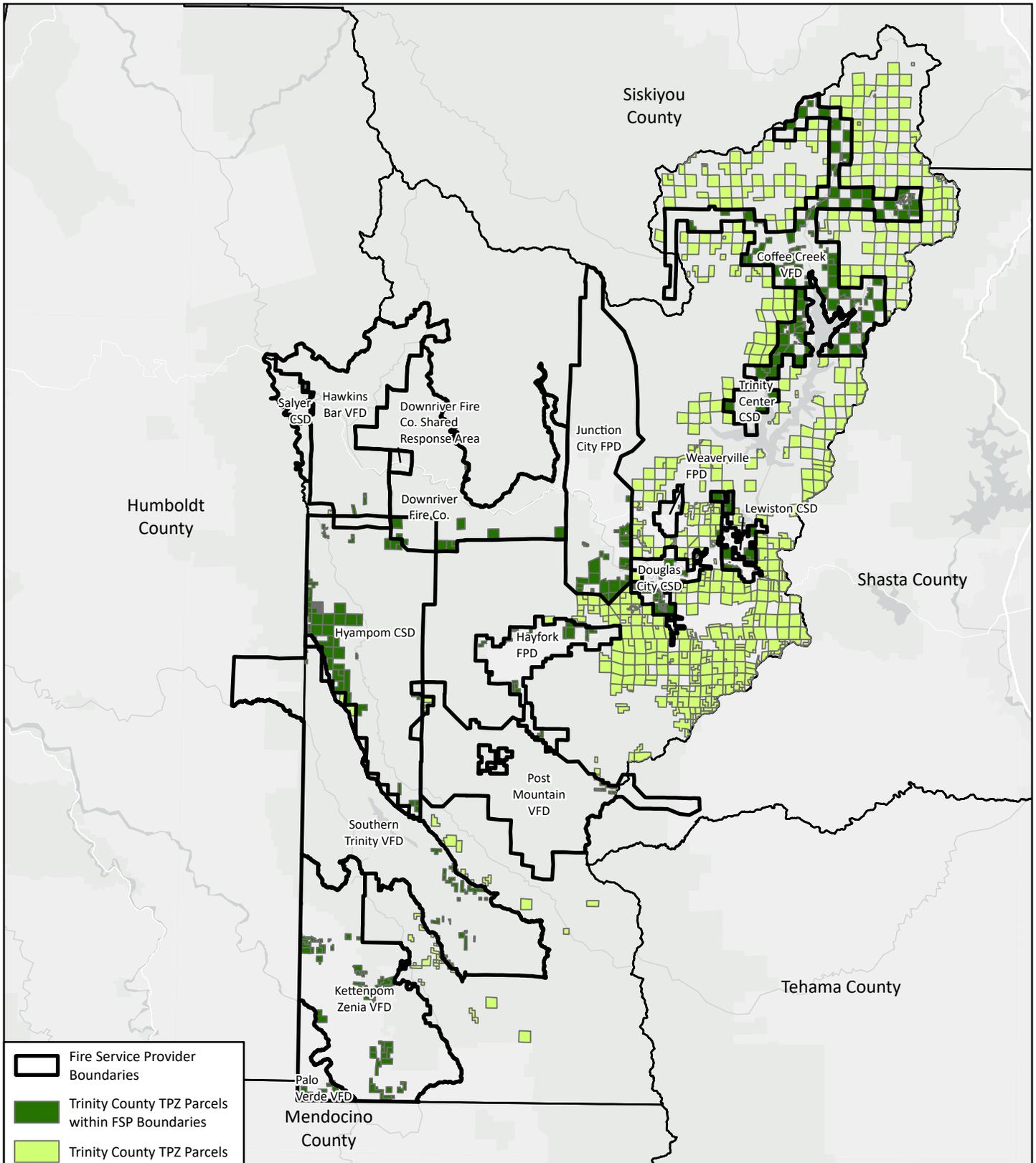
timberlands. Continued coordination will be aimed at developing a balanced approach that reflects operational realities, fiscal fairness, and CAL FIRE's statutory wildland fire role.

RECOMMENDATION

Staff recommends the Commission receive and file this report. The Commission is invited to discuss the item and provide direction to staff as needed.

Attachments:

- A) Trinity County TPZ Parcels within Fire Service Provider Boundaries Figure



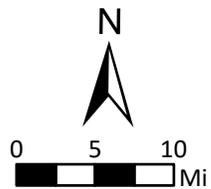
-  Fire Service Provider Boundaries
-  Trinity County TPZ Parcels within FSP Boundaries
-  Trinity County TPZ Parcels



Trinity County TPZ Parcels

Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, (c) OpenStreetMap contributors, and the GIS User Community
 Fire Service Provider Boundaries: Trinity LAFCo, Trinity RCD CWPP Hub
 Parcels: Trinity RCD
 Roads: Trinity County Open GIS

2/2/2026



Coordinate System: NAD 1983 2011 StatePlane California I FIPS 0401 Ft US