



CITY OF FORT BRAGG

Incorporated August 5, 1889

416 N. Franklin Street

Fort Bragg, CA 95437

<http://city.fortbragg.com/>

Mendocino Local Agency Formation Commission
200 S School Street #2
Ukiah, CA 95482
Attn: Chair and Commissioners

Re: Municipal Service Review – Mendocino Coast Recreation and Park District

Dear Chair and Commissioners:

The City of Fort Bragg respectfully urges the Commission to decline any expansion of the Municipal Service Review (MSR) beyond its statutory scope, particularly with respect to property tax allocation, fiscal equity analysis, or reorganization scenarios.

The 2012 Property Tax Exchange Agreement transferred full responsibility for the C.V. Starr Community Center from Mendocino Coast Recreation Parks District (MCRPD) to the City of Fort Bragg and established a corresponding allocation of up to 45% of the District's property tax revenue to support those obligations. That Agreement remains valid, binding, and in full force and effect, with no sunset provision.

Under the Agreement, the City assumed:

- Full operational responsibility
- Long-term capital and maintenance obligations
- All financial risk associated with sustaining the facility

This funding structure was deliberately designed to reflect a complete transfer of responsibility. Any effort to revisit or reduce that allocation—while the City continues to bear the full burden of ownership and operation—would be inconsistent with both the intent and the express terms of the Agreement.

The District's current pursuit of an expanded MSR, after having transferred both responsibility and risk, raises significant concerns. Having effectively offloaded the obligations associated with the facility, attempts to now reexamine or diminish the agreed-upon property tax allocation appear to be an effort to reclaim revenue without reassuming corresponding responsibilities. Such an approach undermines the balance and mutual reliance that formed the basis of the original Agreement.

Absent a willingness by the District to take back a commensurate share of operational, capital, and financial obligations, there is no principled basis for altering the funding structure. To do so would shift costs to the City while allowing the District to retain the benefits—an outcome that is neither equitable nor consistent with the Agreement.

As LAFCO staff has clearly stated, the requested scope expansion is not appropriate within an MSR framework:

- Parcel-level tax analysis is not required under MSR
- Fiscal equity analysis constitutes a separate fiscal study
- Reorganization or tax reallocation must proceed through a formal application process

Maintaining this distinction is essential. Expanding the MSR beyond its statutory purpose risks blurring the line between service review and policy-making, while introducing uncertainty into long-standing agreements that local agencies rely upon.

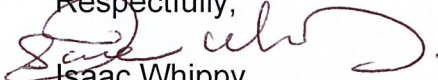
It is also important to recognize that the current structure of recreation services is the direct result of prior District decisions. The transfer of the C.V. Starr Community Center to the City occurred due to financial and operational challenges and fundamentally reshaped service delivery along the Mendocino Coast. Today, the facility serves as the primary recreation hub for the region, providing aquatics, youth programs, fitness, senior services, and community events to residents across the District—not just within Fort Bragg. The City operates and maintains this facility as a regional asset on behalf of the broader community serving approximately 91,300 members in FY 24/25.

The MSR was initiated and funded by the District to address internal service and financial considerations. It should not now be expanded into a vehicle for revisiting settled agreements or pursuing policy changes that fall outside LAFCO's prescribed process. For these reasons, the City respectfully requests that the Commission to decline to expand the scope of the MSR, affirm completion of the MSR within its statutory framework and reinforce that any consideration of property tax reallocation or governance changes must proceed through a formal application process.

The City remains committed to serving the broader Mendocino Coast community and ensuring the continued success of the C.V. Starr Community Center. Upholding clear process boundaries and honoring existing agreements will best support stable and equitable service delivery moving forward.

Thank you for your consideration.

Respectfully,


Isaac Whippy
City Manager
City of Fort Bragg